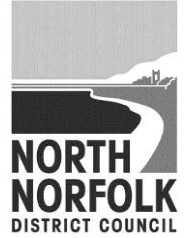


# Planning Policy & Built Heritage Working Party



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2 November 2017

A meeting of **Planning Policy & Built Heritage Working Party** will be held in the **Council Chamber** at the Council Offices, Holt Road, Cromer on **Monday 13 November 2017 at 10.00 am**.

At the discretion of the Chairman, a short break will be taken after the meeting has been running for approximately one and a half hours.

Members of the public who wish to ask a question or speak on an agenda item are requested to arrive at least 15 minutes before the start of the meeting. It will not always be possible to accommodate requests after that time. This is to allow time for the Committee Chair to rearrange the order of items on the agenda for the convenience of members of the public. Further information on the procedure for public speaking can be obtained from Democratic Services, Tel: 01263 516010, Email: [democraticservices@north-norfolk.gov.uk](mailto:democraticservices@north-norfolk.gov.uk)

Anyone attending this meeting may take photographs, film or audio-record the proceedings and report on the meeting. Anyone wishing to do so must inform the Chairman. If you are a member of the public and you wish to speak on an item on the agenda, please be aware that you may be filmed or photographed.

**Emma Denny**  
**Democratic Services Manager**

To: Mrs S Arnold, Mrs J English, Ms V Gay, Mrs P Grove-Jones, Mr J Punchard, Mr R Reynolds, Mr S Shaw, Mr N Smith, Mrs V Uprichard, Ms K Ward, Vacancy

All other Members of the Council for information.  
Members of the Management Team, appropriate Officers, Press and Public



**If you have any special requirements in order to attend this meeting, please  
let us know in advance**

If you would like any document in large print, audio, Braille, alternative format or in a different language please contact us

**Heads of Paid Service:** Nick Baker and Steve Blatch  
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# AGENDA

## 1. APOLOGIES FOR ABSENCE

To receive apologies for absence, if any.

## 2. PUBLIC QUESTIONS

## 3. MINUTES

Page 4

To approve as a correct record the Minutes of a meeting of the Working Party held on 16 October 2017.

## 4. ITEMS OF URGENT BUSINESS

To determine any other items of business which the Chairman decides should be considered as a matter of urgency pursuant to Section 100B(4)(b) of the Local Government Act 1972.

## 5. DECLARATIONS OF INTEREST

Members are asked at this stage to declare any interests that they may have in any of the following items on the agenda. The Code of Conduct for Members requires that declarations include the nature of the interest and whether it is a disclosable pecuniary interest.

## 6. UPDATE ON MATTERS FROM THE PREVIOUS MEETING (IF ANY)

## 7. LOCAL PLAN – ACCOMMODATION NEEDS ASSESSMENT, GYPSIES, TRAVELLERS, AND TRAVELLING SHOWPEOPLE, BOAT DWELLERS AND RESIDENTIAL CARAVAN DWELLERS

Page 10  
(Appendix 1 – page 18)

Summary: This report provides updated evidence to inform the preparation of the Local Plan. Through analysis of existing Gypsies & Travellers, Travelling Showpeople, boat and residential caravan dwellers it provides an assessment of future accommodation needs.

Conclusions That the Study is published as a source of information to support the emerging Local Plan and is used as a basis to inform policy development.

Recommendations: **This report recommends that the Working Party recommend to Cabinet to note the contents and publish the Norfolk Caravans and Houseboats Accommodation Needs Assessment (ANA) including for Gypsies, Travellers and Travelling Showpeople as a source of evidence to support the emerging Local Plan for North Norfolk and be used as a basis of further work and policy development.**

Cabinet Member(s)	Ward(s) affected
All members	All Wards
Contact Officer, telephone number and email: Iain Withington, 01263 516034 <a href="mailto:iain.withington@north-norfolk.gov.uk">iain.withington@north-norfolk.gov.uk</a>	

**8. LOCAL PLAN – APPROACH TO POLICY DEVELOPMENT - WIND ENERGY** Page 164  
(Appendix 169)

Summary: This report provides an overview to the requirements of plan making and the options around policy development in the area of wind energy. The purpose of the paper is to enable discussion on the potential policy approaches available to the Council in identifying suitable areas for wind energy development and provide officers with a steer for subsequent policy development.

Recommendations: **This report recommends that the Working Party recommend to Cabinet that Option 2 is used as a basis for further work and policy development.**

Cabinet Member(s)	Ward(s) affected
All members	All Wards
Contact Officer, telephone number and email: Iain Withington, 01263 516034 <a href="mailto:iain.withington@north-norfolk.gov.uk">iain.withington@north-norfolk.gov.uk</a>	

**9. EXCLUSION OF PRESS AND PUBLIC**

To pass the following resolution (if necessary):

“That under Section 100A(4) of the Local Government Act 1972 the press and public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A (as amended) to the Act.”

**10. TO CONSIDER ANY EXEMPT MATTERS ARISING FROM CONSIDERATION OF THE PUBLIC BUSINESS OF THE AGENDA**

**16 OCTOBER 2017**

Minutes of a meeting of the **PLANNING POLICY & BUILT HERITAGE WORKING PARTY** held in the Council Chamber, Council Offices, Holt Road, Cromer at 10.00 am when there were present:

Councillors

Mrs S Arnold (Chairman)  
J Punchard (Vice-Chairman)

Ms V Gay  
R Reynolds

Mrs V Uprichard  
Ms K Ward

Observers:

Mrs A Green  
B Hannah  
Mrs G Perry-Warnes  
Ms M Prior  
J Rest

Officers

Mr M Ashwell – Planning Policy Manager

**26. APOLOGIES FOR ABSENCE**

Apologies for absence were received from Councillors Mrs J English, Mrs P Grove-Jones and N Smith. An apology was also received from Councillor N D Dixon.

**27. PUBLIC QUESTIONS**

None.

**28. MINUTES**

Minute 24 – Norfolk Strategic Framework Consultation

Councillor R Reynolds requested the following amendments:

Add the words “if this was not addressed” to the end of his comment under “Agreements 10 – 17”.

Add the words “and connection should be a requirement for all new properties” to his comment under “Agreement 20”.

Delete the sentence “It was vital that the windfarms were connected together to provide a decent supply.” from his comment under “Other Comments” and add specific reference to “offshore” wind farms.

Councillor Ms K Ward stated that the survey she had offered to share had been

conducted by the Cabinet Office.

Subject to the above amendments, the Minutes of the meeting held on 21 August 2017 were approved as a correct record and signed by the Chairman.

**29. ITEMS OF URGENT BUSINESS**

There were no items of urgent business.

**30. DECLARATIONS OF INTEREST**

None.

**31. UPDATE ON MATTERS FROM THE PREVIOUS MEETING**

There were no additional updates.

**32. BROWNFIELD REGISTER**

The Planning Policy Manager presented an introduction to the duties and actions arising from the Town and County Planning (Brownfield Land Register) Regulations 2017 and the Town and Country Planning (Permission in Principle) Order 2017. This placed a duty on the local authority to prepare, maintain and publish a register of previously developed (brownfield) land which was suitable for residential development. The Council was required to publish Part 1 of the register, comprising all brownfield sites which were appropriate for residential development, by 31 December 2017. Part 2 of the register would be produced in the new year and comprise those sites which were granted permission in principle.

In response to a question by Councillor Ms V R Gay as to whether or not gardens were included in the brownfield definition, the Planning Policy Manager agreed to circulate a briefing note concerning the status of garden land.

Councillor Ms V R Gay restated her long-held view that automatic presumption that gardens were brownfield was very detrimental. She hoped that the local plan would not support a presumption in favour of development in gardens.

Councillor Ms M Prior supported Councillor Gay's view and stated that such development had already happened in many towns.

Councillor R Reynolds referred to Policy SS2. He asked whether the register would help to develop infill sites.

The Planning Policy Manager explained that sites had to comply with adopted policy and infill sites outside of designated areas would not get onto the register.

Councillor Ms K Ward questioned the purpose of the Government's insistence on having a register.

The Planning Policy Manager explained that there had been a policy for a brownfield register for some time but nothing in place to identify brownfield sites. The Government would use the register to identify how much land was available and this could possibly lead to a performance indicator being introduced in the future.

Councillor Ms K Ward expressed concern that the policy was urban orientated and

might increase the Council's Objectively Assessed Need (OAN).

The Chairman asked if the register would help bring forward development of the former Crane Fruehauf site at North Walsham.

The Planning Policy Manager explained that the Crane Fruehauf site was not within the development area and would therefore be more likely to be designated for development in the Local Plan.

In answer to Members' questions regarding identification of brownfield sites, the Planning Policy Manager explained that brownfield land was defined in the NPPF guidance. However, there would be some sites where the status of the land was open to interpretation

## **RESOLVED**

**That Part 1 of the Brownfield Land Register be prepared and published.**

### **33. HOUSING NEEDS ASSESSMENT, REVISED APPROACH CONSULTATION**

The Planning Policy Manager presented the report which outlined a current Government consultation on proposals to alter the way in which Housing Needs Assessments are undertaken. The proposed approach was likely to increase the Council's Objectively Assessed Need (OAN) figure and result in a much higher housing target.

Councillor J Punchard raised concerns as to the affordability of deposits.

Councillor Ms K Ward was concerned that there was nothing in the Council's policies to prevent dwellings becoming second homes. She asked if there were any known problems with local data.

The Planning Policy Manager stated that if the Government adopted the proposed methodology the Council would need to calculate the new housing figure. The new Local Plan could be submitted for examination without that number of dwellings, citing reasons why the figure was not sustainable. If sites could be identified and allocated, it was unlikely that the required number could be delivered on a sustained basis, leading to challenge to the five-year land supply and consequently more appeal-led planning. The Planning Policy Manager considered that more houses would not have an impact on house prices or result in more affordable housing.

The Planning Policy Manager stated that the Council had been successful in the past in arguing that household migration rates had been overestimated. However, there was nothing in the revised methodology to allow this to be questioned.

Councillor Ms V R Gay considered that building more houses appeared to lead to inward migration of older people who had sold more expensive dwellings elsewhere.

The Planning Policy Manager stated that there was no policy tool to prevent inward migration of older people into the area.

Councillors Ms Gay and Ms M Prior raised questions regarding medical provision as part of the supporting infrastructure.

The Planning Policy Manager explained that the Council's role was to ensure that health organisations could respond to demand, by reserving land for health uses and securing contributions towards capital works where there was evidence to prove a shortfall in provision for a development. The Health Authority was consulted on all major applications.

Councillor J Rest considered that the housing requirement should come before need.

The Planning Policy Manager suggested that 'demand' would be a better term than 'need' as it was demand which was growing the housing numbers.

Councillor J Punchard considered that if there was a one-time only calculation for the life of the plan, there could be a significant change in terms of affordability and earnings.

The Planning Policy Manager considered that whilst the Local Plan could be sound for 10 years, it was likely that a new plan would be started in a short time scale. Household projections changed every two years, household income was also assessed every two years at a different time. The Government was considering locking in housing targets for a period of time so they could not be challenged. He considered that the plan-led process was being eroded.

The Chairman referred to the point made by Councillor R Reynolds at the previous meeting regarding the shortage of builders and questioned whether there would be sufficient numbers to build the additional dwellings, and whether pre-fabricated buildings would be introduced. There was a need to be mindful that North Norfolk attracted the smaller housebuilders.

The Working Party noted the report and that a response to the consultation would be considered by Cabinet.

#### **34. LOCAL PLAN – DRAFT VISION AND OBJECTIVES**

The Planning Policy Manager presented a draft Vision and set of Local Plan Objectives for inclusion in the consultation draft of the new Local Plan. These reflected national policy requirements, the Vision and Objectives agreed for the County as a whole and the key land use issues which the District would face over the plan period. The Vision and Objectives were expected to evolve over the coming months prior to being published for consultation as part of the draft Plan.

Councillor Ms V R Gay stated that there was a shift in public opinion with increasing resistance on the part of the public in North Walsham due to lack of consideration of infrastructure of all kinds.

The Planning Policy Manager explained that infrastructure was being considered but this authority could only plan for it, eg. through policy obligations. It was important that the authority did not over-promise and under-deliver.

Councillor J Punchard stated that Fakenham was one of the most self-sustaining communities in the county if employment reached its maximum people would have to commute elsewhere to work.

Councillor R Reynolds considered that better housing could lead to better jobs, pay and an influx of younger people.

The Planning Policy Manager stated that this was not necessarily the case as setting targets did not necessarily lead to success.

Councillor Mrs A Green considered that modern farming methods would lead to a continuing reduction in agricultural employment.

The Planning Policy Manager stated that the economy was dominated by low paid sectors and the District was not well placed to attract good jobs.

Councillor Mrs Green asked how many of the allocations in the current plan had not been developed, and whether “flat-pack” housing could be considered on the smaller plots for self-build.

The Planning Policy Manager stated that the larger sites had progressed well, but smaller allocations in villages had proved more difficult. It would be necessary to consider self-build projects.

At the request of the Chairman the Planning Policy Manager agreed to investigate whether there were any examples of modern pre-fabricated dwellings in the District which the Working Party could view.

Councillor B J Hannah considered that there should be references to community safety in the document. The Planning Policy Manager agreed to add appropriate references.

Councillor Ms V R Gay considered that there should be specific reference to the coast and that “historic environment” should be made more explicit, with specific reference to the number of Conservation Areas in the District. She supported the aspiration for higher paid jobs.

The Chairman requested that the Vision should refer to “higher skilled and better paid jobs”.

Councillor Ms Gay stated that professional services were needed. Consultancies and similar small businesses were important to the economy.

Councillor Ms K Ward considered that the diversity of jobs needed broadening out and that microbusinesses should be included.

Councillor J Punchard asked if there should be reference to the proximity of the District to the Broads.

The Planning Policy Manager stated that the Broads was part of the context of the District and agreed that it would be correct to refer to it.

The Planning Policy Manager stated that it was important that the Objectives were correct and that it could clearly be seen how they flowed through to the Development Management policies.

The Chairman stated that Objective 1, third bullet point should read “... where services *will be* available” and not “... *are* available” .

Members raised issues regarding the ability of new dwellings to be ready for new technology, e.g. fibre broadband. The Planning Policy Manager explained that Building Regulations covered these issues, as well as sustainable construction. He



suggested that Objective 2, bullet point 3 be amended to include “making the most of improvements in technology”.

Councillor Mrs V Uprichard considered that electric charging points for cars should be freely available.

The Planning Policy Manager considered that in the future developers would be encouraged or required to provide electric charging points at large buildings. Any requirement for domestic dwellings to be provided with this facility would be a Building Regulations issue.

The Chairman considered that pressure should be put on manufacturers to standardise electric charging connections.

Councillor Mrs G Perry-Warnes stated that in its response to the Dong Energy consultation her parishes had suggested that electric charging points be installed along the cable corridor as a community benefit.

It was proposed by Councillor J Punched, seconded by Councillor R Reynolds and

#### **RESOLVED**

**That subject to the above amendments and ongoing modifications, the draft Vision and Objectives identified in Appendix A to the report be agreed as a basis for policy development and public consultation.**

#### **35. CHAIRMAN’S ANNOUNCEMENTS**

The Chairman welcomed Stuart Harrison and Jill Fisher who had recently joined the Planning Policy team.

Site visits to sites which were suggested for future allocations would be arranged on dates allocated for reserve Development Committee site inspections.

The meeting closed at 11.44 am.

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CHAIRMAN  
13 November 2017

**Local Plan – Accommodation Needs Assessment, Gypsies, Travellers, and Travelling Showpeople, Boat Dwellers and Residential Caravan Dwellers.**

- Summary: This report provides updated evidence to inform the preparation of the Local Plan. Through analysis of existing Gypsies & Travellers, Travelling Showpeople, boat and residential caravan dwellers it provides an assessment of future accommodation needs.
- Conclusions That the Study is published as a source of information to support the emerging Local Plan and is used as a basis to inform policy development.
- Recommendations: **This report recommends that the Working Party recommend to Cabinet to note the contents and publish the Norfolk Caravans and Houseboats Accommodation Needs Assessment (ANA) including for Gypsies, Travellers and Travelling Showpeople as a source of evidence to support the emerging Local Plan for North Norfolk and be used as a basis of further work and policy development.**

Cabinet Member(s)	Ward(s) affected
All members	All Wards
Contact Officer, telephone number and email: Iain Withington, 01263 516034 <a href="mailto:iain.withington@north-norfolk.gov.uk">iain.withington@north-norfolk.gov.uk</a>	

**1. Introduction**

- 1.1 As part of the updating of the evidence base required to inform the emerging Local Plan, through the Norfolk Strategic Framework and the Duty to Co-operate the Council jointly commissioned RRR Consultancy Ltd to undertake a Caravans and Houseboats Needs Accommodation Assessment, ANA, for the period 2017 – 2036 across North Norfolk, Greater Norwich, (Broadland, Norwich City and South Norfolk Council areas), Great Yarmouth Borough Council and the Broads Authority.
- 1.2 The purpose of the study is to update this evidence in light of the requirement to assess the accommodation needs of Gypsies and Travellers and Travelling Showpeople as established through national guidance contained in Planning Policy for Travellers (DCLG, 2015). Those residing in boats and residential caravans have been considered as part of this assessment following the introduction, in the Housing and Planning Act 2016 of a requirement to consider the needs of people residing in houseboats and caravans. The remit of the Caravans and Houseboats Needs Assessments is to provide an up-to-date understanding of the likely permanent and transit accommodation needs within the areas covered (including the land and waterways under the administrative authority of the Broads Authority).

- 1.3 The ANA provides an evidence base which is required to aid the preparation of the Local Plan policies for the provision of new Gypsy and Traveller pitches and Travelling Showpeople plots. This ensures that the Council comply with planning policy and legislation.<sup>1</sup>
- 1.4 On 31<sup>st</sup> August 2015, the Government published its amended Planning Policy for Traveller Sites, PPTS<sup>2</sup> which replaced the previous guidance and circulars relating to Gypsies and Travellers and Travelling Showpeople. The guidance emphasises the need for local authorities to use evidence to plan positively and manage development. This replaced the previous policy published in 2012. The policy approach stipulates that the PPTS should be read in conjunction with the National Planning Policy Framework, NPPF and that local planning authorities' should make their own assessment of need for the purposes of planning.
- 1.5 The PPTS introduced an amendment to the definition of "Gypsy and Traveller" for planning purposes. Only if they fall within the new definition will their housing needs need to be assessed separately from the wider population. The key change is that persons who have ceased to travel will not now fall under the planning definition of a "Traveller". As the Planning and Housing Act 2016 repealed the previous statutory definition included in sections 225 and 226 of the Housing Act 2004, the PPTS is now the sole definition.

*For the purposes of this planning policy gypsies and travellers means;*

*Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.*

*In determining whether persons are "gypsies and travellers" for the purposes of planning policy, consideration should be given to the following issues amongst other relevant matters:*

- a) whether they previously led a nomadic habit of life*
- b) the reasons for ceasing their nomadic habit of life*
- c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.*

Annex 1: Planning policy for traveller sites, DCLG, 2015

- 1.6 Gypsies (including, English (Romany), Scottish, Welsh) and Irish Travellers are recognised by the courts as two distinct ethnic groups, and have the protection of the Equality Act 2010. Travelling Showpeople, boat and residential caravan dwellers are not considered to be ethnic minority groups.
- 1.7 Whilst it is clear that the 2015 PPTS excludes those who have ceased to travel permanently as being Gypsies and Travellers (for planning purposes), it does not explicitly state how the new definition should be interpreted in relation to other factors such as whether families travel for economic or work

<sup>1</sup> Included in the Housing Act 1985, the National Planning Policy Framework 2012, Planning Practice Guidance 2014, Planning Policy for Traveller Sites 2015, and the Housing and Planning Act 2016.

<sup>2</sup> <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites>

purposes falls under a nomadic habit or life. Ambiguity exists in case law and recent planning inspectors decisions around whether the Gypsy and Traveller status (for planning purposes) should be based on patterns of employment-related nomadism. Given this, the study adopts an approach that is seen to “future proof” the ANA and seeks to provide two sets of needs figures. The figures are presented as two options: Option one based on the accommodation needs of families who have not permanently ceased to travel; while option two considers the accommodation needs only of families who travel in a caravan for work purposes. It will be for each authority to decide individually which approach to take for planning purposes.

- 1.8 In March 2016 the Department of Communities and Local Government, DCLG published draft guidance on the periodic review of housing needs for caravans and houseboats. It states that when considering the need for caravans and houseboats local authorities will need to include the needs of a variety of residents in differing circumstances. E.g. those caravan and houseboat dwellers who have no authorised site anywhere on which to reside or whose existing site accommodation is overcrowded or unsuitable, but who are unable to obtain larger or more suitable accommodation and or those who are unable to access a place on an authorised site or obtain or afford land to develop on. Further detail on this guidance can be found in para 2.12 – 2.17 of the study.
- 1.9 The study provides robust and sound baseline evidence to inform the preparation of the Council’s emerging single Local Plan DPD and will be a tool for the Council to make informed choices about the nature and extent of policy development. **A copy of the study can be found in Appendix 1.**

### **Methodology**

- 1.10 The ANA has sought to establish the accommodation needs of the Gypsy, Traveller and Travelling Showpeople population, boat and residential caravan dwellers in the study area through a combination of desk-based research of secondary data (2017 caravan count and previous Gypsy and Traveller Accommodation Needs Assessment, GTAA), stakeholder interviews, including online survey with Broads Authority ranges and caravan site managers and direct engagement through face to face surveys with families.
- 1.11 Future Gypsy and Traveller need to 2036 was established based on a 15 step process used by DCLG guidance 2007<sup>3</sup> and supplemented by data derived from the survey. Analysis includes the current number of pitches, migration intentions, family size and age, current overcrowding, transit pitches, recorded unauthorised encampments and those with a psychological aversion to housed accommodation (i.e. those in brick and mortar accommodation that may have an aversion to living in such accommodation due to a lack of choice but also due to cultural reasons) - cultural aversion is established in case law and is established in the Human Rights Act. As such a duty is imposed on local authorities that it is mandatory to consider Gypsy and Traveller’s rights and needs. The study estimates that approximately 10% of all households are likely to be psychologically averse to residing in bricks and mortar accommodation. The step by step process is broken down in chapter 6 of the study.

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<sup>3</sup> DCLG, Gypsy and Traveller Accommodation Needs Assessment, October 2007, pages 24-25

- 1.12 Future Travelling Showpeople need was established through surveys undertaken with residents and discussions with the Showmen's Guild. There are three permanent Travelling Showpeople yards with planning permission located within the Greater Norwich area (two in Norwich City and one in South Norfolk), containing a total of 55 plots. The needs assessment was undertaken based around the same DCLG model as outlined above and contained in section 8 of the study
- 1.13 A range of methods were used to gain insight into the number and accommodation needs of people living permanently on boats across Norfolk. No permanent residential boat dwellers were identified as living outside of the Broads Authority waterways. As such, consultation with the Broads Authority officers and Rangers from across the Broads Authority area took place involving meetings, email and telephone communication, along with a survey of boat yard owners. The consultants spent time with Broads Authority Rangers traversing the Broads waterways to access a sample of boat dwellers. Council tax records were also used. There remains no established method of determining the accommodation needs of boat dwellers so again the study used as a base the DCLG 2007 methodology developed for Gypsy & Traveller assessments but acknowledges that the accommodation needs of boat dwellers may differ from Gypsy and Traveller households e.g. residing on a boat may reflect a 'lifestyle' choice or a lack of alternative bricks and mortar accommodation. The assessment is detailed in chapter 10 of the study.
- 1.14 In relation to residential use of caravans, statistical data was provided by each of the authorities regarding the number of authorised Park caravan sites for permanent residential caravan pitches and sites in each local authority area. Telephone consultation was then carried out with residential caravan site owners and managers in the areas to help estimate the number of permanent residential and potential pitches and gain insight into the accommodation needs of residential caravan dwellers. The subsequent assessment of future accommodation need was undertaken using the same DCLG, 2007 methodology. Whilst this guidance relates specifically to assessing needs for Gypsy and Traveller accommodation it was considered also appropriate for assigning the needs for residential caravan dwellers. The assessment is detailed in section 11 of the study. It is worth noting that the assessment was based around existing Park sites.

## 2 Results

A summary of the study and findings are detailed below:

### 2.1 Gypsies and Travellers

- The 2011 census suggests that there were 463 Gypsies and Travellers in the study area. Broken down as Great Norwich - 354, Great Yarmouth – 63, **North Norfolk – 46**;
- Current occupied permanent residential site pitches in the study area – 101. Broken down as Greater Norwich - 84, **North Norfolk - 13**, Great Yarmouth – 4<sup>4</sup>;

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<sup>4</sup> Note Great Yarmouth contains 24 local authority pitches however only 4 are occupied by Gypsy & Traveller families, 2 pitches were vacant, 4 used for transit use and 14 used by non Gypsies and Travellers. Through site

- Current occupied private residential sites in **North Norfolk – 7**;
- Current transit pitches across the study area – 30. **66% of these (20) are in North Norfolk (2 sites)**. The remainder are at Thetford and Costessey along with some limited provision on a public site in Great Yarmouth (4);
- The January 2017 caravan count counted 355 caravans in the study area. **10 of these were recorded in North Norfolk**, 120 in Great Yarmouth and 225 in Greater Norwich;
- The number of caravans recorded in the bi-annual caravan count remain **consistently low between 2015 and 2017 for North Norfolk**, while Great Yarmouth and Greater Norwich varied considerably between 60 – 116 for Great Yarmouth and 135 – 218 for Greater Norwich;
- The number of unauthorised caravans throughout the study area recorded by the bi-annual DCLG Traveller Count varied seasonally between 10 in 2015, 87 in 2016 and 38 in January 2017. **The number of unauthorised sites in North Norfolk remains significantly lower than the rest of the region** - 3 events in 2015 and 5 events in 2016.

#### Accommodation Need of Gypsies & Travellers – Study Area

- The main drivers of need are from newly forming families on authorised sites. The study found that a significant number of existing Traveller population residing in the area is settled and had stopped travelling in the terms of the new definition.
- Option 1 is based on families who have *not permanently ceased to travel*, whilst Option 2 is based on families who *only travel for work*. The figures in brackets are the accommodation needs and 2022 base figures including households who display psychological aversion, but with the need addressed over 19 years, rather than within the first 5 years.

Table 1 (Option 1): Summary of Gypsy and Traveller and pitch needs 2017-36

Period	2017-2022	2022-27	2027-2032	2032-2036	Total
Broads Authority	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
Great Yarmouth	2 (2)	1 (1)	1 (1)	1 (1)	5 (5)
Greater Norwich	15 (9)	14 (16)	15 (17)	16 (18)	60 (60)
<b>North Norfolk</b>	<b>2 (2)</b>	<b>2 (2)</b>	<b>2 (2)</b>	<b>2 (2)</b>	<b>8 (8)</b>
Total	19 (13)	17 (19)	18 (20)	19 (21)	73 (73)

Source Table 12.2 ANA, 2017

Table 2 (Option 2): Summary of Gypsy and Traveller and pitch needs 2017-36

Period	2017-2022	2022-27	2027-2032	2032-2036	Total
Broads Authority	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
Great Yarmouth	-1 (-1)	1 (1)	1 (1)	1 (1)	2 (2)
Greater Norwich	-2 (-5)	11 (12)	11 (12)	11 (12)	31 (31)
<b>North Norfolk</b>	<b>2 (2)</b>	<b>2 (2)</b>	<b>2 (2)</b>	<b>2 (2)</b>	<b>8 (8)</b>
Total	-1 (-4)	14 (15)	14 (15)	14 (15)	41 (41)

Source Table 12.3 ANA, 2017

- Transit provision – No new Transit provision is identified - the study recommends that all study areas implement a negotiated stopping places

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management improvements the intention is that the 20 pitches currently not used for Gypsies & Travellers will be available for future supply.

policy. Such a place is not a built site but a location where land is used temporarily as authorised short-term (less than 28 days) stopping places for all travelling communities.

## 2.2 Travelling Showpeople

- Provision is concentrated across Greater Norwich through 55 plots on 3 sites;
- The 2017 Caravan count shows 68 Caravans.

### Accommodation Need of Travelling Showpeople.

Table 3: Summary of Travelling Showpeople plot needs 2017-36					
Period	2017-2022	2022-27	2027-2032	2032-2036	Total
Broads Authority	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
Great Yarmouth	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
Greater Norwich	25 (25)	6 (6)	7 (7)	8 (8)	46 (46)
<b>North Norfolk</b>	<b>0 (0)</b>	<b>0 (0)</b>	<b>0 (0)</b>	<b>0 (0)</b>	<b>0 (0)</b>
Total	25 (25)	6 (6)	7 (7)	8 (8)	46 (46)

Source: ANA 2017, Table 8.3 (figures in brackets are accommodation needs excluding households who do not travel for work)

## 2.3 Boat Dwellings/ Moorings

- Provision is concentrated in the Broads Executive Area;
- There are no permanent moorings outside the Broads Area;
- There is one permanent authorised mooring and 10 temporary residential moorings, (up to 2021);
- Its estimated there are up to 100 boat dwellers;
- There are an additional 974 24 hr moorings provided and managed by the Broads Authority.

### Accommodation Need of Boat Dwellers

Table 4: Summary of permanent residential moorings needs 2017-36					
Period	2017-2022	2022-27	2027-2032	2032-2036	Total
Broads Authority	51	4	4	4	63
Great Yarmouth	0	0	0	0	0
Greater Norwich	0	0	0	0	0
<b>North Norfolk</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Total	51	4	4	4	63

Source ANA, 2017 Table 10.3

## 2.4 Residential Caravans

- It's estimated there are 891 permanent authorised residential caravans and 857 currently occupied, (34 vacant);
- District Breakdown: Great Yarmouth 264, Greater Norwich 413, **North Norfolk 180**;
- Number unused residential pitches in **North Norfolk – 29**;
- An additional 50 known unauthorised families on sites within the study area;
- **Zero unauthorised encampments were identified in North Norfolk.**

### Accommodation Need of Residential Caravan Dwellers

Table 5: Summary of permanent residential pitch needs 2017-36					
Period	2017-2022	2022-27	2027-2032	2032-2036	Total
Broads Authority	0	0	0	0	0
Great Yarmouth	29	3	3	3	38
Greater Norwich	91	5	5	5	106
<b>North Norfolk</b>	<b>-10*</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>-4*</b>
Total	110	10	10	10	140

Source ANA, 2017 Table 11.3

- The reason for the negative needs figures for North Norfolk is because the District has more supply than need in the first five years. The study identifies an additional supply of 33 pitches and a need of 23 pitches i.e. a need of 23 pitches less a supply of 33 pitches = a net need of -10 pitches.

### 3. Identifying a Preferred Approach

3.1 It remains a legal requirement to seek to meet the identified needs of Gypsies and Travellers. The low level of identified need across the District would suggest that there is no need to allocate specific sites for Gypsies and Travellers in the Local Plan. It is recommended to develop a policy based on criteria based approach similar to the existing Core Strategy approach detailed in policy HO4.

3.2 Any such policy would need to take account as a minimum of:

- The updated definition;
- Sustainability and the reasonable access to services and facilities including education and health;
- Flooding;
- Proximity of new provision to existing provision (i.e. avoid the potential of social tensions between sites);
- Local amenity and minimum impacts on settled communities;
- Environmental including landscape impact;
- Safe vehicular access;
- Ability for site expansion to meet family growth;
- Site size including appropriate trailer provision and work area;
- Undue pressure on the road network.

3.3 In addition the study states that any policy approach should attach weight to:

- Previously developed land;
- Sites being well planned or soft landscaped to positively enhance the environment rather than hard landscaping such as walls or fences;
- Pitch sizes of a minimum 325sqm – 500sqm to allow for adequate separation between caravans and pitch boundaries and seek to accommodate hard standing, 2 car park spaces, 1 amenity block, storage and amenity areas.

3.4 Policy development will be subject to public consultation as part of the first consultation draft of the Local Plan.



## **4 Risks**

- 4.1 In developing the Local Plan it is a requirement of national policy to identify and address the needs of Gypsies and Travellers and Travelling Showpeople. Not identifying and addressing such needs is considered an inappropriate response to the matter and one which could potentially be seen to conflict with the provisions of national planning policy.
- 4.2 In producing their Local Plan the PPTS states that LPA's should identify and update annually a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets.

## **5 Recommendation**

- 51 The ANA provides an evidence base which is required to aid the preparation of the Local Plan. This enables the Council to comply with planning policy and legislation.
- 5.2 It is recommended that Members of the Working Party recommend to Cabinet to note the contents and publish the Norfolk Caravans and Houseboats Accommodation Needs Assessment (ANA) including for Gypsies, Travellers and Travelling Showpeople as a source of evidence to support the emerging Local Plan for North Norfolk and be used as a basis of further work and policy development.

## **Appendix 1**

Norfolk Caravans and Houseboats Accommodation Needs Assessment (ANA) including for Gypsies, Travellers and Travelling Showpeople - Final Report October 2017.

### **Abbreviations:**

NPPF- National Planning Policy Framework  
PPG – Planning Practice Guidance  
DCLG – Department of Communities & Local Government  
ANA – Accommodation needs Assessment  
GTAA – Gypsy & Traveller Accommodation Assessment

# Norfolk Caravans and Houseboats Accommodation Needs Assessment (ANA) including for Gypsies, Travellers and Travelling Show people

## Final Report

October 2017

*RRR Consultancy Ltd*



NORWICH  
City Council



GREAT YARMOUTH  
BOROUGH COUNCIL



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# Executive Summary

## Introduction

- S1. In January 2017, five Norfolk local authorities (Broadland District Council, Great Yarmouth Borough Council, North Norfolk District Council, Norwich City Council, and South Norfolk District Council), alongside the Broads Authority and Norfolk County Council, commissioned *RRR Consultancy Ltd* to undertake a Caravans and Houseboats Needs Accommodation Assessment (ANA) for the period 2017-2036.
- S2. The requirement to assess the accommodation needs of Gypsies and Travellers and Travelling Showpeople is established through national guidance contained in Planning Policy for Travellers (DCLG, 2015). Those residing in boats have been considered as part of this assessment following the introduction, in the Housing and Planning Act 2016, of a requirement to consider the needs of people residing in houseboats. The Housing and Planning Act also requires the needs of people residing in caravans to be considered.
- S3. The results will be used as an evidence base for policy development in housing and planning and to inform the allocation of resources. The assessment covers need for caravans and houseboats insofar as this relates to Gypsies, Travellers, Travelling Showpeople, non-Gypsy and Traveller caravan dwellers, and boat dwellers.
- S4. It is important to note that previous and current guidance documents are useful in helping guide the ANA process and how local authorities should address the needs of the different Gypsy and Traveller groups. This includes data collection and analysis following practice guidance set out by Communities and Local Government (DCLG) in recent 'Draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats' (March 2016), and 'Planning Policy for Traveller Sites' (August 2015).
- S5. To achieve the study aims, the research drew on a number of data sources including:
- Review of secondary information;
  - Consultation with organisations involved with Gypsy and Traveller and Travelling Showpeople;
  - Extensive face-to-face surveys of Gypsies, Travellers and Travelling Showpeople covering a range of issues related to accommodation and service needs; and
  - Surveys of boat yard owners and managers and Broads Authority Rangers.

## Policy context

- S6. In August 2015, the Government published its amended planning policy for traveller sites, which replaced the previous guidance and circulars relating to Gypsies and Travellers and



Travelling Showpeople. The guidance emphasises the need for local authorities to use evidence to plan positively and manage development.

- S7. In March 2016, the Department of Communities and Local Government (DCLG) published its draft guidance to local housing authorities on the periodic review of housing needs for caravans and houseboats. It states that, when considering the need for caravans and houseboats, local authorities will need to include the needs of a variety of residents in differing circumstances including, for example, caravan and houseboat dwelling households and households residing in bricks and mortar dwellings.
- S8. The existing local planning policies of the study area's local authorities outline the criteria against which the location of new Gypsy and Traveller accommodation must be determined (alongside other material considerations), with the Broads Authority having its own criteria-based policy for residential moorings. It is apparent that the local authorities consider it important to consider a range of factors including the sustainability of new sites e.g. proximity to local services, and the potential impact on the environment. The findings of this ANA will need to be taken into account in the production of the emerging Local Plans.

## Population Trends

- S9. There are two major sources of data on Gypsy and Traveller numbers in the study area – the national DCLG Traveller Caravan Count, and local authority data. The DCLG count has limitations in terms of accuracy and reliability. As such, it should only be used to determine general trends – it is the survey undertaken as part of the ANA which provides more reliable and robust data. There is no equivalent data source in relation to non-Gypsy and Traveller caravans and residential boats.
- S10. There is some variation in the number of Gypsy and Traveller caravans in each study area local authority. The January 2017 Count shows a total of 10 caravans in North Norfolk, and 120 caravans in Great Yarmouth, whilst 225 caravans were recorded in the Greater Norwich area.
- S11. When population is considered the density of caravans varies widely. North Norfolk (10 caravans per 100,000 population) is very much below the East of England regional average of 94 caravans per 100,000 population. Greater Norwich (57 caravans per 100,000 population) is also below the regional average, whilst Great Yarmouth (122 caravans per 100,000 population) is above it.
- S12. The data indicates a total provision of 55 Travelling Showpeople plots, 53 privately owned pitches, 48 local authority pitches, 34 transit pitches, 4 pitches with temporary planning permission, 1 unauthorised development, and 1 boat mooring.
- S13. The number of caravans on unauthorised sites throughout the study area recorded by the DCLG Traveller caravan count remained low in January 2015 and July 2015 but increased to 42 in January 2016 before peaking at 87 in July 2016 (including 29 in Great Yarmouth

and 53 in the Greater Norwich area) before reducing to 38 in January 2017. It is known that some of the Greater Norwich numbers in July 2016 related to a temporary unauthorised encampment by visitors to the area attending an event, and they departed Greater Norwich a few days later.

## Stakeholder Consultation

- S14. A focus group undertaken with key stakeholders offered important insights into the main issues faced by Gypsies and Travellers, Travelling Showpeople and those residing on boats and in residential caravans within the area. In relation to Gypsies and Travellers, it was generally acknowledged that there is a lack of available accommodation provision in the study area. Much of the accommodation need is due to growing families on existing pitches leading to overcrowding. Stakeholders recognised that cultural identity and lifestyles of different groups such as Gypsies and Travellers may impact on the type of accommodation required.
- S15. Stakeholders felt that the change in definition has the potential to lead to more unauthorised encampments. Despite the need for new permanent and transit sites and (potentially) moorings, there are a range of barriers to new provision including a lack of suitable land. In response, there needs to be a better understanding between the Gypsy and Traveller communities, and settled communities.
- S16. In relation to boat dwellers, stakeholders commented on how most of those that they are aware of are usually older people and/or single people unable to afford to live in housing. Some commented on how there are some vulnerable households, mainly couples or men on their own. And that some are there out of lack of choice and others are there through lifestyle choice. It was suggested that the Broads Authority definition, which includes vessels capable of navigation should be adopted, as there are clearly both movable and non-moveable boats being used by boat dwellers as permanent accommodation across Norfolk.
- S17. In relation to residential caravan dwellers, it was suggested that similar to those living on boats, people living in caravans on park homes are usually older people and/or single people unable to afford to live in housing. Some commented on how there are some vulnerable households, mainly couples or men on their own, living on residential sites. Stakeholders commented on how, whilst accommodation issues for Gypsies and Travellers, and Travelling Showpeople is about need, the desire for more residential caravan sites is more about demand.
- S18. It was also very apparent that from stakeholders' comments, that the councils need to try to address accommodation needs for all groups appropriately, whether this is due to need, demand or lifestyle choice. It was accepted that the accommodation needs of Gypsies, Travellers, and Travelling Showpeople more usually reflects "need", whilst the desires of many people residing in caravans and boats may better be characterised as "demand". However, it is important to objectively assess such accommodation demand or need.

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## Surveys of Gypsy and Traveller families

- S19. Between February 2017 and April 2017, a total of 98 surveys were undertaken by *RRR Consultancy* with Gypsy and Traveller families residing on authorised permanent and transit sites (95 surveys), unauthorised developments (1 survey), unauthorised encampments (1 survey), and families residing on sites with temporary planning permission (1 survey).
- S20. Importantly, the survey results suggest that most of the families have lived on site for more than five years, and most do not intend to move in the future. These findings therefore emphasise the residential longevity of Gypsies and Travellers living in the study area. Interestingly, over a third of respondent households had at some point in their life lived in a house or flat although New Travellers were much more likely to have done so compared to Romany Gypsies or Irish Travellers.
- S21. Satisfaction rates with sites and site locations varied with households residing on local authority sites generally the least satisfied. Those on local authority sites commented on concerns about the quality and provision on pitches and sites. All households also stated that cost of pitches is not an issue.
- S22. In relation to accessing health services, all families were registered with a local doctor and none had been refused access to a GP. Around a sixth of respondent households stated that they experience mental health issues. Only one family stated that health treatments had been disrupted due to being moved on or evicted. Only three fifths of children of school age attend school although around a fifth receive home tutoring. The remaining children have left school and working with family members. The importance of education is increasing to Gypsy and Traveller families, partly due to changing work patterns. This is because there are fewer opportunities for Gypsies and Travellers employed in 'traditional' roles such as seasonal agricultural work. Respondent households were most likely to be self-employed although a relatively high proportion of households were retired or housewives.
- S23. Almost three quarters of respondents stated that they had travelled during the last 12 months in a caravan or trailer. Households were more likely to travel during the summer and spring months compared to autumn or winter. The main reasons for travelling included to visit family or friends, to attend events, for cultural reasons, to holiday, for work, and due to no choice (i.e. due to not having an authorised site). Importantly, in relation to determining the needs figures, over two-fifths (40%) stated that someone in the household travels for work purposes.
- S24. From the evidence presented, the main issues concern the size of sites, a lack of transit provision, and the need for more sites. According to respondents, small family sites appear to work well, avoiding conflict that can arise on larger sites with different family groups. The main issues reported were related to obtaining planning permission and to preconceptions by the settled community about such applications. They spoke of how they feel safer on smaller sites, and how they are easier to manage and maintain. They also commented on

how smaller sites are more accepted by the local settled community and lead to better integration.

### **Surveys of Travelling Showpeople families**

S25. Similar to Gypsy and Traveller families residing on yards, there is a long history of Travelling Showpeople both living and working within the study area. At the time of the survey, there were 55 occupied plots on three yards (all located in the Greater Norwich area). Accommodation need was determined by surveys undertaken with residents and discussions with the Showmen's Guild. It is apparent that one of the private yards has sufficient space to meet current and future accommodation need, but the other two yards are overcrowded and some families contain adult children requiring their own plots either now or in the near future.

### **Boat dwellers**

S26. Consultation regarding the accommodation needs of households permanently residing on boats was undertaken with a range of stakeholders including Broads Authority Rangers, boat yard owners and managers, and boat dwellers. It is difficult to determine the exact numbers of households permanently residing on boats although consultation with Broads Authority Rangers and officers, boat dwellers, and boat yard owners and managers estimate that there may be up to 100 across the study area. Many of the occupiers are single people or couples without children. Households permanently reside on boats within the study area for a wide range of reasons including wanting to live an "alternative" lifestyle (which is a consequence of 'choice') or due to lack of access to affordable traditional housing.

### **Residential caravan dwellers (i.e. non-Gypsies, Travellers and Travelling Showpeople)**

S27. From consultation with site owners and managers combined with local authority data it is estimated that there are 891 permanent authorised (857 plus 34 currently vacant) and 50 known unauthorised residential caravan pitches on sites within the study area. It should be noted that at the time of the survey, 14 of the 24 pitches on the registered Gypsy and Traveller site in Great Yarmouth were found to be occupied by non-Gypsies and Travellers. However, as of 1 April 2017, the site is in new management and longer term the pitches are to be allocated to Gypsy and Traveller families.

S28. There are also 50 known pitches being occupied permanently on sites registered for holiday use in Greater Norwich, but it is not known how many there are in the other study area local authorities. It is highly likely that there are more families residing permanently on unregistered residential pitches in Great Yarmouth and North Norfolk holiday sites, although the exact number is difficult to estimate. There are currently 34 vacant residential pitches in the study area expected to be bought back into use within the next 5 years. They

are vacant for a range of reasons including being for sale, being redeveloped, or waiting for the new owner(s) to move in.

- S29. This accommodation option is popular amongst people who want to retire and live near the coast. This includes families who may have holidayed in the local area or people brought up in the area but who moved away and have subsequently returned. Residing on a residential caravan site is regarded by many such occupiers as a more affordable alternative to living in a house. Although there is increasing demand for residential caravan pitches, only one site operates a waiting list. Some site owners stated that their sites could accommodate more residential pitches, whilst others stated they were concerned that expanding the existing site could lead to it becoming too large.

### Accommodation need

- S30. Accommodation need for the study area was assessed using analysis of primary and secondary data. The accommodation needs calculation steps are based on a model in accordance with both previous and current Practice Guidance issued by the Department of Communities and Local Government (DCLG). It contains seven basic components, five assessing need and two assessing supply, which are applied to each sub-group, based on secondary data.
- S31. Table S.1 summarises the accommodation needs of the four different community groups over the period 2017-2036. The Option 1 column (based on families who have *not permanently ceased to travel*) shows a need of 73 Gypsy and Traveller pitches. The Option 2 column (based on families who *only travel for work*) shows a need of 41 Gypsy and Traveller pitches. The figures in brackets provides the councils with the option of either meeting their Gypsy and Traveller needs arising from psychological aversion within the first five years or over 19 years.
- S32. Table S.1 also shows that there is a need in the study area over the 19 period 2017-36 for 46 plots for Travelling Showpeople, 63 boat moorings, and 140 pitches for non-Gypsy and Traveller households residing permanently on residential pitches.

Period	G&T Pitches Option 1	G&T Pitches Option 2	TS Plots	Residential Boat Moorings	Residential pitches
Total 2017-22	19 (13)	-1 (-4)	25	51	110
Total 2022-27	17 (19)	14 (15)	6	4	10
Total 2027-32	18 (20)	14 (15)	7	4	10
Total 2032-36	19 (21)	14 (15)	8	4	10
Total 2017-36	73 (73)	41 (41)	46	63	140

Source: ANA 2017

(NB the figures in brackets are the accommodation needs and 2022 base figures including households who display psychological aversion, but with the need addressed over 19 years, rather than within the first 5 years).

- S33. In relation to transit provision, there is no need for provision for Travelling Showpeople. In relation to boat dwellers, it is recommended that the current 24 hour moorings are made available for longer periods of time during out of season periods. With regard to Gypsies and Travellers, it is recommended that each of the 4 authority areas implement a negotiated stopping place policy.
- S34. The term 'negotiated stopping' is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent 'built' transit sites but negotiated arrangements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period, with the provision of limited services such as water, waste disposal and toilets. The arrangement is between the local authority and the (temporary) residents.

## Conclusions

- S35. As well as quantifying accommodation need, the study also makes recommendations on key issues. This report primarily recommends that the commissioning councils work jointly where appropriate to address the identified needs. The other recommendations are as follows:
- Develop a holistic vision for their work on Gypsies and Travellers, Travelling Showpeople yards, boat dwellers and residential caravan dwellers and embed it in Community and Homelessness Strategies, Local Plans and planning and reporting obligations under the Equality Act 2010.
  - The councils could either meet their Gypsy and Traveller needs arising from psychological aversion within the first five years or over 19 years.
  - Provide regular training and workshop sessions with local authority and service provider employees (and elected members) help them to further understand the key issues facing the Gypsy and Traveller, Travelling Showpeople yards, boat dwellers and residential caravan communities.
  - Further formalise communication processes between relevant housing, planning and enforcement officers etc. in both the study area and neighbouring local authorities.
  - Develop criteria and processes for determining the suitability of Gypsy and Traveller sites, Travelling Showpeople yards, boat dwellers' residential moorings, and residential caravan sites as indicated above for including in emerging/future Local Plans.
  - Review existing provision for opportunities for expansion where suitable and appropriate.
  - Study area authorities to support and guide potential site developers through the planning application process. This could include helping the owners of small family sites to apply for planning permission to extend sites in order to address future need.

- Authorities could consider helping to meet the needs of households unable to afford to own a site by renting or leasing small parcels of local authority owned land to them and assisting with planning applications and site development.
- To determine whether some of the accommodation needs of boat and caravan dwellers can be met by affordable or supported housing.
- To consider alternative site management structures as discussed by the Joseph Rowntree Foundation (JRF) (2016) research.
- To consider applying for funding for new sites under the HCA's 2015-18 Affordable Homes Programme (AHP).
- To consider alternative site funding mechanisms such as: site acquisition funds; loans for private site provision through Community Development Financial Institutions; and joint ventures with members of the Gypsy and Traveller community.
- To consider alternative options for developing new sites such as sites developed on a cooperative basis, shared ownership, or small sites owned by a local authority, but rented to families for their own use.
- Develop a common approach to recording unauthorised encampments which includes information such as location, type of location (e.g. roadside, park land etc.), number of caravans/vehicles involved, start date, end date, reason for unauthorised encampment (e.g. travelling through area, attending event, visiting family etc.), family name(s), and action taken (if any).
- Encourage local housing authorities to include Gypsy and Traveller categories on ethnic monitoring forms to improve data on population numbers, particularly in housing.
- Better sharing of information between agencies which deal with the Gypsy and Traveller, Travelling Showpeople and Boat Dwellers communities.
- The population size and demographics of all three community groups can change rapidly. As such, their accommodation needs should be reviewed every 5 to 7 years.

# 1. Introduction

## Study context

- 1.1 In January 2017, five Norfolk local authorities (Broadland District Council, Great Yarmouth Borough Council, North Norfolk District Council, Norwich City Council, and South Norfolk District Council), alongside the Broads Authority and Norfolk County Council commissioned *RRR Consultancy Ltd* to undertake a Caravans and Houseboats Needs Assessment (ANA) for the period 2017-2036. The results will be used as an evidence base for policy development in housing and planning and to inform the allocation of resources. King's Lynn and West Norfolk Borough Council are part of a combined ANA with Cambridgeshire and West Suffolk authorities, and Breckland District Council has prepared (through consultants) its own ANA (see Chapter 2 below for details).
- 1.2 The requirement to assess the accommodation needs of Gypsies and Travellers and Travelling Showpeople is established through national guidance contained in Planning Policy for Travellers Sites (DCLG, 2015). Those residing in boats have been considered as part of this assessment following the introduction, in the Housing and Planning Act 2016, of a requirement to consider the needs of people residing in houseboats. The Housing and Planning Act also requires the needs of people residing in caravans to be considered and this is reflected upon through the survey of residential caravan site owners.

## Methodological context

- 1.3 To achieve the study aims, the research drew on a number of data sources including:
  - Review of secondary information: a review of national and local planning policies and recently undertaken Gypsy and Traveller Accommodation Assessments (GTAAs), and analysis of secondary data. This included analysis of the most recently published (January 2017) DCLG Traveller Caravan Count to determine trends in the population of Gypsies and Travellers.
  - A focus group with key stakeholders and telephone interviews with stakeholders unable to attend the focus group. This provided qualitative data regarding the accommodation needs of Gypsies, Travellers, Travelling Showpeople, residential caravan dwellers, and boat dwellers.
  - An online survey of Broads Authority Rangers regarding the location, number, and needs of boat dwellers residing within the study area, and boat yard owners.
  - An online survey of caravan site managers regarding the number and needs of permanent residential caravan dwellers residing within the study area.
  - Extensive face-to-face surveys of Gypsies, Travellers, Travelling Showpeople, and boat dwellers covering a range of issues related to accommodation and service needs. This key methodology determined an extensive range of data regarding enabling accommodation needs to be determined.

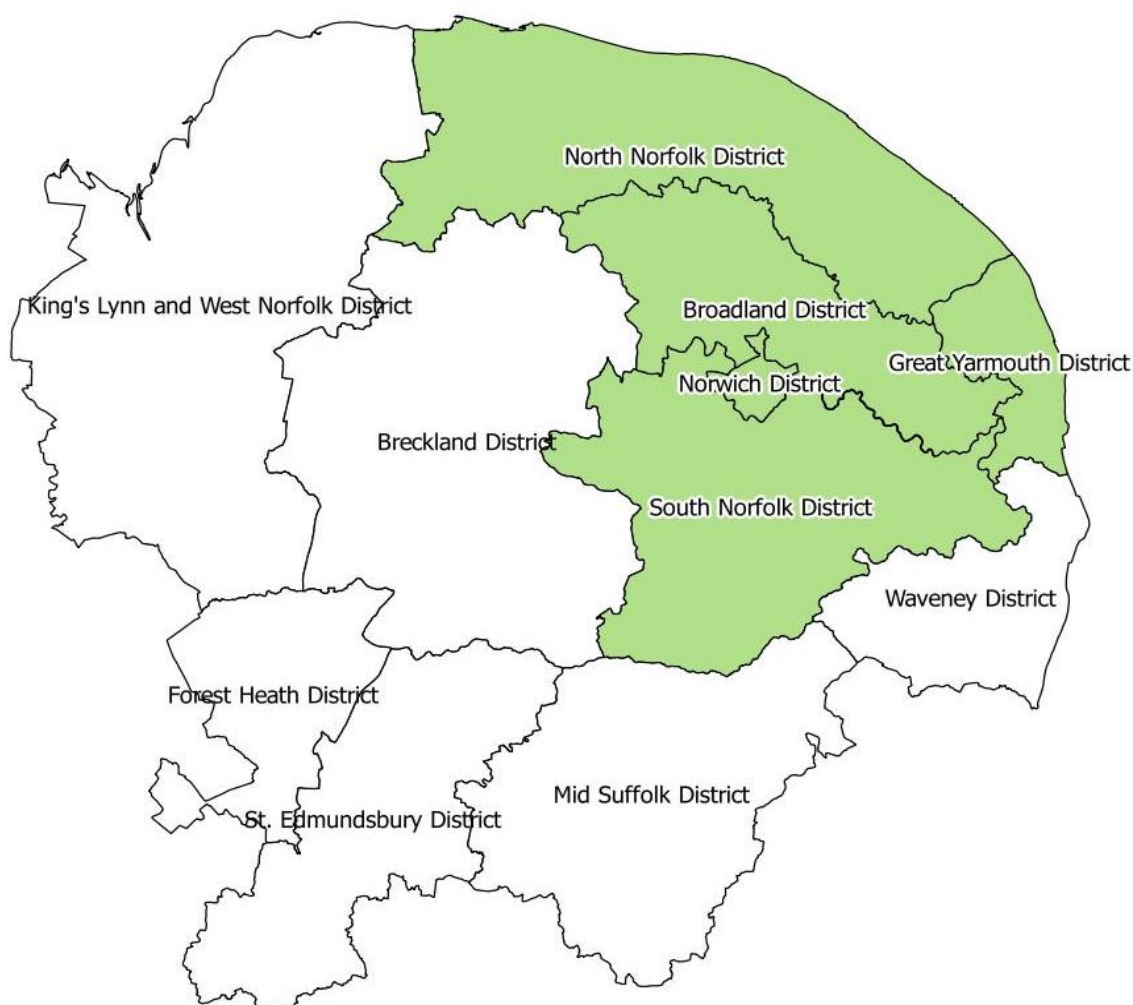


1.4 The above provided an extensive range of quantitative and qualitative data enabling a robust and reliable assessment of accommodation needs.

## Geographical context

1.5 Figure 1.1 shows a map of the Accommodation Needs Assessment (ANA) study area (shaded in green) with neighbouring authorities (unshaded). Figure 1.2 shows the boundary of the Broads Authority Executive Area. Please note that the Greater Norwich area comprises Broadland, Norwich, and South Norfolk whilst the Broads Authority covers parts of the local authority areas of Broadland, Great Yarmouth, North Norfolk, Norwich, South Norfolk, and Waveney. The entirety of the Broads Authority Executive Area is assessed, including that part in Waveney district.

Figure 1.1 ANA Study Area (with neighbouring local authorities)



Source: ONS 2016

Figure 1.2 Broads Authority Executive Area Map



Source: Broads Authority 2017

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## **The Broads**

- 1.6 The Norfolk and Suffolk Broads has status equivalent to a National Park, and the Broads Authority is the Local Planning Authority for the area within the Broads executive boundary. The Norfolk and Suffolk Broads covers 303 km<sup>2</sup> and has nearly 6,000 residents. It is a rural area and overlaps with six other local authority boundaries. There are no major settlements included within the Broads boundary, only parts of villages and the fringes of Norwich, Great Yarmouth, Lowestoft and market towns. The boundary is tightly drawn around the flood plains and lower reaches of three main rivers – the Bure, Yare and Waveney<sup>1</sup>.
- 1.7 The economic characteristics of the Broads reflect its singular navigable wetland environment, in that it is driven by tourism. The hire boat industry is the single most important provider of holidays, accounting for 4.4 million nights. Tourism also benefits the shops, restaurants, hotels and attractions in the area, with an overall value to the Broads of £146.6 million. The leisure marine industry includes boat building and equipment manufacturers as well as the inland hire and charter companies. Agriculture has also been a significant part of the economy, but is having to diversify and change its practices to survive. Other local skills, such as thatching and mill wrighting, remain a small but important part of life in the Broads. It is the last place in the UK where reed is cut commercially.
- 1.8 There is considerable pressure in certain areas on the use of water space for navigation, recreation and nature conservation purposes; however, as recognised by the Authority's Tourism & Recreation Strategy, tourism is heavily reliant on the natural environment. Angling is also a key pursuit in the Broads, contributing significantly to the Broads economy, but it brings its own pressures for access to banks and improved slipways
- 1.9 Due to the geography and network of waterways, much of the Broads area is relatively difficult to access. The best – and sometimes only – way to reach many parts of the system is by water. Moreover, links between land and water-based recreational provisions are limited. There are 18 community transport schemes based in and around Broads villages. Commuters living in the Broads use bus services less than in the rest of Norfolk and the proportion of residents owning cars increases accordingly. There is an average of 3% yearly growth in traffic in the Broads area.

## **Greater Norwich**

- 1.10 The estimated combined population of the Greater Norwich area is 392,629 people (ONS 2016). According to the Joint Core Strategy (2014), Greater Norwich is one of the most important city regions in the east of England. It has the region's largest economy and the highest-ranking retail centre. The area has three assets of international importance – its heritage, natural environment and its growing knowledge economy. This rich heritage and

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<sup>1</sup> Broads Authority, Core Strategy 2007–2021 Development Plan Document, Adopted September 2007.

abundance of cultural assets are key elements of the current and future economy of the area. Knowledge based industries cluster where quality of life is high and where support services and businesses are found<sup>2</sup>.

- 1.11 The economy is diverse and generally performs strongly. High numbers of new jobs have been created in recent years. The importance of manufacturing and farming has declined, though agriculture is still the largest user of land and automotive engineering remains strong. There has been major development of the service sector in an increasingly globalised economy. Particular strengths include the growing knowledge economy (mainly life sciences and health), financial services, retail, media, arts and, cultural and information technology based industries. Relatively low wages remain a weakness. The area benefits from a strong and growing tertiary education sector with the University of East Anglia, the Norwich University College of the Arts, City College Norwich and Easton College. However, the proportion of local people with higher-level qualifications is relatively low.
- 1.12 The A11 provides key strategic access to London, Cambridge, the south Midlands and much of the rest of the UK, with the dualling of the A11 being completed in 2014. The A140 provides strategic access to London (via the A12) and Ipswich and local links to Diss and Harleston. The A140 is almost entirely single carriageway and subject to a range of speed restrictions, particularly in Suffolk. The A146 is an important link for the rural south east of the Greater Norwich area, and for Beccles and Bungay in Waveney.
- 1.13 The A47 to the west provides strategic road access to the Midlands and North. It is mostly single carriageway in Norfolk and suffers from congestion and safety issues. Significant growth is proposed at East Dereham and King's Lynn. The A47 to the east of the Greater Norwich area connects to Great Yarmouth and Lowestoft, which are coastal resorts and industrial towns with significant regeneration needs. The development of Eastport at Great Yarmouth provides access to continental Europe for commercial activities. However, the A47 to the east of Norwich has significant limitations. A number of improvements to the A47 in Norfolk were consulted on by Highways England in spring 2017, with the improvements scheduled to commence construction in 2020.

### **Great Yarmouth**

- 1.14 The estimated population of the Greater Yarmouth Borough area is 98,172 people (ONS 2016). The Borough of Great Yarmouth is situated on the east coast of Norfolk, adjacent to the Broads. The borough covers 17,000 hectares including 24 kilometres of coastline, productive farmland and environmentally important wetlands. The largest settlement in the borough is the town of Great Yarmouth, which is located at the mouth of the River Yare and

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<sup>2</sup> Joint Core Strategy for Broadland, Norwich and South Norfolk, Adopted March 2011, amendments adopted January 2014.

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has a resident population of 27,156 (ONS 2011). Great Yarmouth is the principal centre in the borough for retail, services and employment, including port related activities.

- 1.15 The borough's economy is dominated by three major industries: energy and engineering, port and logistics, and tourism, all of which make an important contribution to the sub-regional, regional and national economy. Locally based energy companies have access to a significant amount of commercial expertise and a 24-hour port that provides the main supply base for the offshore gas industry in the Southern Basin of the North Sea and for offshore windfarms. There is also a small but leading-edge cluster of high-tech electronics and engineering companies. With regards to the visitor economy, Great Yarmouth is one of the most popular coastal resorts in the UK with around 5 million visitors per year. The borough offers a wide range of attractions, facilities and accommodation types for visitors to enjoy. Great Yarmouth is also one of the gateways to the Broads where visitors can enjoy recreational pursuits such as walking, cycling, sailing, angling and bird-watching<sup>3</sup>.
- 1.16 Within the borough there is one trunk road, the Acle Straight section of the A47 running from Acle through Great Yarmouth to the centre of Lowestoft. The A47 is the main strategic route linking Norfolk to the Midlands and the north (westbound). The road is largely single carriageway, resulting in slow and unreliable journeys. The main trunk roads connect to the north of the borough via the A149 which runs through the northern parishes of Ormesby and Rollesby towards Cromer and along the North Norfolk Coast. The A1064 leads through the northern parishes of Filby and Fleggburgh on to Acle. To the south of the borough the trunk roads leading out of Great Yarmouth connect to the A143 through to Bradwell and Belton, and towards Beccles.

### **North Norfolk**

- 1.17 The estimated population of the North Norfolk is 102,867 people (ONS 2016). North Norfolk is a large rural area of some 87,040 hectares (340 square miles) (excluding Broads Authority Area) situated on the northern periphery of the east of England. The nearby urban area and major economic, social and cultural centre of Norwich (approximate population nearly 280,000), situated some 35 km (22 miles) to the south of Cromer, exerts a significant influence over parts of the district. The towns of King's Lynn (pop. 33,730), situated 34 km (20 miles) to the west of Fakenham and Great Yarmouth, situated 25 km (16 miles) to the south-east of Stalham, are the other principal neighbouring settlements, but their impact on the district is more limited. Despite the close proximity of the district to Norwich, (a third of working residents of North Walsham and Stalham commute to the Norwich area for jobs) there is a high degree of live/work self-containment in the district overall with 73% of the economically active residents employed within the District<sup>4</sup>.

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<sup>3</sup> Great Yarmouth Core Strategy 2013-2030, adopted December 2015.

<sup>4</sup> North Norfolk Core Strategy September 2008.

- 1.18 The economy of North Norfolk remains fairly narrow with a relatively high dependence upon employment in the agriculture, manufacturing and tourism sectors – all of which face significant structural change and operate in a global context. The local economy is particularly characterised by the fact that the majority of employees (84%) work in small businesses. Whilst there has been a change in the business base of the manufacturing sector with business closures / rationalisations in the food processing and engineering sectors in recent years, there has been a growth in employment in the manufacture of plastic and timber products and marine engineering / boat-building which continue to perform strongly. Significant numbers of employees in the District are engaged in the provision of education, health and social care, public administration, retailing and tourism. In recent years the tourism sector has enjoyed growth through investment in quality accommodation and attractions, and a move to year-round operations capturing short breaks and specialist markets in addition to the traditional summer holiday.
- 1.19 North Norfolk's peripheral location is reflected in the fact that it has no trunk roads or motorways. Only the A140 (Cromer to Stowmarket), the A148 (Cromer to King's Lynn - via Holt and Fakenham but also serving Sheringham) and the A1065 (Fakenham to Mildenhall) are regarded as part of the national 'primary route network'. Other important routes are the A1067 (Fakenham to Norwich), the A149 (Cromer to Great Yarmouth – via North Walsham and Stalham) and the A1151 (linking the A149 at Smallburgh to Norwich via Hoveton).

## Definition Context

### *Gypsies and Travellers*

- 1.20 It is essential to consider definitions relating to the Gypsy and Traveller population. According to Niner<sup>5</sup>, there are three broad groupings of Gypsies and Travellers in England: traditional English (Romany) Gypsies, traditional Irish Travellers, and New Travellers. There are smaller numbers of Welsh Gypsies and Scottish Travellers. Romany Gypsies were first recorded in Britain around the year 1500, having migrated across Europe from an initial point of origin in Northern India.
- 1.21 Gypsies and Irish Travellers have been recognised by the courts to be two distinct ethnic groups, so have the full protection of the Equality Act 2010. The courts have made clear that travelling is not a defining characteristic of these groups, but only one among others<sup>6</sup>. This is significant, because the majority of Britain's estimated 300,000 Gypsies and

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<sup>5</sup> Pat Niner (2004), Counting Gypsies & Travellers: A Review of the Gypsy Caravan Count System, ODPM, February 2004 located at <http://www.communities.gov.uk/documents/housing/pdf/158004.pdf>.

<sup>6</sup> See Greenwich LBC v Powell<sup>6</sup> which confirmed that someone could be a Gypsy if they had a permanent residence, and travelled only seasonally; and R v Shropshire CC ex parte Bungay<sup>7</sup> which recognised that someone could remain a Gypsy if they did not travel, provided the travelling was only in abeyance, not abandoned.

Travellers are thought to live in conventional housing, some by choice, and some because of the severe shortage of sites<sup>7</sup>.

- 1.22 However, in relation to planning, in August 2015, the DCLG amended its definition of Gypsies and Travellers (see Glossary p.9), to that set out below:

*Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.*

*In determining whether persons are "gypsies and travellers" for the purposes of planning policy, consideration should be given to the following issues amongst other relevant matters:*

- a) whether they previously led a nomadic habit of life*
- b) the reasons for ceasing their nomadic habit of life*
- c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.*

### **Travelling Showpeople**

- 1.23 Unlike Gypsies and Travellers, Travelling Showpeople are not considered to be an ethnic minority. Although some Gypsies and Travellers may earn a living as 'travelling showpeople', Travelling Showpeople as a group do not consider themselves to belong to an ethnic minority<sup>8</sup>.

- 1.24 According to DCLG (August 2015) guidance on planning policy for traveller sites, the definition of Travelling Showpeople is:

*Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.<sup>9</sup>*

- 1.25 Also, for the purposes of Gypsy and Traveller Accommodation Needs Assessments (GTANAs), Travelling Showpeople are included under the definition of 'Gypsies and Travellers' in accordance with The Housing (Assessment of Accommodation Needs)

<sup>7</sup> Commission for Racial Equality, *Common Ground Equality, good race relations and sites for Gypsies and Irish Travellers - Report of a CRE inquiry in England and Wales*, (Summary), May 2006, pages 3-4.

<sup>8</sup> DCLG, *Consultation on revised planning guidance in relation to Travelling Showpeople*, January 2007, p. 8

<sup>9</sup> DCLG, *Planning Policy for Traveller Sites*, August 2015 (Glossary, p.9).

(Meaning of Gypsies and Travellers) (England) Regulations 2006, and the draft guidance to local housing authorities on the periodical review of housing needs (Caravans and Houseboats) (March 2016). It recommends that Travelling Showpeople's own needs and requirements should be separately identified in the ANA <sup>10</sup>. To ensure it is following DCLG guidance, this ANA adheres to the definition of Gypsies, Travellers and Travelling Showpeople as defined by the DCLG 'Planning Policy for Traveller Sites' (August 2015) (see paragraphs above).

### **Boat Dwellers**

1.26 In relation to boat dwellers, the term 'houseboat' is defined elsewhere in legislation (in the Housing and Planning Act 2016) and not within DCLG guidance. It is common to adopt the widely-adopted VAT definition which defines a houseboat as being a floating decked structure which is designed or adapted for use solely as a place of permanent habitation, and which does not have the means of, and which is not capable of being readily adapted for, self-propulsion (VAT Notice 701/20, December 2013). However, we are aware that there may be boat dwellers who are licensed to permanently reside on other types of boats. As such, this needs assessment covers all households residing permanently on any type of boat. Because it is moorings that the Local Plans can allocate land for, as well as using the VAT definition of 'houseboat', we also adopt the Broads Authority definition of "residential moorings" where those living on boats moor, as:

"one where someone lives aboard a vessel (which is capable of navigation), that the vessel is used as the main residence and where that vessel is moored in one location for more than 28 days in a year. The vessel may occasionally/periodically go cruising and return to base".

### **Summary**

1.27 Whilst the Housing and Planning Act removes the requirement for all local authorities to carry out an assessment of the accommodation needs of Gypsies and Travellers, the August 2015 Planning Policy for Traveller Sites (PPTS) reiterates the need for local authorities to evidence the accommodation needs of Gypsies and Travellers and to determine the number, type and location of new provision. The PPTS amended the definition of Gypsies and Travellers for planning purposes.

1.28 Households residing in boats have been considered as part of this assessment following the introduction of the Housing and Planning Act (2016) of a requirement to consider the needs of people residing in houseboats. The Housing and Planning Act also requires the

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<sup>10</sup> DCLG, *Planning Policy for Traveller Sites*, August 2015 and DCLG, *Draft Guidance to local housing authorities on the periodical review of housing needs (Caravans and Houseboats)* March 2016.



needs of people residing in caravans to be considered and this is reflected upon through the survey of residential caravan site owners.

- 1.29 The purpose of this assessment is to quantify the accommodation and housing related support needs of Gypsies, Travellers, Travelling Showpeople, boat dwellers, and permanent residential caravan dwellers in the study area between 2017 and 2036. This is in terms of permanent pitches (and sites) and transit sites/negotiated stopping arrangements for Gypsies and Travellers, plots (and yards) for Travelling Showpeople, and permanent residential moorings for boat dwellers. The results will be used to inform the allocation of resources and as an evidence base for policy development in housing and planning.
- 1.30 To achieve the study aims, the research drew on several data sources: a review of secondary information; consultation with organisations involved with Gypsy and Traveller and Travelling Showpeople issues; online surveys of Broads Authority Rangers; telephone surveys of residential caravan site owners; and extensive surveys of Gypsies, Travellers, Travelling Showpeople, and boat dwellers. These provided an extensive range of quantitative and qualitative data enabling a robust and reliable assessment of accommodation needs.
- 1.31 The four study area local authorities are situated in diverse areas. Greater Norwich is one of the most important city regions in the east of England. It has the region's largest economy and the highest-ranking retail centre. In contrast, the Broads Authority has status equivalent to a National Park and overlaps with six other local authority boundaries. The economic characteristics of the Broads reflect its singular navigable wetland environment, in that it is driven by tourism. Similarly, Great Yarmouth's economy is dominated by three major industries: energy and engineering, port and logistics, and tourism, all of which make an important contribution to the sub-regional, regional and national economy. The economy of North Norfolk remains fairly narrow with a relatively high dependence upon employment in the agriculture, manufacturing and tourism sectors. Generally, there are good transport links between the study area local authority areas and neighbouring authorities although North Norfolk has no trunk roads or motorways.

## 2. Policy context

### Introduction

- 2.1 To assess the current state of play, existing documents have been examined to determine what reference is made to Gypsy and Traveller, Travelling Showpeople and boat dwellers issues.
- 2.2 The intention is to highlight areas of effective practice in the study area, and examine the extent to which authorities are currently addressing the issue. Furthermore, understanding the current position will be important in the development of future strategies intended to meet accommodation need and housing related support need among Gypsies and Traveller, Travelling Showpeople and boat dwellers.

### National Policies

#### *DCLG Planning Policy for Traveller Sites (PPTS) (August 2015)*

- 2.3 In August 2015 the Government published its amended planning policy for traveller sites, which replaced the previous version of PPTS (March 2012) relating to Gypsies and Travellers and Travelling Show people. The guidance emphasises the need for local authorities to use evidence to plan positively and manage development. The PPTS requires local authorities to work with neighbouring local authorities to determine transit and permanent pitch and plot targets. It states that in assembling the evidence base necessary to support their planning approach, local authorities should:
- effectively engage with both settled and traveller communities;
  - co-operate with traveller groups to prepare and maintain an up-to-date understanding of the likely permanent and transit/emergency accommodation needs of their areas; and
  - use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions.
- 2.4 There are some key differences between the March 2012 and August 2015 versions of the PPTS, including the weight which can be given to any absence of a five year supply of permanent sites when deciding planning applications for temporary sites, and the weight which can be given to any absence of a five year supply of permanent sites when deciding planning applications for temporary sites<sup>11</sup>.

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<sup>11</sup> House of Commons Library, *Gypsies and Travellers: Planning Provisions*, Briefing Paper 07005, 4 January 2016 p.14.

- 2.5 One important amendment relates to the change in the definitions of Gypsies, Travellers, and Travelling Showpeople. The August 2015 PPTS changed the definition to exclude households who have permanently ceased to travel – in effect, for planning purposes, PPTS regards such households as members of the settled community. As such, their accommodation needs are not considered as part of Gypsy and Traveller accommodation assessments, and so this is the approach taken in this ANA.
- 2.6 Whilst it is clear that the 2015 PPTS excludes those who have ceased to travel permanently as being Gypsies and Travellers (for planning purposes), it does not explicitly state how the new definition should be interpreted in relation to other factors such as whether families travel for economic or work purposes.
- 2.7 One interpretation is that ‘a nomadic habit of life’ means travelling for an economic purpose. Previous case law e.g. *R v Shropshire CC ex p Bungay* (1990) and *Hearne v National Assembly for Wales* (1999) has been used to support this point. However, there is nothing within PPTS which indicates that Gypsy or Traveller status (for planning purposes) is solely derived from whether there is any employment-related travelling. Also, such case law precedes the August 2015 definition change and it is believed that there has not yet been any case law in relation to the updated definition.
- 2.8 More recent Planning Inspectors’ reports have reached differing conclusions regarding whether the Gypsy and Traveller status (for planning purposes) should be based on patterns of employment-related nomadism. For example, a planning appeal decision regarding a site at Throcking, Hertfordshire, in 2016 concluded the appellant was not a Gypsy and Traveller for planning purposes as there was insufficient evidence “that he is currently a person of a nomadic habit of life”<sup>12</sup> for employment purposes (i.e. he did not meet the August 2015 PPTS definition).
- 2.9 In contrast, some other Planning Inspectors’ reports have appeared to give less weight to the travelling status of Gypsies and Travellers. For example, an appeal decision regarding a site in Blythburgh, Suffolk, states that whilst the appellant had permanently ceased to travel, he is nonetheless an ethnic Romany gypsy with protected characteristics under the Equality Act 2010<sup>13</sup>. *RRR Consultancy* is also aware of current and potentially forthcoming legal challenges to the August 2015 PPTS definition. For example, the Community Law Partnership is preparing a legal challenge to the definition on behalf of a Gypsy woman. It is therefore *possible* that applying a strict employment-based interpretation of the August 2015 definition for planning purposes could lead to difficulties, but it is also possible that the

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<sup>12</sup> Appeal Ref: APP/J1915/W/16/3145267 Elmfield Stables, Thirty Acre Farm, Broadfield, Throcking, Hertfordshire, 6 December 2016.  
SG9 9RD

<sup>13</sup> Appeal Ref: APP/J3530/A/14/2225118, Pine Lodge, Hazels Lane, Hinton, Blythburgh, Suffolk IP17 3RF 1 March 2016.

legal challenge to PPTS could fail and the employment-based interpretation become more settled.

- 2.10 In the absence of caselaw on the current (2015) PPTS definition, the key conclusion to draw on this matter is that there is no firm, settled understanding of the extent to which nomadism for employment-related purposes is determinative of the planning status of a self-identifying Gypsy and Traveller. As the differing appeal decisions show, the facts of each individual case are very important in reaching a conclusion.
- 2.11 Given the above, our approach is to undertake a methodology which provides two needs figures: first, one based on the accommodation needs of families who have not permanently ceased to travel; and second, considers the accommodation needs only of families who travel in a caravan for work purposes. Using these methods will 'future-proof' the Accommodation Needs Assessment and ensure that the revised definition is applied in both a fair and objective manner. As such, the accommodation needs of Gypsies and Travellers are able to be determined in respect of the current definition that is both robust and reliable and minimises possible future challenges. Different GTAs reach differing conclusions on this matter and it is for the local authorities to decide individually which approach to take for planning purposes. It is recommended that this be kept under review in the light of evolving appeal decisions and caselaw.

#### *DCLG Draft Guidance on Housing Needs (Caravans and Houseboats) (March 2016)*

- 2.12 In March 2016 DCLG published its draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats. It states that when considering the need for caravans and houseboats local authorities will need to include the needs of a variety of residents in differing circumstances, for example:
- Caravan and houseboat dwelling households:
    - who have no authorised site anywhere on which to reside
    - whose existing site accommodation is overcrowded or unsuitable, but who are unable to obtain larger or more suitable accommodation
    - who contain suppressed households who are unable to set up separate family units and
    - who are unable to access a place on an authorised site, or obtain or afford land to develop on.
  
  - Bricks and mortar dwelling households:
    - Whose existing accommodation is overcrowded or unsuitable ('unsuitable' in this context can include unsuitability by virtue of a person's cultural preference not to live in bricks-and-mortar accommodation).

- 2.13 Importantly, in respect of this report, the draft guidance states that assessments should include, but are not limited to, Romany Gypsies, Irish and Scottish Travellers, New Travellers, and Travelling Showpeople.
- 2.14 The DCLG draft guidance recognises that the needs of those residing in caravans and houseboats may differ from the rest of the population because of:
- their nomadic or semi-nomadic pattern of life
  - their preference for caravan and houseboat-dwelling
  - movement between bricks-and-mortar housing and caravans or houseboats
  - their presence on unauthorised encampments or developments.
- 2.15 Also, it suggests that as mobility between areas may have implications for carrying out an assessment local authorities will need to consider:
- co-operating across boundaries both in carrying out assessments and delivering solutions
  - the timing of the accommodation needs assessment
  - different data sources
- 2.16 Finally, the DCLG draft guidance (2016) states that in relation to Travelling Showpeople account should be taken of the need for storage and maintenance of equipment as well as accommodation, and that the transient nature of many Travelling Showpeople should be considered.
- 2.17 The Guidance remains in draft form at the time of this ANA, and so does not carry the same status as other guidance and legislation. It is unclear when – if at all – this guidance will lose its “draft” status. Nonetheless, it is of some value for those preparing ANAs.

### *Housing and Planning Act 2016*

- 2.18 The Housing and Planning Act, which gained Royal Assent on 12 May 2016, deletes sections 225 and 226 of the Housing Act 2004, which previously identified ‘gypsies and travellers’ as requiring specific assessment for their accommodation needs when carrying out reviews of housing needs. Instead, the Act amends section 8 of the Housing Act 1985 governing the assessment of accommodation needs to include all people residing in or resorting to the district in caravans or houseboats. However, for planning purposes, as noted above, the PPTS (August 2015) still requires local authorities to identify the accommodation needs of Gypsies, Travellers and Travelling Showpeople.
- 2.19 Importantly, according to correspondence between *RRR Consultancy Ltd* and DCLG (27 October 2016), DCLG stated that it is for local housing authorities to determine how to assess and understand the accommodation needs of people who reside in or resort to the area with respect to the provision of caravan sites or houseboats. This means that there is

no “standard” methodology that can be followed i.e. it is for each authority to prepare (and justify) an appropriate methodology.

### *Duty to cooperate and cross-border issues*

- 2.20 The Duty to Co-operate was created in the Localism Act 2011. It places a legal duty on local planning authorities, county councils in England, and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation relating to strategic cross boundary matters.
- 2.21 Local authorities are required to work together to prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs for their areas. They should also consider the production of joint development plans to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area. This is confirmed by section 9 of PPTS (2015) which states that local authorities should set pitch targets for Gypsies and Travellers, and plot targets for Travelling Showpeople, and section 10 c) which states that local authorities should consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites.
- 2.22 As part of the production of this assessment, a Stakeholder Focus Group was held at which adjoining planning and housing authorities, representatives from the Police and Health and Wellbeing officers were invited to discuss issues relevant to them relating to Gypsies, Travellers and Travelling Showpeople. The findings from the consultation are discussed in detail in Chapter 4. In addition, *RRR Consultancy* attended the meeting of the Norfolk and Suffolk Gypsy and Traveller Forum on 11<sup>th</sup>. November 2016.

## **Local Planning Policies**

### *Broads Authority Site Specific Policies Local Plan Period 2013-2028*

- 2.23 Policy BRU6 regarding Brundall Gardens states that Development Management policy DP25 (New Residential Moorings) will apply as the marina will be treated as if it were adjacent to the development boundary. Proposals for Residential Moorings will be allowed in this area if they are not at a scale which would compromise existing business on the site as well as meeting the criteria in DP18 and DP20 of the Development Management Policies DPD. Proposals must ensure no adverse effects on the conservation objectives and qualifying features of the nearby SSSI.

### *Broads Authority Development Management Policies 2011-2021*

- 2.24 Policy DP25 (‘New Residential Moorings’) states that applications for permanent residential moorings will be permitted provided that the mooring:

- a) Is in a mooring basin, marina or boatyard that is within or adjacent to a defined development boundary and, if more than one residential mooring is proposed, the proposal is commensurate with the scale of development proposed for that settlement. Furthermore, that the mooring basin, marina or boatyard provides an adequate and appropriate range of services and ancillary facilities or provides adequate access to local facilities in the vicinity;
- b) Would not result in the loss of moorings available to visitors/short stay use;
- c) Would not impede the use of the waterway;
- d) Would not have an adverse impact upon:
  - the character or appearance of the surrounding area;
  - protected species, priority habitats and designated wildlife sites;
  - the amenities of neighbouring occupiers; or
  - bank erosion.
- e) Provides safe access between vessels and the land without interfering with or endangering those using walkways;
- f) Has adequate car parking and makes provision for safe access for service and emergency vehicles and pedestrians;
- g) Would not prejudice the current or future use of adjoining land or buildings;
- h) Makes adequate provision for waste, sewage disposal and the prevention of pollution;
- i) Provides for the installation of pump-out facilities (where on mains sewer) unless there are adequate facilities in the vicinity.

2.25 Finally, it states that all such development will meet the requirements of the Water Framework Directive.

*Broads Authority Local Plan for the Broads – Preferred Options Consultation (2017)*

2.26 The period for the Preferred Options consultation was 5 December 2016 to 3 February 2017. Policy PODM34 outlines the criteria for Gypsies, Travellers, and Travelling Showpeople. It states that appropriate development and site applications will be allowed where they meet the following criteria:

- a) Avoid sites being over-concentrated in any one location or disproportionate in size to nearby communities.
- b) Well related to existing settlements and do not harm the character and appearance of the area.
- c) Within reasonable distances to facilities and supporting services.
- d) Are on brownfield (previously developed) land.
- e) There are no significant adverse impacts on the safe and efficient operation of the highway network.
- f) There is adequate provision for parking, turning and safe manoeuvring of vehicles within the site.

- g) Transit sites should be in close proximity to the main established travelling routes in the area.
- h) Have clearly defined physical boundaries and will be appropriately screened and landscaped and be capable of visual privacy.
- i) The site will not have any adverse effects on the setting of any heritage asset or any adverse impact on the character and appearance of the surrounding landscape.
- j) Permanent built structures in rural locations or on settlement fringes are restricted to essential facilities.
- k) There is sufficient amenity space for occupiers.
- l) The design, layout and density of the site are based on Government guidance in 'Designing Gypsy and Traveller Sites' (or successor documents).
- m) Sites or pitches are capable of being provided with adequate infrastructure such as power, water supply, foul water drainage and recycling/waste management.
- n) Proposals do not cause unacceptable harm to the amenity of neighbouring uses and occupiers and the tranquillity of the area.
- o) Due regard has been given to all types of flood risk.
- p) Sites are not proposed which will impact on Natura 2000 sites

2.27 It also states that transit or temporary sites may have conditions applied relating to length of occupancy in consultation with the Housing Authority.

2.28 Policy PODM35 of the Preferred Options Consultation document outlines the criteria for new residential moorings. It states that applications for permanent residential moorings will be permitted provided that the mooring:

- a) Is in a mooring basin, marina or boatyard that is within or adjacent to a defined development boundary and, if more than one residential mooring is proposed, the proposal is commensurate with the scale of development proposed for that settlement. Furthermore, that the mooring basin, marina or boatyard provides an adequate and appropriate range of services and ancillary facilities to meet the needs of the occupier of the residential moorings (for example potable water and electricity) or provides adequate access to local facilities in the vicinity;
- b) Would not result in the loss of moorings available to visitors/short stay use;
- c) Would not impede the use of the waterway;
- d) Would not have an adverse impact upon:
  - i. the character or appearance of the surrounding area from the use of adjacent land incidental to the mooring;
  - ii. protected species, priority habitats and designated wildlife sites;
  - iii. the amenities of neighbouring occupiers; or
  - iv. bank erosion.
- e) Provides safe access between vessels and the land without interfering with or endangering those using walkways;
- f) Has adequate car parking and makes provision for safe access for service and emergency vehicles and pedestrians;



- g) Would not prejudice the current or future use of adjoining land or buildings;
- h) Makes adequate provision for waste, sewage disposal and the prevention of pollution; and
- i) Provides for the installation of pump-out facilities (where on mains sewer) unless there are adequate facilities in the vicinity

2.29 The Local Plan allocated sites for around 10 residential moorings split between two sites at Brundall Gardens and Beccles.

*Joint Core Strategy for Broadland, Norwich and South Norfolk (2011, amendments adopted 2014)*

2.30 The Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS, amended version adopted January 2014) was prepared by the three councils of Broadland, Norwich and South Norfolk, working together with Norfolk County Council. Reflecting previously undertaken GTAAs, Policy 4 identifies a need for 58 permanent residential pitches for Gypsies and Travellers between 2006 and 2011, and 78 permanent residential pitches for the period 2012 to 2026. It recommends that sites should not have more than 10 to 12 pitches, but this may be varied to suit the circumstances of a particular site. The sites will be provided in locations which have good access to services and in locations where local research demonstrates they would meet the needs of the Gypsy and Traveller communities.

2.31 JCS Policy 4 also identifies a need for 15 additional Travelling Showpeople plots by 2011, and a further 12 between 2012 and 2026. It suggests that the plots would be located on sites within the Norwich urban area, or if sites within the urban area cannot be identified, with easy access to it. Additionally, the JCS identifies the need for 17 transit pitches. These would generally be in locations providing good access to the main routes used by Gypsies and Travellers, such as the A11, A47, A140 and A 143/A1066. Sites would not normally be expected to accommodate more than 10 to 12 pitches.

*Development Management policies for Broadland, Norwich and South Norfolk*

2.32 Policy H6 of Broadland Council's Development Management DPD (2015) outlines its policy in respect of proposed Gypsy and Traveller sites. It states that outside settlement limits proposals for permanent Gypsy and Traveller residential accommodation which meet an identified need will be permitted on sites that are within reasonable proximity of community facilities provided there is no significant adverse impact.

2.33 Norwich's Development Management Policy DM14 outlines its policy in respect of proposed sites for Gypsies, Travellers, and Travelling Showpeople. It states that the existing Gypsy and Traveller site at Swanton Road and the Travelling Showpeople's site at Hooper Lane, off Sprowston Road will be retained and reserved for those purposes. Proposals for the upgrading and enhancement of either site over the plan period will be accepted and permitted where consistent with other relevant policies of the plan.

2.34 It also states that proposals for the development of additional sites within Norwich to meet the identified needs of the traveller community will be permitted where:

- a) safe access to the site can be obtained through an appropriate layout with good visibility, without the loss of natural screening;
- b) the site has good access to public transport, services and community facilities including shops, healthcare facilities and schools;
- c) the development will not have a significant detrimental impact on the character and amenity of the area; and
- d) the proposed site is of sufficient size and in a location to meet the on-site needs of occupiers, having regard to current national standards for site design and management, including for the provision of appropriate services and infrastructure.

2.35 Finally, it states that should it not be possible to identify sites capable of meeting needs up to 2026 through the above process, the council will produce a short focussed Local Plan which will have the objective of identifying and allocating additional sites for Gypsies and travellers to meet identified needs up to 2026. The Local Plan may be produced for Norwich or a wider area through joint working with adjoining local authorities and, if needed, will be commenced within one year and completed within two years of adoption of the plan.

2.36 South Norfolk's Development Management Policy 3.3 covers proposed sites for Gypsies and Travellers. It states that proposals for all new sites for Gypsies and Travellers, both inside and outside of development boundaries, will be assessed with regard to the following key considerations a) to h):

- a) The scale of the site should not dominate the nearest settled community;
- b) The development should be well planned to provide open space and facilities for the needs of occupiers and to meet national design guidance and site management experience. The site should include the provision of satisfactory foul and surface drainage, water supply and utilities, and avoid boundary structures that give a deliberately isolating appearance to the site;
- c) Sites for mixed residential and business uses must be suitably designed with regard to the amenity of the occupants, the neighbouring community and protection of the local environment.
- d) The development should not have a significant adverse impact on heritage assets and their setting or the character and appearance of the landscape and should be sited and designed to integrate into the local landscape, with good screening by vegetation and/or landform;
- e) The site should not be allocated in the Local Plan for a non-residential purpose, and there is a preference for sites located on previously developed land or previously occupied agricultural yards and hard-standings;
- f) The site should not be so isolated from Settlements that the occupiers cannot gain convenient access to schools and facilities to meet their daily needs;

- g) Consideration should be given as to where there is adequate capacity available in local infrastructure and services and potential measures to remedy any lack of capacity; and
- h) The proposed site should have suitable route(s) of access for the occupiers.

### *Great Yarmouth Core Strategy 2013-2030*

- 2.37 The Core Strategy (adopted 2015) cites the 2013 Housing Market Assessment (2013) which identified a need for 10 new pitches over the plan period. According to the Core Strategy, there is only one Gypsy and Traveller site in the borough at Gapton Hall, Great Yarmouth. Gapton Hall is a well-used, functional site that has been operational since the mid-1980s. Alterations and an extension to the site in 2010 saw the provision of new caravan plots, vehicle compounds and utility buildings. The works also included a new play area, which was designed with the help of young residents. The site currently provides 25 pitches and is owned by Great Yarmouth Borough Council.
- 2.38 Policy CS5 of the Core Strategy (2015) outlines the Council's policy regarding Gypsies, Travellers and Traveling Showpeople. The Council will:
- a) Safeguard the existing travellers site at Gapton Hall (25 pitches) for use by gypsies and travellers
  - b) Seek to identify 10 additional permanent pitches for use by gypsies and travellers within the borough
  - c) Use a 'plan, monitor and manage' approach, based on the Annual Monitoring Report and updates of the Strategic Housing Land Availability Assessment, to ensure the continuous maintenance of a five-year rolling supply
  - d) Ensure that in identifying land or determining planning applications, proposals for potential sites/pitches comply with national policy in the Planning Policy for Traveller Sites document or successor publications and seek to meet the following criteria:
    - The site has good, safe access to the public highway system, with adequate space for parking, turning and servicing on site
    - The site has reasonable and safe access to key community facilities such as schools, shops and healthcare facilities
    - The site is well-designed and based on guidance in the 'Designing Gypsy and Traveller Sites' document or successor documents
    - The development of the site minimises potential impacts on the surrounding townscape, landscape, including the Broads and the Norfolk Coast Area of Outstanding Natural Beauty, heritage assets, geodiversity, biodiversity and high grade agricultural land
    - The site is not in an area at risk of flooding
    - The site has adequate disposal of sewage to ensure that there is no reduction in water quality within the catchment
    - Suitable waste and recycling facilities are provided

- e) Seek to ensure that sites are made available on a temporary basis for Travelling Showpeople, as and when they are required

### *Emerging Great Yarmouth Site Allocations policy*

- 2.39 The council is currently preparing its Draft Local Plan Part 2: Detailed Policies and Site Allocations policy document which will provide detailed policies on new developments. Consultation on the draft document is likely to take place Autumn 2017.

### *North Norfolk Core Strategy (adopted 2008 and underwent Single Issue Review in 2012)*

- 2.40 According to the Core Strategy (2008), North Norfolk has traditionally experienced low levels of Gypsy and Traveller activity compared with other Districts in Norfolk. However, Gypsies and Travellers do visit the area for short periods of time as they are passing through, visiting religious festivals, looking for work or for recreational purposes in the summer period. Typically, these activities have occurred in the Fakenham, Walsingham, and Cromer/Sheringham areas.
- 2.41 It cites the Norfolk Protocol for the Consideration of Unauthorised Encampments (October 2005) which recommends that unauthorised encampments should be tolerated where they occur wherever possible. Gypsies and Travellers stop on land which are unacceptable, there is often a need to seek to move the Gypsies and Travellers to a more suitable location, and sites need to be identified that will be reserved for these situations. These should be located in areas where they are likely to be required, as indicated by previous incursions and evidence on Gypsy and Traveller needs. Current evidence indicates that two 'Short Stay Stopping Places' should be identified – one in the Fakenham area and one in the Cromer/Sheringham area. These have subsequently been provided.
- 2.42 Policy HO4 of the Core Strategy (2008) outlines the Council's policy regarding Gypsies, Travellers and Traveling Showpeople. It states that development to meet the needs of Gypsies and Travellers and of Travelling Showpeople will be permitted provided it is of an appropriate scale and nature and the following criteria are met:
- the intended occupants meet the definition of Gypsies and Travellers or the description of Travelling Showpeople; and
  - development minimises impact on the surrounding landscape; and
  - safe vehicular access to the public highway can be provided; and
  - the movement of vehicles to and from the site will not cause significant disturbance; and
  - there is adequate space for parking, turning and servicing on site; and
  - the site is on the outskirts of, or within a reasonable distance of, a settlement which offers local services and community facilities; and

- suitable landscaping and boundary enclosures are provided to give privacy, minimise impact
- on the surrounding area and provide a safe and acceptable living environment.

### *Summary of local planning policies*

2.43 The study area local authorities' planning policies consider the accommodation needs of local Gypsies, Travellers, Travelling Showpeople, boat dwellers, and residential caravan dwellers. Importantly, they emphasise the necessity of meeting the accommodation needs of such groups whilst maintaining the sustainability of surrounding environments. This is emphasised by the extensive conditions attached to the consideration of new sites and yards and the development of site specific policies. Whilst it is unlikely that some of the key evidence base underpinning the local planning policies will have changed substantially since the publication of the local plans (e.g. main travelling routes), it is inevitable likely that other components e.g. accommodation needs will have changed.

## **Gypsy and Traveller Accommodation Assessments (GTAA's)**

### *Babergh, Ipswich, Mid Suffolk, Suffolk Coastal and Waveney ANA (2017)<sup>14</sup>*

2.44 According to the 2017 ANA, the estimated extra site provision that is required between 2016 and 2036 is 73 pitches (1 pitch in Babergh, 27 in Ipswich, 9 in Mid Suffolk, 15 in Suffolk Coastal, and 21 in Waveney). This includes existing households on unauthorised sites, those with temporary planning permissions, and the growth in household numbers due to household formation. Any sites in the pipeline for development have not been included in this figure. The report also identified a need for 3 different 8 pitch transit sites or emergency stopping places to help to manage unauthorised encampments and provide for visiting households. The report also identifies a need for 9 additional Travelling Showpeople plots (0 plots in Babergh, 0 in Ipswich, 7 in Mid Suffolk, 2 in Suffolk Coastal, and 0 in Waveney), and 28 residential boat moorings (10 moorings in Babergh, 0 in Ipswich, 0 in Mid Suffolk, 17 in Suffolk Coastal, and 1 in Waveney).

### *Breckland GTAA (2016)<sup>15</sup>*

2.45 The GTAA uses a different method compared to previous GTAA's in that it assesses the accommodation need of households who *meet* the DCLG (August 2015) definition, who *do not* meet the definition (defined as those households who travel for employment reasons), and households whose status under the new definition is 'unknown'. The GTAA identifies a 20-year need of 10 pitches for those households who meet the definition, 43 pitches for

<sup>14</sup> Babergh, Ipswich, Mid Suffolk, Suffolk Coastal and Waveney Gypsy, Traveller & Travelling Showpeople Accommodation Assessment, October 2013.

<sup>15</sup> Breckland Gypsy and Traveller Accommodation Assessment, November 2016.

those households who do not meet the definition, and up to 27 pitches for those households whose status is 'unknown'. Similarly, in relation to Travelling Showpeople, the GTAA identifies a 20-year need of 2 plots for those households who meet the definition, and up to 1 plot for those households who may meet the definition. The GTAA does not indicate transit pitch requirements but states that new provision should be considered in Autumn 2018 once there is a new 3 year evidence base following the changes to PPTS in August 2015.

*Cambridgeshire, King's Lynn & West Norfolk, Peterborough and West Suffolk GTAA (2016)*<sup>16</sup>

2.46 Based on existing (2016) provision of 783 occupied pitches the GTAA identifies a 20-year need of 5 pitches for those households who meet the definition, up to 177 pitches for those households who do not meet the definition, and 189 pitches for those households whose status is 'unknown'. Similarly, in relation to Travelling Showpeople, the GTAA identifies a 20-year need of 14 plots for those households who meet the definition, up to 8 plots for those households who do not meet the definition, and 6 plots for those households whose status is 'unknown'. The GTAA does not indicate transit pitch requirements but states that new provision should be considered jointly dependent on location. This GTAA was prepared after the publication of the August 2015 PPTS.

*Greater Norwich GTAA (2012)*

2.47 According to the Greater Norwich GTAA (2012)<sup>17</sup>, the estimated extra provision that is required for Gypsies and Travellers for the period 2012-2017 in Greater Norwich is 48 pitches. In addition, the GTAA identifies a need for a further 30 new pitches within the study areas for the period 2017-2032. In relation to transit provision, there is a need for at least 6 pitches in the study area. The GTAA also states that in relation to Travelling Showpeople, while there are housing needs on the existing Showmen's site in Norwich, many Showmen would ideally like to live more centrally in England for work purposes. Therefore, the existing and future housing needs on the site do not necessarily have to be met in Greater Norwich and are more likely to be met outside the sub-region.

*Greater Yarmouth SHMA (2013)*

2.48 The accommodation needs of Gypsies and Travellers was determined as part of the 2013 SHMA. It states that there is evidence that the accommodation needs of Gypsies and Travellers within the Great Yarmouth Borough area are not being met. The CLG caravan

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<sup>16</sup> Cambridgeshire, King's Lynn & West Norfolk, Peterborough and West Suffolk Gypsy and Traveller Accommodation Assessment, October 2016.

<sup>17</sup> Greater Norwich Gypsy and Traveller Accommodation Assessment, August 2012.

count suggested that there has been no unauthorised encampments during recent years. However, qualitative data suggested that the number of unauthorised encampments in Norfolk (not Great Yarmouth Borough) increases during summer months. Given limited evidence was not possible to determine exact pitch requirements. However, given that the current site at Gapton Hall was fully occupied and that need for pitches increases during summer months, it was thought likely that there is a need for new pitches in Great Yarmouth Borough. The SHMA recommended that the Council to plan for an additional site of about 10 pitches in Great Yarmouth Borough.

### *South Norfolk GTAA (2014)*

- 2.49 The South Norfolk GTAA (2014)<sup>18</sup> states that there is a need for 35 pitches over the period 2014-2031. In relation to transit provision, according to the GTAA, given that a new transit site has recently opened at Bawburgh has not been fully occupied since it opened, and that the current unauthorised caravans are included in the calculations for permanent pitches, it recommends there is no additional transit provision in South Norfolk. Finally, the GTAA suggests there is no need for any further Travelling Showpeople provision within the district. This ANA will replace the 2014 GTAA.

### **Summary**

- 2.50 *Planning Policy for Traveller Sites* (August 2015) emphasises the need for local authorities to use evidence to plan positively and manage development. The Housing and Planning Act 2016 amends section 8 of the Housing Act 1985 governing the assessment of accommodation needs to include all people residing in or resorting to the district in caravans or houseboats. However, for planning purposes, as noted above, PPTS 2015 still requires local authorities to identify the accommodation needs of Gypsies, Travellers and Travelling Showpeople.
- 2.51 The DCLG March 2016 draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats states that when considering the need for caravans and houseboats local authorities will need to include the needs of a variety of residents in differing circumstances. The DCLG confirmed that it is for local housing authorities to determine how to assess and understand the accommodation needs of people who reside in or resort to the area with respect to the provision of caravan sites or houseboats.
- 2.52 The local planning policies of the study area local authorities outline the criteria by which the location of new Gypsy, Traveller and Travelling Showpeople accommodation, residential caravan sites, and boat moorings should be determined. It is apparent that they consider it important to consider a range of factors including the sustainability of new sites

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<sup>18</sup> South Norfolk Gypsy, Traveller and Travelling Showpeople Accommodation Assessment, June 2014.

e.g. proximity to local services, and the potential impact on the environment. However, it is likely that any revised local policies will need to reflect the findings of this ANA.

- 2.53 Given the cross-boundary characteristic of accommodation issues experienced by the groups considered by this ANA, it is important to consider the findings of GTAAs produced by neighbouring local authorities. GTAAs recently undertaken by neighbouring local authorities suggest that there remains Gypsy and Traveller accommodation need throughout the east of England. This possibly reflects the fact that need is determined over the long-term e.g. to 2026 or 2036.



## 3. Trends in the population levels

### Gypsies and Travellers

#### Introduction

- 3.1 This section examines population levels in the ANA study area and population trends. The primary source of information for Gypsies and Travellers (including Travelling Showpeople) in England is the DCLG Traveller Caravan Count. This was introduced in 1979 and places a duty on local authorities in England to undertake a twice-yearly (January and July) count for the DCLG on the number of Gypsy and Traveller caravans in their area. The count was intended to estimate the size of the Gypsy and Traveller population for whom provision was to be made and to monitor progress in meeting need.
- 3.2 Although the duty to provide sites was removed in 1994, the need for local authorities to conduct the count has remained. There are, however, several weaknesses with the reliability of the data. For example, across the country counting practices vary between local authorities, and the practice of carrying out the count on a single day ignores the rapidly fluctuating number and distribution of unauthorised encampments. Also, some authorities include Travelling Showpeople in the same figures as the Gypsies and Travellers but others do not.
- 3.3 Significantly, the count is only of caravans and so Gypsies and Travellers living in bricks and mortar accommodation are excluded. It should also be noted that pitches often contain more than one caravan, typically two or three.
- 3.4 However, despite concerns about accuracy, the count is valuable because it provides the only national source of information about numbers and distribution of Gypsy and Traveller caravans. As such, it is useful for identifying trends in the Gypsy and Traveller population, if not determining absolute numbers. Also, the surveys undertaken with Gypsy and Traveller households discussed in Chapter 5 based on a high response rate of 90% combined with in-depth analysis of survey responses mean that the results of the January 2017 Count could be verified.
- 3.5 The DCLG Count includes data concerning both Gypsies' and Travellers' sites. It distinguishes between caravans on socially rented authorised, private authorised, and unauthorised pitches. Unauthorised sites and pitches are broken down as to whether they are tolerated or not tolerated. The analysis in this chapter includes data from January 2015 to January 2017.

## Population of Gypsies and Travellers

- 3.6 The total Gypsy and Traveller population living in the UK is unknown, with estimates for England ranging from 90,000 and 120,000<sup>19</sup> (1994) to 300,000<sup>20</sup> (2006). There are uncertainties partly because of the number of different definitions that exist, but mainly because of an almost total lack of information about the numbers of Gypsies and Travellers now living in bricks and mortar accommodation. Estimates produced for the predecessor body to DCLG suggest that at least 50% of the overall Gypsy and Traveller population are now living in permanent housing<sup>21</sup>.
- 3.7 Local authorities in England provide a count of Gypsy and Traveller caravans in January and July each year for the DCLG. The January 2017 Count (the most recent figures available) indicated a total of 22,004 caravans. Applying an assumed three people per caravan<sup>22</sup> multiplier would give a population of over 66,000.
- 3.8 Again, applying an assumed multiplier of three people per caravan and doubling this to allow for the potential numbers of Gypsies and Travellers in housing,<sup>23</sup> gives a total population of around 128,000 for England. However, given the limitations of the data this figure can only be very approximate, and it may be a significant underestimate.
- 3.9 For the first time, the national Census, undertaken in 2011, included the category of 'Gypsy or Irish Traveller' in the question regarding ethnic identity. The 2011 Census suggests there were 463 Gypsies and Travellers living in the study area, representing around 0.08% of the usual resident population.<sup>24</sup>

Table 3.1 Gypsy and Traveller Population			
	Population (no.)	G&T Pop (no.)	G&T Pop (%)
Greater Norwich	392,629	354	0.09%
Great Yarmouth	98,172	63	0.06%
North Norfolk	102,867	46	0.04%
Total	593,668	463	0.08%

Source: NOMIS 2017

- 3.10 It is also possible to determine the Gypsy and Traveller population within the study area by tenure. Table 3.2 shows that the tenure of 191 Gypsies and Travellers representing around two-fifths of the study area population was recorded. It is assumed that the remaining three-fifths of Gypsies and Travellers were residing on sites at the time of the 2011 Census. The most common tenure is social rented housing occupied by over two-fifths (46%) of the

<sup>19</sup> J. P. Liegeois, (1994) *Romas, Gypsies and Travellers* Strasbourg: Council of Europe. This is equivalent to 0.15% to 0.21% of the total population.

<sup>20</sup> Commission for Racial Equality, *Common Ground Equality, good race relations and sites for Gypsies and Irish Travellers - Report of a CRE inquiry in England and Wales*, (Summary), May 2006, pages 3-4.

<sup>21</sup> Niner, Pat (2003), *Local Authority Gypsy/Traveller Sites in England*, ODPM.

<sup>22</sup> *Ibid.*

<sup>23</sup> *Ibid.*

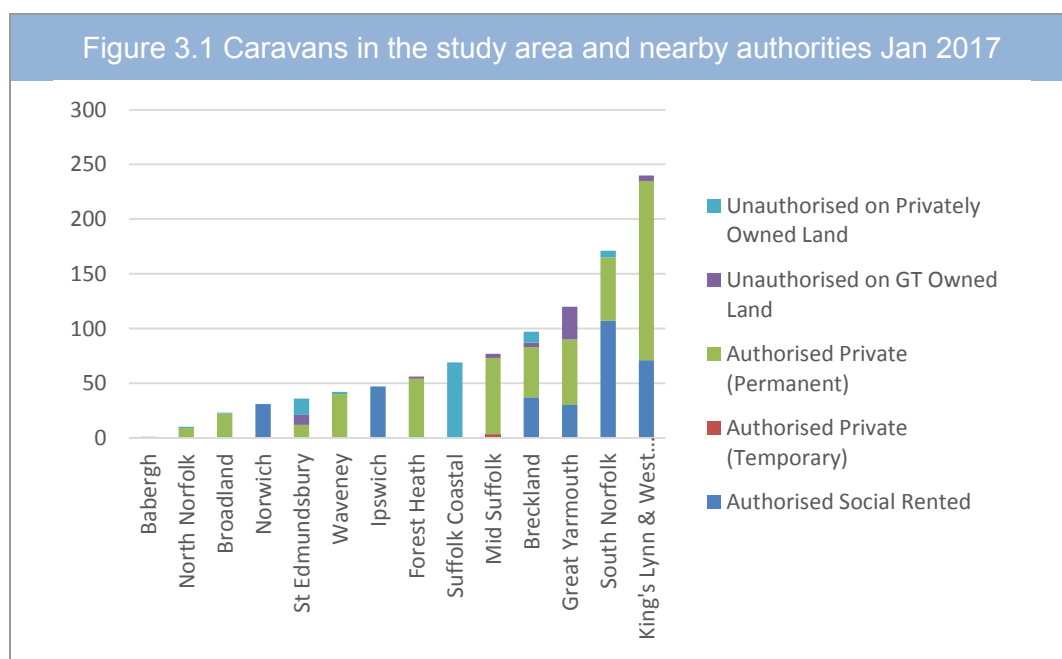
<sup>24</sup> See ONS 2011 Census Table KS201EW Ethnic Group located at: <http://www.ons.gov.uk/>

population, followed by two-fifths (40%) who own the housing they occupy, and around a seventh (15%) who rent privately.

	Social rented		Owned		Private rented		Total	
	No.	%	No.	%	No.	%	No.	%
Greater Norwich	71	48%	65	44%	13	9%	149	100%
Great Yarmouth	12	50%	8	33%	4	17%	24	100%
North Norfolk	4	22%	3	17%	11	61%	18	100%
Total	87	46%	76	40%	28	15%	191	100%

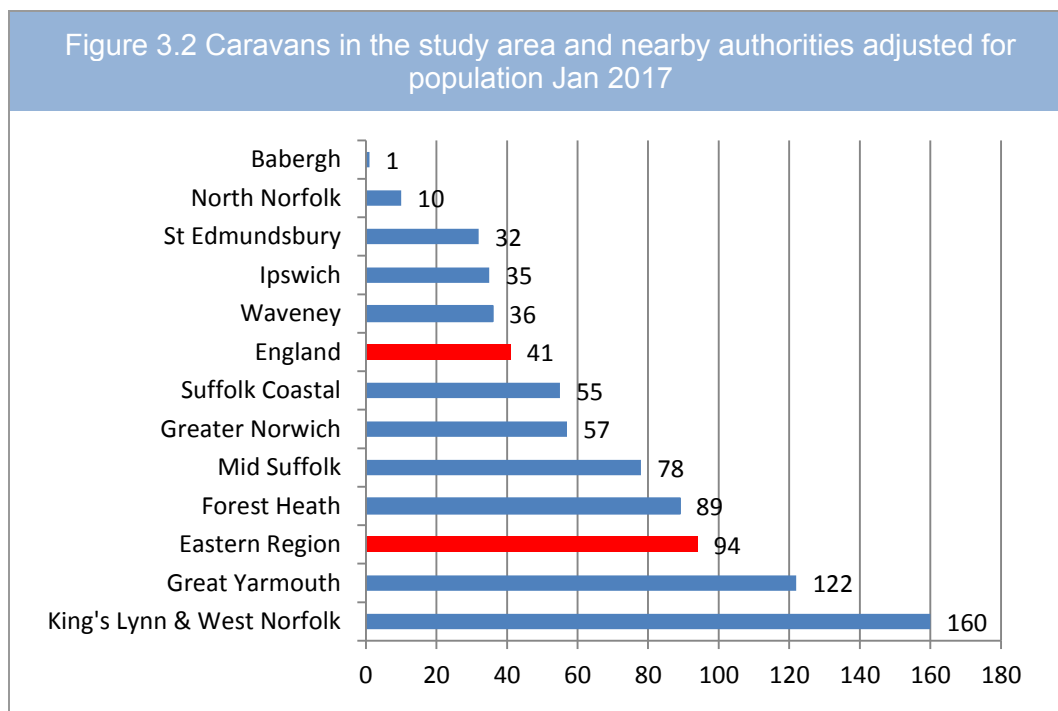
Source: NOMIS 2017

- 3.11 In order to consider the study area within the context of its locality, Figure 3.1 shows the study area's and neighbouring authority areas' most recent Traveller Caravan Count. The January 2017 Count shows a total of 10 caravans in North Norfolk, 120 caravans in Great Yarmouth, and 225 caravans in the Greater Norwich area.



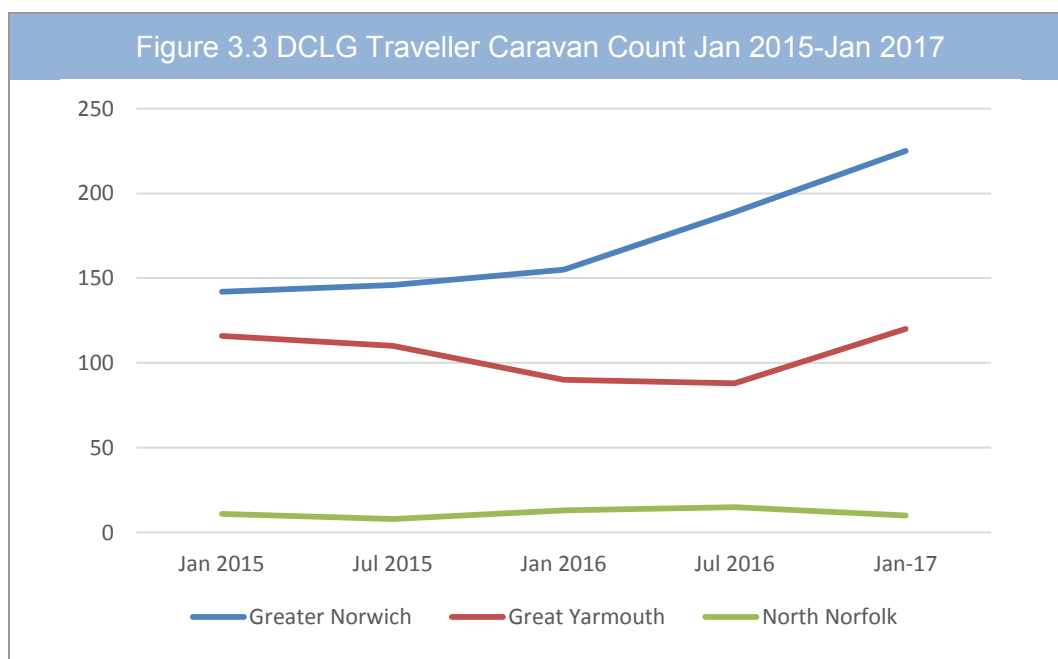
Source: DCLG Traveller Caravan Count, Jan 2017

- 3.12 Similarly, Figure 3.2 shows that when the population is taken into account the density of caravans varies widely. North Norfolk (10 caravans per 100,000 population) is very much below the regional average of 94 caravans per 100,000 population. Greater Norwich (57 caravans per 100,000 population) is also below the regional East of England average, whilst Greater Yarmouth (122 caravans per 100,000 population) is above it.



Source: DCLG Traveller Caravan Count, Jan 2017

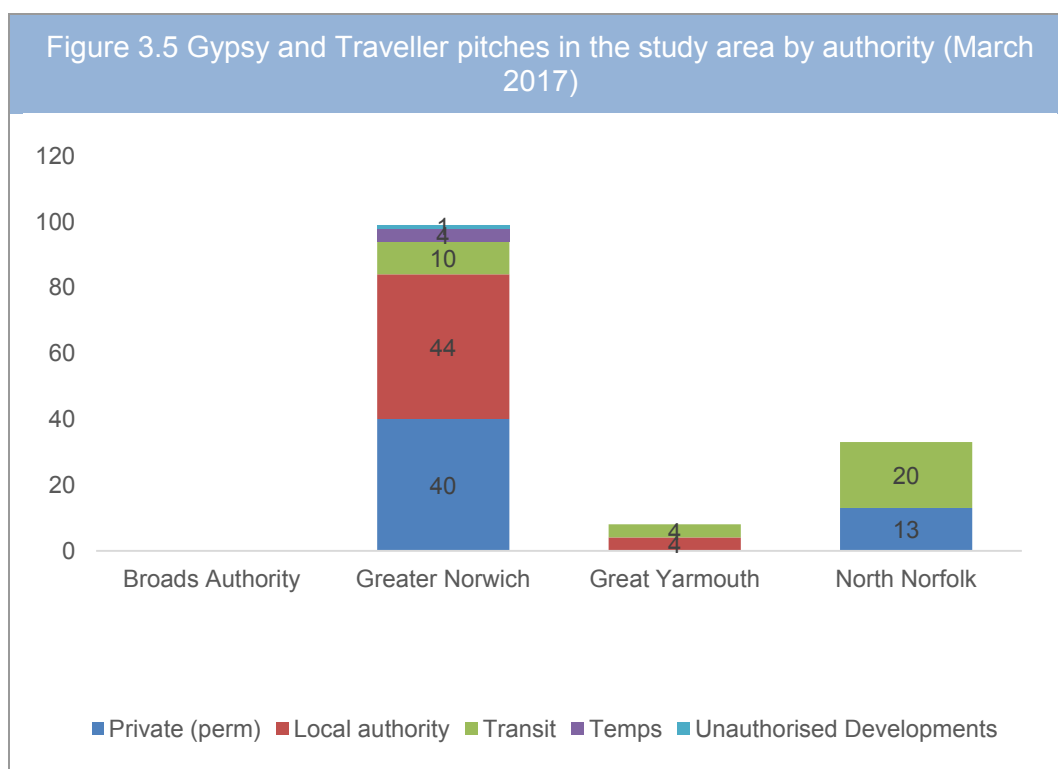
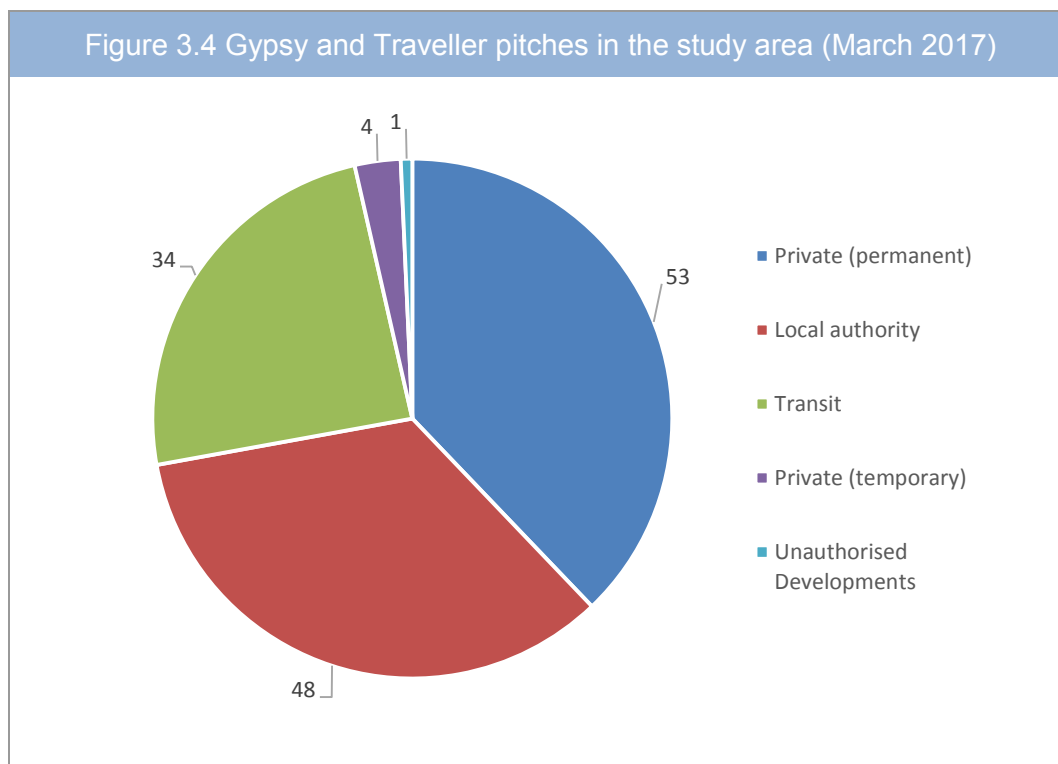
3.13 Figure 3.3 shows that the total number of caravans recorded has varied over the period January 2015 to January 2017. The total number of caravans recorded in the study area varied from a low of 258 in January 2016 to a high of 355 in January 2017. The number of caravans recorded by the last five Counts in North Norfolk ranged from a low of 8 in July 2015 to a high of 15 in July 2016. The number of caravans in Great Yarmouth ranged from a low of 88 in July 2016 to a high of 120 in January 2017. Finally, the number of caravans in the Greater Norwich area ranged from a low of 142 in January 2015 to a high of 225 in January 2017.



Source: DCLG Traveller Caravan Count, Jan 2017

### **Gypsy and Traveller pitches in the study area**

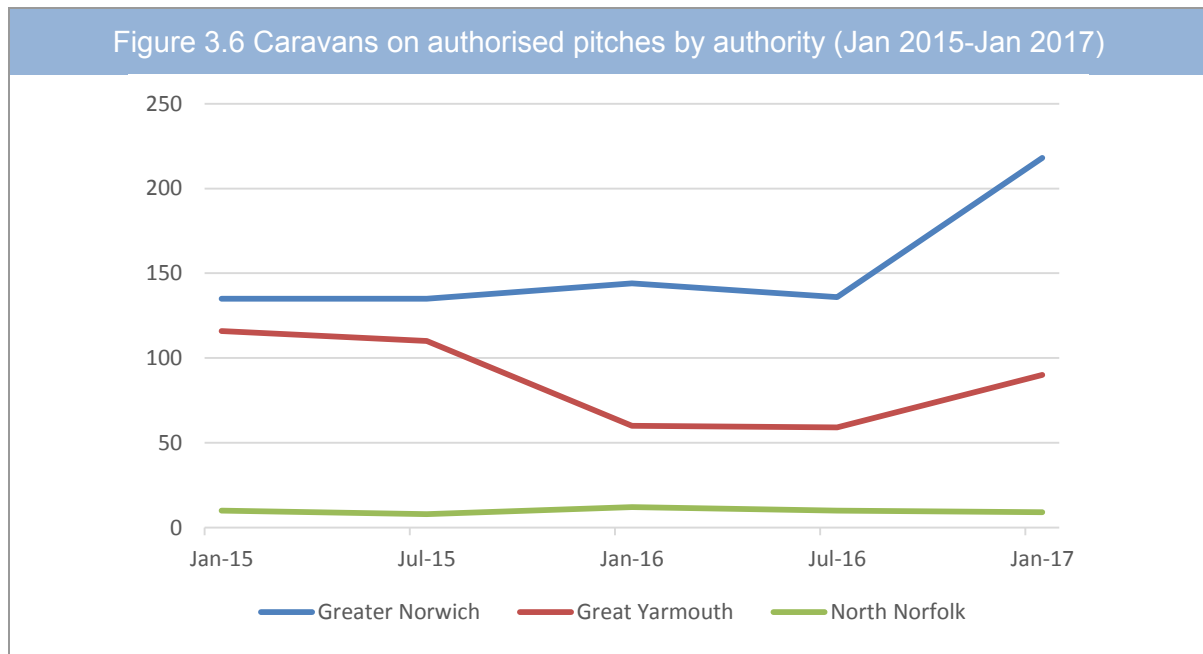
- 3.14 The following charts are based on data provided by each district in the study area. Figure 3.4 shows a total provision 53 privately owned pitches, 48 local authority pitches, 34 transit pitches, 4 pitches with temporary planning permission, and 1 unauthorised development. Figure 3.5 shows the provision of pitches, plots and moorings located in each study area local authority.
- 3.15 It is important to note that although Great Yarmouth contains 24 local authority pitches, at the time of the survey 4 pitches were occupied by Gypsies and Travellers, 2 pitches were vacant, 4 pitches were for transit use and 14 pitches were occupied by non-Gypsies and Travellers. If the vacant pitches and those occupied by non-Gypsies and Travellers were to become available to Gypsies and Travellers, the 2017 and 2022 base figures would be 24. From consultation with the new site managers, since the surveys, pitches are being reallocated to Gypsies and Travellers. The site is now occupied by 15 Irish Travellers and 9 non-Gypsies and Travellers.
- 3.16 The new site managers are in the process of changing the site including recombining pitches which had previously been divided into 2 pitches, and applying for planning permission to change the status of the transit pitches to permanent pitches. These changes should ensure that the site reverts to one of 24 Gypsy and Traveller pitches. The management team expect all 24 pitches on this site to become fully occupied by Irish Travellers within the first five-year period. It is also important to note that since the surveys were undertaken, the Irish Traveller households who were residing on a local authority site in Greater Norwich (which is managed by the same team who manages the Great Yarmouth site) have moved to the local authority site in Great Yarmouth. This has resulted in the Greater Norwich site now being occupied wholly by English Romany Gypsies.



### DCLG data on authorised Gypsy and Traveller sites

3.17 The Traveller Caravan Count data for the study area shows a slightly different composition, primarily because it is based on numbers of caravans rather than numbers of pitches. The most recently published Traveller caravan count took place in January 2017.

- 3.18 As seen in Figure 3.6 below, the number of caravans on authorised pitches recorded in the study area by the DCLG Traveller Count varied between the period January 2015 to January 2017. North Norfolk recorded a consistently low number of caravans on authorised sites ranging between 8 in July 2015 to 12 in January 2016. The number of caravans on authorised sites in Great Yarmouth varied, with a low of 60 in January 2016 and high of 116 in January 2015. The number of caravans recorded on authorised sites in the Greater Norwich area has remained fairly consistent ranging from 135 in January 2015 to 218 in January 2017.

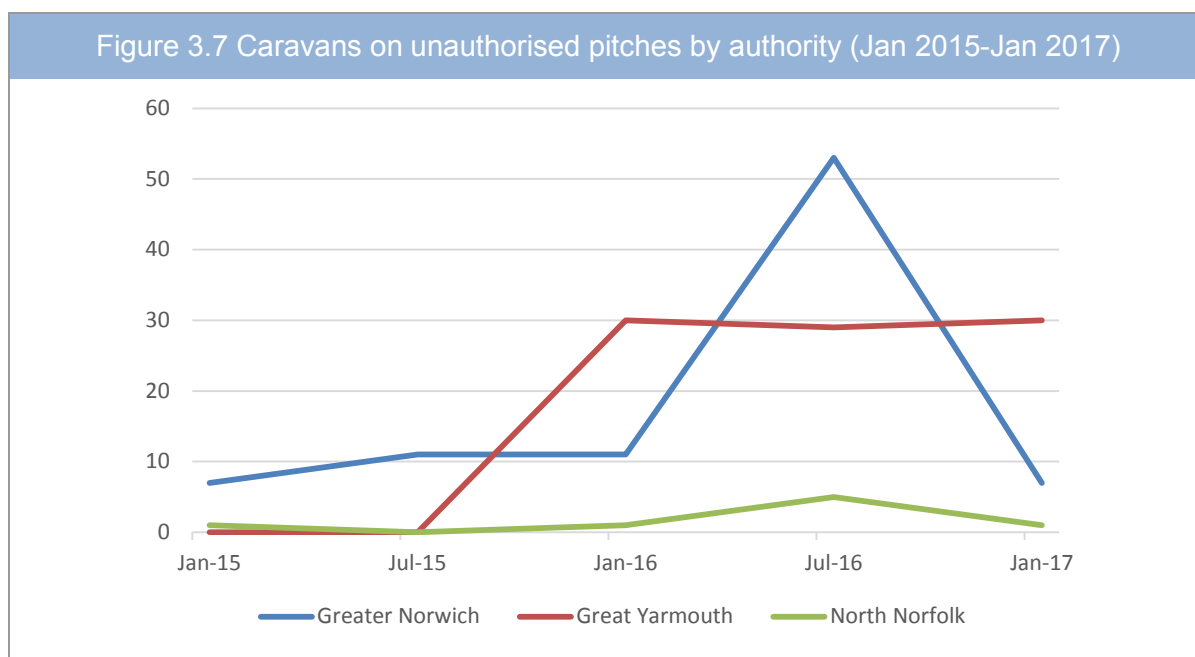


Source: DCLG Traveller Caravan Count, Jan 2017

### DCLG data on unauthorised Gypsy and Traveller sites

- 3.19 The DCLG count records the number of caravans situated on unauthorised sites (i.e. sites without planning permission) within the study area. The DCLG data on unauthorised encampments is of limited accuracy. For example, caravans on unauthorised sites may be more likely to be observed in more populated, urban areas compared with less populated rural areas. However, the data may indicate general trends (although it should be noted that the DCLG count records caravans on unauthorised sites, whilst the study area local authority data records the number of encampments). The numbers are broken down by district below and include unauthorised caravans on both Gypsy-owned and non-Gypsy land, and which are tolerated (meaning that no enforcement action is currently being taken) and not tolerated (Figure 3.6).
- 3.20 Figure 3.7 indicates the number of unauthorised caravans throughout the study area over the period January 2015 to January 2017. It shows that the number of unauthorised caravans recorded by the DCLG Traveller Count within the study area remained low in January 2015 and July 2015 but increased to 42 in January 2016 before peaking at 87 in July 2016 (including 29 in Great Yarmouth and 53 in the Greater Norwich area). According

to local authorities this is due to families temporarily visiting events – they departed within a few days. The number of unauthorised caravans has since reduced to 38 in January 2017.



Source: DCLG Traveller Caravan Count, Jan 2017

## Travelling Showpeople

- 3.21 Data is also available in the study area from planning data showing provision for Travelling Showpeople. In total, the study area contains 55 plots in the Greater Norwich area. Since 2014 the DCLG has collected data each January on the number of Travelling Showpeople caravans<sup>25</sup>. The January 2017 count shows a total of 68 caravans in the Greater Norwich area.
- 3.22 The cultural practice of Travelling Showpeople is to live on a plot in a yard in static caravans or mobile homes, along with smaller caravans used for travelling or inhabited by other family members (for example, adolescent children). Their equipment (including rides, kiosks and stalls) is usually kept on the same plot. It should consequently be borne in mind that the amount of land needed to live on is greater than for Gypsies and Travellers. For clarity, we refer to Travelling Showpeople ‘plots’ rather than ‘pitches’, and ‘yards’ rather than ‘sites’ to recognise the differences in design.

## Boat moorings

- 3.23 In comparison to Gypsies, Travellers and Travelling Showpeople, there is less data regarding the number of people living on boats within the study area. As such, it is difficult to determine the exact numbers of households permanently residing on boats although

<sup>25</sup> Data regarding Travelling Showpeople is published separately by the DCLG as ‘experimental statistics’.



through consultation with Broads Authority officers, Broads Authority Rangers, boat dwellers, and yard owners, estimates indicate that there could be up to 100 across the study area.

- 3.24 There are no known permanent moorings in the study area, apart from those located in the Broads Authority Executive Area. It was determined that there is one permanent authorised mooring and 10 temporary residential moorings in the Broads Authority area. The permanent mooring is on a yard and is occupied by the owner and his family. There is a second boat yard with 10 residential moorings with temporary planning permission until January 2021. There are also 974 24-hour moorings provided and managed by the Broads Authority.
- 3.25 Many of the people living on boats are single people or couples without children. Households permanently reside on boats within the study area for a wide range of reasons including wanting to live an “alternative” lifestyle or due to lack of access to affordable traditional housing, so there is unlikely to be any “ethnic”-type “need” for this type of accommodation.

## Residential caravans

- 3.26 Similar to boat moorings, in comparison to Gypsies, Travellers and Travelling Showpeople, there is less data regarding the number of residential caravans within the study area. As such, it is difficult to determine the exact numbers of households permanently residing in caravans.
- 3.27 From consultation with site owners and managers combined with local authority data it is estimated that there are 891 permanent authorised (857 plus 34 currently vacant) and 50 known unauthorised residential caravan pitches on sites within the study area.

## Summary

- 3.28 There are two major sources of data on Gypsy and Traveller numbers in the study area – the national DCLG Traveller Caravan Count, and other local authority data. The DCLG count has limitations in terms of accuracy and reliability. As such, it should only be used to determine general trends. However, the surveys undertaken with Gypsy and Traveller households discussed in Chapter 5 based on a high response rate of 90% combined with in-depth analysis of survey responses mean that the results of the January 2017 Count could be verified.
- 3.29 There is some variation in the number of caravans in each study area local authority. The January 2017 Count shows a total of 10 caravans in North Norfolk, and 120 caravans in Great Yarmouth, whilst 225 caravans were recorded in the Greater Norwich area.
- 3.30 When population is considered the density of caravans varies widely. North Norfolk (10 caravans per 100,000 population) is very much below the East of England regional average of 94 caravans per 100,000 population. Greater Norwich (57 caravans per 100,000 population) is also below the regional average, whilst Great Yarmouth (122 caravans per 100,000 population) is above it.

- 3.31 The data indicates a total provision of 55 Travelling Showpeople plots, 53 privately owned pitches, 48 local authority pitches, 34 transit pitches, 4 pitches with temporary planning permission, 1 unauthorised development, and 1 boat mooring.
- 3.32 The number of caravans on unauthorised sites throughout the study area recorded by the DCLG Traveller caravan count remained low in January 2015 and July 2015 but increased to 42 in January 2016 before peaking at 87 in July 2016 (including 29 in Great Yarmouth and 53 in the Greater Norwich area) before reducing to 38 in January 2017. It is known that some of the Greater Norwich numbers in July 2016 related to a temporary unauthorised encampment by visitors to the area attending an event, and they departed Greater Norwich a few days later.
- 3.33 There are no known permanent moorings located in the study area, apart from those that are located in the Broads Authority Executive Area. It was determined that there is one permanent authorised mooring and 10 temporary residential moorings in the Broads Authority area.
- 3.34 From consultation with site owners and managers combined with local authority data it is estimated that there are 891 permanent authorised (857 plus 34 currently vacant) and 50 known unauthorised residential caravan pitches on sites within the study area.

## 4. Stakeholder consultation

### Introduction

- 4.1 Consultations with a range of stakeholders within the study area and neighbouring local authorities (including King's Lynn and West Norfolk, Mid Suffolk, and Waveney) were conducted between January 2017 and April 2017 (including online survey, face to face and telephone discussions, and a focus group). Stakeholders included the police, planning officers, housing officers, education workers, enforcement officers, health workers, Gypsy and Traveller liaison officers, the Norfolk and Suffolk Gypsy Roma and Traveller Service officers, Showmen's Guild, and Broad Authority Rangers. Consultation with Gypsies and Travellers, Travelling Showpeople, and boat dwellers were consulted through the household surveys and not as part of the stakeholder consultation discussed in this chapter, but in the following chapters. The aim of the consultation was to obtain both an overall perspective on issues facing these groups, and an understanding of local issues that are specific to the study area.
- 4.2 Themes raised through the consultations included: the need for additional provisions and facilities, linked to Government and DCLG guidance (2016); travelling patterns, with particular reference to the August 2015 DCLG change to the planning definition of Gypsies and Travellers; the availability of land; accessing services; and work taking place to meet the needs of Gypsies and Travellers across local authorities in relation to the Localism Act 2011. This chapter presents brief summaries of the consultation and highlights the main points that were raised. Where relevant, the points raised are considered further in relation to the analysis in the concluding chapter.
- 4.3 It was discussed how the needs and demands of different groups (Gypsies and Travellers, Travelling Showpeople, boat dwellers, residential caravan dwellers and those households not meeting the new definition) need to be assessed separately.

### ***Gypsies and Travellers***

- 4.4 Since 2004 there has been official Government policy for local authorities to use in assessing the accommodation needs of Gypsies and Travellers. The Housing and Planning Act 2016 deletes sections 225 and 226 of the Housing Act 2004, which previously identified 'gypsies and travellers' as requiring specific assessment for their accommodation needs when carrying out reviews of housing needs. However, for planning purposes, the DCLG Planning Policy for Traveller Sites (August 2015) still requires local authorities to identify the accommodation needs of Gypsies, Travellers and Travelling Showpeople.
- 4.5 In response to national policy, stakeholders commented on how availability of land, the planning process and public and political perceptions were key barriers to meeting needs. Public perceptions of Gypsies and Travellers, through negative media coverage, and some negative experiences of unauthorised encampments have, according to some

stakeholders, added to the divisions between the settled community and Gypsies and Travellers, and in doing so added to the barrier to meeting the accommodation needs of Gypsies and Travellers.

- 4.6 Stakeholders spoke about the need for more pitches in local areas, the benefits of expanding some sites, and how families tend to want to stay together. It was also suggested that sites should not be too large due to the risks of conflict and tensions. In relation to the ideal size of pitches it was recognised that there is no one agreed size and that whilst on one level this is right as different people have different needs, this can lead to confusion as to gauging the level of provision and need.
- 4.7 A key issue is the growth of family units which is leading to overcrowding and demands for more permanent sites. Stakeholders commented on how accommodation need and demand are different but it can be difficult to differentiate the two. Gypsies and Travellers can have cultural and nomadic needs which influence the type of sites and accommodation provision required.
- 4.8 Some stakeholders suggested that it is preferable to have separate provision for Romany Gypsies and Irish Travellers. However, it was acknowledged that this meant that the accommodation needs of some families may not be met if their ethnic identity differed from families already occupying a particular site. One stakeholder suggested that the solution was to ensure that there was sufficient accommodation provision for all Gypsy and Traveller families. Through site management of two of the local authority sites in the study area, the Norfolk and Suffolk Gypsy Roma and Traveller Service are in the process of addressing this across the two sites.
- 4.9 It was noted that although Gypsies and Travellers primarily prefer small family sites, it can be quicker and cheaper for local authorities to provide larger sites. However, it was suggested that larger sites can be more difficult to maintain and can sometimes lead to community cohesion difficulties. Stakeholders commented on how sites of up to around 15-20 pitches are more likely to be manageable and anything larger could potentially lead to conflict.
- 4.10 Generally, it was thought that there tends to be less public opposition to the provision of new small sites compared with new larger ones. Issues that can arise on larger sites include potential for conflict between families, high turnover of pitches, and costs of repairs and maintenance. In the longer run, families moving away from a larger site due to conflict create need for accommodation elsewhere.
- 4.11 One suggested option is for councils to rent land to families rather than develop local authority run sites. Stakeholders regarded this as ensuring fair access to families in need. Also, in the long-term families could purchase land with councils' help, for example, the council renting them land which they can purchase later when they are financially able to

afford the land. A barrier to this option is the limited land the councils own. It was suggested that councils could perhaps help families purchase privately owned land by offering loans.

- 4.12 Stakeholders agreed it can be very difficult to measure or estimate the number of Gypsy and Traveller families residing in bricks and mortar accommodation. They spoke about limited awareness of Gypsy and Traveller families in housing and acknowledged that there are clear gaps in information. They spoke of how families living in bricks and mortar accommodation were likely to constitute 'hidden' demand or need.
- 4.13 It was acknowledged that whilst some families adapt well to living in bricks and mortar accommodation, some struggle. Families with children attending school may resort to hiding their identity to try to avoid bullying and harassment. It was noted that Gypsy and Traveller children living in bricks and mortar accommodation were more likely to attend secondary school compared to those living on sites.
- 4.14 Stakeholders commented on how some Gypsies and Traveller pitches are occupied by members of the settled community, including migrant workers. This can cause site management issues although it is important to understand that pitches can become the accommodation of 'last resort' for the most vulnerable households.
- 4.15 Stakeholders commented on the importance of having communal areas on sites. They provide agencies helping with health and educational needs with access to families on sites. There is a communal building on the Great Yarmouth site and some of the private owners of larger family sites are considering providing communal buildings. Due to financial cuts, local authorities and agencies are struggling to meet the needs of local communities. Having communal spaces helps lower the cost of providing services and helps access families. One stakeholder spoke about how some service providers are applying for funds to provide new communal buildings.
- 4.16 As part of Duty to Co-operate (Localism Act 2011), housing and planning officers from within the study area and neighbouring authorities commented on their respective travelling provision and travelling patterns, and impact on one another's authority. The impact and implications of the revised planning definition of Gypsy and Traveller were also discussed.
- 4.17 The need for the provision of new transit sites was discussed. It was stated that a lack of transit provision can lead to unauthorised encampments. Stakeholders noted that there are dedicated transit sites in Cromer, Fakenham, Thetford, Costessey (near Norwich) and on the local authority site in Great Yarmouth (at the time of the ANA). Some spoke of how transit sites are used by some families as an alternative to permanent provision due to being unable to obtain a site (either due to lack of sites or not being able to afford one).
- 4.18 Stakeholders discussed travelling patterns. It was agreed that it can be difficult to determine travelling routes although there was acknowledgment that these transcend local authority boundaries. Stakeholders commented on how in Suffolk unauthorised encampments are

primarily along the A140. This is also the case in in South Norfolk to some extent although unauthorised encampments are less likely to occur along the A140 north of Norwich. Travelling patterns in west Norfolk are focused around the Cambridge and Fenland areas, and do not usually extend east of Swaffham. One stakeholder stated that they tend to get a summer influx normally before and after the Feast of Assumption pilgrimage at Walsingham whilst other groups arrive sporadically for work. Another stated that families residing on the Splashes site in Breckland often travel to Great Yarmouth or Ireland.

- 4.19 Stakeholders noted that some unauthorised encampments consist of families travelling through the area to visit family and friends. However, moving families on from unauthorised encampments usually leads to them setting up another unauthorised encampment from which they are, again, likely to be moved on.
- 4.20 Stakeholders stated that Planning Policy for Travellers Sites (PPTS) (August 2015), which led to a revised definition of Gypsies, Travellers and Travelling Showpeople, could adversely impact on levels of unauthorised encampments. This is because some Gypsies and Travellers have begun to travel more regularly to 'prove' their status in relation to the new definition. One stakeholder stated: "It doesn't make sense. Those who want to be settled have to prove they are travelling. They say, 'How do I prove I'm travelling?'"
- 4.21 Stakeholders commented on how there will be some families who do not meet the revised definition of Gypsy and Travellers although they reside in caravans and have accommodation needs. It was suggested that previously, extending Gypsy and Traveller sites to accommodate adult children, was not an issue. However, the change in definition means that this is no longer straightforward.
- 4.22 Applying 'work criteria' to help determine the status of Gypsy and Traveller families was also regarded by stakeholders as problematic. It was acknowledged that not all families will necessarily need to travel for work and that the 'work criteria' is not mentioned by the August 2015 PPTS. Stakeholders also noted how the change in definition makes the relationship between Gypsy and Traveller families and local authorities more complex.
- 4.23 Stakeholders believed that the new definition may, depending on how guidance is interpreted, lead to lower estimates of accommodation need for Gypsies and Travellers. It was suggested that there needs to be consistency and agreement between neighbouring authorities as to how the new definition is interpreted. For example, the accommodation needs assessments undertaken by some local authorities only acknowledge (for planning purposes) Gypsies and Travellers who travel for work, whilst others accept that families may be Gypsies and Travellers whether they travel for work or not.
- 4.24 Stakeholders commented on how, for many, being a Gypsy and Traveller is being part of a cultural identity and not simply about travelling. This identity influences how they live, interact, their relationships, and how they communicate with one another. Its importance led

Gypsies and Travellers to campaign for their ethnic identity to be protected as a human right.

- 4.25 In accordance with the Duty to Co-operate (Localism Act 2011), stakeholders are currently working towards improving the partnership working between council departments and other agencies which deal with Gypsy and Traveller issues. This continues to be a 'work in progress' and there needs to be better information sharing. One stakeholder commented on how they work with officers in other authorities around the country to assess and monitoring local waiting lists. Also, waiting lists may include useful data such as names, contact details and current and past locations of the applicant – all of which can be monitored and compared. The stakeholder also commented on how regional officers are in the process of developing a regional register of Gypsy and Traveller sites and waiting lists.
- 4.26 Stakeholders spoke about how through the Norfolk and Suffolk Gypsy, Roma and Traveller Forum, local authorities and key stakeholders from authorities across the counties have developed a good cross-border working relationship. One stated that without it, local authorities would primarily only work with those authorities who share borders or are within the same county. Some stakeholders commented on how there is still a need for greater liaison and sharing of information between authorities and agencies. There is a need for better working between departments and agencies within local authorities, especially in relation to information sharing.

### ***Travelling Showpeople***

- 4.27 Stakeholders spoke of how Showpeople yards seem to have a lower profile and are less controversial compared to Gypsy and Traveller sites. One stakeholder stated that Showpeople tend not to be so visible. Generally, those that have yards to store vehicles and equipment either rent privately or own the land. Showpeople appear to be more accepted by the local community. It was suggested that this is because they are regarded as providing entertainment.
- 4.28 Since 2007 there has been guidance for local authorities to assess the accommodation needs of Travelling Showpeople. The most recent guidance (section 9 of PPTS 2015) states that local authorities should set pitch targets for Gypsies and Travellers, and plot targets for Travelling Showpeople. Also, section 10c states that local authorities should consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites. In response to this guidance, stakeholders commented on the need for more permanent plots for Showpeople and that transit sites are not necessary for Travelling Showpeople as they tend to stop on the land where the event is taking place, and then either move onto the next event, or go back to their own yard.
- 4.29 Stakeholders commented on how there is also unlikely to be much need, if any, from Travelling Showpeople living in houses needing residential yards. They are only likely to require storage facilities, if any. Travelling Showpeople living in housing will be doing so more out of choice than necessity and therefore, unlike Gypsies and Travellers, tend not to

experience psychological aversion to living in such accommodation and so this does not normally turn into a subsequent “need” for a pitch or plot.

- 4.30 Some stakeholders also commented on how Travelling Showpeople who are unable to afford their own pitches are usually supported by the Guild (if a member) and less likely to turn to the council for accommodation support.
- 4.31 Stakeholders commented on how existing yards are overcrowded and how families have already approached authorities about needing more plots. According to the Showmen’s Guild, they are in need of more permanent residential yards and their members are struggling to get land in the area. There are two family yards, one of which is known to be overcrowded and the family and extended family have been looking for land for a number of years. They have been looking within the authority and neighboring authorities (within Norfolk). Residents on the large Guild-managed yard and the Guild have also been looking for appropriate land. Stakeholders commented on how there needs to be more collaborative working between authorities and the Guild and the families to address this need and identification of land. Some stakeholders commented on how the type of space and accommodation needed is different for Showpeople to Gypsies and Travellers and that this needs to be taken into account when identifying land and in the planning process.

### **Boat dwellers**

- 4.32 Stakeholders commented on how the relationship between the settled community and boat dwellers appears to be largely harmonious. They commented on how people are often interested in living on boats, and that “the housed community often dream of living on a boat”. As one stakeholder explained, there is not really an issue between the two communities, as boat dwellers primarily derive from the settled community. Stakeholders commented on how most of those that they are aware are usually older people and/or single people unable to afford to live in housing. Some commented on how there are some vulnerable households, mainly couples or men on their own, and that some are there out of lack of choice but others are there through lifestyle choice.
- 4.33 The inclusion of boat dwellers in the assessment of need defined by the DCLG Draft Guidance on Housing Needs (Caravans and Houseboats) (March 2016) did not clearly state who, and which type of boat, is to be included. There was discussion in relation to a lack of clarity regarding the accommodation needs of people residing on house boats. Stakeholders commented that what constitutes a house boat has been left open to interpretation. Some authorities adopt the VAT definition of a house boat (i.e. a boat without means of propulsion), whilst other authorities adopt something closer to the Broads Authority definition which focuses on residential boat dwellers irrespective of the boat’s ability to move (see Chapter 1).
- 4.34 It was suggested that the Broads Authority definition, which includes vessels capable of navigation, should be adopted, as there are clearly both movable and non-moveable boats being used by boat dwellers as permanent accommodation across Norfolk.



- 4.35 Stakeholders commented on how this recent introduction of assessing the accommodation needs of people living on boats has highlighted that whilst they know that there are a large number of boat dwellers, they are unaware of the actual level of people living on boats in the area and therefore unable to estimate of the level of demand for permanent residential moorings. Some commented on how this is made harder by the fact that with the exception of one authorised mooring and ten temporary moorings, the rest are unauthorised.
- 4.36 Stakeholders commented on how, in relation to boat dwellers, permanent moorings are like permanent sites, and 24-hour moorings are like transit sites. They commented on how boat yards and some waterways have facilities available to people travelling along them. During the summer there is demand for the 24-hour moorings from tourists on boats as well as those permanently residing on boats in the area. Stakeholders were not aware of an outstanding need for transit provision in relation to boat dwellers, but did comment on a possible need for more residential moorings.
- 4.37 Some stakeholders suggested that boat yards are the best way to address any outstanding permanent need, as they will be able to offer the necessary amenities and facilities. One spoke of not understanding why boat yards with existing permission for keeping boats moored at their yards could not have some of those moorings for permanent residential moorings. He said that this would not impact on the river or on the local communities and would have minimum cost as most of the necessary infrastructure would already be in place. Another spoke of how this would simply mean a change of use in planning terms.
- 4.38 Stakeholders commented on how authorities need to work together to address the need of all individuals and suggested that needs should be shared. In relation to boat dwellers, stakeholders commented on how councils may border the Broads and other waterways, and as such, should work with the Broads Authority to provide moorings for permanent boat dwellers.

### ***Residential caravan dwellers***

- 4.39 The DCLG Draft Guidance on Housing Needs (Caravans and Houseboats) (March 2016) also requires the accommodation of residential caravan dwellers to be considered, and paragraph 124 of the Housing and Planning Act includes a duty for local housing authorities to “consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed...”. Stakeholders stated that residential caravan sites are regarded differently compared to Gypsy and Traveller sites. Attitudes may be influenced by whether the site is for holiday or residential use. Residential sites tend to be regarded by local people as just another type of housing. Some stakeholders stated that planning applications for residential caravan sites are treated in planning terms the same as any other residential application – it is just that they are a different type of accommodation.
- 4.40 It was suggested that similar to those living on boats, people living in caravans on park homes are usually older people and/or single people unable to afford to live in housing. Some commented on how there are some vulnerable households, mainly couples or men

on their own, living on residential sites. It was also commented on how policies such as the 'spare room subsidy' (or 'bedroom tax') benefit caps were factors leading to people turning to alternative forms of low-cost accommodation such as caravans and or boats. They also commented that new, modern-standard park homes (residential caravan sites) are less of an affordable tenure as they are expensive to buy. However, there is anecdotal evidence of some holiday accommodation being rented out all-year round.

- 4.41 Transit provision was not regarded as an issue for residential caravan dwellers as they either do not travel by caravan, or if they do, they use caravan holiday camps.
- 4.42 Stakeholders commented on how, whilst accommodation issues for Gypsies and Travellers, and Travelling Showpeople is about need, the desire for more residential caravan sites is more about demand. Some stakeholders commented on how this demand can be influenced by factors such as people not coping residing in housing, financial factors such as needing relatively low-cost accommodation, or changes in circumstances such as separation or divorce.

## Summary

- 4.43 The consultations with key stakeholders offered important insights into the main issues within the study area. In relation to Gypsies and Travellers it was generally acknowledged that there is a lack of accommodation provision in the study area. Much of the accommodation need is due to growing families on existing pitches leading to overcrowding. Stakeholders recognised that cultural identity and lifestyles of different groups such as Gypsies and Travellers may impact on the type of accommodation sought.
- 4.44 Stakeholders felt that the change in definition has the potential to lead to more unauthorised encampments. Despite the need for new permanent and transit sites and (potentially) moorings, there are a range of barriers to new provision including a lack of suitable land. In response, there needs to be a better understanding between the Gypsy and Traveller communities, and settled communities.
- 4.45 There needs to be agreement (as far as is practicable) as to how national policy is to be interpreted and applied. This is particularly important when guidance is being interpreted in different ways and there is no recent case law to help. Some stakeholders stated that Planning Inspectors' interpretations of guidance may differ and may therefore not be a reliable guide. The PPTS approach to accommodation needs is leading to confusion and divisions rather than greater clarity and collaboration and stakeholders stated that it takes time to build trust with the Gypsy and Traveller community:
- 4.46 Stakeholders are currently working towards improving partnership working between different departments and organisations, although there needs to be better information sharing. Some stakeholders suggested that authorities across Norfolk and Suffolk need to work more closely together as part of the Duty to Co-operate.

- 4.47 In relation to Travelling Showpeople, stakeholders commented on how there is unlikely to be much need, if any, from Travelling Showpeople living in houses needing residential yards. They are only likely to require storage facilities if any. Travelling Showpeople living in housing will be doing so more out of choice than necessity and therefore, unlike Gypsies and Travellers, tend not to experience psychological aversion and subsequent need for a pitch. However, stakeholders stated that they are aware of some overcrowding on yards.
- 4.48 In relation to boat dwellers, stakeholders commented on how most of those that they are aware of are usually older people and/or single people unable to afford to live in housing. Some commented on how there are some vulnerable households, mainly couples or men on their own. And that some are there out of lack of choice and others are there through lifestyle choice. It was suggested that the Broads Authority definition, which includes vessels capable of navigation should be adopted, as there are clearly both movable and non-moveable boats being used by boat dwellers as permanent accommodation across Norfolk
- 4.49 In relation to residential caravan dwellers, it was suggested that similar to those living on boats, people living in caravans on park homes are usually older people and/or single people unable to afford to live in housing. Some commented on how there are some vulnerable households, mainly couples or men on their own, living on residential sites. Stakeholders commented on how, whilst accommodation issues for Gypsies and Travellers, and Travelling Showpeople is about need, the desire for more residential caravan sites is more about demand.
- 4.50 Finally, it was accepted by stakeholders that the accommodation needs of Gypsies, Travellers, and Travelling Showpeople usually reflects 'need', whilst the needs of many families residing in caravans and boats is more likely to reflect 'demand'. However, stakeholders agreed that it is important to objectively assess such accommodation demand or need (i.e. this ANA), and then decide how best to meet the needs/demands through their new Local Plans.

## 5. Gypsies and Travellers living on sites

### Introduction

5.1 This chapter provides a snapshot of the supply of existing pitches and an analysis of need for current and future pitches across the study area. In doing so, it examines the key findings derived from the consultation with Gypsy and Traveller families. It is based on a survey of 98 households<sup>26</sup> living on sites in the study area:

- 91 out of potential 104 authorised pitches with full planning permission
- 4 on transit pitches
- 1 out of potential 1 authorised pitch with temporary permission
- 1 out of potential 1 pitch recognised as an unauthorised development
- 1 unauthorised encampment

5.2 The surveys were undertaken between February 2017 and April 2017. This provided the consultants with good access to households living on pitches in the area, as families are less likely to be travelling (at least for 'social' reasons) at this time of year. This includes those on authorised pitches and unauthorised encampments and developments. Those on unauthorised encampments at this time of year are most likely in the area due to having need rather than travelling to or visiting the area.

5.3 After identifying the number and location of existing pitches, each pitch was visited. Households were consulted on key issues regarding their needs. The combination of site visits and the surveys helped to clarify the status of pitches, which pitches are occupied or not occupied by Gypsies and Travellers, which pitches are vacant or occupied, overcrowded pitches, pitches occupied by household members with a need for separate accommodation (current and future need), and other needs issues.

5.4 Weighting was applied to the survey in order to ensure that it represented the whole population. This was calculated by comparing the number of occupied authorised pitches to the number of completed surveys. For example, there are 87 occupied, authorised permanent pitches in the Greater Norwich area. 76 of the 87 pitches were represented in the consultation, representing 87.4% of the population. Weighting is applied using the following formula:

- 84 occupied authorised permanent pitches in the Greater Norwich area  
Divided by:

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<sup>26</sup> The definition of 'household' is used flexibly. The survey assumes that a pitch is occupied by a single household although it acknowledges that this may also include e.g. extended family members or hidden households.

- 76 surveys undertaken with families residing on authorised permanent pitches = weighting of 1.105

5.5 The weighting is only applied to authorised pitches and was applied to each local authority area as shown in Table 5.1 below:

Table 5.1 Sample weighting				
	Pitches	Sample	%	Weight
Great Yarmouth	4	3	75.0%	1.333
Greater Norwich	84	76	87.4%	1.105
North Norfolk	13	12	92.3%	1.083

Source: ANA 2017

5.6 It is important to note that although Great Yarmouth contains 24 local authority pitches, at the time of the survey only 4 pitches were occupied by Gypsies and Travellers, 2 pitches were vacant, 4 pitches were for transit use and 14 pitches were occupied by non-Gypsies and Travellers. If the vacant pitches and those occupied by non-Gypsies and Travellers were to become available to Gypsies and Travellers, the 2017 and 2022 base figures would be 24. From consultation with the new site managers, since the surveys were undertaken, pitches are being reallocated to Gypsies and Travellers.

## Population Characteristics

- 5.7 The survey recorded 342 people self-identifying as Gypsies and Travellers (in accordance with ethnic identity as given full protection under the Equality Act 2010) living on authorised and unauthorised developments and encampments. Interestingly, this compares with figures derived from the 2011 Census which suggests there are 463 Gypsies and Travellers living in the study area<sup>27</sup>. However, whilst the Census figures are likely to reflect a larger proportion of Gypsies and Travellers living in bricks and mortar accommodation, they perhaps may not record all those living on sites. The average size of families living on the survey sites is 3.1 people compared to a 2011 UK average of 2.4 people per household.
- 5.8 There was a fairly even distribution of respondent household sizes, although over two-fifths (42%) contained only 1 or 2 people. However, over a fifth (21%) of households contained 5 or more people. The households represented by the survey contained high proportions of younger people, with over two-fifths (43%) of all respondent household members aged 19 or under. This compares with the 2011 Census findings which suggests that around a quarter (24%) of the population of England is aged 19 or under. Around a tenth (9%) of respondent household members were aged 61 years or over. In terms of the gender composition of household members, there are slightly more females (54%) than males

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See ONS 2011 Census Table KS201EW Ethnic Group located at: <http://www.ons.gov.uk/>

(46%). Importantly, almost four-fifths (79%) of respondents described themselves as Romany Gypsies, with around a seventh (15%) describing themselves as New Travellers, and a small proportion (5%) describing themselves as Irish Travellers. It is important to note that New Travellers do not enjoy the same “protected” status under the Equalities Act as English Romany Gypsies and Irish Travellers, but they may still ‘count’ as Gypsies and Travellers under PPTS.

## Residency characteristics

- 5.9 Respondents were asked about the tenure of their current pitch. Almost all respondents either occupy a private pitch owned by the occupant or family/friend (including some privately rented by family/friend) (50%), or local authority owned pitch rent from the local authority (45%). Far fewer respondents were residing on a transit site (2%), staying with friends or family (2%), residing on an unauthorised development (1%), or residing on an unauthorised encampment (1%). Almost all (97%) of respondents were currently residing in their main home. The remaining 3% were residing on transit sites or an unauthorised encampment.
- 5.10 Reflecting longevity of tenure, almost four-fifths of respondents (78%) had lived on site for more than five years. Just two respondents (2%) had lived on site for 1-3 months; these were all located on transit sites or an unauthorised encampment. Four respondents (4%) had lived on site for between 4-6 months, eight (8%) for between 1-2 years, and 10 (9%) for between 3-5 years.
- 5.11 The desire of families to remaining on existing sites is reflected in the fact that over two-thirds (69%) stated that they did not intend to move in the future. Only one respondent (1%) intended to stay for 4-6 months, three (3%) for 7-12 months, and six (5%) for 3-5 years. However, almost a fifth (19%) of respondents stated that they did not know when they intended to move.
- 5.12 Over a third of respondent households (37%) had, at some point in their lives, lived in a house or flat. However, there were differences between ethnic groups with all (100%) of New Travellers having previously lived in a house or flat, compared with just over a third (35%) of English Romany Gypsies, and over a quarter (29%) of Irish Travellers. The single most significant reasons for living in a house or flat were ‘to try it’ (71%), ‘to live with family’ (24%), or ‘for the children’ (5%). Nine-tenths (90%) of respondent households who had previously lived in a house or flat moved onto a site because it ‘did not work’. Smaller proportions moved out when the children left school (5%), because they could not settle (2%), or due to divorce (2%). Very few (1%) respondent households stated they would consider residing in a house or flat, but around a seventh (14%) did not know.

### **Site characteristics**

- 5.13 Satisfaction rates with sites varied. Over half (52%) of all respondents stated that they were satisfied with sites compared to nearly half (47%) who were neither satisfied nor dissatisfied. No respondents were dissatisfied (the one respondent who stated 'not applicable' was residing on an unauthorised encampment). Almost two-thirds (64%) of respondents considered the location of their site to be either 'very good' (8%) or 'good' (56%). In contrast, over a third of respondents (35%) rated their site location as 'neither good nor bad'.
- 5.14 Households residing on private sites were more likely to be satisfied with the site and its location compared with households residing on local authority sites. Households residing on small family sites were most likely to be satisfied. Households residing on local authority sites were particularly concerned about the location of sites. This included households residing on the local authority site in Norwich whose access is through a refuse collection depot. The Norwich households were also concerned about the poor condition of pitches and utility blocks.
- 5.15 Almost all (97%) of households stated that they felt safe residing on their site. A significant majority of respondents (81%) stated that they had sufficient space and it was safe for children to play on the site. Over half (55%) of respondents have their own amenity block whilst just over a third (36%) access amenities located in a static caravan. Smaller proportions of households access amenities in a mobile caravan/trailer (6%), shed/outbuilding (2%), or a chalet (1%).
- 5.16 In terms of spatial provision, almost all (97%) households stated that they had space for all of the following: a large trailer, drying space for clothes, a lockable shed, and/or space for keeping animals. The exceptions were over two-fifths who do not have space for work equipment (43%) or parking spaces (41%), and over a fifth (23%) who stated that they do not have space for touring caravan.
- 5.17 Some households stated that they had need for new facilities on site such as bigger or better utility blocks (17%) or more space. Over four-fifths (84%) of households stated that their pitch is marked by a fence, hedge or wall. Few (9%) stated it has markings on the ground, or is not marked (5%). The cost of pitches is not an issue for any households. This is because most households either own the pitch they occupy or receive benefits to help pay for pitch rents.

### **Services and health**

- 5.18 All respondents (100%) felt that they had experienced some form of discrimination due to their cultural identity. Similarly, over four-fifths (84%) of respondents stated that they had considered it necessary, on occasion, to hide their ethnic identity in order to access services. Some stated that it was 'part of life for us'. However, few households stating that

they had experienced discrimination reported it to the relevant authorities. The main reasons for not reporting it included wanting to ignore it, or believing that reporting incidences to authorities would be ineffective. The kinds of discrimination experienced included: being refused work by employers; being bullied and experiencing verbal harassment; services refusing to deliver goods or services to sites; taxis refusing to drop off or collect people from sites; and Gypsies and Travellers being refused service in shops, restaurants, or pubs.

- 5.19 In relation to accessing health services, all families were registered with a local doctor. Over half (54%) of families stated that they contain no one with health issues. However, health issues reported by the remaining households included: problems due to old age (24%), mental illness (12%), asthma (7%), long-term illness (7%), physical disability (5%), learning disability (2%), and sensory impairment (2%). Compared with the settled community, the health status of Gypsies and Travellers tends to be poorer than the general population<sup>28</sup>. Only one family stated that health treatments had been disrupted due to being moved on or evicted. This is because they have found ways to access services whilst on the road so that their health would not adversely be affected (including using drop in centres and getting back to their own doctors as and when necessary).

## Education and employment

- 5.20 The survey asked how many households included school age children and whether children attended school and/or were home tutored. In total, 57 (51%) families contain school-age children. Three-fifths (60%) of families containing school-age children have children who attend school and almost a fifth (19%) of 57 families with school-age children receive home tutoring. The remaining children have left school and were working with family members. The main reason for children not attending school included because the parents prefer to teach them at home (42%), due to a bad experience of education (25%), due to a lack of a permanent address (17%), due to bullying (8%), or another reason (8%) (the child's father had recently died).
- 5.21 Nonetheless, education was regarded by households as very important. Some respondents commented on how it was important for children and grandchildren to receive an education as they did not have the same opportunity. Some families with pre-school children recognised the importance of early education and planned to send children to a nursery once old enough.
- 5.22 Respondents commented on how traditional employment opportunities for Gypsies and Travellers are now less available and this is why education is becoming more important. Although Gypsy and Traveller children have not traditionally done so, more families are

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<sup>28</sup> Cemlyn, Sarah, Greenfields, Margaret, Burnett, Sally, Matthews, Zoe and Whitwell, Chris (2009) *Inequalities Experienced by Gypsy and Traveller Communities: A Review*, Equality and Human Rights Commission, London.



ensuring that children gain qualifications either by attending secondary school or college or undertaking home tutoring. Some families spoke of how well their children were doing in terms of education.

- 5.23 The employment status of respondents varied although over two-fifths (41%) described themselves as self-employed (including scrap metal work, landscaping, builders, joiners, etc). Over a fifth (23%) of respondents described themselves as retired. Smaller proportions of respondents described themselves as housewives (16%), unemployed (14%), employed part-time (5%), or employed full-time (1%). The employment status of respondent partners also varied with over two fifths (42%) self-employed, housewives (40%), retired (12%), employed part-time (5%), or 'other' (2%).

## Travelling

- 5.24 Almost three-quarters (73%) of households stated that they had travelled during the last 12 months in a caravan or trailer. In terms of main travelling routes, respondent households were likely to state 'anywhere' or 'all over' rather than state specific routes. Households were most likely to travel during the summer (100%) compared with spring (88%), autumn (41%), and winter (36%). The main reasons for travelling included to visit family or friends, to attend events, for cultural reasons, to holiday, for work, and due to no choice (i.e. they do not have a permanent home). Importantly, in relation to determining the needs figures, three-fifths (60%) stated that someone in the household travels and stops in a caravan for work purposes (the needs figures in Appendix 1 are based on households who do and do not travel (and stopping in a caravan) for work). Almost all (97%) households get to keep their main pitch when they travel (the exception being the families residing on unauthorised encampments). Around a sixth (17%) of households had been moved on from any location in the past year.
- 5.25 The survey asked whether the families intend to stop travelling in a caravan for work in the future. Over nine-tenths (92%) stated that they did not intend to stop travelling for work in the future and the remainder (8%) did not know. Similarly, the survey asked whether the families intend to generally stop travelling in a caravan in the future. Over two-thirds (77%) stated that they did not intend to stop travelling in a caravan; almost a fifth (18%) stated that they had already stopped; and a small proportion (5%) did not know. The most significant reason for stopping travelling included due to health or support needs (50%), age/too old (44%), and for educational reasons (6%).
- 5.26 In accordance with the revised PPTS definition (August 2015), for planning purposes the accommodation needs of families who have permanently ceased travelling cannot be considered as part of an assessment of need for Gypsy and Traveller pitches. Families who have permanently stopped travelling have done so due to health and support issues. As none of the respondents and families who have permanently stopped travelling are requiring alternative accommodation or have any hidden or future need, their status does not impact on the needs calculations.

- 5.27 When asked about travelling routes, most households stated that 'it varies'. They commented on how it depends upon where they are going and the reason for their journey. Families also spoke about how they sometimes made arrangements to stay with family or friends living on sites in other areas. However, even if allowed, sites tend to limit both the number and length of time caravans can temporarily stay. Also, a lack of transit accommodation across the study area means that they sometimes have to use unauthorised roadside encampments when visiting events or travelling long distances.

### **Current accommodation supply**

- 5.28 Perhaps unsurprisingly, almost all (96%) of households stated that there is need for more Gypsy and Traveller pitches in the local area, ideally small private owner-occupier family sites. Households stated that larger sites lead to conflicts and are harder to manage and maintain. They commented on how small family sites mean that they not only know who is on the site, but that they are related to the other occupants. They also spoke of how, within planning constraints, families are able to set out small family sites how they want and maintain them and not rely on others to get repairs or changes made.
- 5.29 Almost a third (63%) of households stated that there is insufficient transit provision in the local area. Some respondents stated it would be helpful if there was somewhere visiting families could stay. Over two-fifths (45%) of households stated that they had previously contained someone who had moved away due to lack of pitches. Few family members moved within the local authority area (16%) or a neighbouring local authority area (20%) compared to elsewhere (64%). In all (100%) instances, the respondents stated that the family member would be likely to move back if pitches were available.
- 5.30 Households were asked if they would like to develop a site, and over two-fifths (42%) stated that they would. However, of those households who stated they would like to develop a site, few (9%) stated that they are financially able to do so. A third (33%) stated that there is sufficient space for their current site to accommodate more pitches of varying sizes.

### **Accommodation need**

- 5.31 According to survey responses, only a small proportion (6, or 5%) households need/want to move to a different home within the next 5 years. Respondents cited a range of reasons as to why they primarily need to move, including because they are currently living on the roadside (50%), because they need a permanent site (33%), and because they want to reside with family (17%). All (100%) stated that they would prefer to remain in the local area. Around a sixth (17%) of households needing/wanting to move stated that they are on a waiting list for bricks-and-mortar housing. This is primarily not out of choice, but they need further help due to health needs of a family member, and perceive living in a house as a means of gaining better access to support.

## Future need

5.32 The survey asked if households contained any people who may require separate accommodation within the next 5 years (i.e. children turning 16/18). This question helps to determine the extent of future accommodation needs deriving from existing households. 16 (14%) families contained a total of 25 children who require separate accommodation in the next five years. Just over a tenth (12%) stated they require separate accommodation now, just over a tenth (12%) within a year, over two-fifths (44%) within 1-2 years, and almost a third (32%) within 3-5 years. Over a third (36%) of people requiring separate accommodation stated that they would prefer to stay with their family, just under a third (32%) would prefer to reside on a separate site, 1 (4%) in a house, whilst 7 (28%) did not know. Some families spoke about how their accommodation need could be addressed by increasing the number of caravans allowed on existing pitches or by granting planning permission for new or extended pitches/sites. All (100%) would prefer to remain in the local area. Only 1 person (4%) requiring separate accommodation is currently on a housing waiting list.

### Gypsies and Travellers in Bricks-and-Mortar Accommodation

5.33 A combination of evidence derived from the 2011 Census and local knowledge indicates that there are Gypsies and Travellers residing in bricks-and-mortar accommodation. *RRR Consultancy* attempted to determine the potential numbers of such households through consultation with stakeholders and Gypsies and Travellers living on sites, and council and support services data. This led to an estimated 1-to-1 ratio of Gypsies and Traveller households residing in bricks and mortar accommodation to the number of authorised pitches i.e. 101 households residing in bricks and mortar accommodation within the study area.

5.34 However, the consultants were able to access only 10 households (around 10% of the total number) living in bricks and mortar accommodation across the study area. The 10 households only represent a small proportion of the estimated total number of households residing in bricks and mortar accommodation. As such, the results of the consultation undertaken with them are only used to provide insight rather than determine accommodation needs. The accommodation needs of Gypsy and Traveller households discussed in Chapter 6 are based on an estimated 101 households residing in bricks and mortar accommodation within the study area.

5.35 From consultation with stakeholders and with the 10 Gypsy and Traveller households residing in bricks and mortar accommodation, it is apparent that there are differences between those who reside in housing with land and those who reside in properties without land. The latter include smaller and more restrictive properties such as flats, terraced houses, and council housing. Importantly, households may experience restrictions such as a lack of space to accommodate caravans owned by the family or by visiting family and friends. Households occupying properties with space for caravans were more likely to be settled compared to those without. Households choosing to reside in housing were more

likely to be satisfied compared with those residing in housing due to a lack of choice or in response to health or education needs.

- 5.36 One surveyed household residing in bricks and mortar accommodation has a site on land adjoining the house which is used by family and friends. Another surveyed household residing in a house wants to apply for planning permission for a similar site. Both of these households are satisfied living in bricks and mortar accommodation. They spoke of how it is culturally important for them to reside close to family and friends. Due to having sufficient space they are able to accommodate family and friends with caravans. Having sufficient space means that they can also spend time in their own caravans. They also have space to accommodate animals such as horses.
- 5.37 Two surveyed households live close to family who reside on a nearby site. One resident stated that she is satisfied residing in a house. She stated that residing in a house is an alternative if households are unable to afford the substantial outlay required to develop a site or buy a large caravan. The second household residing in a house close to family travel regularly in order to maintain a 'traditional' Gypsy and Traveller lifestyle.
- 5.38 A fifth Gypsy and Traveller household residing in bricks and mortar accommodation used to reside on a site but now resides in a house. They have resided in a house for over 10 years are satisfied with doing so. They stopped travelling in a caravan as it was becoming harder to do so. They are employed locally in professional jobs and their children have gained university qualifications. They often see their family but are more likely to stay in a hotel rather than on site when they visit.
- 5.39 A sixth surveyed Gypsy and Traveller household residing in bricks and mortar accommodation was temporarily residing with family on site but usually reside in a house. They visit their family's site regularly but prefer to reside in a house. She stated that residing in a house enables better access to services and is more comfortable than residing on a site.
- 5.40 Two households commented on how they had never lived on a site, but still follow the Gypsy or Traveller traditional way of life and visit family as much as possible. One respondent stated that her parents had lived in a caravan when they were young, but once they married and had children they moved into a house. The other family are satisfied residing in a house and their children experience a combination of both traditional Gypsy and settled community cultural lifestyles.
- 5.41 One household stated that they are struggling. They only reside in bricks and mortar accommodation due to there being no alternative. The respondent travels for work in a caravan when he can and spends as much time as he can visiting and staying with family who reside on sites within the study area.

- 5.42 Another household is satisfied residing in a house as they see it as aiding their children's education. According to the respondent, the family find it difficult to reside in bricks and mortar accommodation but alleviate any negative issues by travelling as much as possible. They stated that residing in a house is better for their children's education as it minimises discrimination. They stated that living on a site means that: "you only have to give your address and people treat you differently – living in a house often means that people never know that you are a Gypsy".
- 5.43 It is apparent from the above that some Gypsy and Traveller households reside in bricks and mortar accommodation due to a lack of choice. However, there are Gypsy and Traveller households who prefer to reside in bricks-and-mortar accommodation. This may be, for example, because they have children attending a local school, are residing close to a GP surgery, are residing close to work places, or have good access to local services. Even households who display some symptoms of "psychological aversion" to residing in bricks-and-mortar accommodation may consider the benefits of residing in a house to outweigh the harms.
- 5.44 According to the households surveyed most bricks-and-mortar dwellers are likely to be content with their accommodation. Even if they had a preference to move to a pitch on an authorised site, the circumstances under which they would actually make such a move might depend substantially on the location and type of the site. Someone ideally seeking a small family-sized site in, say, Town A in North Norfolk would probably be unlikely to accept a pitch on a large public site in, say, Town B in South Norfolk.
- 5.45 Chapter 6 on Gypsy and Traveller accommodation need assumes that around 50% of all self-identifying Gypsy and Traveller households in the study area are likely to be residing in bricks-and-mortar accommodation. It is estimated that around 10% of these households are likely to be "psychologically averse" to residing in bricks-and-mortar accommodation.

## Summary

- 5.46 This chapter has provided both quantitative and qualitative data regarding key characteristics of respondent households residing on Gypsy and Traveller sites. The majority of respondents described themselves as Romany Gypsies. Reflecting national trends, it is apparent that respondent Gypsy and Traveller households tend to be larger and have a younger age composition compared with families in the settled community. At the time of the survey (February 2017 to April 2017), only one family was residing on an unauthorised development whilst one was residing on an unauthorised encampment.
- 5.47 Importantly, the survey suggested longevity of tenure with most of the families having lived on site for more than five years, and most not intending to move in the future. These findings therefore emphasise the residential longevity of Gypsies and Travellers living in the study area. Interestingly, over a third of respondent households had previously lived in a house or flat, although New Travellers were much more likely to have done so compared with Romany Gypsies or Irish Travellers. Satisfaction rates with sites and site locations

varied, with households residing on local authority on local authority sites generally less satisfied, but not necessarily dissatisfied, with their sites. Those on local authority sites commented on concerns about the quality and provision on pitches and sites. All households also stated that cost of pitches is not an issue.

- 5.48 In relation to accessing health services, all families were registered with a local doctor and none had been refused access to a GP. Around a sixth of respondent households stated that they experience mental health issues. Only one family stated that health treatments had been disrupted due to being moved on or evicted due to finding ways to access services whilst on the road. Only three-fifths of children of school age attend school although around a fifth receive home tutoring. The importance of education is increasing partly due to changing work patterns i.e. there are fewer opportunities for Gypsies and Travellers employed in 'traditional' roles such as seasonal, agricultural work. Respondent households were most likely to be self-employed although a relatively high proportion of households contained retired people or housewives.
- 5.49 Almost three-quarters of respondents stated that they had travelled during the last 12 months in a caravan or trailer. Unsurprisingly, households were more likely to travel during the summer and spring months compared to autumn or winter. The main reasons for travelling included: to visit family or friends; to attend events; for cultural reasons; to holiday; for work; and due to no choice (i.e. not having a "home" site). Importantly, in relation to determining the needs figures, over two-fifths stated that someone in the household travels for work purposes.
- 5.50 Perhaps unsurprisingly, most households stated that there are too few permanent Gypsy and Traveller pitches in the local areas, although fewer stated that there is a need for more transit pitches. This has led to some households stating that family members have moved away due to a lack of pitches. Importantly, in relation to the assessment of accommodation needs, around two-fifths of households stated that they would like to develop a site, although very few stated that they are financially able to do so. However, around a third stated that their current site had space to be expanded to accommodate more pitches. In relation to accommodation need, only six households stated that they are likely to move within the next five years, whilst 16 households contain members who require separate accommodation, with most wanting to remain close to or nearby family. This reflects the cultural desire of most Gypsies and Travellers to stay close to their family.
- 5.51 From the evidence presented, the main issues concern the size of sites, a relative lack of transit provision, and the need for more sites. According to respondents, small family sites appear to work well, avoiding conflict that can arise on larger sites containing different family groups. The main issues reported were related to obtaining planning permission and to preconceptions by the settled community about such applications. They spoke of how they feel safer on smaller sites, and how they are easier to manage and maintain. They also commented on how smaller sites tend to be more accepted by the local settled community and lead to better integration.

5.52 A combination of evidence derived from the 2011 Census and local knowledge indicates that there are around 100 Gypsy and Traveller households residing in bricks and mortar accommodation within the study area. However, the consultants were able to access only 10 households (around 10% of the total number) across the study area representing only a small proportion. As such, the results of the surveys undertaken with them are only used to provide insight rather than determine accommodation needs. It is apparent that whilst some Gypsy and Traveller households reside in bricks and mortar accommodation due to lack of choice, some do so due to education, health or lifestyle choices. It is estimated that around 10% of all Gypsy and Traveller households residing in bricks and mortar accommodation within the study area display symptoms of “psychological aversion”.

## 6. Gypsy and Traveller accommodation need

### Introduction

- 6.1 This chapter presents the detailed technical calculation of the Gypsy and Traveller needs assessment. The model used is based on the example given in the DCLG 2007 Guidance<sup>29</sup>. General comments on the findings are contained in Chapter 5.
- 6.2 The chapter contains the following sections:
- Requirements for residential pitches 2017-2022: summary
  - Requirement for residential pitches 2017-2022: steps of the calculation
  - Requirements for transit pitches /negotiated stopping arrangements: 2017-2036
  - Requirements for residential pitches 2022-2036
- 6.3 It should be noted that the first five-year period is determined by survey responses, whilst future 5-year periods are determined by projections based on data collected through the surveys.

### Requirement for residential pitches 2017-2022: summary<sup>30</sup>

- 6.4 The need for residential pitches in the study area is assessed according to a 15-step process, based on the model suggested in DCLG (2007) guidance and supplemented by data derived from the survey. Please note that the following accommodation needs calculations contain needs figures based on families who have *not permanently ceased to travel* (see Table 6.1: Option 1), and alternative figures which only *include families who travel for work* (see Table 6.1: Option 2) for the whole study area. The detailed assessments for each authority are located in Appendix 1.
- 6.5 Table 6.1 shows accommodation needs figures based on families who have *not permanently ceased to travel*. It shows a need of 19 pitches for the period 2017-2022 (including all need arising from families residing in bricks and mortar accommodation but displaying “psychological aversion”), or 13 pitches (need arising from “psychological aversion” met over 19 years). Table 6.2 shows accommodation needs figures based on families who only *travel for work*. It shows a need of 1 pitch for the period 2017-2022 (including all need arising from families residing in bricks and mortar accommodation but

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<sup>29</sup> Department for Communities and Local Government (DCLG), *Gypsy and Traveller Accommodation Needs Assessments*, October 2007 pp.24-25.

<sup>30</sup> Please note that due to rounding column totals may differ slightly from row totals



displaying “psychological aversion”), or -4 pitches (need arising from “psychological aversion” met over 19 years).

Table 6.1 (Option 1): Estimate of the need for permanent residential pitches 2017-2022 (based on households who have not ceased to travel permanently)	
1) Current occupied permanent residential site pitches	101
<i>Current residential supply</i>	
2) Number of unused residential pitches available	4
3) Number of existing pitches expected to become vacant through mortality 2017-2022	3
4) Net number of family units on sites expected to leave the study area in next 5 years	0
5) Number of family units on sites expected to move into housing in next 5 years	0
6) Residential pitches planned to be built or to be brought back into use 2017-2022	22
7) Less pitches with temporary planning permission	4
Total Supply	25
<i>Current residential need: Pitches</i>	
8) Family units (on pitches) seeking residential pitches in the area, 2017-2022, excluding those counted as moving due to overcrowding in step 11	2
9) Family units on transit pitches requiring residential pitches in the area	4
10) Family units on unauthorised encampments requiring residential pitches in the area	0
11) Family units on unauthorised developments requiring residential pitches in the area	1
12) Family units currently overcrowded on pitches seeking residential pitches in the area, excluding those containing an emerging family unit in step 8	6
13) Net new family units expected to arrive from elsewhere	0
14) New family formations expected to arise from within existing family units on sites	21
Total Need	34
<i>Current residential need: Housing</i>	
15) Estimated family units in housing but with a psychological aversion to housed accommodation	10 (4)
Total Need	44 (38)
<i>Balance of Need and Supply</i>	
Total Additional Pitch Requirement	19 (13)
Annualised Additional Pitch Requirement	4 (2)

Source: ANA 2017

(NB The figures in brackets are the accommodation needs and 2022 base figures including households who display psychological aversion, but with the need addressed over 19 years, rather than within the first 5 years).

Table 6.2 (Option 2): Estimate of the need for permanent residential pitches 2017-2022 (based on those who only travel for work purposes)	
1) Current occupied permanent residential site pitches	101
<i>Current residential supply</i>	
2) Number of unused residential pitches available	4
3) Number of existing pitches expected to become vacant through mortality 2017-2022	3
4) Net number of family units on sites expected to leave the study area in next 5 years	0
5) Number of family units on sites expected to move into housing in next 5 years	0
6) Residential pitches planned to be built or to be brought back into use 2017-2022	22
7) Less pitches with temporary planning permission	4
Total Supply	25
<i>Current residential need: Pitches</i>	
8) Family units (on pitches) seeking residential pitches in the area, 2017-2022, excluding those counted as moving due to overcrowding in step 11	0
9) Family units on transit pitches requiring residential pitches in the area	2
10) Family units on unauthorised encampments requiring residential pitches in the area	0
11) Family units on unauthorised developments requiring residential pitches in the area	1
12) Family units currently overcrowded on pitches seeking residential pitches in the area, excluding those containing an emerging family unit in step 8	3
13) Net new family units expected to arrive from elsewhere	0
14) New family formations expected to arise from within existing family units on sites	12
Total Need	18
<i>Current residential need: Housing</i>	
15) Estimated family units in housing but with a psychological aversion to housed accommodation,	6 (3)
Total Need	24 (21)
<i>Balance of Need and Supply</i>	
Total Additional Pitch Requirement	-1 (-4)
Annualised Additional Pitch Requirement	0 (0)

Source: ANA 2017

(NB The figures in brackets are the accommodation needs and 2022 base figures including households who display psychological aversion, but with the need addressed over 19 years, rather than within the first 5 years).

### Requirement for residential pitches, 2017-2022: steps of the calculation

6.6 The calculations depend on base information derived from the ANA using data corroborated by local authorities in the study area. The key variables used to inform the calculations include:

- The estimated number of Gypsies and Travellers housed in bricks and mortar accommodation
- The number of existing Gypsy and Traveller pitches
- The number of families residing on unauthorised encampments requiring accommodation (and surveyed during the survey period)
- The number of unauthorised developments (during the survey period)
- The number of temporary pitches
- The number of vacant pitches
- The number of planned or potential new pitches
- The number of transit pitches

6.7 The remainder of this chapter describes both the process and results of the Gypsy and Traveller accommodation needs calculations.

### **Supply of pitches 2017-2022**

6.8 Supply (steps 1 to 7) steps are the same for both Options 1 and 2, irrespective of the interpretation of the PPTS (2015) definition.

#### **Step 1: Current occupied permanent site pitches**

6.9 Based on information provided by the respective Councils and corroborated by information from site surveys. There are currently 101 occupied authorised Gypsy and Traveller pitches in the study area.

#### **Step 2: Number of unused residential pitches available**

6.10 According to the survey data there are currently four vacant pitches on authorised sites in the study area.

#### **Step 3: Number of existing pitches expected to become vacant, 2017-2022**

6.11 This is calculated using mortality rates as applied in conventional Housing Needs Assessments. However, the figures for mortality have been increased in accordance with studies of Gypsy and Traveller communities suggesting a life expectancy approximately 10 years lower than that of the general population.<sup>31</sup>

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<sup>31</sup> E.g. L. Crout, *Traveller health care project: Facilitating access to the NHS*, Walsall Health Authority, 1987. NB: For Travelling Showpeople, the standard mortality rate is used.

**Step 4: Number of family units in site accommodation expressing a desire to leave the study area**

- 6.12 This was determined by survey data. It was assumed, given that development of sites is likely to occur in the areas surrounding the study areas as well as in the planning area itself, that those currently living on sites expecting to leave the area permanently in the next five years – out of choice (step 4) or due to overcrowding (step 12) – would generally be able to do so.
- 6.13 In total, given the low level of interest in leaving the study area, this resulted in the supply of 0 pitches in the study area.

**Step 5: Number of family units in site accommodation expressing a desire to live in housing**

- 6.14 This was determined by survey data. It was assumed that all those currently living on sites planning to move into housing in the next five years (step 5), or preferring to move into housing from an overcrowded pitch (step 11), would be able to do so. This excluded those planning to move due to site management issues, since it was assumed that these could be resolved in response to the findings of this study.
- 6.15 A supply of 0 pitches in the study area were expected from this source, excluding those moving out of the study area, since these are already counted in step 4.

**Step 6: Residential pitches planned to be built or brought back into use, 2017-2022**

- 6.16 This is determined by local authority data. There are 22 new pitches in the study area that are expected to be built or brought back into use in the study area during the period 2017-2022, mostly in Great Yarmouth (see para 3.15 above).

**Step 7: Pitches with temporary planning permission**

- 6.17 This is determined by local authority data. It is assumed families living on pitches whose planning permission expires within the period 2017-2022 will still require accommodation within the study area. There are currently four pitches with temporary planning permission located in the study area.

**Need for pitches 2017-2022**

- 6.18 Steps 8 to 15 which measure accommodation need vary according to whether they exclude households who have *permanently ceased to travel* (Option 1), or include households who *only travel for work* (Option 2).

**Step 8: Family units on pitches seeking residential pitches in the study area 2017-2022**

- 6.19 This was determined by survey data. These family units reported that they 'needed or were likely' to move to a different home in the next five years, and wanted to stay on an authorised site, or that they were currently seeking accommodation.

6.20 This category of need overlaps with those moving due to overcrowding, counted in step 11, and so any family units which are both overcrowded and seeking accommodation are deducted from this total. This generates a total need of:

- Option 1: 2 pitches
- Option 2: 0 pitches

**Step 9: Family units on transit pitches seeking residential pitches in the study area 2017-2022**

6.21 This was determined by survey data. These family units reported that they required permanent pitches within the study area in the next five years. This generates a total need of:

- Option 1: 4 pitches
- Option 2: 2 pitches

**Step 10: Family units on unauthorised encampments seeking residential pitches in the area**

6.22 Guidance (DCLG 2007) indicates that it should be considered whether alternative accommodation is required for families living on unauthorised encampments. Using survey data, it has been calculated how many families on unauthorised encampments want residential pitches in the study area. There were no unauthorised encampments in the area at the time of the surveys. Please note that only Gypsies and Travellers requiring permanent accommodation within the study area have been included in this calculation – transiting Gypsies and Travellers are included in separate calculations. This step generates a need of:

- Option 1: 0 pitches
- Option 2: 0 pitches

**Step 11: Family units on unauthorised developments seeking residential pitches in the area**

6.23 This was determined by survey data. The guidance also indicates that the accommodation needs of families living on unauthorised developments for which planning permission is not expected must be considered. Regularising families living on their land without planning permission would reduce the overall level of need by the number of pitches given planning permission. There is a need for one pitch deriving from an unauthorised development in the Greater Norwich area.

- Option 1: 1 pitches
- Option 2: 1 pitches

**Step 12: Family units on overcrowded pitches seeking residential pitches in the area**

6.24 This was determined by survey data. Households which also contain a newly formed family unit that has not yet left are excluded. This is because it is assumed that once the extra family unit leaves (included in the need figures in step 13) their accommodation will no

longer be overcrowded. Need generated in this step can be addressed over the plan period, either through new pitches or met by larger existing pitches (subject to planning permission). The calculations suggest that there is a need for:

- Option 1: 6 pitches
- Option 2: 3 pitches

**Step 13: New family units expected to arrive from elsewhere**

6.25 In the absence of any sustainable data derivable from primary or secondary sources (beyond anecdotal evidence) on the moving intentions of those outside the study area moving into the area, as in the case of those moving out of the area, it is assumed that the inflow of Gypsies and Travellers into the area will be equivalent to the outflow. In addition, inflow equivalent to the outflow of newly forming family units must be considered. Together, these amount to a net inflow of 0 units into the study area:

- Option 1: 0 pitches
- Option 2: 0 pitches

**Step 14: New family formations expected to arise from within existing family units on sites**

6.26 This was determined by survey data. The number of individuals needing to leave pitches to create new family units was estimated from survey data. Allowing for those planning to leave the area, and for estimated rates of marriages to both Gypsies and Travellers and non-Gypsies and Travellers, it is estimated that this will result in the formation of the following level of households requiring residential pitches during the 2017-2022 period in the study area:

- Option 1: 21 pitches
- Option 2: 12 pitches

**Step 15: Family units in housing with a psychological aversion to housed accommodation**

6.27 This was determined firstly by estimating the number of houses occupied by Gypsies and Travellers using a ratio of 1:1 i.e. for every authorised pitch, there is potentially one family residing in bricks and mortar accommodation. This is then followed by estimating the proportion of which suffer from psychological aversion to housed accommodation (10%).

6.28 This need arises from family units moving onto sites that were considered to have a psychological aversion to housing. An alternative accommodation need figure which excludes need arising from households residing in bricks and mortar accommodation displaying “psychological aversion” has also been provided (see Tables 6.3, 6.4, 6.6, 6.7 and 6.8). Option 2 also provides need calculation estimation of those experiencing “psychological aversion” and only travelling for work purposes in a caravan (based on proportion of those on sites). It is for the planning authorities to decide which accommodation need figure they will adopt. The figures in brackets are the accommodation

needs if addressed over 20 years, rather than within the first 5 years. This step leads to an estimated need of:

- Option 1: 10 pitches (4 pitches if need is met over 20 years)
- Option 2: 6 pitches (3 pitches if need is met over 20 years)

### ***Balance of Need and Supply***

6.29 From the above the total additional pitch requirement is calculated by deducting additional supply from additional need.

#### **Option 1:**

- Total supply (not including existing occupied provision): 25 pitches
- Total need (including need arising from psychological aversion): 44 pitches
- Total additional pitch requirement: 44 – 25 = 19 pitches

#### **Option 2:**

- Total supply (not including existing occupied provision): 25 pitches
- Total need (including need arising from psychological aversion): 24 pitches
- Total additional pitch requirement: 24 – 25 = -1 pitch

### ***2022 Pitch base figure***

6.30 The Gypsy and Traveller pitch base figure for 2022 is calculated by adding the number of potential pitches expected to be developed and the calculated accommodation need for the period 2017-2022 to the 2017 pitch base figures (see Tables 6.3 and 6.4 below):

Table 6.3 (Option 1): Base figures for pitches as at 2022 assuming all need is met for 2017-2022				
	2017 Base	Potentials 2017-22	Need 2017-22	2022 Base
Broads Authority	0	0	0 (0)	0 (0)
Great Yarmouth*	4	0	2 (1)	6 (5)
Greater Norwich	84	21	15 (9)	120 (114)
North Norfolk	13	1	2 (2)	16 (16)
<b>Total</b>	<b>101</b>	<b>22</b>	<b>19 (12)</b>	<b>142 (135)</b>

Source: ANA 2017

\*As previously discussed, it is important to note that although Great Yarmouth contains 24 local authority pitches, at the time of the survey 4 pitches were occupied by Gypsies and Travellers, 2 pitches were vacant, 4 pitches were for transit use and 14 pitches were occupied by non-Gypsies and Travellers. By 2022 it is assumed that the 24 pitches will be occupied by Gypsies and Travellers in Great Yarmouth, making the total base for 2022 increase by 20 to 162 (155).

NB The figures in brackets are the accommodation needs and 2022 base figures including households who display psychological aversion, but with the need addressed over 19 years, rather than within the first 5 years.

Table 6.4 (Option 2): Base figures for pitches as at 2022 assuming all need is met for 2017-2022

	2017 Base	Potentials 2017-22	Need 2017-22	2022 Base
Broads Authority	0	0	0 (0)	0 (0)
Great Yarmouth*	4	0	-1 (-1)	3 (3)
Greater Norwich	84	21	-2 (-4)	103 (101)
North Norfolk	13	1	2 (2)	16 (16)
<b>Total</b>	<b>101</b>	<b>22</b>	<b>-1 (-3)</b>	<b>122 (120)</b>

Source: ANA 2017

\*As previously discussed, it is important to note that although Great Yarmouth contains 24 local authority pitches, at the time of the survey 4 pitches were occupied by Gypsies and Travellers, 2 pitches were vacant, 4 pitches were for transit use and 14 pitches were occupied by non-Gypsies and Travellers. By 2022 it is assumed that the 24 pitches will be occupied by Gypsies and Travellers in Great Yarmouth, making the total base for 2022 increase by 20 to 142 (140).

NB The figures in brackets are the accommodation needs and 2022 base figures including households who display psychological aversion, but with the need addressed over 19 years, rather than within the first 5 years.

### Requirement for residential pitches 2022-2036

6.31 By 2022 it is assumed that vacant pitches are occupied and potential pitches have been developed. Also, it is assumed that families displaying psychological aversion to residing in bricks-and-mortar accommodation will move onto sites within the first 5-year period. As such, only natural population increase, mortality, and movement into and out of the study area are considered for the period 2022-2036. The base figures regarding the number of pitches on sites at the end of the first 5-year period are shown in Tables 6.3 and 6.4 above. Please note that the 2017 base figures include both authorised occupied and vacant pitches, whilst the 2022 base figures assume that any potential pitches have been developed.

6.32 The needs calculations for the periods 2022-2027, 2027-2032 and 2032-2036 are based on the following steps:

#### **Supply of pitches 2022-2027**

##### **Step 1: Estimated pitches occupied by Gypsies and Travellers.**

6.33 The Gypsy and Traveller pitch base figure for 2022 is calculated by adding the number of potential pitches expected to be developed and the calculated accommodation need for the period 2017-2022 to the 2017 pitch base figures.

##### **Step 2: Pitches expected to become vacant due to mortality**

6.34 This is an estimate of the number of pitches expected to become vacant due to mortality during the calculation period.

##### **Step 3: Number of family units on pitches expected to move out of the study area**

6.35 This is based on households expected to move out of the study area.



### **Need for additional pitches 2022-2027**

#### **Step 4: Family units moving into the study area**

6.36 This is based on 100% of outflow (step 3)

#### **Step 5: Newly forming family units.**

6.37 In March 2014 Brandon Lewis (then Parliamentary Under Secretary of State within the Department for Communities and Local Government) confirmed that the 3% household growth rate does not represent national planning policy. Alternatively, it is suggested that an annual household growth rate of 1.5% to 2.5% is more appropriate<sup>32</sup>.

6.38 In relation to this accommodation assessment, analysis of the current population indicates that an annual household growth rate of 2.7% per annum equating to a 5-year rate of 14.2% is more appropriate. This is based on an analysis of various factors derived from the surveys including current population numbers, the average number of children per household, and marriage rates. It is assumed that these rates are likely to continue during the period 2022-2036.

#### **Balance of Need and Supply and Annualised Need**

6.39 As with the first five years calculation period, the need is then balanced against the supply, which results in the total need after the supply has been subtracted from the need. Also, the annualised need is then calculated, based on the total need divided by the number of years in the given needs calculation period.

#### **Summary of Need**

6.40 Table 6.5 shows an example of accommodation need for the period 2022-2027 based on Option 1 figures (the figure in brackets shows the base pitch figure for 2022 excluding need deriving from families displaying psychological aversion):

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<sup>32</sup> Professor Philip Brown, Sustainable Housing & Urban Studies Unit (SHUSU), University of Salford, *Advice for Warwick District Council on household formation relating to Gypsy and Traveller pitches*, October 2015.

Table 6.5 Estimate of the need for permanent residential site pitches 2022-2027	
<i>Pitches as at 2022</i>	
1) Estimated pitches occupied by Gypsies and Travellers	142 (140)*
<i>Supply of pitches</i>	
2) Pitches expected to become vacant due to mortality 2022-2027	4
3) Number of family units on pitches expected to move out of the study area 2021-2026	0
Total Supply	4
<i>Need for pitches</i>	
4) Family units moving into the study area (100% of outflow)	0
5) Newly forming family units	21
Total Need	21
<i>Additional Need</i>	
Total additional pitch requirement, 2022-2027	17
Annualised additional pitch requirement	3

Source: ANA 2017

\*As previously discussed, by 2022 it is assumed that the 24 pitches in Great Yarmouth will be occupied by Gypsies and Travellers, making the total base for 2022 increase by 20 to 162 (152).

6.41 The following two tables summaries the needs for each of the authorities within the study area for each calculation period:

Table 6.6 (Option 1): Summary of Gypsy and Traveller and pitch needs 2017-36					
Period	2017-2022	2022-27	2027-2032	2032-2036	Total
Broads Authority	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
Great Yarmouth	2 (2)	1 (1)	1 (1)	1 (1)	5 (5)
Greater Norwich	15 (9)	14 (16)	15 (17)	16 (18)	60 (60)
North Norfolk	2 (2)	2 (2)	2 (2)	2 (2)	8 (8)
<b>Total</b>	<b>19 (13)</b>	<b>17 (19)</b>	<b>18 (20)</b>	<b>19 (21)</b>	<b>73 (73)</b>

Source: ANA 2017

(NB the figures in brackets are the accommodation needs and 2022 base figures including households who display psychological aversion, but with the need addressed over 19 years, rather than within the first 5 years).

Table 6.7 (Option 2): Summary of Gypsy and Traveller and pitch needs 2017-36					
Period	2017-2022	2022-27	2027-2032	2032-2036	Total
Broads Authority	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
Great Yarmouth	-1 (-1)	1 (1)	1 (1)	1 (1)	2 (2)
Greater Norwich	-2 (-5)	11 (12)	11 (12)	11 (12)	31 (31)
North Norfolk	2 (2)	2 (2)	2 (2)	2 (2)	8 (8)
<b>Total</b>	<b>-1 (-4)</b>	<b>14 (15)</b>	<b>14 (15)</b>	<b>14 (15)</b>	<b>41 (41)</b>

Source: ANA 2017

(NB the figures in brackets are the accommodation needs and 2022 base figures including households who display psychological aversion, but with the need addressed over 19 years, rather than within the first 5 years).

## Requirements for transit /negotiated stopping arrangements: 2017-2036

6.42 As noted in previous chapters, when families do stop in the area, they usually only do so for short periods of time. Additional transit provision should reduce the number of unauthorised

encampments and associated negative publicity. Due to an absence of a negotiated agreement policy or transit sites, costly issues relating to unauthorised encampments are not being resolved. This results in insecurity for the Gypsy and Traveller families, costs to local authorities and other agencies such as the courts and police, and impacts on local communities.

- 6.43 In relation to transit provision, it is recommended that all study area authorities should continue to implement a negotiated stopping places policy which is known to all relevant departments and agencies. The term ‘negotiated stopping’ is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent ‘built’ transit sites but negotiated arrangements which allow caravans to be sited on suitable ground for an agreed and limited period, with the provision of limited services such as water, waste disposal and toilets. The specific terms of the agreement are negotiated between the authority and temporary residents.

## Summary

- 6.44 Table 6.8 summarises the number of additional Gypsy and Traveller residential pitches required for the period 2017-2036. It shows the needs based on families who have *not permanently ceased to travel* (Option 1), and alternative figures which only *include families who travel for work* (Option 2) for the whole study area. The tables below also consider needs figures which both include and exclude accommodation needs arising from “psychological aversion” of households residing in bricks and mortar accommodation.
- 6.45 The Option 1 column shows that a further 73 Gypsy and Traveller pitches are needed over the period 2017-2036 throughout the study area (including need arising from households experiencing “psychological aversion”), or 63 pitches (excluding need arising from households experiencing “psychological aversion”).
- 6.46 The Option 2 column shows that a further 41 Gypsy and Traveller pitches are needed over the period 2017-2036 throughout the study area (including need arising from households experiencing “psychological aversion”), or 35 pitches (excluding need arising from households experiencing “psychological aversion”).
- 6.47 It is recommended that each of the 4 authority areas ensure that they have a negotiated stopping place policy in place.

Table 6.8: Summary of Gypsy and Traveller Needs 2017-36		
Period	Option 1	Option 2
Total 2017-22	19 (13)	-1 (-4)
Total 2022-27	17 (19)	14 (15)
Total 2027-32	18 (20)	14 (15)
Total 2032-36	19 (21)	14 (15)
Total 2017-2036	73 (73)	41 (41)

Source: ANA 2017

(NB the figures in brackets are the accommodation needs and 2022 base figures including households who display psychological aversion, but with the need addressed over 19 years, rather than within the first 5 years).

## 7. Travelling Showpeople

### Introduction

- 7.1 As described in Chapter 1, this ANA considers the accommodation needs of Travelling Showpeople. Unlike Gypsies and Travellers, Travelling Showpeople are not considered to be an ethnic minority and, as such, are not protected by the Equality Act 2010. However, current (DCLG 2015) and previous (DCLG 2007, 2012) guidance indicates that local authorities should consider the accommodation needs of Travelling Showpeople families.
- 7.2 In response to Government guidance, and given that Travelling Showpeople in the study area can face similar accommodation issues to Gypsies and Travellers (e.g. difficulty in finding affordable land suitable for development), they have been included in this study. There are three permanent Travelling Showpeople yards with planning permission located within the Greater Norwich area (two in Norwich City and one in South Norfolk), containing a total of 55 plots.

### Accommodation Provision

- 7.3 Norwich City contains two authorised Travelling Showpeople yards. One consists of a single plot which is owned and occupied by an extended family. There is overcrowding on this plot and the family are in need of a larger yard with about 5 plots and space for storage and maintenance of equipment and vehicles. They have expressed interest in developing a yard in either the Greater Norwich area or North Norfolk. They have work connections to both of these planning areas. There are three families from the same extended family living in this small space, along with their equipment and vehicles.
- 7.4 The second yard is a very large complex owned by the Showmen's Guild. The families and individuals on this yard rent their respective plots from the Guild, and must be Guild members to be able to stay on the yard. From consultation with residents at the yard, the Guild and from observations, the yard is overcrowded and the plots are very small. In some cases, it is difficult to distinguish one plot from another. It is primarily an open plan yard consisting of around 10 plots with clearly marked out boundaries. As well as people living on the yard, there are also a limited number of plots available for transit use.
- 7.5 Consultation was carried out with the Guild who own and manage the yard. Consultation was also conducted with several residents, but, this was primarily for insight and to compare to information provided by the Guild.
- 7.6 There are three distinct sections on the Guild-owned yard. The first section is occupied by retired Showpeople who have lived on the yard for many years. Each plot contains a static caravan and space for parking. The second section is mainly for transit use with some permanent static caravans located on it and a small area for storage. The individual plots are very small with just enough space for a static caravan and parked car.

- 7.7 The third section is for permanent residents. There are seven marked plots leased to primarily retired households with some containing extended family members. The remaining plots are open plan with no clear plot markings. They each have an electricity hook-up point and space for a caravan and a parked car. Over time these plots have over-spilled over to adjacent plots and it has become less clear as to where the plot boundaries lie. This area is overcrowded and those living on it have limited space to live or work. The surveys took place at the start of the travelling season (March 2017), and some families had left the yard to work at fairs. Even without the travelling families and their vehicles the yard was overcrowded.
- 7.8 According to the Guild, there are approximately 50 permanent households on the yard. 30 households consist of Showpeople who are either retired or currently not working. The remaining 20 households consist of working Showpeople.
- 7.9 The third Showpeople yard is located in South Norfolk (part of the Greater Norwich area). This is occupied an extended family who have lived on the yard for many years. They are from Norfolk and have strong ties with Showpeople in the local area. There are three generations residing on the yard consisting of four related households. Some plots are occupied by people who work with the family (primarily seasonally). The yard is mainly open plan. A house on the yard is occupied by one part of the family. Other family members and workers reside in static caravans and trailers on the yard. There is also space to store and maintain equipment on the yard.

### **Services and Experiences**

- 7.10 The preferred method of gaining information about services was through 'word of mouth' and the internet. Respondents commented on how, like Gypsies and Travellers, Travelling Showpeople have always had a very effective network system of sharing information and support. Some commented on how more people have access to the internet via mobile phones and more people are signed up to network groups such as Facebook. Members of groups such as the Showmen's Guild receive information through media such as magazines.
- 7.11 Most families spoke of having felt that they had experienced some form of discrimination. Similar to Gypsies and Travellers, some stated that it was "part of life for Travelling Showpeople". Also, as in the case of Gypsies and Travellers, the main reasons for not reporting it included wanting to ignore it, or believing that reporting incidences to authorities would be ineffective. Most commented on how people often confuse Travelling Showpeople with Gypsies and Travellers and, as such, feel that they can be subject to similar types of discrimination.
- 7.12 All families were registered with a local doctor. Respondents were asked if they, or anyone else in their household, experienced health issues. Due to the large number of retired Showpeople, most health issues were problems due to old age or long-term health issues requiring ongoing monitoring.
- 7.13 The survey asked households if they contain school-age children and whether they attend school and/or were home tutored. All children of school age attended school. The families spoke of having strong belief in the importance of children attending school and receiving a

full education. They stated it is increasingly important that children receive a good education and gain good qualifications. Families are unable to rely solely on the Travelling Show business to make ends meet. As well as running fairground or circus businesses, many families now contain family members employed in different professions. About 10 Travelling Showpeople families contained school-age children, all of whom attend school.

- 7.14 The retired households living on the Guild yard enjoy easy access to services, such as shops, post offices, and health services. Other households were not so concerned about travelling to amenities as they were more concerned about the lack of space yards. One stated that they would not mind if they had to travel further to access shops or services as long as they had sufficient space and privacy on the yard. This was also the case for the families residing on the overcrowded private yard. One of the households on the Guild yard stated that having privacy was important as “everyone is on top of one another”. Households living on the other private yards had no problem travelling to access services. They stated that it was more important having sufficient space on the yards.
- 7.15 In relation to employment status, 25 households had some form of Travelling Showpeople related business such as a family circus or fairground rides. In most cases the businesses had been run by families for generations. Some families contain family members who undertake other types of work, particularly during the months they were not travelling with shows. Retired Showpeople were residing on all three yards. On the Showmen’s Guild yard in Norwich around a quarter of occupants are retired. The residents and the Guild agreed that this yard is more appropriate for accommodating retired Showpeople or active Showpeople families with little equipment.

### **Travelling**

- 7.16 All working families had travelled during the last 12 months, mainly for work. A few families stated that they already stopped or intended to stop travelling due to poor health or age. Whilst the families stated there is a need for more plots in the local area to accommodate young families, none stated that there is a need for any transit plots or emergency stopping places within the study area. The main reason for travelling was due to work although they also stated: “it’s our way of life”, “it’s what we do”, and to visit family or friends.
- 7.17 Respondent Travelling Showpeople families tend to travel all year around although more travelling is done between Easter and Christmas, and slightly less during the winter. When travelling, families primarily stay where the fair, circus or event is taking place. In terms of main travelling routes, respondent households were likely to state “anywhere” or “all over” rather than state specific routes. Some families travel for work across the whole of Britain and Europe, some travel around the south of England, whilst some just travel for work locally. Some families spoke of how expensive it is for them to travel and how they have to be more selective as to which jobs they take. They stated that the cost of travelling is increasingly problematic. One Showperson spoke about how they have to ensure the work they undertake justifies the cost getting to the venue and then moving on to the next venue. None of the families stated that they intend to stop travelling.

### **Accommodation need**

- 7.18 Households (and the Guild) were asked if there are enough spaces for Travelling Showpeople in the area. None of the respondents stated that there is a need for transit

- plots or emergency stopping places within the study area. Families stated that this is because transit provision tends to be insecure and is not suitable for storing equipment.
- 7.19 Most stated that family sized yards would be preferred if new accommodation for Travelling Showpeople was developed within the study area. They spoke about how yards may need to accommodate several generations at any given time, as Travelling Showpeople families tend to live and work together for generations.
- 7.20 Similar to Gypsy and Traveller families residing on yards, there is a long history of Travelling Showpeople both living and working across the whole study area. At the time of the survey, there were 55 occupied plots (all in Greater Norwich). Four of the plots are on a yard which has enough space for now and future need. The households residing on the other two yards have need for further accommodation.
- 7.21 As stated above, there are two private family yards. The first yard is overcrowded and all households want and need to move to an alternative yard. The families on the second private yard stated that there is sufficient space on the yard to meet current and future need.
- 7.22 The overcrowded yard contains four households living alongside equipment and vehicles in a small area equivalent to a small plot. They want to move together and develop a family yard with separate plots and space for them to accommodate current and future need. They stated that although they currently reside within the Greater Norwich area, as they also work across the whole of the study area (in particular North Norfolk and Great Yarmouth, as well as Norwich and South Norfolk), they would be willing to reside in any part of the study area. They were more concerned about having sufficient space on a safe yard than where they reside.
- 7.23 The Guild stated that the yard they own in Norwich City is gradually becoming occupied by retired Showpeople. The plots are large enough only for couples or small families with little or no equipment. Showpeople suggested that the plots on their site could meet the accommodation needs of small families, whilst larger plots elsewhere should be provided for working families who need to store larger equipment.
- 7.24 Most of the households residing on the yard consist of people who were brought up on it. Several generations of some families reside on the yard. Many of the younger residents are in need of separate accommodation but unable to obtain a yard. It is estimated that there are up to 20 working Showpeople households requiring separate accommodation for themselves and extended family members. As with the families on the private yard with need, the families on this yard also expressed needing new provision either within Greater Norwich or elsewhere within the study area. They also commented on work and family connections to North Norfolk and Great Yarmouth.

### **Summary**

- 7.25 Similar to Gypsy and Traveller families residing on yards, there is a long history of Travelling Showpeople both living and working within the study area. At the time of the survey, there were 55 occupied plots on three yards (all located in the Greater Norwich area). Accommodation need was determined by surveys undertaken with residents and discussions with the Showmen's Guild. It is apparent that one of the private yards has

sufficient space to meet current and future accommodation need. The other yards are overcrowded and some families contain adult children requiring their own plots either now or in the near future.



## 8. Travelling Showpeople accommodation need

### Introduction

- 8.1 This chapter presents the detailed technical calculation of the Travelling Showpeople needs assessment. The model used is based on the example given in the DCLG 2007 Guidance. General comments on the findings are contained in Chapter 7.
- 8.2 The results of the calculations are shown in the tables below, while the subsequent section contains explanations of the sourcing and calculation of figures for each step.

Table 8.1 Estimate of the need for Travelling Showpeople plots 2017-2022	
1) Current occupied permanent residential yard plots	55
<i>Current residential supply</i>	
2) Number of unused residential plots available	0
3) Number of existing plots expected to become vacant through mortality 2016-2021	2
4) Number of family units on yards expected to leave the study area in next 5 years	1
5) Number of family units on yards expected to move into housing in next 5 years	0
6) Residential plots planned to be built or to be brought back into use 2016-2021	0
7) Less plots with temporary planning permission	0
Total Supply	3
<i>Current residential need: Plots</i>	
8) Family units (on plots) seeking residential plots in the area, 2016-2021, excluding those already counted as moving due to overcrowding in step 11	11
9) Family units on unauthorised encampments requiring residential plots in the area	0
10) Family units on unauthorised developments requiring residential plots in the area	0
11) Family units currently overcrowded on plots seeking residential plots in the area, excluding those containing an emerging family unit	10
12) New family units expected to arrive from elsewhere	0
13) New family formations expected to arise from within existing family units	7
Total Need	28
<i>Balance of Need and Supply</i>	
Total Additional Plots Requirement	25
Annualised Additional Plots Requirement	5

Source: ANA 2017

### Requirement for residential plots 2017-2022: steps of the calculation

- 8.3 Determining the accommodation needs of Travelling Showpeople uses the same process as determining the accommodation needs of Gypsies and Travellers (although population sizes are much smaller). The following sections show the steps of the Travelling Showpeople accommodation needs calculations.

## Supply of plots 2017-2022

### **Step 1: Current permanent residential yard plots**

8.4 Based on information provided by the local authorities there are currently a total of 55 occupied authorised Travelling Showpeople plots in the study area. These plots are owned by occupying families or privately rented.

### **Step 2: Number of unused residential plots available**

8.5 According to the survey data there is currently 0 vacant plots on authorised yards in the study area.

### **Step 3: Number of existing plots expected to become vacant, 2017-2022**

8.6 This is calculated using mortality rates as applied in conventional Housing Needs Assessments. However, the figures for mortality have been increased in accordance with studies of Gypsy and Traveller communities suggesting a life expectancy approximately 10 years lower than that of the general population.<sup>33</sup> It is estimated that two plots are likely to arise from this source.

### **Step 4: Number of family units in yard accommodation expressing a desire to leave the study area**

8.7 One household stated that they intend to move out the study area within the next five years. It is important to note that whilst the three current yards are located in the Greater Norwich area, the households stated that they would reside on any suitable yards located both within and outside the study area. For example, some families stated that, due to work connections, they would consider residing in North Norfolk.

### **Step 5: Number of family units in yard accommodation expressing a desire to live in housing**

8.8 This was determined by survey data. It was assumed that all those currently living on yards planning to move into housing in the next five years (step 5), or preferring to move into housing from an overcrowded plot (step 11), would be able to do so. A supply of 0 plots was expected from this source.

### **Step 6: Residential plots planned to be built or brought back into use, 2016-2021**

8.9 This is determined by local authority data. There are 0 new plots expected to be built or brought back into use during the period 2017-2022.

### **Step 7: Plots with temporary planning permission**

8.10 This is determined by local authority data. It is assumed families living on plots whose planning permission expires within the period 2017-2022 will still require accommodation

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<sup>33</sup> E.g. L. Crout, *Traveller health care project: Facilitating access to the NHS*, Walsall Health Authority, 1987. NB: For Travelling Showpeople, the standard mortality rate is used.

within the study area. There are currently 0 plots with temporary planning permission located in the study area.

## **Need for plots 2017-2022**

### ***Step 8: Family units on plots seeking residential plots in the study area 2016-2021***

8.11 This was determined by survey data. These family units reported that they 'needed or were likely' to move to a different home in the next five years, and wanted to stay on an authorised site, or that they were currently seeking accommodation. This category of need overlaps with those moving due to overcrowding, counted in step 11, and so any family units which are both overcrowded and seeking accommodation are deducted from this total. This generates a total need of 11 plots in the study area.

### ***Step 9: Family units on unauthorised encampments seeking residential plots in the area***

8.12 Guidance (DCLG 2007) indicates that it should be considered whether alternative accommodation is required for families living on unauthorised encampments. It is assumed that those families who are consistently moving around the study area are in need of permanent accommodation. There is no evidence of unauthorised encampments occupied by Travelling Showpeople in the study area, so there is a need for 0 plots arising from this source.

### ***Step 10: Family units on unauthorised developments seeking residential plots in the area***

8.13 This was determined by local authority data. The guidance also indicates that the accommodation needs of families living on unauthorised developments for which planning permission is not expected must be considered. Regularising families living on their land without planning permission would reduce the overall level of need by the number of plots given planning permission. A need of 0 plots currently arises from unauthorised developments within the study area.

### ***Step 11: Family units on overcrowded plots seeking residential plots in the area***

8.14 Families on overcrowded plots should be provided with plots of an adequate size. Households which also contain a newly formed family unit that has not yet left are excluded. This is because it is assumed that once the extra family unit leaves (included in the need figures in step 13) their accommodation will no longer be overcrowded. The calculations suggest that there is a need for 10 plots in the study area to resolve overcrowding over the period 2017-2022.

### ***Step 12: New family units expected to arrive from elsewhere***

8.15 In the absence of any credible data derivable from primary or secondary sources (beyond anecdotal evidence) on the moving intentions of those outside the study area moving into the area, as in the case of those moving out of the area, it is assumed that the inflow of Travelling Showpeople into the area will be equivalent to the outflow i.e. 0 plots over the period 2017-22.

**Step 13: New family formations expected to arise from within existing family units on sites**

8.16 Allowing for those planning to leave the area, and for estimated rates of marriages to Travelling Showpeople, it is thought that this will result in the formation of 7 new households requiring residential plots during 2017-2022.

**Requirements for residential plots 2022-2036**

8.17 Similar to estimating future pitch need, the ANA estimates the future Travelling Showpeople plot provision for the period 2022-2036. The same factors used to determine the future accommodation needs of Gypsies and Travellers is applied to Travelling Showpeople including an average annual family growth rate of 2% (equating to 10.4% over a five-year period). Future 5-year period mortality rates are projected to be the same as those for 2016-2021. Movement into and out of the study area is also assumed to continue at the 2016-2021 rate (0%). Table 8.2 shows the estimated need for residential plots for the period 2021-26, whilst Table 8.3 summarises plot needs for the period 2017-2036.

Table 8.2 Estimate of the need for residential plots 2022-2027	
<i>Plots as at 2022</i>	
1) Estimated plots occupied by Travelling Showpeople	80
<i>Supply of pitches</i>	
2) Plots expected to become vacant due to mortality 2022-2027	2
3) Number of family units on pitches expected to move out of the study area 2021-2026	0
Total Supply	2
<i>Need for pitches</i>	
4) Family units moving into the study area (100% of outflow)	0
5) Newly forming family units	8
Total Need	8
<i>Additional Need</i>	
Total additional plot requirement, 2022-2027	6
Annualised additional plot requirement	1

Source: ANA 2017

**Summary**

8.18 Table 8.3 summarises the number of Travelling Showpeople plots required over the period 2017-36. It shows that a further 46 Travelling Showpeople plots are needed over the period throughout the study area. It is important to note that although the need is identified in Greater Norwich, it could be addressed across the study area. As discussed in Chapter 7, households with accommodation need have connections to areas throughout the study area, in particular. As such, all study area local authorities should consider meeting the need for additional Travelling Showpeople plots.

Table 8.3: Summary of Travelling Showpeople plot needs 2017-36

Period	2017-2022	2022-27	2027-2032	2032-2036	Total
Broads Authority	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
Great Yarmouth	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
Greater Norwich	25 (25)	6 (6)	7 (7)	8 (8)	46 (46)
North Norfolk	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
Total	25 (25)	6 (6)	7 (7)	8 (8)	46 (46)

Source: ANA 2017

(figures in brackets are accommodation needs excluding households who do not travel for work)

## 9. Boat dwellers

### Introduction

- 9.1 As described in Chapter 1, this chapter considers the accommodation needs of boat dwellers. Unlike Gypsies and Travellers, boat dwellers are not considered to be an ethnic minority and, as such, are not protected by the Equality Act 2010. However, recent Government guidance (March 2016) and paragraph 124 of the Housing and Planning Act 2016 indicates that local authorities must consider the accommodation needs of boat dwelling families.
- 9.2 In response to the legislative requirements, and in the interests of efficiency, they have been assessed in this ANA.

### Method

- 9.3 A range of methods were used to gain insight into the number and accommodation needs of people living permanently on boats in Norfolk. The Broads Authority area was regarded as the main area in which boat dwellers would reside (including the Broads Authority area of Waveney, Suffolk). Other waterways were considered, but no permanent residential boat dwellers were identified as living outside of the Broads Authority waterways. As such, consultation with the Broads Authority officers and Rangers from across the Broads Authority area took place involving meetings, email and telephone communication, face-to-face discussions, and surveys. Also, a day was spent with some Rangers on a boat traversing the Broads waterways to access some boat dwellers and gain a better understanding of living conditions and locations.
- 9.4 With the aid of the survey, face-to-face and telephone consultation also took place with 10 households residing on boats on the Broads. This helped to gain direct insight into people's experiences and reasons for living on the Broads and accommodation needs.
- 9.5 Boat yard owners were invited to complete an online survey. This helped determine the number of permanent residential and potential moorings and gain further insight into the accommodation needs of boat dwellers. Telephone consultation also took place with boat yard owners including owners of residential moorings.

### Accommodation Provision

- 9.6 There are no known permanent moorings located within the local authority areas apart from those in the Broads Authority Executive Area. It was determined that there is one permitted permanent authorised mooring and 10 temporary residential moorings in the Broads Authority area. There are also 974 24-hour moorings provided and managed by the Broads Authority.

- 9.7 The permanent mooring is on a yard and is occupied by the owner and his family consisting of his partner and a school-aged child. The family had previously lived in a house but, has chosen to reside on a boat for several years. The family owns a boat for residing on and other boats used for travelling.
- 9.8 There is a second boat yard with temporary planning permission for 10 residential moorings until January 2021. One mooring is currently occupied by a retired couple. The boat yard owner would like the 10 moorings which currently have temporary planning permission to be granted permanent planning permission. He has a waiting list of seven families wanting to reside on the yard but the moorings are currently unoccupied due to their temporary planning permission status. He stated that having temporary permission has discouraged families who want a permanent mooring from residing on his yard. He stated that people living on the Broads often do so by 'living under the radar' (i.e. unofficially), and are only likely to officially apply for residential status if they are confident they can access long-term, permanent accommodation. Not being able to access such accommodation means that they risk going back to the open waterways without a permanent base and being continually moved on. The yard owner is confident that giving permanent planning permission for the 10 moorings would mean that the remaining nine moorings would likely soon be occupied.
- 9.9 The yard with the 10 moorings with temporary planning permission contains a total of 130 moorings (120 for moorings on a temporary or storage basis). Initially, the owner was considering applying for planning permission for 10% of his moorings i.e. around 13 moorings to gain permanent residential status, but was advised to reduce this to 10. In 2016, 10 moorings were granted temporary planning permission. According to the Broad's authority, this was because the yard did not meet the location criteria as it is in an isolated location and not in or adjacent to a development boundary. Its moorings were given temporary planning permission to help the viability of the business. The owner has since appealed against this decision for reasons discussed above.
- 9.10 There are 974 24-hour moorings at 57 locations across the Broads Authority area. Most are free for boat owners to use. There are many more boat moorings available moorings at places such as Staithes, public houses and boatyards, although some charge a fee. Great Yarmouth and Norwich yacht stations also charge a fee to moor although they are manned by officers and a range of facilities are available.
- 9.11 According to Broads Authority Rangers, there are three categories of boat dwellers: first, long-term river dwellers who have resided on the waterways for years; second, people who try it for a year or two but then return to living in a house; and third, day trippers and holiday makers who reside on boats for a few days or weeks.
- 9.12 As discussed in the stakeholder chapter, there is an absence of data regarding the number of households residing on boats within the study area. However, consultation with Broads Authority Rangers and officers, boat dwellers, and boat yard owners and managers, enabled an estimate in each designated Broads Authority area to be determined. it is

estimated that there are potentially 100 unauthorised boat dwellers residing permanently in and around the study area. Due to their unauthorised status, most boat dwellers regularly move around the Broads either using the boat's own propulsion method, or by being towed.

- 9.13 From consultation, it was also estimated that at least half the unauthorised boat dweller have need for a permanent mooring, whilst the other half would prefer to continue travelling freely around the Broads and waterways. A stakeholder stated that there are people who choose to live on boats so that they can 'live under the radar' i.e. there is no official record of their location, and would regard taking up a permanent mooring as becoming 'above the radar'.
- 9.14 There are a wide range of reasons for people living on boats. According to Broads Authority Rangers and yard owners/managers, whilst most people who permanently reside on boats do so out of choice as they want to live an "alternative" lifestyle, others do so due to the lack of an alternative. Boat dwellers consist of a wide range of social types from professionals such as teachers or artists to unemployed people.
- 9.15 Some stakeholders believe that a large proportion of boat dwellers are single males aged between 25 to 50 years, whilst a Ranger stated that "they are older people in my experience". Both the Rangers and boat dwellers stated that they are aware of a "handful" of families with children residing permanently on the Broads. According to the Rangers, yard owners and boat dwellers the main reasons people reside permanently on boats include:
- It offers an alternative life-style choice
  - People enjoy the freedom to roam that the waterways offer
  - People enjoy living amongst nature
  - It can offer a quiet way of life
  - Some people enjoy living alone
  - Some people are unable to afford living in a house
  - A small number of boat dwellers are hiding from authorities or family members.

## **Access to services**

- 9.16 According to a Broads Authority Ranger, one key issue for people residing permanently on boats is that some often have insufficient funds to pay for living expenses, food and electricity. Also, they may lack funds for moorings leading them to reside on unauthorised moorings with no facilities.
- 9.17 According to Rangers, yard owners, and boat dwellers, the main needs of people residing on boats are access to food, water, electricity, and warmth. They commented on how permanent boat dwellers require access to moorings, electricity points, fresh water, and waste disposal (both refuse and human waste). Boat dwellers stated that they appreciate authorities want to prioritise 24-hour moorings for tourist boaters during the summertime. However, boat dwellers stated that it would be helpful if moorings could be made available



for longer periods of time for those who permanently reside on the Broads outside the tourist season.

- 9.18 One Ranger stated that most people living on boats lead a steady and quiet life. Only a small number need help, support and advice. However, he stated that Rangers are aware of some permanent boat dwellers who are struggling due to poor health, and substance and/or alcohol dependency. Some people are regarded as having 'fallen through the net' and in need of support. According to one Ranger some boat dwellers:

*"... appear to have low incomes, are unemployed or have only sporadic work, and some have health issues. They need to have regular contact of some description, but usually on their own terms."*

- 9.19 The boat dwellers' preferred method of gaining information about services was through 'word of mouth' and the internet. Respondents commented on how boat dwellers have their own effective network system of sharing information and support. Some also commented on how they get information from the Rangers and other boat dwellers whom they have got to know over the years.
- 9.20 Some boat dwellers spoke of having felt that they had experienced discrimination, but some stated that it was "part of life". The main reasons for not reporting it included wanting to ignore it, or believing that reporting incidences to authorities would be ineffective.
- 9.21 Boat dwellers commented on how many of those permanently residing on boats are not registered with a local doctor, and some also mentioned health-related problems. Broads Authority Rangers commented on some boat dwellers have mental health and substance misuse issues. They commented on how some boat dwellers that have 'fallen through the net' and live on boats because they cannot cope living in a house. Rangers commented on how many boat dwellers have minimal access to facilities and healthcare. This is because they tend to move around with no fixed address and there is no support infrastructure. It was suggested that boat dwellers would benefit from having a named officer who would provide help or support or refer families to agencies. They would liaise with agencies and neighbouring local authority departments (including housing and social services) across the county.
- 9.22 Whilst it was acknowledged that there are boat dwellers in need of support, some stakeholders suggested that this requires a flexible and unobtrusive approach. This is because some boat dwellers consider some Broads Authority rules and conditions e.g. where boats can or cannot moor or the length of time boats can be moored as restrictive. Boat dwellers suggested that it would be helpful if the Broads Authority were more flexible in the amount of time they allowed boat dwellers to reside at a mooring. It was appreciated by boat dwellers that there are circumstances such as an unauthorised mooring causing an obstruction when enforcement action is necessary. However, it was suggested that the extent of harm caused by an unauthorised mooring should be assessed before enforcement action is undertaken.

## Travelling

- 9.23 Similar to tourists, permanent boat dwellers frequently travel around the Broads but are more likely to do so throughout the whole year. Consultees regarded the travelling patterns of the boat dwellers as being mainly determined by an absence of permanent moorings i.e. they moor where they can. Some boats occupied by permanent residents are stationary whilst others frequently travel around the waterways.
- 9.24 Some permanent boat dwellers are located on long-term, unauthorised, moorings. Alternatively, they may have moored adjacent to privately owned land and are tolerated by the land owners. Such boats tend to remain at the mooring for longer periods.

## Accommodation need

- 9.25 Through evidence collected as part of this consultation it is estimated that there are around 100 unauthorised moorings in the study area. According to the Broads Authority Rangers and boat dwellers, not all of those residing on unauthorised moorings require permanent moorings. About half would prefer to remain transient but would like more flexibility in relation to the amount of time they can spend at Broads Authority moorings, especially out of season.
- 9.26 One boat mooring yard has a waiting list of seven families. The yard owner wants a change in the planning status of 10 moorings to be changed from temporary to permanent. This would encourage him to further develop the yard and provide permanency to potential occupants. Another yard owner has a future need for two moorings and would like to expand the existing yard by five moorings.
- 9.27 There is an area near Norwich which has been used for boat moorings for some decades known as Thorpe Island. The island has recently been sold. According to consultees, until recently, the island was predominately used by boat-dwellers located on unauthorised moorings. This led to issues with the local community and local authority. The new owners have issued eviction notices to households located on the unauthorised moorings. Most of the households have since moved, although some remain. There are currently around 10 households residing on unauthorised moorings on the Island. According to Broads Authority Rangers and people residing on the Island there is no overcrowding of households on the island.
- 9.28 Also, the Rangers stated that there is no evidence of overcrowding on any of the boats permanently occupied within the study area. According to the Rangers most permanently occupied boats consist of single people or couples. Although some boats have limited space that they are occupied by small households mean that they are unlikely to be overcrowded. According to Rangers and people residing on boats there is a small number of estimated households permanently residing on boats with children. It was also suggested that some boat dwellers, including those seeking a permanent mooring, could have their accommodation needs addressed through affordable housing. With appropriate support they may benefit more from residing in a house than on a boat.
- 9.29 According to consultees, whilst it is best for any additional accommodation need to be met by existing yards, there is reluctance for current yards to apply for planning permission to

expand. This is due to the costs involved in applying for planning permission and the complexity of the process. There are also concerns regarding conditions that may be imposed if planning permission is granted. There was also the view that many people permanently residing on boats are reluctant to be 'regularised'. Finally, it was suggested that a simpler planning application and monitoring process would be helpful.

## Summary

- 9.30 There is a long history of boat dwellers residing within the study area. Consultation regarding the accommodation needs of households permanently residing on boats was undertaken with a range of stakeholders including Broads Authority Rangers, boat yard owners and managers, and boat dwellers. It is difficult to determine the exact numbers of households permanently residing on boats although estimates indicate that there are up to 100. Many of the families consist of single people or couples without children. Households permanently reside on boats within the study area for a wide range of reasons including wanting to live an alternative lifestyle or due lack of access to traditional housing.
- 9.31 That Broads Authority moorings are only available for 24 hours means that many households permanently residing on boats frequently travel around the waterways. Many families have limited access to health and support services suggesting the need for households to have a named Broads Authority contact who can coordinate responses to needs. It is estimated that around half the households residing on unauthorised moorings require permanent moorings. This need can be met by reviewing the status of existing yards and see which yards could accommodate permanent residential moorings at their yard.

## 10. Boat dwellers accommodation need

### Introduction

- 10.1 Given that the requirement to determine the accommodation needs of boat dwellers was only recently introduced by the DCLG Draft Guidance on Housing Needs (Caravans and Houseboats) (March 2016), there is no established method to determine need. As such, the need for permanent residential moorings in the study area is assessed according to a 14-step process, based on the model suggested in DCLG (2007) guidance and supplemented by data provided by the local authorities. Whilst this guidance relates specifically to assessing needs for Gypsy and Traveller accommodation, it is considered appropriate for assessing needs for houseboats. Nonetheless, it should be acknowledged that the accommodation needs of boat dwellers may differ from Gypsy and Traveller households e.g. residing on a boat may reflect a 'lifestyle' choice or a lack of alternative bricks and mortar accommodation. The results of this are shown in the tables below, while the subsequent section contains explanations of the sourcing and calculation of figures for each step.
- 10.2 It should be noted that the analysis is based upon those houseboats that it was possible to survey, supplemented with Council Tax records. It is possible that additional boats are being used as dwellings (either authorised or unauthorised), and that there may therefore be additional need arising from these. The local authorities may therefore wish to update the need calculations as and when additional information becomes available.

### Requirement for residential moorings 2017-2022: summary<sup>34</sup>

- 10.3 The need for additional residential moorings in the study area is assessed according to a 14-step process, based on the model suggested in DCLG (2007) guidance and supplemented by data and information provided by the local authorities. The calculations are based on surveys and secondary data. The results are shown in Table 10.1 below, while the subsequent section contains explanations of the sourcing and calculation of figures for each step. The overall need for the period 2017-2022 is for 51 additional moorings throughout the study area.

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<sup>34</sup> Due to rounding column totals may differ slightly from row totals

Table 10.1 Estimate of the need for Permanent Residential Moorings 2017-2022

1) Current identified permanent residential moorings	1
<i>Current residential supply</i>	
2) Number of unused residential moorings available	0
3) Number of existing permanent residential moorings expected to become vacant through mortality 2017-2022	0
4) Number of household units on permanent residential moorings expected to leave the study area in next 5 years	0
5) Number of residential units on permanent residential moorings expected to move into housing in next 5 years	0
6) Permanent residential moorings planned to be built or to be brought back into use 2016-2021	0
7) Less permanent residential moorings with temporary planning permission (occupied)	-1*
Total Supply	-1
<i>Current residential need: Moorings</i>	
8) Residential units (permanent residential moorings) seeking permanent residential moorings in the area, 2017-2022, excluding those already counted as moving due to overcrowding in step 12	0
9) Estimated residential units on unauthorised moorings requiring permanent residential moorings in the area	50
10) Residential units identified on unauthorised developments requiring residential permanent residential moorings in the area	0
11) Residential units currently overcrowded on permanent residential moorings seeking residential permanent residential moorings in the area, excluding those containing an emerging residential unit	0
12) New residential units expected to arrive from elsewhere	0
13) New residential unit formations expected to arise from within existing family units	0
14) New residential units on waiting lists	0
Total Need	50
<i>Balance of Need and Supply</i>	
Total Additional Permanent Residential Moorings Requirement	51
Annualised Additional Permanent Residential Moorings Requirement	10

Source: ANA 2017

(\* there were a further 9 unoccupied temporary moorings at the time of the survey)

### Requirement for permanent residential moorings 2017-2022: steps of the calculation

10.4 Determining the accommodation needs of boat dwellers uses the same process as determining the accommodation needs of Gypsies and Travellers (although population sizes are much smaller). The following sections show the steps of the Boat Dwellers accommodation needs calculations.

## Supply of moorings 2017-2022

### **Step 1: Current permanent occupied residential moorings**

10.5 Based on information obtained through this study there are currently a total of one occupied authorised permanent residential mooring in the study area. This permanent residential mooring is owned by the occupying household. There are other boat yards across the study area, but according to the yard managers, owners, and other stakeholders, these are for holiday and seasonal use rather than permanent residential use.

### **Step 2: Number of unused permanent residential moorings available**

10.6 According to the survey data there are currently no vacant permanent residential moorings on authorised yards in the study area.

### **Step 3: Number of existing moorings expected to become vacant, 2017-2022**

10.7 This is calculated using mortality rates as applied in conventional Housing Needs Assessments.

### **Step 4: Number of household units on permanent residential moorings expressing a desire to leave the study area**

10.8 The percentage for assessment is 0%.

### **Step 5: Number of household units on permanent residential moorings expressing a desire to live in housing**

10.9 This was determined by survey data. It was assumed that all those currently living on boats planning to move into houses in the next five years (step 5), or preferring to move into houses from an overcrowded mooring (step 11), would be able to do so. A supply of 0 moorings were expected from this source.

### **Step 6: Permanent residential moorings planned to be built or brought back into use, 2017-2022**

10.10 This is determined by local authority data. There are 0 new moorings expected to be built or brought back into use during the period 2017-2022.

### **Step 7: Residential moorings with temporary planning permission**

10.11 This is determined by local authority data. It is assumed people living on moorings whose planning permission expires within the period 2017-2022 will still require accommodation within the study area. There is currently 1 occupied mooring and 9 unoccupied moorings with temporary planning permission located in the study area.

## Need for permanent residential moorings 2017-2022

### **Step 8: Residential units on permanent residential moorings seeking permanent residential moorings in the study area 2017-2022**

10.12 Guidance suggests that those moving from mooring to mooring should be included in the need section. Based on survey data it is estimated that 0 households seek to move within the study area.

10.13 This category of need overlaps with those moving due to overcrowding, counted in step 12, and so any residential units which are both overcrowded and seeking accommodation are deducted from this total. This generates a total need of 0 moorings in the study area.

**Step 9: Residential units on unauthorised moorings seeking permanent residential moorings in the area**

10.14 Guidance (DCLG 2007) indicates that it should be considered whether alternative accommodation is required for households living on unauthorised moorings. It is possible that some of those living on boats could have their accommodation needs addressed by affordable housing (bricks and mortar) accommodation, and the councils in the study area should work together to consider this alternative accommodation for people in need. However, from consultation with Rangers, boat yard managers / owners and boat dwellers, it is estimated that there is a need for 50 moorings as arising from an estimation of 100 occupants consistently moving around the study area, and half being in need of permanent accommodation.

**Step 10: Residential units on unauthorised developments seeking permanent residential moorings in the area**

10.15 The guidance indicates that the accommodation needs of households living on unauthorised moorings for which planning permission is not expected must be considered. A need of 0 moorings currently arises from unauthorised moorings identified within the study area as part of the assessment.

**Step 11: Residential units on overcrowded permanent residential moorings seeking residential moorings in the area**

10.16 Guidance indicates that those on overcrowded moorings should be provided with moorings of an adequate size. Households which also contain a newly formed residential unit that has not yet left are excluded. This is because it is assumed that once the extra unit leaves (included in the need figures in step 13) their accommodation will no longer be overcrowded. The surveys suggest that there is a need for 0 moorings in the study area to resolve overcrowding over the period 2017-2022.

**Step 12: New residential units expected to arrive from elsewhere**

10.17 In the absence of any data derivable from secondary sources on the moving intentions of those outside the study area, it is assumed that the inflow of boat dwellers into the area will be equivalent to the outflow i.e. net 0 moorings over the period 2017-22 (based on 0%).

**Step 13: New residential unit formations expected to arise from within existing household units on permanent residential moorings**

10.18 Allowing for those planning to leave the area, and for estimated rates of marriages to boat dwellers, it is thought that this will result in the formation of 0 new households requiring residential moorings during 2017-2022 (primarily for adult children).

**Step 14: New residential units on a boat yard waiting list**

10.19 From consultation with boat yard owners and managers, there are seven households on a waiting list in the Broads Authority area. This results in a need of seven residential moorings. They are on a waiting list for the yard currently with temporary permission, but do

not want to move on until it is permanent permission. However, to avoid risk of double counting, they are not included in the calculations as they have been included in step 9.

## Requirements for residential moorings 2022-2036

10.20 Similar to estimating future pitch need, the assessment estimates the future permanent residential moorings provision for the period 2022-2036. The same factors used to determine the future accommodation needs of Gypsies and Travellers is applied to boat dwellers including an average annual household growth rate of 2% (equating to 10.4% over a five-year period). Future 5-year period mortality rates are projected to be the same as those for 2017-2022. Movement into and out of the study area is also assumed to continue at the 2017-2022 rate (0%). Table 10.2 shows the estimated need for residential plots for the period 2022-27, whilst Table 10.3 summarises residential mooring needs for the period 2017-2036.

Table 10.2 Estimate of the need for permanent residential moorings 2022-2027	
<i>Residential Moorings as at 2022</i>	
1) Estimated permanent residential moorings occupied by boat dwellers	52
<i>Supply of permanent residential moorings</i>	
2) Plots expected to become vacant due to mortality 2022-2027	2
3) Number of residential units on permanent residential moorings expected to move out of the study area 2022-2027	0
Total Supply	2
<i>Need for permanent residential moorings</i>	
4) Residential units moving into the study area (100% of outflow)	0
5) Newly forming residential units	5
Total Need	5
<i>Additional Need</i>	
Total additional permanent residential moorings requirement, 2022-2027	4
Annualised additional permanent residential moorings requirement	1

Source: ANA 2017

## Summary

10.21 Table 10.3 summarises the number of permanent residential moorings, required over the period 2017-36. It shows that a further 63 permanent residential moorings are needed over twenty years throughout the study area.



Table 10.3: Summary of permanent residential moorings needs 2017-36

Period	2017-2022	2022-27	2027-2032	2032-2036	Total
Broads Authority	51	4	4	4	63
Great Yarmouth	0	0	0	0	0
Greater Norwich	0	0	0	0	0
North Norfolk	0	0	0	0	0
Total	51	4	4	4	63

Source: ANA 2017

# 11. Residential caravan dwellers

## Introduction

- 11.1 As described in Chapter 1, this chapter considers the accommodation needs of permanent residential caravan dwellers. Unlike Gypsies and Travellers, residential caravan dwellers are not considered to be an ethnic minority and, as such, are not protected by the Equality Act 2010. However, recent Government guidance (March 2016) and paragraph 124 of the Housing and Planning Act 2016 indicates that local authorities should consider the accommodation needs of residential caravan dwelling families.
- 11.2 In response to Government guidance and legislation, and given that residential caravan dwellers in the study area may face similar accommodation issues to Gypsies and Travellers (e.g. difficulty in finding affordable places suitable for development), they have been included in this report.

## Method

- 11.3 Statistical data was provided by each of the authorities regarding the number of permanent residential caravan pitches and sites, and holiday and mixed-use data in each local authority area. The local authorities also provided addresses and some contact numbers for site owners or managers. Attempts were made to contact all sites. Telephone consultation was then carried out with residential caravan site owners and managers in the area to help estimate the number of permanent residential and potential pitches and gain insight into the accommodation needs of residential caravan dwellers. The consultation also helped confirm the number of residential and holiday pitches on each site.

## Consultation

- 11.4 From consultation with site owners and managers combined with local authority data it is estimated that there are 891 permanent authorised (857 plus 34 currently vacant) and 50 known unauthorised residential caravan pitches on sites within the study area. This includes 14 non-Gypsies and Travellers living on a registered Gypsy and Traveller site in Great Yarmouth at the time of the survey (February to April 2017). The families on the Great Yarmouth site were in need of alternative accommodation as the site was in the process of transferring to new management. Consequently, the pitches are to be re-allocated to Gypsy and Traveller families.
- 11.5 There are also 50 known unauthorised pitches being occupied on sites registered for holiday use in Greater Norwich. It is highly likely that there are more families residing on unregistered residential pitches in Great Yarmouth and North Norfolk holiday sites although the exact number is very difficult to estimate. There are currently 34 vacant residential pitches in the study area expected to be brought back into use within the next 5 years. They

are vacant for a range of reasons including being for sale, being redeveloped, or waiting for the new owner(s) to move in.

- 11.6 Similar to those living on boats, many families residing on residential pitches consist of single people or couples with few families with children. Most residential sites apply occupation criteria such as residents are having to be aged 50 years or over. Some sites do not allow children or pets (unless small household pets) on site. According to site owners and managers, some residential caravans are occupied by single young men unable to cope or afford to live in traditional housing. Some families move into caravans on a temporary basis until they can afford buy or rent traditional accommodation in the local area. This also means that after some time families can register on housing waiting lists which have minimum length of residency criteria. According to one site owner, some residential caravan occupiers are born in the local area and have returned after living elsewhere. Residing in residential caravans is seen by some as an affordable option.
- 11.7 There is a long history of people living on residential caravan sites across the study area on most current sites. This accommodation option is popular amongst people who want to retire and live near the coast. This includes families who may have holidayed in the local area or people brought up in the area but moved away and are returning. Residing on a residential caravan site is regarded as an affordable alternative to living in a house. One site was developed by the current owner's father in 1959. He borrowed money to set up the site and over the years it has grown from a small family size site to a large one with over 100 pitches for residential occupiers and tourers.
- 11.8 Some of the holiday sites contacted were interested in making some pitches available for permanent residential use. They stated that they are aware of the growing demand for residential caravans and that an increasing number of people are considering alternatives to living in a house. Some stated that an increase in people holidaying within the country compared to going abroad ('staycations') combined with the relative affordability of caravan holidays, means that there is increased demand on holiday caravan sites. As such, they stated it is likely that fewer sites would be able to accommodate families long-term (irrespective of the planning status of such sites for residential accommodation).
- 11.9 Although there is increasing demand for residential caravan pitches, only one site operates a waiting list (currently two families). Most site owners or managers believe that a waiting list is not needed; they stated that vacant pitches are soon occupied. According to the site owners and managers, estate agents and word of mouth are the main methods by which vacant pitches are advertised. One site owner stated that vacant pitches for sale are usually sold very quickly.
- 11.10 Some site owners stated that their sites could accommodate more residential pitches, whilst others stated they were concerned that expanding the existing site could lead to it becoming too large. One owner spoke about amalgamating pitches on the site. When

adjacent pitches become vacant, they offer the new owners the option of turning the two pitches into one so that they can have more space.

## Assessment of need

11.11 The need for permanent residential pitches in the study area is assessed according to a 14-step process, based on the model suggested in DCLG (2007) guidance<sup>35</sup> and supplemented by data provided by the local authorities. Whilst this guidance relates specifically to assessing needs for Gypsy and Traveller accommodation, it is considered appropriate for assessing needs for residential caravan dwellers. The results of this are shown in the tables below, while the subsequent section contains explanations of the sourcing and calculation of figures for each step.

## Requirement for residential caravan pitches 2017-2022: summary

11.12 The need for additional residential permanent residential caravan pitches in the study area is assessed according to a 14-step process, based on the model suggested in DCLG (2007) guidance and supplemented by data and information provided by the local authorities. The calculations are based on surveys and secondary data. The results are shown in Table 11.1 below, while the subsequent section contains explanations of the sourcing and calculation of figures for each step. The overall need for the period 2017-2022 is for 110 additional permanent residential caravan pitches throughout the study area.

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<sup>35</sup> Department for Communities and Local Government (DCLG), *Gypsy and Traveller Accommodation Needs Assessments*, October 2007 pp.24-25.

Table 11.1 Estimate of the need for Permanent Residential Caravan Pitches 2017-2022	
1) Current identified permanent residential pitches	857
<i>Current residential supply</i>	
2) Number of unused residential pitches available	34
3) Number of existing permanent residential pitches expected to become vacant through mortality 2017-2022	18
4) Number of family units on permanent residential pitches expected to leave the study area in next 5 years	0
5) Number of family units on permanent residential pitches expected to move into housing in next 5 years	0
6) Residential permanent residential pitches planned to be built or to be brought back into use 2017-2022	0
7) Less permanent residential pitches with temporary planning permission	0
Total Supply	52
<i>Current residential need: Pitches</i>	
8) Family units (permanent residential pitches) seeking permanent residential pitches in the area, 2017-2022, excluding those already counted as moving due to overcrowding in step 12	86
9) Family units identified on unauthorised pitches requiring permanent residential pitches in the area	0
10) Family units identified on unauthorised developments requiring residential permanent residential pitches in the area	50
11) Family units currently overcrowded on permanent residential pitches seeking residential permanent residential pitches in the area, excluding those containing an emerging family unit	0
12) New family units expected to arrive from elsewhere	0
13) New family formations expected to arise from within existing family units	26
Total Need	162
<i>Balance of Need and Supply</i>	
14) Total Additional Permanent Residential Pitches Requirement	110
Annualised Additional Permanent Residential Pitches Requirement	22

Source: ANA 2017

### Requirement for permanent residential pitches 2017-2022: steps of the calculation

11.13 Determining the accommodation needs of residential caravan dwellers uses the same process as determining the accommodation needs of Gypsies and Travellers. The following sections show the steps of the residential caravan dwellers accommodation needs calculations.

### Supply of pitches 2017-2022

#### **Step 1: Current permanent occupied residential pitches**

11.14 Based on information obtained through this study there are currently an estimated 857 permanent occupied residential pitches in the study area including 413 in Greater Norwich, 264 in Great Yarmouth (including 14 non-Gypsies and Travellers living on the Gypsy and

Traveller site at the time of the survey), 180 in North Norfolk, and 0 in the Broads Authority area. These permanent residential pitches are owned by occupying households or privately rented. There are other caravan sites across the study area, but according to site owners and managers, and other stakeholders, these are for holiday and seasonal use rather than permanent residential use.

**Step 2: Number of unused permanent residential pitches available**

11.15 According to the survey data there are currently 34 vacant permanent residential pitches on residential sites in the study area.

**Step 3: Number of existing pitches expected to become vacant, 2017-2022**

11.16 This is calculated using mortality rates as applied in conventional Housing Needs Assessments.

**Step 4: Number of family units on permanent residential pitches expressing a desire to leave the study area**

11.17 The percentage for assessment is 0%.

**Step 5: Number of family units on permanent residential pitches expressing a desire to live in housing**

11.18 It was assumed that all those currently living on pitches planning to move into housing in the next five years (step 5), or preferring to move into housing from an overcrowded pitch (step 11), would be able to do so. A supply of 0 pitches were expected from this source.

**Step 6: Permanent residential pitches planned to be built or brought back into use, 2017-2022**

11.19 This is determined by site owner survey data. There are 0 pitches expected to be built or brought back into use during the period 2017-2022.

**Step 7: Permanent residential pitches with temporary planning permission**

11.20 This is determined by local authority data. It is assumed families living on pitches whose planning permission expires within the period 2017-2022 will still require accommodation within the study area. There are currently 0 residential pitches with temporary planning permission located in the study area.

**Need for permanent residential pitches 2017-2022**

**Step 8: Family units on permanent residential pitches seeking permanent residential pitches in the study area 2017-2022**

11.21 Guidance suggests that those moving from pitch to pitch should be included in the need section. Based on previous work undertaken by *RRR Consultancy* it is estimated that around 10% of families seek to move within the study area.

11.22 This category of need overlaps with those moving due to overcrowding, counted in step 12, and so any family units which are both overcrowded and seeking accommodation are deducted from this total. This generates a total need of 86 pitches in the study area.

**Step 9: Family units on unauthorised pitches seeking permanent residential pitches in the area**

11.23 Guidance (DCLG 2007) indicates that it should be considered whether alternative accommodation is required for families living on unauthorised pitches. It is assumed that those families who are consistently moving around the study area are in need of permanent accommodation. There a need for 0 pitches is identified as arising from this source.

**Step 10: Family units on unauthorised developments seeking permanent residential pitches in the area**

11.24 The guidance indicates that the accommodation needs of families living on unauthorised pitches for which the residents either own or rent the pitch which does not have planning permission for permanent residential pitches must be considered. A need of 50 pitches currently arises from unauthorised pitches in Greater Norwich identified as part of the assessment.

**Step 11: Family units on overcrowded permanent residential pitches seeking residential pitches in the area**

11.25 Guidance indicates that those on overcrowded pitches should be provided with pitches of an adequate size. Households which also contain a newly formed family unit that has not yet left are excluded. This is because it is assumed that once the extra family unit leaves (included in the need figures in step 13) their accommodation will no longer be overcrowded. There is a need for 0 pitches in the study area to resolve overcrowding over the period 2017-2022.

**Step 12: New family units expected to arrive from elsewhere**

11.26 In the absence of any data derivable from secondary sources on the moving intentions of those outside the study area, it is assumed that the inflow of residential caravan dwellers into the area will be equivalent to the outflow i.e. net 0 pitches over the period 2017-22 (based on 0%).

**Step 13: New family formations expected to arise from within existing family units on permanent residential pitches**

11.27 As there are few families containing children residing on permanent residential pitches it is assumed that the rate of new family formation equates to the mortality rate. However, the calculation also incorporates the estimated population of families residing on unauthorised developments. As such, it is thought that this will result in the formation of 26 new households requiring residential pitches during 2017-2022.

## Requirements for residential pitches 2022-2036

11.28 Similar to estimating future pitch need, the assessment estimates the future permanent residential pitches provision for the period 2021-2036. Based on CLG (2015) household projections it is estimated that the number of households in the study area will increase by 3.73% over the five-year period 2017-2022. Future 5-year period mortality rates are projected to be the same as those for 2017-2022. Movement into and out of the study area is also assumed to continue at the 2017-2022 rate (0%). Table 11.2 shows the estimated need for residential pitches for the period 2021-26, whilst Table 11.3 summarises pitch needs for the period 2017-2036.

Table 11.2 Estimate of the need for permanent residential pitches 2022-2027	
<i>Pitches as at 2022</i>	
1) Estimated permanent residential pitches occupied by caravan dwellers	967
<i>Supply of permanent residential pitches</i>	
2) Pitches expected to become vacant due to mortality 2022-2027	27
3) Number of family units on permanent residential pitches expected to move out of the study area 2021-2026	0
Total Supply	27
<i>Need for permanent residential pitches</i>	
4) Family units moving into the study area (100% of outflow)	0
5) Newly forming family units	36
Total Need	36
<i>Additional Need</i>	
Total additional permanent residential pitches requirement, 2022-2027	9
Annualised additional permanent residential pitches requirement	2

Source: ANA 2017

## Summary

11.29 Table 11.3 summarises the number of permanent residential pitches, required over the period 2017-36. It shows that a further 140 permanent residential pitches are needed over nineteen years throughout the study area.

Table 11.3: Summary of permanent residential pitch needs 2017-36					
Period	2017-2022	2022-27	2027-2032	2032-2036	Total
Broads Authority	0	0	0	0	0
Great Yarmouth	29	3	3	3	38
Greater Norwich	91	5	5	5	106
North Norfolk	-10*	2	2	2	-4*
Total	110	10	10	10	140

Source: ANA 2017

\*The reason for the negative needs figures for North Norfolk is because they have more supply than need in the first five years. They have an additional supply of 33 pitches and a need of 23 pitches i.e. a need of 23 pitches less a supply of 33 pitches = a net need of -10 pitches.



## 12. Conclusions on the evidence

### Introduction

- 12.1 This final chapter draws conclusions from the evidence. It then makes a series of recommendations relating to meeting the identified need for new pitches, plots and moorings, site management and facilities, and recording and monitoring processes. The recommendations throughout this chapter are put forward by *RRR Consultancy* for the authorities to consider in accordance with respective policies and constraints.
- 12.2 The chapter begins by presenting an overview of the policy changes, followed by review of the needs and facilitating the needs of Gypsy and Traveller sites and Travelling Showpeople, followed by the needs and facilitating of needs for boat dwellers and residential caravan dwellers. It then concludes with key recommendations.

### Policy Changes

- 12.3 As noted in Chapter 1, in 2012 the Coalition Government brought about new statutory guidance regarding Gypsy and Traveller accommodation. This built on earlier commitments to strengthen measures to ensure fair and equal treatment for Gypsies and Travellers in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.
- 12.4 The new planning policy gave councils the freedom and responsibility to determine the right level of Gypsy and Traveller site and Travelling Showpeople plot provision in their area, in consultation with local communities and based on sound evidence such as ANAs, while ensuring fairness in the planning system. It sat within a broader package of reforms such as the abolition of the previous Government's Regional Strategies and the return of planning powers to councils and communities.
- 12.5 In August 2015 the DCLG published 'Planning Policy for Traveller Sites' (including Travelling Showpeople yards). It states that for the purposes of planning policy "gypsies and travellers" means:

*Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.*

- 12.6 In determining whether persons are "gypsies and travellers" for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:
- a) whether they previously led a nomadic habit of life; and
  - b) the reasons for ceasing their nomadic habit of life; and
  - c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.

12.7 For the purposes of planning policy, “travelling showpeople” means:

*Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.*

12.8 The accommodation needs calculations undertaken as part of this ANA were based on analysis of both secondary data and primary surveys with Gypsy, Traveller, Travelling Showpeople, boat dweller households, and residential caravan dwellers.

12.9 In March 2016 the Department of Communities and Local Government (DCLG) published its draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats. It states that when considering the need for caravans and houseboats local authorities will need to include the needs of a variety of residents in differing circumstances including, for example caravan and houseboat dwelling households and households residing in bricks and mortar dwelling households.

12.10 The Housing and Planning Act, which gained Royal Assent on 12 May 2016, deletes sections 225 and 226 of the Housing Act 2004, which previously identified ‘gypsies and travellers’ as requiring specific assessment for their accommodation needs when carrying out reviews of housing needs. Instead, the Act amends section 8 of the Housing Act 1985 governing the assessment of accommodation needs to include all people residing in or resorting to the district in caravans or houseboats. However, for planning purposes, as noted above, the DCLG Planning Policy for Traveller Sites (August 2015) still requires local authorities to identify the accommodation needs of Gypsies, Travellers and Travelling Showpeople.

12.11 Importantly, according to correspondence between *RRR Consultancy Ltd* and DCLG (27 October 2016), the DCLG stated that it is for local housing authorities to assess and understand the accommodation needs of people who reside in or resort to the area with respect to the provision of caravan sites or houseboats. Also, DCLG confirmed that the term ‘houseboat’ is defined elsewhere in legislation and not within the DCLG Guidance.

### **New accommodation provision**

12.12 In relation to Gypsies and Travellers, the main drivers of need are from newly forming families on authorised provision, families residing on overcrowded pitches, families living on unauthorised provision, and psychological aversion of households living in bricks and mortar accommodation. In relation to travelling Showpeople, need arises as a consequence of overcrowding on yards and from newly forming families. New accommodation provision for Gypsies and Travellers and Travelling Showpeople may need to accommodate larger families. Similarly, there may be a requirement for space to accommodate trailers and caravans, and particularly in relation to Travelling Showpeople, space for storage and maintenance of work equipment. Also, it is important to acknowledge the cultural sensitivities involved in allocating housing to Gypsy and Traveller and Travelling Showpeople families. For example, allocating housing without access to open space may negatively impact on re-housed families’ satisfaction with accommodation.

12.13 In relation to boat dwellers, there might be need for more than one boat on a mooring space (one to live on, and one for travel). They also need access to space on land for other facilities (including amenities such as electrics, water and pumping out facilities, and parking for cars etc). It was not possible to identify with certainty all of the existing households residing on houseboats, but the assessment has provided an estimation of the level of need and has usefully identified the general circumstances of those residing on houseboats. The need for more provision for boat dwellers primarily derives from the estimated level of unauthorised moorings and lack of authorised moorings for permanent boat dwellers.

12.14 Tables 12.1 to 12.6 summarise the accommodation needs of the 4 different community groups. The Gypsy and Traveller figures include different permutations (Option 1 is based on families who have *not permanently ceased to travel*, whilst Option 2 is based on families who *only travel for work*. The figures in brackets are the accommodation needs and 2022 base figures including households who display psychological aversion, but with the need addressed over 19 years, rather than within the first 5 years.

### **Accommodation needs of Gypsies and Travellers**

Period	Option 1	Option 2
Total 2017-22	19 (13)	-1 (-4)
Total 2022-27	17 (19)	14 (15)
Total 2027-32	18 (20)	14 (15)
Total 2032-36	19 (21)	14 (15)
Total 2017-2036	73 (73)	41 (41)

Source: ANA 2017

(NB The figures in brackets are the accommodation needs and 2022 base figures including households who display psychological aversion, but with the need addressed over 19 years, rather than within the first 5 years).

12.15 Tables 12.2 to 12.6 summarise the accommodation needs of each authority within the study area for each 5-year period:

Period	2017-2022	2022-27	2027-2032	2032-2036	Total
Broads Authority	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
Great Yarmouth	2 (2)	1 (1)	1 (1)	1 (1)	5 (5)
Greater Norwich	15 (9)	14 (16)	15 (17)	16 (18)	60 (60)
North Norfolk	2 (2)	2 (2)	2 (2)	2 (2)	8 (8)
<b>Total</b>	<b>19 (13)</b>	<b>17 (19)</b>	<b>18 (20)</b>	<b>19 (21)</b>	<b>73 (73)</b>

Source: ANA 2017

(NB The figures in brackets are the accommodation needs and 2022 base figures including households who display psychological aversion, but with the need addressed over 19 years, rather than within the first 5 years).

Table 12.3 (Option 2): Summary of Gypsy and Traveller and pitch needs 2017-36

Period	2017-2022	2022-27	2027-2032	2032-2036	Total
Broads Authority	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
Great Yarmouth	-1 (-1)	1 (1)	1 (1)	1 (1)	2 (2)
Greater Norwich	-2 (-5)	11 (12)	11 (12)	11 (12)	31 (31)
North Norfolk	2 (2)	2 (2)	2 (2)	2 (2)	8 (8)
<b>Total</b>	<b>-1 (-4)</b>	<b>14 (15)</b>	<b>14 (15)</b>	<b>14 (15)</b>	<b>41 (41)</b>

Source: ANA 2017

(NB The figures in brackets are the accommodation needs and 2022 base figures including households who display psychological aversion, but with the need addressed over 19 years, rather than within the first 5 years).

### **Accommodation needs of Travelling Showpeople**

Table 12.4: Summary of Travelling Showpeople plot needs 2017-36

Period	2017-2022	2022-27	2027-2032	2032-2036	Total
Broads Authority	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
Great Yarmouth	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
Greater Norwich	25 (25)	6 (6)	7 (7)	8 (8)	46 (46)
North Norfolk	0 (0)	0 (0)	0 (0)	0 (0)	0 (0)
<b>Total</b>	<b>25 (25)</b>	<b>6 (6)</b>	<b>7 (7)</b>	<b>8 (8)</b>	<b>46 (46)</b>

Source: ANA 2017

(NB figures in brackets are accommodation needs excluding households who do not travel for work)

### **Accommodation needs of residential boat dwellers**

Table 12.5: Summary of permanent residential moorings needs 2017-36

Period	2017-2022	2022-27	2027-2032	2032-2036	Total
Broads Authority	51	4	4	4	63
Great Yarmouth	0	0	0	0	0
Greater Norwich	0	0	0	0	0
North Norfolk	0	0	0	0	0
<b>Total</b>	<b>51</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>63</b>

Source: ANA 2017

### **Accommodation needs of residential caravan dwellers**

Table 12.6: Summary of permanent residential pitch needs 2017-36

Period	2017-2022	2022-27	2027-2032	2032-2036	Total
Broads Authority	0	0	0	0	0
Great Yarmouth	29	3	3	3	38
Greater Norwich	91	5	5	5	106
North Norfolk	-10	2	2	2	-4
<b>Total</b>	<b>110</b>	<b>10</b>	<b>10</b>	<b>10</b>	<b>140</b>

Source: ANA 2017

## Comparison between current accommodation need and previously determined need

- 12.16 Table 12.7 summarises previously determined accommodation need within the study area. The need to determine the accommodation needs of boat dwellers and residential caravan dwellers was only determined by the March 2016 DCLG guidance so was not considered by previous planning documents. The total number of Gypsy and Traveller pitches and Travelling Showpeople plots required identified by this ANA and previous planning documents remains broadly similar.
- 12.17 This includes a total of 73 Gypsy and Traveller pitches over a 20-year period identified by this ANA compared with 88 pitches identified by previous planning documents (albeit over varying planning periods) i.e. a difference of only 15 pitches. However, the difference between current and previously identified accommodation need increases to 47 pitches once families who do not travel to work have been excluded from the ANA accommodation needs calculations (i.e. 41 pitches currently compared to 88 previously).
- 12.18 The revised DCLG August 2015 definition leads to a different identification of need compared to previous accommodation assessments. The difference between this GTAA's, and previous study area GTAA's, could also be partly explained by some accommodation need having been met over recent years. Also, this ANA's need figures include a total of 21 potential pitches in the Greater Norwich area and 1 potential pitch in North Norfolk. If these pitches were excluded from the accommodation needs calculations the number of new pitches required would increase to 84 pitches (63 excluding families who do not travel for work).
- 12.19 In relation to Travelling Showpeople this ANA identifies an additional need of 46 plots compared with 15 plots previously identified i.e. a difference of 31 plots. This difference is likely due to no new plots being provided in the Greater Norwich area since the Joint Core Strategy was published in 2011.

Table 12.7: Summary of previous accommodation needs per local authority

Period	G&T Pitches	TS Plots	Transit pitches	Boat Moorings	Residential pitches
Broads Authority*	0	0	0	0	0
Greater Norwich <sup>\$</sup>	78	15	17	0	0
Great Yarmouth <sup>±</sup>	10	0	0	0	0
North Norfolk <sup>€</sup>	0	0	0	0	0
Total	88	15	17	0	0

Sources as below:

\* Although the Broads Authority Policy Local Plan Preferred Options consultation document does not state the number of new residential mooring required, policy PODM35 outlines new residential moorings criteria (p. 133)

<sup>\$</sup> For the period 2012-2026 (JCS 2011 p.42).

<sup>±</sup> Great Yarmouth Core Strategy 2013-2030 p.52

<sup>€</sup> Core Strategy 2012 p. 28

## Facilitating new provision

- 12.20 A key issue remains the facilitation of new sites / yards / moorings. Over the last 10 years most new provision within the study area consisted of privately owned sites, yards and

moorings. Most households on sites and yards stated that they preferred small family sites or yards.

- 12.21 Nationally, it is difficult to determine the extent to which new sites provided in the last 10 years are privately or publically owned as there are no national records. The January 2017 DCLG Count shows that around a third of Gypsy and Traveller caravans were residing on social rented sites, whilst the remaining two thirds were residing on privately owned sites. Interestingly, this compares with the January 2010 DCLG Count which indicated that just under half of Gypsy and Traveller caravans were residing on social rented sites, whilst the remaining half were residing on privately owned sites. This suggests either that the provision of new social rented pitches has not kept pace with demand and/or that Gypsy and Traveller households prefer to reside on privately owned sites.
- 12.22 Each DCLG Count provides details of all new local authority and Private Registered Provider sites opened since 1934 (although 38 sites are undated). In total, 28 local authority and Private Registered Provider sites have opened since 2010. The 28 new sites provide a total of 282 permanent pitches and 33 transit pitches able to accommodate 517 caravans.
- 12.23 Some Gypsy and Traveller sites are owned or managed by housing associations. Although DCLG data does not distinguish between local authority and housing association owned/managed social rented sites, the January 2017 Count indicates that there are a total of 327 local authority sites or schemes owned and/or managed by local authorities or private registered providers.
- 12.24 Although the Homes and Communities Agency (HCA) allocated £3m for the provision of new and improved sites within the 'East and South East' area for the period 2011-15, none of this funding was allocated to study area authorities. Local authorities can apply for funding as part of the HCA's 2015-18 Affordable Homes Programme (AHP). Although there is no specific budget for the provision of Gypsy and Traveller pitches, applications can be made within the remit of the AHP.
- 12.25 Analysis of the most recent HCA figures (September 2016) indicate that 2 new sites have recently been funded by the AHP including a new site of 22 pitches in Darlington, and a new site of 22 pitches in Harlow. However, at £2.4m the combined funding for the 2 new sites represents only a small proportion of the total AHP funding of the £527m already allocated for new affordable homes. Given the above, it may be difficult for study area local authorities to gain central government funding for new sites.
- 12.26 Analysis of current provision of Travelling Showpeople yards (see Chapter 7) suggests that the majority of current authorised, permanent provision within the study area is privately owned whilst there are no publically owned yards. As with other accommodation needs assessments undertaken by *RRR Consultancy Ltd*, this ANA concludes that most Travelling Showpeople families would prefer to reside on privately-owned family-sized yards, and that those who are unable to purchase land would still prefer to live on small yards. Travelling Showpeople families who cannot afford to their own yard tend to rent from the Travelling Showmen's Guild (as is the case in relation to the 50 plot yard in Greater Norwich).

- 12.27 As Travelling Showpeople primarily live on their own family sites or small rental yards, they are unlikely to move to public owned yards. The study area councils will therefore not be expected to provide yards, but to aid families and the Travelling Showpeople Guild to find appropriate land and assist them through the planning process.
- 12.28 It is recommended that local authorities work together to address the needs of Travelling Showpeople. This particularly the case as the 2 yards in the Greater Norwich area are overcrowded whilst households have family and work connections in both the Greater Norwich and North Norfolk areas. However, this does not preclude other study area authorities providing new Travelling Showpeople provision.
- 12.29 As in the case of Travelling Showpeople, analysis of current provision of Gypsy and Travellers sites (see Chapter 5) suggests that more than half of current authorised, permanent provision within the study area is privately owned. As with other accommodation needs assessments undertaken by *RRR Consultancy Ltd*, this ANA concludes that most Gypsy and Traveller families would prefer to reside on privately-owned family-sized sites, and that those who are unable to purchase land would still prefer to live on small sites.
- 12.30 The difference between current local public and private provision is due to several factors. One factor is that, as acknowledged by stakeholders (see Chapter 4), the development process including the acquisition of land is too expensive for most Gypsy and Traveller families, and the perceived complexity of the planning process can also a potential barrier. Another factor is that there has been a lack of finance for the development of publically owned sites for a number of years. Given current financial constraints on public expenditure, it is unlikely that this situation will change significantly in coming years.
- 12.31 Some accommodation need can be addressed by expanding existing sites (private sites rather than public sites). Further need could also be met by considering granting planning permission to occupiers residing on unauthorised developments. For example, authorisation of the unauthorised development in Greater Norwich would address a need in the area. This might require the council purchasing the land and granting planning permission, but as the site would be occupied by current occupants who are primarily self-sufficient, would not require further costs placed on the council. The council could then rent or lease the site to the current occupants. It is important to state, though, that this is just a logical inference: it is clearly for any council to decide, on the information before it, whether a particular unauthorised site should (or should not) be granted permission, and for the avoidance of doubt, this ANA is not recommending that the unauthorised site in Greater Norwich *should* be granted planning permission.
- 12.32 This ANA recommends that planning authorities could contact households who have previously displayed an interest in developing a new site but have progressed to the planning application stage.
- 12.33 Further, local authorities could consider helping to meet the needs of households unable to afford to own a site by renting or leasing small parcels of local authority owned land to them and assisting with planning applications and site development. Occupying families could be granted the option to wholly purchase the site later.
- 12.34 The local authorities could also consider sites developed on a cooperative basis, shared ownership, or small sites owned by a local authority, but rented to an extended Gypsy or

Traveller family for their own use. These options might involve the families carrying out physical development of the site (self-build) with the land owner providing the land on affordable terms. Local councils might develop such initiatives or in partnership with Registered Providers. Local authorities could jointly examine their Strategic Housing Land Availability Assessments (SHLAAs) or Housing and Economic Land Availability Assessments (HELAAs) to identify suitable locations. Provision could be provided through Local Plans and allocation or where there is a lower requirement managed through criteria based planning policies which detail how sites which come forward can be assessed.

- 12.35 For example, Bristol City Council (2009) considered various options for facilitating new sites including: only purchasing land for self-build projects; purchasing land and providing infrastructure such as drains and electricity supply and/or making finance available for materials; providing pre-built pitches which are available to buy using shared- or part-ownership options<sup>36</sup>.
- 12.36 Another example is South Somerset District Council which has been exploring, in consultation with local travellers, ideas such as: site acquisition funds; loans for private site provision through Community Development Financial Institutions; and joint ventures with members of the Gypsy and Traveller community<sup>37</sup>.
- 12.37 In relation to boat and residential caravan dwellers, this ANA recognises that some of the accommodation need could be addressed through affordable or supported housing. All four study area authorities (and not just the Broads Authority) could work together and contact known boat yards to determine which could accommodate permanent residential moorings. However, it is important to consider the impact on landscape and biodiversity of new moorings. In particular, new moorings should not adversely impact on the character or appearance of the surrounding area, protected species, priority habitats, or designated wildlife sites.
- 12.38 Similarly, the accommodation needs of residential caravan dwellers could also be addressed by the planning authorities contacting residential and touring caravan park owners to determine which could accommodate more residential caravan pitches.

## Managing Gypsy and Traveller sites

12.39 The Joseph Rowntree Foundation (JRF) (2016) undertook research on managing and delivering Gypsy and Traveller sites. Its case studies identified a variety of management approaches including:

1. Local authority owned and managed.
2. ALMO or housing association managed.

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<sup>36</sup> For discussion of the benefits of community land trusts in relation to Gypsies and Travellers see: <http://www.gypsy-traveller.org/where-you-live-2/community-land-trusts/>

<sup>37</sup> *A Big or Divided Society?* Interim Recommendations and Report of the Panel Review into the Impact of the Localism Bill and Coalition Government Policy on Gypsies and Travellers.



3. Local housing association managed.

12.40 Within the above three management approaches there are further typologies:

- a. A non-Gypsy/Traveller direct employee visits the site to undertake any management duties required.
  - b. A Gypsy/Traveller direct employee who is non-resident on any of the sites visits them to undertake any management duties required.
  - c. A Gypsy/Traveller site resident is employed by the organisation to undertake some management duties on that site and possibly other nearby sites. Site residents may refer to this role as a 'warden'.
4. Multi-agency unit managed – normally this is led by a county council in an area and includes police, health and education officers in the team.
  5. Housing association proactively building and managing sites in an area.
  6. Private Gypsy/Traveller organisation managing sites on a lease agreement.
  7. Private Gypsy/Traveller managing sites acquired from council divesting stock.

12.41 Importantly, the report states that sites were most likely be developed and better managed where a 'grasp the nettle' culture had been adopted i.e. where officers, politicians and Gypsies and Travellers were engaged in attempting to meet ongoing need for site provision (p.17). The report concludes by making 12 key recommendations to housing bodies, local authorities and government agencies:

- Recognise that site provision is the key to resolving continuous unauthorised encampments in an area.
- Where sites are not already in existence, consider 'negotiated stopping', rather than eviction, as a more resource-efficient and humane approach to unauthorised encampments.
- Understand unauthorised encampments and lack of permanent sites as housing issues reflecting unmet accommodation needs.
- Have robust Gypsy and Traveller Accommodation Assessment data based on open channels of communication with residents.
- Identify sites in Local Plans and consult with Gypsies, Travellers and other residents on location of sites.
- Encourage elected members to play a key role in leading local debates on managing and delivering sites, supported through training and by national political leadership.

- Recognise a duty to promote equality in this area and challenge discriminatory discourse about Gypsies and Travellers as part of this.
- Plan for a mixture of tenure, size and location for new Gypsy and Traveller sites, as with general housing stock.
- Bring in Gypsy and Traveller accommodation alongside other social housing, in terms of policies, administration and standards of management.
- Recognise that a well-run site will not cost money in the long term (income can cover costs) but capital funding is needed initially to support delivery.
- See information sharing as key to good management: inefficiencies occur when lines of accountability between departments and agencies are blurred.
- Pay careful consideration to future management and ownership issues when undertaking reviews of local authority sites.

## The location of provision

- 12.42 Stakeholder comments suggested that smaller sites are preferred by Gypsy and Traveller and Travelling Showpeople households due to better management and maintenance of sites / yards and feeling safer, and that boat dwellers prefer residential mooring yards due to better access to utilities and facilities. Ongoing monitoring of site / plot / mooring provision and vacant provisions should be undertaken by the local authorities alongside discussions with Gypsies, Travellers, Travelling Showpeople and boat dwellers to ensure that any additional need that may arise is identified. The precise location (along with design and facilities) should, however, be drawn up in consultation with Gypsies, Travellers, Travelling Showpeople, boat dwellers and other stakeholders to ensure the extra provision meets their needs, is in appropriate locations and is deliverable.
- 12.43 Ensuring that new sites / plots / moorings are located in a safe environment is important although the impact of land costs on determining feasibility must also be considered. The settled community neighbouring the sites / plots / moorings should also be involved in the consultation from an early stage. There may be scope for expanding existing sites / yards and boat yards to meet some arising need. However, in relation to Gypsies and Travellers, the preference is for smaller sites / plots which tend to be easier to manage.
- 12.44 In terms of identifying broad locations for new permanent sites / yards / moorings, there are a number of factors which could be considered including:

### Costs

- How do land costs impact on feasibility i.e. is it affordable?
- Implementation of services – is it possible for the new site to connect to nearby mains services e.g. electricity, gas, water or sewerage?
- Can good drainage be ensured on the new provision?

*Social*

- Does the proposed location of the new provision lie within a reasonable distance of school catchment areas?
- Sustainability – is the proposed location close to existing bus routes?
- Proximity of social and leisure services – is the proposed location close to leisure facilities such as sports centres, cinemas etc. or welfare services such as health and social services etc.

*Availability*

- Who owns the land and are they willing to sell / rent?
- Is access easy or will easements across other land be needed both for residents and services/utilities?
- Are utilities close enough to service the provision at realistic prices?

*Deliverability*

- Does the proposed location meet existing general planning policy in terms of residential use, for example in relation to flooding and the historic environment?
- Can/will the owner sell the land easily and quickly?
- Can utilities be connected to the proposed provision?
- Can highways connect to the proposed provision?

12.45 Considering the evidence gathered throughout the ANA, it is likely that the key factors determining new provision in the study area are:

- The affordability of land suitable for the development of new sites and the cost of development
- The need to ensure that new provision are within reasonable travelling distance of social, welfare and cultural services
- The need to carefully consider the proximity of new provisions to existing provisions i.e. whether social tensions might arise if new provisions are located too close to existing provisions
- The sustainability of new provisions i.e. ensuring that they do not detrimentally impact on the local environment and do not place undue pressure on the local infrastructure.

12.46 It is important that new provisions are located close to amenities such as shops, schools and health facilities and have good transport links. DCLG (2015) guidance suggests that local planning authorities should strictly limit new Gypsy and Traveller site development in

the open countryside that is away from existing settlements or outside areas allocated in the development plan. Local planning authorities should ensure that sites in rural areas do not dominate the nearest settled community, and avoid placing an undue pressure on the local infrastructure.

- 12.47 It also states that when considering applications, local planning authorities should attach weight to the following matters:
- a. effective use of previously developed (brownfield), untidy or derelict land
  - b. sites being well planned or soft landscaped in such a way as to positively enhance the environment and increase its openness
  - c. promoting opportunities for healthy lifestyles, such as ensuring adequate landscaping and play areas for children
  - d. not enclosing a site with so much hard landscaping, high walls or fences, that the impression may be given that the site and its occupants are deliberately isolated from the rest of the community
- 12.48 There may be families within the study area who would like to increase the number of pitches and plots and/or number of caravans allowed per pitch or plot on existing sites/yards. The consideration of expansion of sites with adequate space would contribute towards meeting existing need. Also, boat yard owners might also like to increase the number of residential moorings allowed on their yard, and some yard owners currently with no residential moorings might consider having some.
- 12.49 Similarly, consideration could be given to whether it would be appropriate to grant planning permission for unauthorised sites in the study area.
- 12.50 In some instances it may be necessary for the identified need to be met outside of the local authority where it arises, and local planning authorities should work together under the Duty to Co-operate where this is the case.
- 12.51 An example of this is how the authorities who jointly commissioned this ANA could work together to meet the needs of the Travelling Showpeople. Whilst the families currently reside in Greater Norwich, they also have work and family connections to North Norfolk and Great Yarmouth. As such, the accommodation needs of the Travelling Showpeople families could be jointly met across the study area.

### **The size of new provision**

- 12.52 DCLG (2008) guidance states that there is no one-size-fits-all measurement of a pitch as, in the case of the settled community, this depends on the size of individual families and their particular needs. However, they do suggest that as a general guide, it is possible to specify that an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, (or two trailers, drying space for clothes, a lockable shed for bicycles, wheelchair storage etc.), parking space for two vehicles and a small garden area.
- 12.53 Based on previous and current DCLG guidance, it can be determined that a pitch of approximately 325 square metres would take into account all minimum separation distance

guidance between caravans and pitch boundaries as stipulated in guidance and safety regulations for caravan development. A pitch size of at least 500 square metres would comfortably accommodate the following on-pitch facilities:

- Hard standing for 1 touring/mobile caravan and 1 static caravan
- 2 car parking spaces
- 1 amenity block
- Hard standing for storage shed and drying
- Garden/amenity area

12.54 If granting permission on an open plan basis, permission should be given on a pitch by pitch equivalent basis to the above. For example, an existing pitch which has enough space to accommodate a chalet structure, two touring caravans and 1 – 2 static caravans along with four parking spaces, two blocks etc., could be counted as two pitches even if based on an open plan basis on one structured pitch. However, this would need to be recorded for future monitoring.

12.55 In relation to plots, there is no set guidance. However, in addition to the guidance above, Travelling Showpeople also have need for adequate space to store and maintain large pieces of equipment (including lorries and fairground equipment).

12.56 As with plots, there are no set guidance, but mooring spaces need to consider space on land for access to facilities and amenities and car parking spaces, and a boat to live on. They also need to have safe and sufficient means to access boats from land.

### **Transit provision**

12.57 As noted in previous chapters, when families stop in the area, they usually do so only for short periods of time. Transit provision can alleviate instances of unauthorised encampments and the negative publicity associated with them. A lack of transit sites or an established negotiated stopping place policy means that families residing on unauthorised encampments tend to be moved on to neighbouring parts of the county. Unauthorised encampments can lead to conflict with the settled community whilst undertaking enforcement action has cost implications in terms of police and court costs. As such, it is recommended that all study area authorities implement a negotiated stopping places policy and ensure that this known to all relevant departments and agencies.

12.58 The term ‘negotiated stopping’ is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent ‘built’ transit sites but negotiated arrangements which allow caravans to be sited on specified land for an agreed and limited period with the provision of limited services such as water, waste disposal and toilets. The arrangement is between the local authority and the (temporary) residents.

12.59 An alternative is the provision of emergency stopping places. This is land used temporarily as authorised short-term (less than 28 days) stopping places for all travelling communities. They may not require planning permission if they are in use for fewer than 28 days in a year. The requirements for emergency stopping places reflect the fact that the site will only

be used for a proportion of the year and that individual households will normally only stay on the site for a few days.

12.60 There is no need for transit provision for Travelling Showpeople.

12.61 In relation to boat dwellers, it is recommended that the current 24-hour moorings are made available for longer periods of time during out of season.

## Summary

12.62 Table 12.8 summarises the accommodation needs of the four different community groups over the period 2017-2036. The Option 1 column (based on families who have *not permanently ceased to travel*) shows a need of 73 Gypsy and Traveller pitches. The Option 2 column (based on families who *only travel for work*) shows a need of 41 Gypsy and Traveller pitches. It is recommended that each of the 4 authority areas implement a negotiated stopping place policy.

12.63 Table 12.8 also shows that there is a need in the study area over the next nineteen years for 46 plots for Travelling Showpeople, 63 boat moorings, and 140 pitches for non-Gypsy and Traveller households residing permanently on residential pitches.

Table 12.8: Summary of accommodation needs 2017-36

Period	G&T Pitches Option 1	G&T Pitches Option 2	TS Plots	Residential Boat Moorings	Residential pitches
Total 2017-22	19 (13)	-1 (-4)	25	51	110
Total 2022-27	17 (19)	14 (15)	6	4	10
Total 2027-32	18 (20)	14 (15)	7	4	10
Total 2032-36	19 (21)	14 (15)	8	4	10
Total 2017-36	73 (73)	41 (41)	46	63	140

Source: ANA 2017

(NB The figures in brackets are the accommodation needs and 2022 base figures including households who display psychological aversion, but with the need addressed over 19 years, rather than within the first 5 years).

12.64 Some Gypsies and Travellers residing in bricks and mortar accommodation do so for health or education reasons etc., although some do so due to a lack of choice. It is the latter who are more likely to experience “psychological aversion” to residing in bricks and mortar accommodation and would prefer to reside on a site. As discussed in Chapters 5 and 6, it can be difficult to determine need arising from “psychological aversion”. As such, the accommodation needs figures in Table 12.8 above both include and exclude need arising from “psychological aversion”. Also, this ANA recommends that any accommodation need not met within five years (including that arising from “psychological aversion”) will have to be met in subsequent periods (2022-2036).

12.65 The policy process that follows on from this research will also need to consider how the identified needs relating to Gypsies, Travellers, Travelling Showpeople, boat dwellers, and residential caravan dwellers can be supported through the planning process. The study also highlighted a number of issues relating to the management and condition of provisions i.e. that smaller sites are easier to manage.

12.66 Finally, this report primarily recommends that the commissioning councils work jointly where appropriate to address accommodation needs. The other recommendations are as follows:

- Develop a holistic vision for their work on Gypsies and Travellers, Travelling Showpeople yards, boat dwellers and residential caravan dwellers and embed it in Community and Homelessness Strategies, Local Plans and planning and reporting obligations under the Equality Act 2010.
- The councils could either meet their Gypsy and Traveller needs arising from psychological aversion within the first five years or over 19 years.
- Provide regular training and workshop sessions with local authority and service provider employees (and elected members) help them to further understand the key issues facing the Gypsy and Traveller, Travelling Showpeople yards, boat dwellers and residential caravan communities.
- Further formalise communication processes between relevant housing, planning and enforcement officers etc. in both the study area and neighbouring local authorities.
- Develop criteria and processes for determining the suitability of Gypsy and Traveller sites, Travelling Showpeople yards, boat dwellers' residential moorings, and residential caravan sites as indicated above for including in emerging/future Local Plans.
- Review existing provision for opportunities for expansion where suitable and appropriate.
- Study area authorities to support and guide potential site developers through the planning application process. This could include helping the owners of small family sites to apply for planning permission to extend sites in order to address future need.
- Authorities could consider helping to meet the needs of households unable to afford to own a site by renting or leasing small parcels of local authority owned land to them and assisting with planning applications and site development.
- To determine whether some of the accommodation needs of boat and caravan dwellers can be met by affordable or supported housing.
- To consider alternative site management structures as discussed by the Joseph Rowntree Foundation (JRF) (2016) research.
- To consider applying for funding for new sites under the HCA's 2015-18 Affordable Homes Programme (AHP).
- To consider alternative site funding mechanisms such as: site acquisition funds; loans for private site provision through Community Development Financial Institutions; and joint ventures with members of the Gypsy and Traveller community.

- To consider alternative options for developing new sites such as sites developed on a cooperative basis, shared ownership, or small sites owned by a local authority, but rented to families for their own use.
- Develop a common approach to recording unauthorised encampments which includes information such as location, type of location (e.g. roadside, park land etc.), number of caravans/vehicles involved, start date, end date, reason for unauthorised encampment (e.g. travelling through area, attending event, visiting family etc.), family name(s), and action taken (if any).
- Encourage local housing authorities to include Gypsy and Traveller categories on ethnic monitoring forms to improve data on population numbers, particularly in housing.
- Better sharing of information between agencies which deal with the Gypsy and Traveller, Travelling Showpeople and Boat Dwellers communities.
- The population size and demographics of all four community groups can change rapidly. As such, their accommodation needs should be reviewed every 5 to 7 years.



# Appendix 1: Local Authority Needs Tables

## **Broads Authority (Gypsies and Travellers): Options 1 and 2**

*This is the same for both Options 1 and 2 (a and b)*

Table A.1a: Five year estimate of the need for permanent/residential site pitches (2017-2022)	
1) Current occupied permanent / residential site pitches	0
<i>Current residential supply</i>	
2) Number of unused residential pitches available	0
3) Number of existing pitches expected to become vacant through mortality 2017-2022	0
4) Number of family units on sites expected to leave the area in the next 5 years	0
5) Number of family units on sites expected to move into housing in the next 5 years	0
6) Residential pitches planned to be built or to be brought back into use 2016-2021	0
7) Additional supply generated by movement within the stock	0
8) Less pitches with temporary planning permission	0
<b>Total Supply</b>	<b>0</b>
<i>Current residential need: Pitches</i>	
9) Family units (on pitches) seeking residential pitches in the area, 2017-2022, excluding those already counted as moving due to overcrowding in step 12	0
10) Family units on unauthorised encampments requiring residential pitches in the area	0
11) Family units on unauthorised developments requiring residential pitches in the area	0
12) Family units currently overcrowded on pitches seeking residential pitches in the area, excluding those containing an emerging family unit	0
13) New family units expected to arrive from elsewhere	0
14) New family formations expected to arise from within existing family units on sites	0
Total Need	0
<i>Current residential need: Housing</i>	
15) Family units in housing but with a psychological aversion to housed accommodation	0
Total Need	<b>0</b>
<i>Balance of Need and Supply</i>	
Total Need	<b>0</b>
Less total supply	<b>0</b>
Total Additional Pitch Requirement	<b>0</b>
Annualised Additional Pitch Requirement	<b>0</b>

Source: ANA 2017

Table A1b: Twenty year summary (2017 – 2036)							
	Base Numbers 2017	Additional need 2017- 2022	Additional need 2022- 2027	Additional need 2027- 2032	Additional need 2032- 2036	Additional need 2017- 2036	Numbers as at 2036
Residential pitches	0	0	0	0	0	0	0

Source: ANA 2017

**Greater Norwich (Gypsy and Traveller Pitches): Option 1**

Table A.2a: Five year estimate of the need for permanent/residential site pitches (2017-2022)	
1) Current occupied permanent / residential site pitches	84
<i>Current residential supply</i>	
2) Number of unused residential pitches available	2
3) Number of existing pitches expected to become vacant through mortality 2017-2022	3
4) Number of family units on sites expected to leave the area in the next 5 years	0
5) Number of family units on sites expected to move into housing in the next 5 years	0
6) Residential pitches planned to be built or to be brought back into use 2017-2022	21
7) Less pitches with temporary planning permission	4
<b>Total Supply</b>	<b>22</b>
<i>Current residential need: Pitches</i>	
8) Family units (on pitches) seeking residential pitches in the area, 2017-2022, excluding those already counted as moving due to overcrowding in step 12	2
9) Family Units on transit sites requiring pitches in the area	2
10) Family units on unauthorised encampments requiring residential pitches in the area	0
11) Family units on unauthorised developments requiring residential pitches in the area	1
12) Family units currently overcrowded on pitches seeking residential pitches in the area, excluding those containing an emerging family unit	6
13) New family units expected to arrive from elsewhere	0
14) New family formations expected to arise from within existing family units on sites	18
Total Need	29
<i>Current residential need: Housing</i>	
15) Family units in housing but with a psychological aversion to housed accommodation	8 (2)
Total Need	<b>37 (31)</b>
<i>Balance of Need and Supply</i>	
Total Need	<b>37 (31)</b>
Less total supply	<b>22</b>
Total Additional Pitch Requirement	<b>15 (9)</b>
Annualised Additional Pitch Requirement	<b>3</b>

Source: ANA 2017

Table A2: Twenty year summary (2017– 2036)

	Base Numbers 2017	Additional need 2017- 2022	Additional need 2022- 2027	Additional need 2027- 2032	Additional need 2032- 2036	Additional need 2017- 2036	Numbers as at 2036
Residential pitches	84	15 (9)	14 (16)	15 (17)	16 (18)	60 (60)	144 (144) *

Source: ANA 2017

(\*Plus potentials and vacant pitches from the first five year period)(NB The figures in brackets are the accommodation needs and 2022 base figures including households who display psychological aversion, but with the need addressed over 19 years, rather than within the first 5 years)

**Greater Norwich (Gypsy and Traveller Pitches): Option 2**

Table A.3a: Five year estimate of the need for permanent/residential site pitches (2017-2022)	
1) Current occupied permanent / residential site pitches	84
<i>Current residential supply</i>	
2) Number of unused residential pitches available	2
3) Number of existing pitches expected to become vacant through mortality 2017-2022	3
4) Number of family units on sites expected to leave the area in the next 5 years	0
5) Number of family units on sites expected to move into housing in the next 5 years	0
6) Residential pitches planned to be built or to be brought back into use 2017-2022	21
7) Less pitches with temporary planning permission	4
<b>Total Supply</b>	<b>22</b>
<i>Current residential need: Pitches</i>	
8) Family units (on pitches) seeking residential pitches in the area, 2017-2022, excluding those already counted as moving due to overcrowding in step 12	0
9) Family Units on transit sites requiring pitches in the area	2
10) Family units on unauthorised encampments requiring residential pitches in the area	0
11) Family units on unauthorised developments requiring residential pitches in the area	1
12) Family units currently overcrowded on pitches seeking residential pitches in the area, excluding those containing an emerging family unit	3
13) New family units expected to arrive from elsewhere	0
14) New family formations expected to arise from within existing family units on sites	9
Total Need	15
<i>Current residential need: Housing</i>	
15) Family units in housing but with a psychological aversion to housed accommodation	5 (2)
Total Need	<b>20 (17)</b>
<i>Balance of Need and Supply</i>	
Total Need	<b>20 (17)</b>
Less total supply	<b>22</b>
Total Additional Pitch Requirement	<b>-2 (-5)</b>
Annualised Additional Pitch Requirement	<b>-1</b>

Source: ANA 2017

Table A3b: Twenty year summary (2016 – 2036)							
	Base Numbers 2017	Additional need 2017- 2022	Additional need 2022- 2027	Additional need 2027- 2032	Additional need 2032- 2036	Additional need 2017- 2036	Numbers as at 2036
Residential pitches	84	-2 (-5)	11(12)	11 (12)	11 (12)	31(31)	115 (115)*

Source: ANA 2017

(\*Plus potentials and vacant pitches from the first five year period)(NB The figures in brackets are the accommodation needs and 2022 base figures including households who display psychological aversion, but with the need addressed over 19 years, rather than within the first 5 years)

## Greater Norwich (Travelling Showpeople Plots)

**This is the same for both including and excluding those who do NOT travel for work as all with need travel for work**

Table A.4a: Five year estimate of the need for permanent/residential plots (2017-2022)	
1) Current occupied permanent / residential plots	55
<i>Current residential supply</i>	
2) Number of unused residential plots available	0
3) Number of existing pitches expected to become vacant through mortality 2017-2022	2
4) Number of family units on sites expected to leave the area in the next 5 years	1
5) Number of family units on sites expected to move into housing in the next 5 years	0
6) Residential plots planned to be built or to be brought back into use 2017-2022	0
7) Less pitches with temporary planning permission	0
<b>Total Supply</b>	<b>3</b>
<i>Current residential need: Pitches</i>	
8) Family units (on plots) seeking residential plots in the area, 2017-2022, excluding those already counted as moving due to overcrowding in step 12	11
9) Family Units on transit sites requiring plots in the area	0
10) Family units on unauthorised encampments requiring residential plots in the area	0
11) Family units on unauthorised developments requiring residential plots in the area	0
12) Family units currently overcrowded on plots seeking residential plots in the area, excluding those containing an emerging family unit	10
13) New family units expected to arrive from elsewhere	0
14) New family formations expected to arise from within existing family units on yards	7
<b>Total Need</b>	<b>28</b>
<i>Balance of Need and Supply</i>	
Total Need	<b>28</b>
Less total supply	<b>3</b>
Total Additional Plot Requirement	<b>25</b>
Annualised Additional Plot Requirement	<b>5</b>

Source: ANA 2017

Table A4b: Twenty year summary (2017– 2036)							
	Base Numbers 2017	Additional need 2017- 2022	Additional need 2022- 2027	Additional need 2027- 2032	Additional need 2032- 2036	Additional need 2017- 2036	Numbers as at 2036
Residential plots	55	25	6	7	8	46	101

Source: ANA 2017

N.B. It is recommend that this accommodation need is shared between the Greater Norwich, North Norfolk, and Great Yarmouth authorities as families completing the surveys expressed wanting to reside either in the Greater Norwich, North Norfolk areas, or Great Yarmouth.

**Great Yarmouth (Gypsy and Traveller Pitches): Option 1**

Table A.5a: Five year estimate of the need for permanent/residential site pitches (2017-2022)	
1) Current occupied permanent / residential site pitches	4
<i>Current residential supply</i>	
2) Number of unused residential pitches available	2
3) Number of existing pitches expected to become vacant through mortality 2017-2022	0
4) Number of family units on sites expected to leave the area in the next 5 years	0
5) Number of family units on sites expected to move into housing in the next 5 years	0
6) Residential pitches planned to be built or to be brought back into use 2017-2022	0
7) Less pitches with temporary planning permission	0
<b>Total Supply</b>	<b>2</b>
<i>Current residential need: Pitches</i>	
8) Family units (on pitches) seeking residential pitches in the area, 2017-2022, excluding those already counted as moving due to overcrowding in step 12	0
9) Family Units on transit sites requiring pitches in the area	2
10) Family units on unauthorised encampments requiring residential pitches in the area	0
11) Family units on unauthorised developments requiring residential pitches in the area	0
12) Family units currently overcrowded on pitches seeking residential pitches in the area, excluding those containing an emerging family unit	0
13) New family units expected to arrive from elsewhere	0
14) New family formations expected to arise from within existing family units on sites	1
Total Need	3
<i>Current residential need: Housing</i>	
15) Family units in housing but with a psychological aversion to housed accommodation	1 (1)
Total Need	<b>4 (4)</b>
<i>Balance of Need and Supply</i>	
Total Need	<b>4 (4)</b>
Less total supply	<b>2</b>
Total Additional Pitch Requirement	<b>2 (2)</b>
Annualised Additional Pitch Requirement	<b>0.3</b>

Source: ANA 2017

(NB The figures in brackets are the accommodation needs and 2022 base figures including households who display psychological aversion, but with the need addressed over 19 years, rather than within the first 5 years)

Table A5b: Twenty year summary (2017– 2036)							
	Base Numbers 2017	Additional need 2017- 2022	Additional need 2022- 2027	Additional need 2027- 2032	Additional need 2032- 2036	Additional need 2017- 2036	Numbers as at 2036
Residential pitches	4	2	1	1	1	5	9 *

Source: ANA 2017

(\*Plus potentials and vacant pitches from the first five year period and 20 further potentials)

**Great Yarmouth (Gypsy and Traveller Pitches): Option 2**

Table A.6a: Five year estimate of the need for permanent/residential site pitches (2017-2022)	
1) Current occupied permanent / residential site pitches	4
<i>Current residential supply</i>	
2) Number of unused residential pitches available	2
3) Number of existing pitches expected to become vacant through mortality 2017-2022	0
4) Number of family units on sites expected to leave the area in the next 5 years	0
5) Number of family units on sites expected to move into housing in the next 5 years	0
6) Residential pitches planned to be built or to be brought back into use 2017-2022	0
7) Less pitches with temporary planning permission	0
<b>Total Supply</b>	<b>2</b>
<i>Current residential need: Pitches</i>	
8) Family units (on pitches) seeking residential pitches in the area, 2017-2022, excluding those already counted as moving due to overcrowding in step 12	0
9) Family Units on transit sites requiring pitches in the area	0
10) Family units on unauthorised encampments requiring residential pitches in the area	0
11) Family units on unauthorised developments requiring residential pitches in the area	0
12) Family units currently overcrowded on pitches seeking residential pitches in the area, excluding those containing an emerging family unit	0
13) New family units expected to arrive from elsewhere	0
14) New family formations expected to arise from within existing family units on sites	1
<b>Total Need</b>	<b>1</b>
<i>Current residential need: Housing</i>	
15) Family units in housing but with a psychological aversion to housed accommodation	0
<b>Total Need</b>	<b>1</b>
<i>Balance of Need and Supply</i>	
<b>Total Need</b>	<b>1</b>
<b>Less total supply</b>	<b>2</b>
<b>Total Additional Pitch Requirement</b>	<b>-1</b>
<b>Annualised Additional Pitch Requirement</b>	<b>0</b>

Source: ANA 2017

Table A6b: Twenty year summary (2017– 2036)							
	Base Numbers 2017	Additional need 2017- 2022	Additional need 2022- 2027	Additional need 2027- 2032	Additional need 2032- 2036	Additional need 2017- 2036	Numbers as at 2036
Residential pitches	4	-1	1	1	1	2	6 *

Source: ANA 2017

(\*Plus potentials and vacant pitches from the first five year period and 20 further potentials)

## North Norfolk (Gypsy and Traveller Pitches): Options 1 and 2

This is the same for both Option 1 and option 2

Table A.7a: Five year estimate of the need for permanent/residential site pitches (2017-2022)	
1) Current occupied permanent / residential site pitches	13
<i>Current residential supply</i>	
2) Number of unused residential pitches available	0
3) Number of existing pitches expected to become vacant through mortality 2017-2022	0
4) Number of family units on sites expected to leave the area in the next 5 years	0
5) Number of family units on sites expected to move into housing in the next 5 years	0
6) Residential pitches planned to be built or to be brought back into use 2017-2022	1
7) Less pitches with temporary planning permission	0
<b>Total Supply</b>	<b>1</b>
<i>Current residential need: Pitches</i>	
8) Family units (on pitches) seeking residential pitches in the area, 2017-2022, excluding those already counted as moving due to overcrowding in step 12	0
9) Family Units on transit sites requiring pitches in the area	0
10) Family units on unauthorised encampments requiring residential pitches in the area	0
11) Family units on unauthorised developments requiring residential pitches in the area	0
12) Family units currently overcrowded on pitches seeking residential pitches in the area, excluding those containing an emerging family unit	0
13) New family units expected to arrive from elsewhere	0
14) New family formations expected to arise from within existing family units on sites	2
<b>Total Need</b>	<b>2</b>
<i>Current residential need: Housing</i>	
15) Family units in housing but with a psychological aversion to housed accommodation	1 (1)
<b>Total Need</b>	<b>3 (3)</b>
<i>Balance of Need and Supply</i>	
<b>Total Need</b>	<b>3 (3)</b>
Less total supply	<b>1</b>
<b>Total Additional Pitch Requirement</b>	<b>2</b>
<b>Annualised Additional Pitch Requirement</b>	<b>0.4</b>

Source: ANA 2017

Table A7b: Twenty year summary (2017 – 2036)							
	Base Numbers 2017	Additional need 2017- 2022	Additional need 2022- 2027	Additional need 2027- 2032	Additional need 2032- 2036	Additional need 2017- 2036	Numbers as at 2036
Residential pitches	13	2	2	2	2	8	21 *

Source: ANA 2017

(\*Plus potentials and vacant pitches from the first five year period )



## Broads Authority (Boat Moorings)

Table 10.1 Estimate of the need for Permanent Residential Moorings 2017-2022	
1) Current identified permanent residential moorings	1
<i>Current residential supply</i>	
2) Number of unused residential moorings available	0
3) Number of existing permanent residential moorings expected to become vacant through mortality 2017-2022	0
4) Number of household units on permanent residential moorings expected to leave the study area in next 5 years	0
5) Number of residential units on permanent residential moorings expected to move into housing in next 5 years	0
6) Permanent residential moorings planned to be built or to be brought back into use 2016-2021	0
7) Less permanent residential moorings with temporary planning permission (occupied)	-1*
Total Supply	-1
<i>Current residential need: Moorings</i>	
8) Residential units (permanent residential moorings) seeking permanent residential moorings in the area, 2017-2022, excluding those already counted as moving due to overcrowding in step 12	0
9) Estimated residential units on unauthorised moorings requiring permanent residential moorings in the area	50
10) Residential units identified on unauthorised developments requiring residential permanent residential moorings in the area	0
11) Residential units currently overcrowded on permanent residential moorings seeking residential permanent residential moorings in the area, excluding those containing an emerging residential unit	0
12) New residential units expected to arrive from elsewhere	0
13) New residential unit formations expected to arise from within existing family units	0
14) New residential units on waiting lists	0
Total Need	50
<i>Balance of Need and Supply</i>	
Total Additional Permanent Residential Moorings Requirement	51
Annualised Additional Permanent Residential Moorings Requirement	10

(\* there were a further 9 unoccupied temporary moorings at the time of the survey)

Table A8b: Twenty year summary (2017 – 2036)							
	Base Numbers 2017	Additional need 2017- 2022	Additional need 2022- 2027	Additional need 2027- 2032	Additional need 2032- 2036	Additional need 2017- 2036	Numbers as at 2036
Residential pitches	1	51	4	4	5	64	65

Source: ANA 2017



**Greater Norwich (Residential Caravan Pitches)**

Table A.10a: Five year estimate of the need for permanent/residential site pitches (2017-2022)	
1) Current occupied permanent / residential site pitches	413
<i>Current residential supply</i>	
2) Number of unused residential pitches available	5
3) Number of existing pitches expected to become vacant through mortality 2017-2022	9
4) Number of family units on sites expected to leave the area in the next 5 years	0
5) Number of family units on sites expected to move into housing in the next 5 years	0
6) Residential pitches planned to be built or to be brought back into use 2017-2022	0
7) Less pitches with temporary planning permission	0
<b>Total Supply</b>	<b>14</b>
<i>Current residential need: Pitches</i>	
8) Family units (on pitches) seeking residential pitches in the area, 2017-2022, excluding those already counted as moving due to overcrowding in step 12	42
9) Family units on unauthorised encampments requiring residential pitches in the area	0
10) Family units on unauthorised developments requiring residential pitches in the area	50
11) Family units currently overcrowded on pitches seeking residential pitches in the area, excluding those containing an emerging family unit	0
12) New family units expected to arrive from elsewhere	13
13) New family formations expected to arise from within existing family units on sites	0
14) New family units on waiting site waiting lists	0
<b>Total Need</b>	<b>105</b>
<i>Balance of Need and Supply</i>	
Total Need	<b>105</b>
Less total supply	<b>14</b>
Total Additional Pitch Requirement	<b>91</b>
Annualised Additional Pitch Requirement	<b>18</b>

Source: ANA 2017

Table A10b: Twenty year summary (2017 – 2036)							
	Base Numbers 2017	Additional need 2017- 2022	Additional need 2022- 2027	Additional need 2027- 2032	Additional need 2032- 2036	Additional need 2017- 2036	Numbers needed as at 2036
Residential pitches	413	91	5	5	5	106	519

Source: ANA 2017

**Greater Yarmouth (Residential Caravan Pitches)**

Table A.11a: Five year estimate of the need for permanent/residential site pitches (2017-2022)	
1) Current occupied permanent / residential site pitches	264
<i>Current residential supply</i>	
2) Number of unused residential pitches available	0
3) Number of existing pitches expected to become vacant through mortality 2017-2022	5
4) Number of family units on sites expected to leave the area in the next 5 years	0
5) Number of family units on sites expected to move into housing in the next 5 years	0
6) Residential pitches planned to be built or to be brought back into use 2016-2021	0
7) Less pitches with temporary planning permission	0
<b>Total Supply</b>	<b>5</b>
<i>Current residential need: Pitches</i>	
8) Family units (on pitches) seeking residential pitches in the area, 2017-2022, excluding those already counted as moving due to overcrowding in step 12	26
9) Family units on unauthorised encampments requiring residential pitches in the area	0
10) Family units on unauthorised developments requiring residential pitches in the area	0
11) Family units currently overcrowded on pitches seeking residential pitches in the area, excluding those containing an emerging family unit	0
12) New family units expected to arrive from elsewhere	0
13) New family formations expected to arise from within existing family units on sites	8
14) New family units on waiting site waiting lists	0
<b>Total Need</b>	<b>34</b>
<i>Balance of Need and Supply</i>	
Total Need	<b>34</b>
Less total supply	<b>5</b>
Total Additional Pitch Requirement	<b>29</b>
Annualised Additional Pitch Requirement	<b>6</b>

Source: ANA 2017

Table A11b: Twenty year summary (2017 – 2036)							
	Base Numbers 2017	Additional need 2017- 2022	Additional need 2022- 2027	Additional need 2027- 2032	Additional need 2032- 2036	Additional need 2017- 2036	Numbers as at 2036
Residential pitches	264	29	3	3	3	38	302

Source: ANA 2017

**North Norfolk (Residential Caravan Pitches)**

Table A.12a: Five year estimate of the need for permanent/residential site pitches (2017-2022)	
1) Current occupied permanent / residential site pitches	180
<i>Current residential supply</i>	
2) Number of unused residential pitches available	29
3) Number of existing pitches expected to become vacant through mortality 2017-2022	4
4) Number of family units on sites expected to leave the area in the next 5 years	0
5) Number of family units on sites expected to move into housing in the next 5 years	0
6) Residential pitches planned to be built or to be brought back into use 2017-2022	0
7) Less pitches with temporary planning permission	0
<b>Total Supply</b>	<b>33</b>
<i>Current residential need: Pitches</i>	
8) Family units (on pitches) seeking residential pitches in the area, 2017-2022, excluding those already counted as moving due to overcrowding in step 12	18
9) Family units on unauthorised encampments requiring residential pitches in the area	0
10) Family units on unauthorised developments requiring residential pitches in the area	0
11) Family units currently overcrowded on pitches seeking residential pitches in the area, excluding those containing an emerging family unit	0
12) New family units expected to arrive from elsewhere	0
13) New family formations expected to arise from within existing family units on sites	5
14) New family units on waiting site waiting lists	0
<b>Total Need</b>	<b>23</b>
<i>Balance of Need and Supply</i>	
Total Need	<b>23</b>
Less total supply	<b>33</b>
Total Additional Pitch Requirement	<b>-10</b>
Annualised Additional Pitch Requirement	<b>-2</b>

Source: ANA 2017

Table A12b: Twenty year summary (2017 – 2036)							
	Base Numbers 2017	Additional need 2017-2022	Additional need 2022-2027	Additional need 2027-2032	Additional need 2032-2036	Additional need 2017-2036	Numbers as at 2036
Residential pitches	180	-10	2	2	2	-4	176

Source: ANA 2017

\*The reason for the negative needs figures for North Norfolk is because they have more supply than need in the first five years. They have an additional supply of 33 pitches and a need of 23 pitches i.e. a need of 23 pitches less a supply of 33 pitches = a net need of -10 pitches.

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# Glossary

## **Amenity block**

A small permanent building on a pitch with bath/shower, WC, sink and (in some larger ones) space to eat and relax. Also known as an amenity shed or amenity block.

## **Authorised site**

A site with planning permission for use as a Gypsy and Traveller site. It can be privately owned (often by a Gypsy or Traveller), leased or socially rented (owned by a council or registered provider).

## **Average**

The term 'average' when used in this report is taken to be a mean value unless otherwise stated.

## **Bedroom standard**

The bedroom standard is based on that which was used by the General Household Survey to determine the number of bedrooms required by families. For this study, a modified version of the bedroom standard was applied to Gypsies and Travellers living on sites to take into account that caravans or mobile homes may contain both bedroom and living spaces used for sleeping. The number of spaces for each accommodation unit is divided by two to provide an equivalent number of bedrooms. Accommodation needs were then determined by comparing the number (and age) of family members with the number of bedroom spaces available.

## **Bricks and mortar accommodation**

Permanent housing of the settled community, as distinguished from sites.

## **Caravan**

Defined by Section 29 (1) of the Caravan Sites and Control of Development Act 1960 a caravan as:

"... any structure designed or adapted for human habitation which is capable of being moved from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer) and any motor vehicle so designed or adapted."

## **Concealed household**

A household or family unit that currently lives within another household or family unit but has a preference to live independently and is unable to access appropriate accommodation (on sites or in housing).

## **Doubling up**

More than one family unit sharing a single pitch.

**Emergency stopping places**

Emergency stopping places are pieces of land in temporary use as authorised short-term (less than 28 days) stopping places for all travelling communities. They may not require planning permission if they are in use for fewer than 28 days in a year. The requirements for emergency stopping places reflect the fact that the site will only be used for a proportion of the year and that individual households will normally only stay on the site for a few days.

**Family Owner Occupied Gypsy Site**

Family sites are seen as the ideal by many Gypsies and Travellers in England. They are also often seen as difficult to attain. There are two major obstacles: money/affordability and getting the necessary planning permission and site licence. While the former is clearly a real barrier to many less well-off Gypsies and Travellers, getting planning permission for use of land as a Gypsy caravan site (and a 'site' in this context could be a single caravan) is currently a major constraint on realising aspirations among those who could afford to buy and develop a family site.

**Family unit**

The definition of 'family unit' is used flexibly. The survey assumes that a pitch is occupied by a single household or family unit although it acknowledges that this may also include e.g. extended family members or hidden households.

**Gypsy**

Member of one of the main groups of Gypsies and Travellers in Britain. In this report it is used to describe English (Romany) Gypsies, Scottish Travellers and Welsh Travellers. English Gypsies were recognised as an ethnic group in 1988.

**Gypsy and Traveller**

As defined by DCLG Planning Policy for Traveller Sites (August 2015):

*Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.*

The DCLG guidance also states that in determining whether persons are "gypsies and travellers" for the purposes of planning policy, consideration should be given to the following issues amongst other relevant matters:

- a) whether they previously led a nomadic habit of life
- b) the reasons for ceasing their nomadic habit of life
- c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.

## **Houseboat**

As confirmed by the DCLG, there is no planning definition of the term 'houseboat'. Instead, it is common to use VAT Notice 701/20 which defines a houseboat as a "floating decked structure which is designed or adapted for use solely as a place of permanent habitation, and which does not have the means of, and which is not capable of being readily adapted for, self-propulsion". However, this excludes many residents who may permanently reside on differing types of boats. As such, as well as using the VAT definition of 'houseboat', for the purposes of this assessment, we also adopt the Broads Authority definition of "residential moorings" as:

"one where someone lives aboard a vessel (which is capable of navigation), that the vessel is used as the main residence and where that vessel is moored in one location for more than 28 days in a year. The vessel may occasionally/periodically go cruising and return to base".

## **Household**

The definition of 'household' is used flexibly. The survey assumes that a pitch is occupied by a single household or family unit although it acknowledges that this may also include e.g. extended family members or hidden households.

## **Irish Traveller**

Member of one of the main groups of Gypsies and Travellers in Britain. Distinct from Gypsies but sharing a nomadic tradition, Irish Travellers were recognised as an ethnic group in England in 2000.

## **Local Authority Sites**

The majority of local authority sites are designed for permanent residential use. The latest published Traveller Caravan Count undertaken in July 2016 suggests that there are a total of 5,262 permanent local authority and private registered provider pitches capable of housing 8,589 caravans across England.

## **Local Development Documents (LDD)**

Local Plans and other documents that contain planning policies and are subject to external examination by an Inspector. Planning applications are determined in relation to an adopted Development Plan which contains documents.

## **Mobile home**

For legal purposes it is a caravan – see under Caravan above for the definition

## **Negotiated Stopping**

The term 'negotiated stopping' is used to describe agreed short term provision for Gypsy and Traveller caravans. It does not describe permanent 'built' transit sites but negotiated arrangements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. The arrangement is between the local authority and the (temporary) residents.



**Net need**

The difference between need and the expected supply of available pitches (e.g. from the re-letting of existing socially rented pitches or from new sites being built).

**New Traveller** (formerly 'New Age Traveller')

Members of the settled community who have chosen a nomadic or semi-nomadic lifestyle. The first wave of New Travellers began in the 1970s and were associated with youth culture and 'new age' ideals. They now comprise a diverse range of people who seek an alternative lifestyle for differing reasons including personal or political convictions. Economic activities include making hand-made goods that are sold at fairs.

**Newly forming families**

Families living as part of another family unit of which they are neither the head nor the partner of the head and who need to live in their own separate accommodation, and/or are intending to move to separate accommodation, rather than continuing to live with their 'host' family unit.

**Overcrowding**

An overcrowded dwelling is one which is below the bedroom standard. (See 'Bedroom Standard' above).

**Permanent residential site**

A site intended for long-stay use by residents. They have no maximum length of stay but often constraints on travelling away from the site.

**Pitch**

Area on a site developed for a family unit to live. On socially rented sites, the area let to a tenant for stationing caravans and other vehicles.

**Plot**

Area on a yard for Travelling Showpeople to live. As well as dwelling units, Travelling Showpeople often keep their commercial equipment on a plot.

**Primary data**

Information that is collected from a bespoke data collection exercise (e.g. surveys, focus groups or interviews) and analysed to produce a new set of findings.

**Private rented pitches**

Pitches on sites which are rented on a commercial basis to other Gypsies and Travellers. The actual pitches tend to be less clearly defined than on socially rented sites.

**Psychological aversion**

An aversion to living in bricks and mortar accommodation. Symptoms can include: feelings of depression, stress, sensory deprivation, feeling trapped, feeling cut off from social contact, a sense

of dislocation with the past, feelings of claustrophobia. Proven psychological aversion to living in bricks and mortar accommodation is one factor used to determine accommodation need.

### **Registered Provider**

A provider of social housing, registered with the Homes and Communities Agency (HCA) under powers in the 2008 Housing and Regeneration Act. This term replaced 'Registered Social Landlord' (RSL) and encompasses housing associations, trusts, cooperatives and companies.

### **Secondary data**

Existing information that someone else has collected. Data from administrative systems and some research projects are made available for others to summarise and analyse for their own purposes (e.g. Traveller Caravan Count).

### **Settled community**

Used to refer to non-Gypsies and Travellers who live in bricks-and-mortar (or similar) housing.

### **Site**

An area of land laid out and/or used for Gypsy and Traveller caravans for residential occupation, which can be authorised (have planning permission) or unauthorised. Sites can be self-owned by a Gypsy and Traveller resident, or rented from a private or social landlord. Sites vary in type and size and can range from one-caravan private family sites on Gypsies' and Travellers' own land, through to large local authority sites. Authorised private sites (those with planning permission) can be small, family-run, or larger, privately-owned rented sites.

### **Socially rented site**

A Gypsy and Traveller site owned by a council or private Registered Provider. Similar to social rented houses, rents are subsidised and offers at below private market levels. According to the latest published DCLG Traveller Count (July 2016), there were 6,292 caravans occupying social rented sites.

### **Tolerated**

An unauthorised development or encampment may be tolerated by the local authority meaning that no enforcement action is currently being taken.

### **Trailer**

Term commonly used by Gypsies and Travellers for a moveable caravan.

### **Transit site/pitch**

This is the authorised encampment option for Gypsies and Travellers travelling in their caravans and in need of temporary accommodation while away from 'home'. Transit sites are sometimes used on a more long-term basis by families unable to find suitable permanent accommodation. As stated above, there are only 445 authorised transit pitches (not all used for short-term purposes) in England. At present unauthorised encampments 'accommodate' the great majority of 'transit' mobility in an almost totally unplanned manner. No national record is kept of the number of actual

'sites' affected, but extrapolation from local records in different areas suggests that it must be thousands each year.

**Travelling Showpeople**

People who organise circuses and fairgrounds and who live on yards when not travelling between locations. Most Travelling Showpeople are members of the Showmen's Guild of Great Britain.

**Unauthorised development**

Unauthorised developments include situations where the land is owned by the occupier, or the occupier has the consent of the owner (e.g. is tolerated /no trespass has occurred), but where relevant planning permission has not been granted. In July 2016, 3,481 caravans were recorded as being on unauthorised sites on Gypsy-owned land consisting of 1,336 'tolerated' and 2,145 'not tolerated' by local authorities in England.

**Unauthorised encampment**

Unauthorised encampments include situations where the land is not owned by the occupier, the land is being occupied without the owner's consent, and as such a trespass has occurred. An encampment can include one or more vehicles, caravans or trailers.

**Unauthorised site**

Land occupied by Gypsies and Travellers without the appropriate planning or other permissions. The term includes both unauthorised development and unauthorised encampment.

**Winter quarters**

A site occupied by Travelling Showpeople, traditionally used when not travelling to provide fairs or circuses. Many now involve year-round occupation.

**Yard**

A term used for a site occupied by Travelling Showpeople. They are often rented by different families with clearly defined plots.

**Local Plan – Approach to Policy Development - Wind Energy**

Summary: This report provides an overview to the requirements of plan making and the options around policy development in the area of wind energy. The purpose of the paper is to enable discussion on the potential policy approaches available to the Council in identifying suitable areas for wind energy development and provide officers with a steer for subsequent policy development.

Recommendations: **This report recommends that the Working Party recommend to Cabinet that Option 2 is used as a basis for further work and policy development.**

Cabinet Member(s)	Ward(s) affected
All members	All Wards
Contact Officer, telephone number and email: Iain Withington, 01263 516034 <a href="mailto:iain.withington@north-norfolk.gov.uk">iain.withington@north-norfolk.gov.uk</a>	

**1. Introduction**

- 1.1 An Initial steer on what might be considered an appropriate way to manage wind energy development through the emerging Local Plan is sought. This report is to inform members of the requirements of policy development in relation to wind turbines in order to explore the potential policy approaches that the Local Plan could take in identifying suitable areas for wind energy development. The development and subsequent preparation of a preferred policy approach and reasonable alternatives will follow from discussion and form further consideration as part of the emerging Local Plan. The options considered in the report will be the basis for public consultation in the 1<sup>st</sup> Consultation Draft of the Plan.
- 1.2 On the 18th June 2015 the Secretary of State for Communities and Local Government (Greg Clark) through a Written Ministerial Statement set out new national provisions relating to wind energy development<sup>1</sup>. The Statement sets out that local planning authorities should only grant planning permission for proposals for wind energy development if the development site is in an area identified as suitable for wind energy development. It goes on to note that these areas need to be identified clearly in a Local or Neighbourhood Plan and that through consultation should be supported by the local community.
- 1.3 National Planning Practice Guidance (PPG) has been amended to reflect these changes and to provide further guidance and clarification. It state that:

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1  
<https://publications.parliament.uk/pa/cm201516/cmhansrd/cm150618/wmstext/150618m0001.htm>

- In the case of wind turbines, a planning application should not be approved unless the proposed development site is an area identified as suitable for wind energy development in a Local or Neighbourhood Plan;
- When identifying suitable areas it is also important to set out the factors that will be taken into account when considering individual proposals in these areas. These factors may be dependent on the investigatory work underpinning the identified area; and
- Suitable areas for wind energy development will need to have been allocated clearly in a Local or Neighbourhood Plan. Maps showing the wind resource as favourable to wind turbines or similar will not be sufficient.

1.4 With regards to renewable energy specifically, the NPPF states that Local Planning Authorities should<sup>2</sup>:

- Recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources;
- Have a positive strategy to promote energy from renewable and low carbon sources;
- Design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts;
- Consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources; and
- Support community-led initiatives for renewable and low carbon energy, including developments outside such areas being taken forward through neighbourhood planning.

1.5 The policy approach to renewable energy and in particular wind generation within the existing Core Strategy relies on a generic policy approach across the whole district. It does not identify areas or sites as suitable for wind turbine development. Although the continuation of such an approach remains an option it is considered that such an approach could fail to address the revised requirements of national policy and could put the emerging Local Plan at risk.

1.6 In seeking a positive policy approach it is recognised that there should be an appropriate mix of renewable energy schemes suitable for the District, in particular any policy approach should recognise the valued landscape of the District.

1.7 **The attached discussion document in Appendix 2**, outlines the legislative and available background information and considers five approaches that could be considered and provides the basis for further discussion.

1.8 Published data indicates that the entire district has wind speeds which are suitable for wind energy generation. This though is not the only consideration.

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<sup>2</sup> NPPF, 2012 para 97

1.9 For each approach consideration is given to the available evidence, the reasoned justification required and the risks associated should an approach be further developed to inform policy development.

1.10 The five approaches are:

- Approach 1 – Unconstrained Approach (Existing Approach) – The entire District would be identified as a suitable area for wind generation and the Council would apply criteria to the assessment of individual proposals such as landscape, heritage and amenity impacts. This is the approach taken in the current Core Strategy;
- Approach 2 – Constrained Approach : Landscape Designations - This would identify the AONB and some other landscape designations as unsuitable locations and apply criteria based policies to the remainder of the District;
- Approach 3 – Further Environmental Constraints, settlement exclusion and other physical constraints - would reduce suitable areas by excluding settlements and a wider range of environmental designations. Remaining areas would still be subject to criteria based policy;
- Approach 4 – Environmental, Residential & other Buffers - would reduce suitable areas further by defining buffers;
- Approach 5 – Approach to Airfields or other specific sites- Would positively allocate particular sites for wind energy and treat the remainder of the district as unsuitable.

1.11 It is clear that for which ever approach is taken forward a criteria based policy will also have to be developed to inform the determination of individual planning applications or the identification of specific sites under approach 5 if this is identified as the preferred approach.

1.12 Any such policy would need to take account as a minimum :

- Landscape and visual impact, including the setting of Landscape designations;
- Townscape and Historic features;
- Residential amenity;
- Nature , ecology and biodiversity considerations;
- Local interest/ people –
- potential Archaeology,
- Air traffic
- Cumulative impacts

1.13 In addition it is suggested that any approach should also include:

- Request that all individual proposals for development within any defined area would be required to undertake compulsory pre application community consultation prior to submission of a formal planning application;
- Supported by appropriately detailed landscape visual impact assessment which builds on the adopted Landscape Character Assessment.

## **2. Identifying a preferred approach**

- 2.1 An early indication from this paper would suggest that developing a policy approach based around the identification of important landscape designations and a criteria based policy to aid in the determination of applications on a case by case basis outside these sensitive areas could be explored further. If such an approach was developed it would lead to the automatic prohibition of wind turbines in designated landscapes such as the AONB and scheduled parks and Gardens and an in principle acceptance that turbines may be suitable in the remainder of the District. Any application in the identified in principle area would still have to comply with the Development Management criteria based policy.
- 2.2 In addition to this a number of sites have been put forward for site assessment specifically for wind generation. These will have to be appraised separately as part of the site assessment process and reviewed through future Planning Policy and Built Heritage working Party sessions.

## **3. Legal Implications and Risks**

- 3.1 In developing the Local Plan it is a requirement of the NPPF and PPG to address renewable energy generation from wind turbines through the identification of suitable areas. Not identifying such areas is considered an inappropriate response to the matter and one which could potentially be seen to conflict with the provisions of national planning policy which seek local planning authorities to 'have a positive strategy to promote energy from renewable and low carbon sources, particularly given the potential wind energy resource that is provided in North Norfolk (wind speeds).
- 3.2 Developing an approach around landscape designation is in its simplest form a constrained approach based on the available evidence. A criticism (and risk) could be that the approach may not fully address the specifics of the requirements in that it falls short of the determination of specific areas on the basis of individual constraints. It is however, based on the available evidence and along with the development of criteria based policy for the review of individual applications considered to be a balanced and pragmatic approach which will enable future proposals to benefit from appropriate planning considerations and have community support.
- 3.3 A further risk is that the recommended approach at this stage is based on the available evidence and it could be considered that the approach does not go far enough. It is not the intention to detail what size of development in the potentially suitable zone would be considered suitable. To do so would require the further commissioning of detailed evidence around landscape Character. This has the potential to delay the Local Plan consultation time line.
- 3.4 By identifying zones, all development outside those zones would be contrary to adopted policy and current national guidance; this would include any community led and rural diversification schemes as well as those proposed on a speculative basis, including micro generation. There is a risk that a more flexible approach may be a preferred for those not wishing to preclude all wind energy development in the designated landscapes. It is however proposed to explore this avenue further through policy development.

3.5 The agreed approach will be required to be subject to community consultation and this will be undertaken through the Local Plan.

3.6 Future changes to the NPPF may change the required approach.

#### **4 Recommendation**

**4.1 The following approaches, or a combination of these approaches, are available:**

- 1. Do not identify any specific area and rely solely on a development management policy on a case by case basis;**
- 2. Developing a policy approach based around the identification of important landscape designations and criteria based policy to aid in the determination of applications on a case by case basis outside sensitive areas;**
- 3. Seek to identify and allocate specific areas.**

**4.2 It is recommended that the Working Party recommend to Cabinet that Option 2 is used as a basis for further work and policy development.**

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#### **Appendix:**

#### **Approach to Wind Energy Policy Discussion Document**

#### **Abbreviations:**

NPPF- National Planning Policy Framework  
PPG – Planning Practice Guidance



# **Local Plan**

## **Approach to Wind Energy – Discussion Document**

**Local Plan and Built Heritage Working Party**

**November 2017**

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# 1. Introduction and Scope

- 1.1 Local Planning Authorities are required to have a positive strategy to promote energy from renewable and low carbon sources, NPPF, para 97. The Secretary of State has clearly set out that new Local Plans will need to address this issue<sup>1</sup>. In the case of wind energy, local planning authorities should only grant planning permission for wind energy proposals if they fall within an area identified as suitable for wind energy development. National Planning Practice Guidance, PPG has been amended to reflect the Secretary of States comments and goes onto state:

*Suitable areas for wind energy development will need to have been allocated clearly in a Local or Neighbourhood Plan. Maps showing the wind resource as favourable to wind turbines or similar will not be sufficient...*

*In the case of wind turbines, a planning application should not be approved unless the proposed development site is an area identified as suitable for wind energy development in a Local or Neighbourhood Plan.*

- 1.2 In an effort to mitigate climate change, the UK is committed to reducing its greenhouse gas emissions by 80% by 2050 and sourcing at least 15% of its energy from renewable sources by 2020. In 2013/14 this target was almost met, and wind energy contributed 9% of the UK's power needs, and at points throughout the year surpassed nuclear energy in its contribution to day to day energy needs.
- 1.3 It is clear that renewable energy will continue to play an important role in enabling the UK to meet its climate change targets and local planning authorities must play their part in promoting renewable energy and facilitating appropriate new development through the planning system. North Norfolk has not shied away from this as evidenced through the significant number of solar farms across the District. ( see table 1)
- 1.4 With the benefits of wind energy however come concerns over its potential impacts. Local planning authorities, whilst needing to embrace wind energy must at the same time ensure that new wind energy development is of an appropriate scale and location so as not to give rise to unacceptable impacts on local communities and the special character of local areas. It is also necessary to ensure an appropriate mix of renewable energy schemes suitable for the District is achieved. When identifying suitable areas it is also important to set out the factors that will be taken into account when considering individual proposals in the District. These can include but are not limited to, appropriate wind speeds, impacts on landscape character and visual amenity, residential amenity wildlife conservation and appropriate cumulative impacts.
- 1.5 The policy approach to renewable energy within the existing Core Strategy relies on a generic policy approach and the consideration of all proposals on a case by case basis. It does not identify suitable areas, such an approach if continued could potentially be seen to conflict with the provisions of national planning policy which seek local planning authorities to 'have a positive strategy to promote energy from renewable and low carbon sources. It is clear that through the new emerging Local Plan the Council is required to consider alternative approaches based on the identification of suitable sites for the generation of wind energy<sup>2</sup>. In

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<sup>1</sup> <https://publications.parliament.uk/pa/cm201516/cmhansrd/cm150618/wmstext/150618m0001.htm>

<sup>2</sup> Further explanation contained in section 2

addition a suitable policy approach will need to be developed in order to guide assessment of proposals submitted within any defined area/areas. It is these areas that set out where proposals may be suitable and be consulted on through the Local Plan process.

1.6 In line with the national PPG It is proposed that the Council should establish an approach to defining areas for wind energy development that can be taken forward in the emerging Local Plan.

**1.7 The purpose of this paper is to explore the potential policy approaches available to the Council in identifying suitable areas for wind energy development and provide the basis for further discussion. The development and subsequent preparation of a preferred policy approach and reasonable alternatives will form further consideration as part of the emerging Local Plan.**

## 2 Context

### National and Local Policy

2.1 On the 18th June 2015 the Secretary of State for Communities and Local Government (Greg Clark) through a Written Ministerial Statement set out new national provisions relating to wind energy development<sup>3</sup>. The Statement sets out that local planning authorities, should only grant planning permission for proposals for wind energy *development if the development site is in an area identified as suitable for wind energy development*. It goes on to note that these areas need to be **allocated clearly in a Local or Neighbourhood Plan** and following consultation can be demonstrated that it has backing of the local community. In the meantime, until such time areas are identified in a development plan a transitional approach has been put in place requiring proposals have the backing of the *affected* community., see para 2.5

2.2 National Planning Practice Guidance (PPG) has been amended to reflect these changes and to provide further guidance and clarification. It goes on to state that:

- *In the case of wind turbines, a planning application should not be approved unless the proposed development site is an area identified as suitable for wind energy development in a Local or Neighbourhood Plan:*<sup>4</sup>
- *When identifying suitable areas it is also important to set out the factors that will be taken into account when considering individual proposals in these areas. These factors may be dependent on the investigatory work underpinning the identified area; and*
- *Suitable areas for wind energy development will need to have been allocated clearly in a Local or Neighbourhood Plan. Maps showing the wind resource as favourable to wind turbines or similar will not be sufficient.*<sup>5</sup>

2.3 The recent changes do not over rule the National Policy Planning Framework (NPPF) and in particular the key role of national policy in securing radical reductions in greenhouse gas emissions and supporting the delivery of renewable and low-carbon energy and associated infrastructure. With regards to renewable energy specifically, Paragraph 97 the NPPF states that local planning authorities should:

- *Recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources;*
- *Have a positive strategy to promote energy from renewable and low carbon sources;*
- *Design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts;*

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<sup>3</sup> <https://publications.parliament.uk/pa/cm201516/cmhansrd/cm150618/wmstext/150618m0001.htm>

<sup>4</sup> PPG Paragraph: 005 Reference ID: 5-005-20150618 <https://www.gov.uk/guidance/renewable-and-low-carbon-energy>

<sup>5</sup> PPG Paragraph: 032 Reference ID: 5-032-150618

- Consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources; and
- Support community-led initiatives for renewable and low carbon energy, including developments outside such areas being taken forward through neighbourhood planning.

### Local Policy: Current Approach

2.4 The current approach being taken is to reach an informed and balanced decision on each individual planning application for wind turbine proposals, giving full consideration to all material planning issues including those raised by the local community. Each proposal is tested against the policies in the adopted Core Strategy relating to residential amenity, landscape, heritage, ecology, etc. and the associated Supplementary Planning Documents such as the Landscape Character Assessment SPD. No specific areas are identified and each determination is required to assess the suitability of the proposed location as well as its impacts with regard the whole policy suit contained in the Core Strategy along with other material considerations.

2.5 This is in line with the transitional arrangements contained in the 2015 Ministerial Statement which states that the following transitional provision applies;

*In such instances, local planning authorities can find the proposal acceptable if, following consultation, they are satisfied it has addressed the planning impacts identified by affected local communities and therefore has their backing.*

2.6 The policy approach to renewable energy within the existing Core Strategy relies on a generic policy approach and the consideration of all proposals on a case by case basis. It does not identify suitable areas and although the continuation of such a policy approach remains an option it could potentially be seen to conflict with the provisions of national planning policy which seek local planning authorities to 'have a positive strategy to promote energy from renewable and low carbon sources. It is clear that through the new emerging Local Plan the Council is required to consider alternative approaches based on the identification of suitable sites for the generation of wind energy . In addition a suitable policy approach will need to be developed in order to guide assessment of proposals submitted within any defined area/areas. It is these areas that set out where proposals may be suitable and be consulted on through the Local Plan process.

2.7 Table 1 - Appraisal of Existing Permitted Turbine and other renewable schemes across the District

<i>Scheme</i>	<i>Planning ref</i>	<i>Description of Proposal</i>	<i>Type of scheme</i>	<i>Date of Approval</i>	<i>Area of proposal</i>	<i>Size of output</i>	<i>Approximate No. Households power will generate</i>	<i>Operational</i>
East Ruston	11/1313	Erection of wind turbine with a hub height of 24.6m and overall blade height of 34.2m	Turbine	22 March 2012	0.0142ha	Not Specified	N/A	Yes

<i>Scheme</i>	<i>Planning ref</i>	<i>Description of Proposal</i>	<i>Type of scheme</i>	<i>Date of Approval</i>	<i>Area of proposal</i>	<i>Size of output</i>	<i>Approximate No. Households power will generate</i>	<i>Operational</i>
<b>OTHER RENEWABLE SCHEMES</b>								
N Walsham Carlton Farm	PF/11/0418	Construction of 5mw solar generating facility	Solar	24 May 2011	15ha.	5 MW	1,000	Yes
Northrepps	PF/12/0816	Construction of solar photovoltaic generating facility	Solar	16 Nov 2012	27ha.	10 MW	2,000	Yes
Egmere	PF/12/1318	Construction of 20 mw solar photovoltaic farm and associated works including inverter housing, landscaping and security measures	Solar	07 Feb 2013	42ha.	20 MW	4,000	Yes
East Beckham	PF/13/0772	Installation of a 10.15mw solar development	Solar	23 Sept 2013	25 ha.	10.15 MW	1,671	Yes
Bodham	PF/13/0960	Installation of 3.6mw solar development	Solar	15 Nov 2013	8ha.	3.6 MW	610	Yes
West Raynham	PF/13/1166	Installation of 49.9MW solar farm with plant housing and perimeter fence	Solar	16 Jan 2014	96.5ha.	49.9 MW	10,212	Yes
Scottow	PF/14/1334	Installation and operation of a ground mounted solar photo voltaic array to generate electricity of up to 50MW capacity comprising photo voltaic panels, inverters, security fencing, cameras and other association infrastructure	Solar	09 Jan 2015	122.8ha.	50 MW	11,000	Yes

<i>Scheme</i>	<i>Planning ref</i>	<i>Description of Proposal</i>	<i>Type of scheme</i>	<i>Date of Approval</i>	<i>Area of proposal</i>	<i>Size of output</i>	<i>Approximate No. Households power will generate</i>	<i>Operational</i>
N Walsham: Bunns Hill	PF/15/0936	Development of ground mounted solar voltaic panels and associated works.	Solar	16 Oct 2015	12.6ha.	5 MW	1,060	Yes
N Walsham: Frogs Loke	PF/15/0938	Proposed development of ground mounted solar photovoltaic panels and associated works	Solar	16 Oct 2015	9.1ha.	5 MW	1,060	Yes
N Walsham: Wayside Farm	PF/15/1536	Installation of 5MW solar farm with ancillary buildings, security fencing, CCTV, access tracks and landscaping	Solar	17 Feb 2016	15ha.	5 MW	955	No
					<b>Total</b>	<b>158.65 MW</b>	<b>41,508</b>	
Scottow	PF/11/1426	Construction of biomass (renewable energy) facility	A.D plant	25 May 2012	2.8ha	2 MW	Not Specified	Yes
Hempton	PF/12/1079	Erection of buildings to house anaerobic digester plant and formation of vehicular access	A.D plant	09 Jan 2013	13.7ha	1.5 MW	Not Specified (gas)	Yes
Egmere	PF/12/1256	Construction of biomass renewable energy facility with associated landscaping and vehicular access	A.D plant	05 Feb 2013	3.3ha	1.5MW	2,500 (gas)	Yes
					<b>Total</b>	<b>5MW</b>	<b>2,500+ (gas)</b>	



## Emerging Local Plan

- 2.8 Given the revised national policy context producing a new Local Plan which does not consider the requirements for on shore wind generation has the potential to introduce **a level of risk to plan making. A failure to address the requirements could introduce a potential soundness issue. It could also leave the council at risk of planning applications for wind turbines for the entirety of the District and at risk at appeal.**
- 2.9 In addition to the national policy requirements the Council have received a number of suggested sites for wind development through the call for sites. National guidance as detailed above advises us that when identifying suitable areas through the Local Plan it is also important to set out the factors that will be taken into account when considering individual proposals in these areas. It is clear that in order to assess the suitability of these sites it will be necessary to establish and apply a clear policy approach.

## Recent Case History

- 2.10 The Council has undertaken a number of significant appeals, the most significant covers two applications at Bodham and Selbrigg farm, Hempstead<sup>6</sup>. Both of these appeals were allowed but subsequently not supported by the Secretary of State.
- 2.11 Central to both appeals:
- Impact on heritage assets;
  - Cumulative effect of 'less than substantial harm' on numerous heritage assets;
  - Landscape impact;
  - Impact on residential amenity;
  - Inherent conflict between high wind speeds up on Cromer Ridge and wide visual impact due to high level topography;
  - Planning balance

## 3 Methodology

- 3.2 This paper sets out potential approaches for identifying suitable locations for wind energy development which will help to inform future work on the Local Plan. The preferred approach and alternatives considered will be subjected to a sustainability appraisal and public consultation as part of the emerging Local Plan process.
- 3.3 All options must align with national policy as defined by the NPPF and reflect guidance in the national PPG, to ensure that the emerging Local Plan is considered sound in this area. It is important that the approach taken and potential areas identified should be fully justified and

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<sup>6</sup>

Appeal Ref: APP/Y2620/W/15/3134132 &  
APP/Y2620/W/15/3143028

should not seek to effectively rule out the delivery of all future wind energy development in the District.

- 3.4 The scenarios presented below represent a range of reasonable alternatives considered acceptable within the bounds of the national policy context. The policy options set out could form the basis form of a strategic tool indicating where wind energy development proposals could be considered broadly acceptable in principle. This would be achieved by defining areas suitable for wind energy development on the formal Local Plan Proposals Map and be subject to scrutiny at examination, coupled to a new Policy which sets out how planning applications for wind energy development would be considered.
- 3.5 Adopting the approach of identifying areas means that the Council will not generally be able to grant consent for **any** wind energy development proposals that fall outside of areas identified areas as suitable for wind energy development. This would include any community led and rural diversification schemes as well as those proposed on a speculative basis. Community led schemes and other proposals for wind energy development which fall outside of the Local Plan's identified areas could only be enabled where communities choose to identify their locations within additional areas suitable for wind energy development in a Neighbourhood Plan or produce a Community Right to Build Order.
- 3.6 The options are presented range from a fully unconstrained approach to one which is constrained by environmental and technical constraints. These are identified through analysis of a series of "hard" and "soft" constraints which either need to be met or could be applied as a result of planning judgment. Hard constraints are generally those which are physical such as roads, woodlands and others due to the limitation of technology such as the availability of appropriate wind speeds as well as other physical constraints where turbines could not be physically installed. Soft constraints are those that potentially could restrict the positioning of turbines such as the considerations around environmental and historical considerations.

#### **Review of available evidence**

- 3.7 This section scopes out the available evidence in relation to wind energy development both locally and nationally. To underpin this work, a review has been made of evidence including a brief explanation of each and whether it is beneficial to be used to inform conclusions made in this paper.
- 3.8 The Department for Energy and Climate Change, DECC, commissioned consultants to develop a methodology for appraising the opportunities and constraints for renewable and low carbon energy development. In doing so it developed and published (2010) a standard methodology to establish the opportunities and constraints for the development of renewable and low carbon energy at a local scale and identified specific factors to consider in relation to wind energy generation.
- 3.9 The methodology is based around a sequential constraint methodology, where constraints are progressively applied though a sequential process. Layers of analysis are applied that progressively reduce the total theoretical opportunity to what is practically achievable. . . The

stages in the methodology are numbered from 1 to 7, with stages 1 to 4 representing physical, technical and regulatory constraints and stages 5 onwards representing delivery constraints such as supply chains and economies of provision and operation. In broad terms, Stages 1 and 2 represent the opportunity for harnessing the renewable energy resource on the basis of what is naturally available vis-à-vis the limitations of existing technology solutions. Stages 3 and 4 address the constraints to the deployment of technologies in relation to the physical environment and planning/regulatory limitations. Stage 5 reviews the economic considerations, such as the cost of the technology, and the potential returns in relation to the overall capital cost, while stage 6 and 7 allow for the review of supply side constraints.

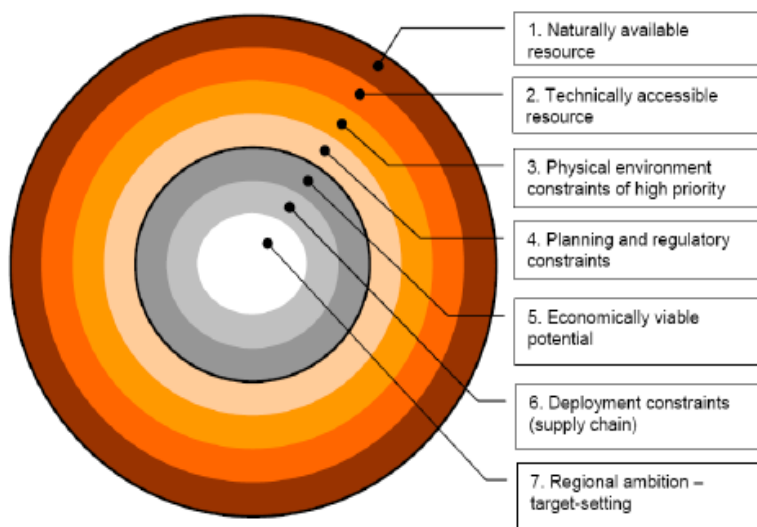


Figure 2. Stages for developing a comprehensive evidence base for renewable energy potential (Source: Renewable and Low-Carbon Energy Capacity Methodology for the English Regions, SQW Energy, January 2010)

- 3.10 The East of England Renewable and Low Carbon Energy capacity Study for the DECC was published in 2011 and utilised this methodology in examining the resource potential for renewable energy generation in East of England and the potential take up by 2020. It provides a basis for more detailed information to be available at a local level which could be used to support local delivery of renewable schemes.
- 3.11 The study is a wide ranging paper covering all renewable and low carbon energy development. And whilst the methodology deals with a number of different issues and produces results against some parameters, the studies are only intended to inform the regional-level evidence base and are not detailed enough to identify broad locations for development.
- 3.12 Identified in layer one and main considerations for selecting a suitable site for wind energy development is a location that has sufficient wind speed. As can be seen on the map below North Norfolk has some of the highest wind speeds in the East of England. **The study concludes that there is sufficient wind capacity across the entire District to support wind energy generation** and that further work was expected to be undertaken on a local level.

## Norfolk Wind Speeds

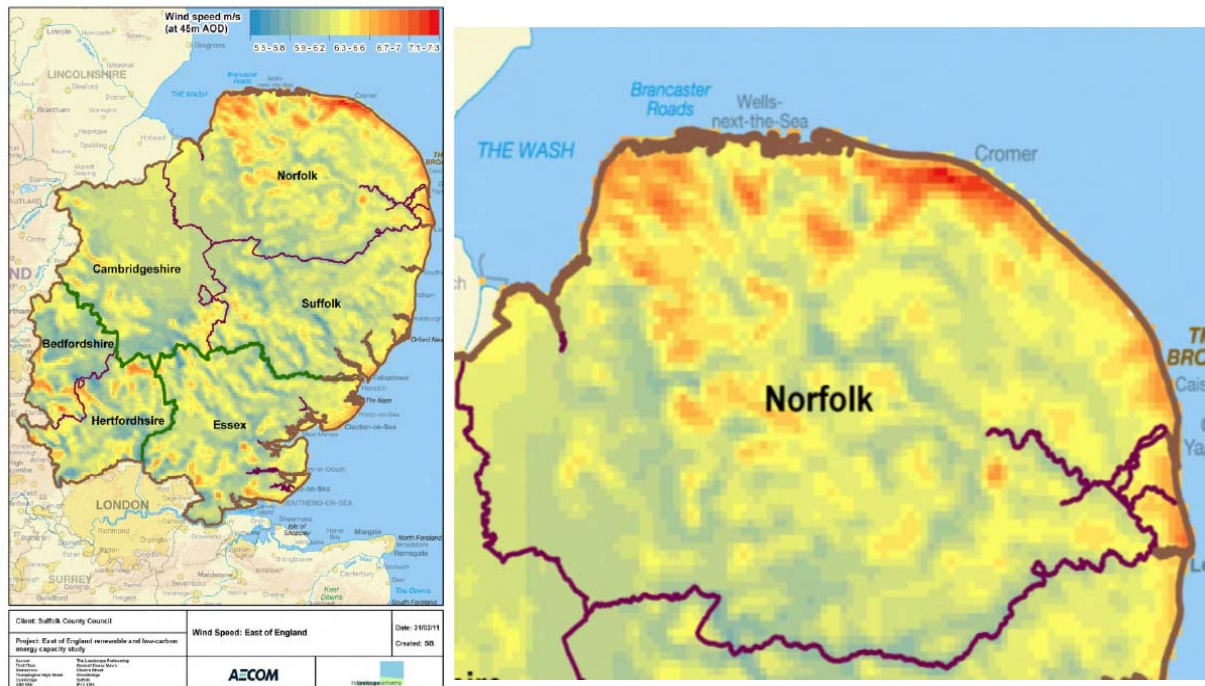
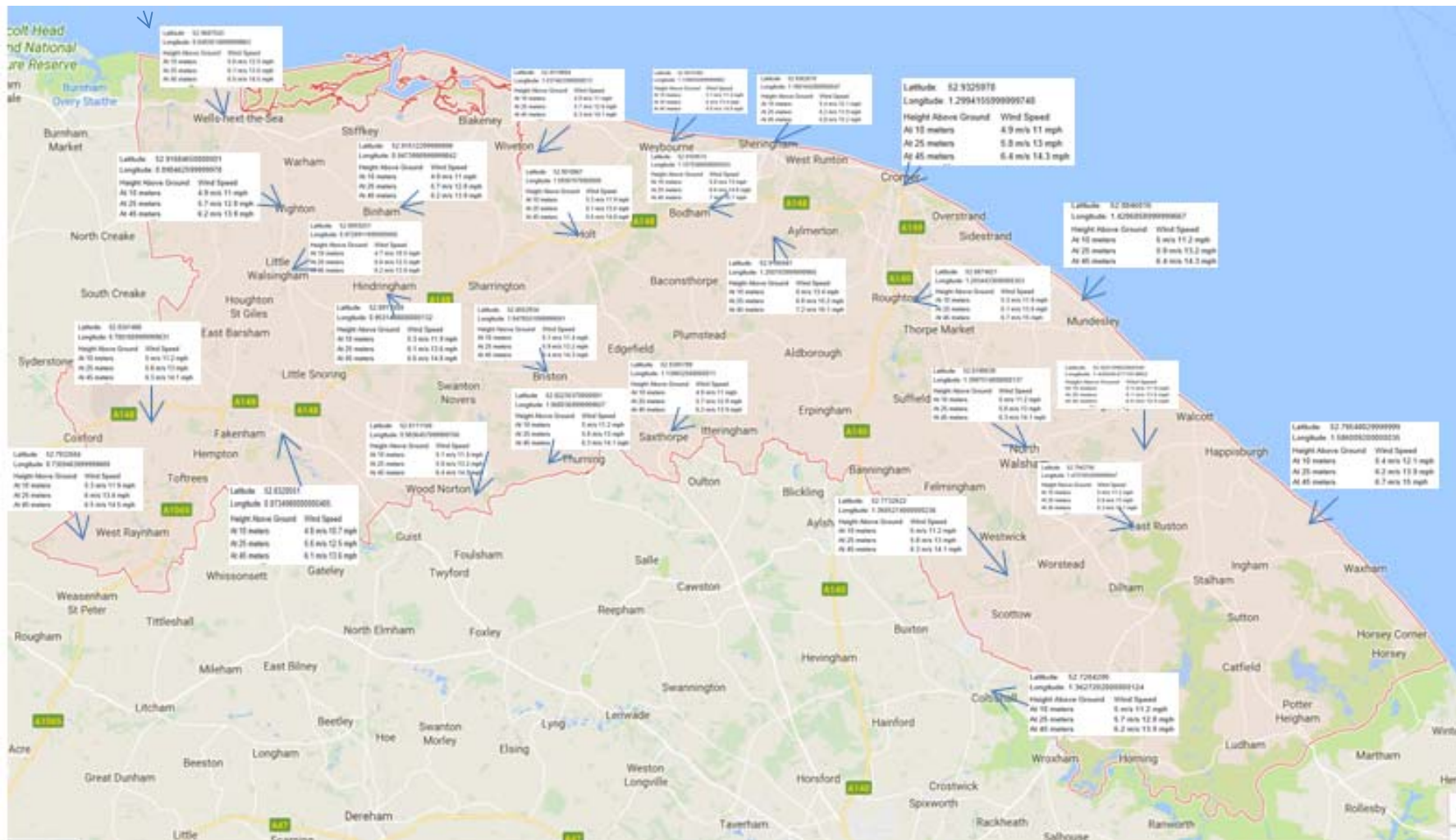


Figure 14. Map of wind speeds across the EoE region based on the UK Windspeed database.

Source: East of England renewable and low carbon energy capacity study 2011

- 3.13 The DECC methodology sets out the benchmark used for minimum commercially viable average wind speed varies between 5m/s and 7 m/s at 45 agl. In practice, the developers currently consider sites with wind speeds of over 6m/s at 45m agl. The threshold wind speed largely depends on the electricity price and financial incentives available. As very windy sites become used up, progressively lower wind speeds are likely to be considered. Technically, areas with wind speeds at and above 5m/s at 45m agl are viable for large scale turbines and adopting a 5m/s at 45m alg lower limit ensures that future opportunities (by 2020) are not ruled out. This is considered to be the accepted approach used by the wind industry in the UK.
- 3.14 The DECC methodology identifies that the best source to find wind speeds is from the UK Wind speed Database (NOABLE). NOABLE provides a good high-level and publicly available database that can be used for high-level wind speed analysis. The methodology warns however that whilst the database is suitable for providing a regional-level assessment, where site specific assessment are to be undertaken, more detailed and accurate data sources would be required. However for the sake of this paper, it is considered sufficient to show that the District has suitable wind speeds.
- 3.15 The map below shows a snap shot of wind speeds across North Norfolk obtained by inputting site addresses across the District into the NOABL website ([www.rensmart.com/Weather/BERR](http://www.rensmart.com/Weather/BERR)). The estimated wind speed are shown at three heights 10m, 25m and 45m and collaborates that East of England Study findings that the district has sufficient wind speeds to support renewable energy generation from wind based on wind speed mapping at 45m height and a wind turbine of 100m rotor diameter and 135m tip height.



Map showing the wind speed across North Norfolk. Source: NOABL Wind Map



## Wind Turbine Size

3.16 The DECC methodology sets out that an average wind turbine size is: 2.5MW installed capacity with the dimensions of tip height: 135m, rotor diameter: 100m, hub height: 85m. It is considered that this size of turbine is standard for planning applications which are currently been prepared or submitted. The figure below represents a comparison of different size turbines and a 2.5MW turbine,.

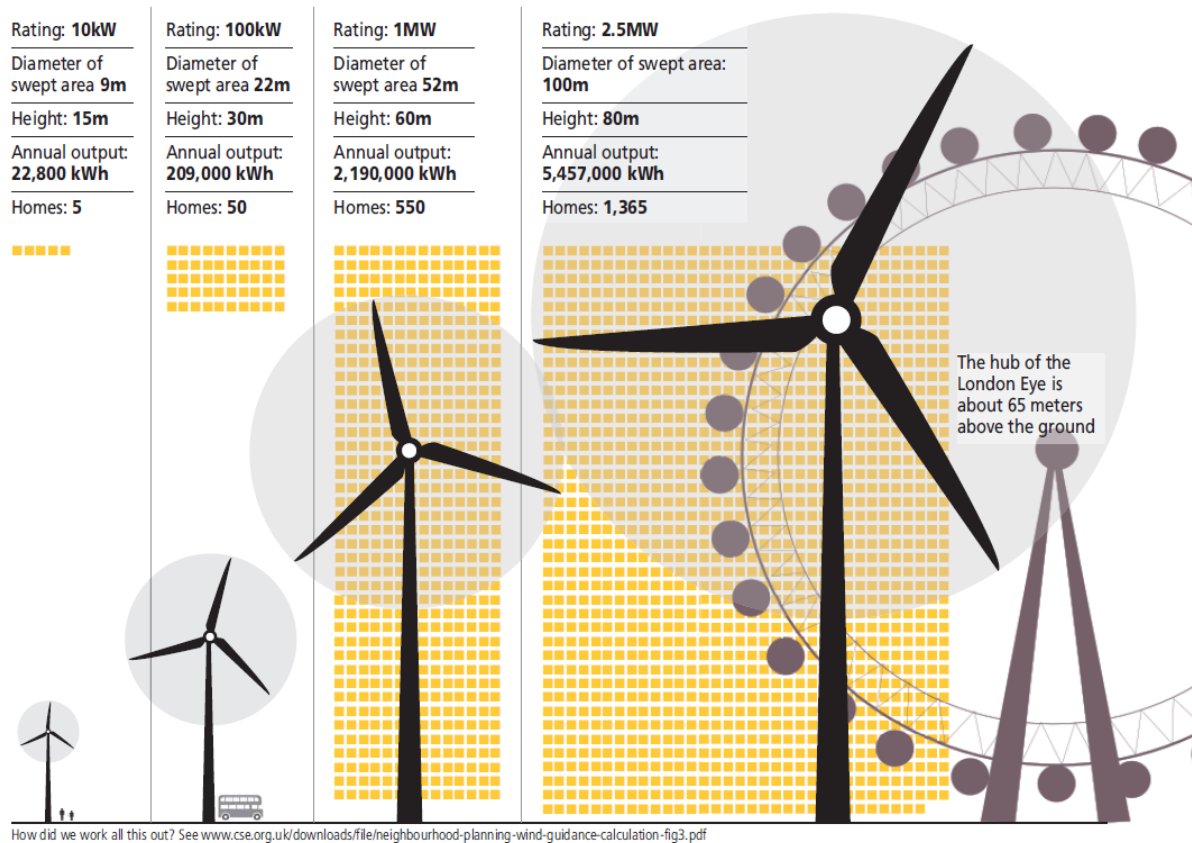


Figure 1- Sizes of wind turbines Source Neighbourhood-planning-wind-guidance.pdf from cse.org.uk

3.17 One of the main difficulties when considering wind energy development is not knowing the size, scale or location of proposals that will come forward at Local Plan stage. Thereby making the assessment of the impact on landscape, heritage and on the community more difficult. In order to get more information on this, more local evidence is available to make these assessments. This local evidence includes:

- A) The National Heritage List and maps for England which details heritage designations and holds the official records for listed buildings, scheduled monuments, Registered Parks and Gardens, World Heritage Sites, Registered Battlefields and Protected Wrecks. It includes a description of what is important about the heritage of the building or site. This list can be used to identify heritage designations across the District in order to illustrate and consider their impact from wind energy development.

B) The NNDC Landscape Character Assessment (LCA) which was adopted by the Council in 2009 and forms part of the North Norfolk Local Development Framework alongside the Core Strategy. The LCA identifies maps, classifies and describes each Landscape Character area within North Norfolk and makes judgements based on those character areas in order to inform a range of decisions. This document could be used as a basis for identifying character types and key landscape characteristics to ascertain the impact wind energy could have on each character area. The document is generally vague in relation to the landscape impacts from different scale turbines. It is considered that any update would need to quantify how any identified development impacts affect the “defined special landscape features and it would benefit from containing Further analysis/information on the sensitivity of each Landscape Character Area would be beneficial in order to have a better understanding of the implications of wind energy on each.

C) The connection of any proposed wind energy development into the relevant electricity network is an important consideration. Although the location of wind energy in relation to the network may not be critical because the cost of installing a new connection to a suitable part of the grid may be relatively economic. The design and capacity of the network at the point of connection may be more critical in terms of the viability of the connection, potentially requiring increased capacity in sub-stations or the network lines. It should be considered though that as economic conditions change and technology (both wind and power distribution) develops, grid connection costs may be able to be mitigated to varying degrees even within remote locations.

It is difficult to obtain accurate information on the ability of sites to connect to electricity grid infrastructure without doing site by site assessments and there is no specific evidence available. Therefore at this stage a simple geographic mapping exercise is not possible. It should however be considered when looking at suitable sites/proposals.

D) Conservation Area Appraisals: Where these are up to date they can provide additional evidence particularly on a case by case basis.

## 4 Policy Approaches

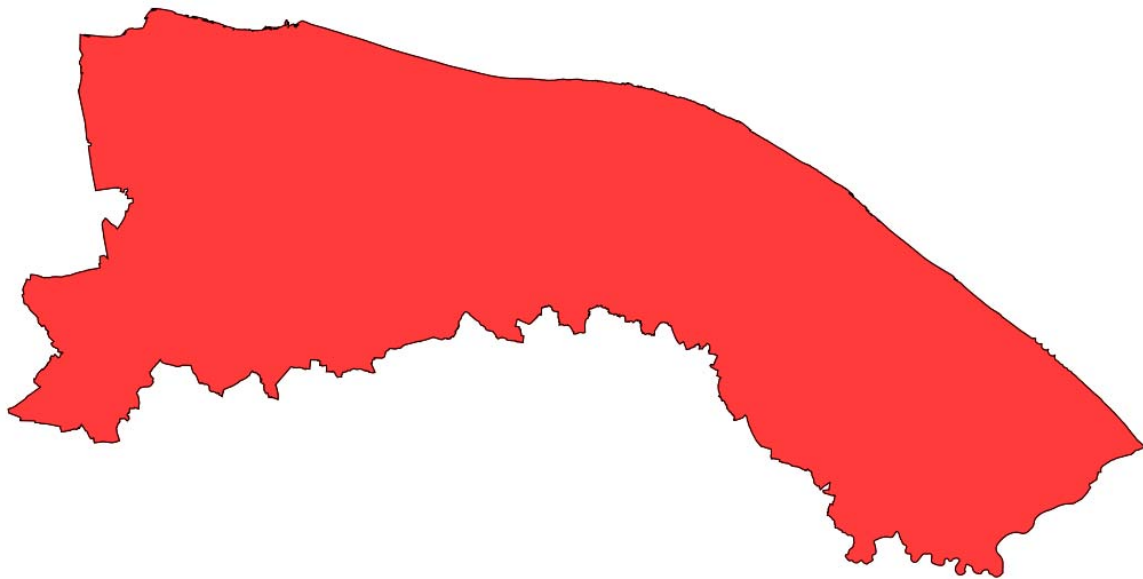
4.1 This section sets out the different approaches that could be used to identify areas considered broadly suitable in principle for wind energy in North Norfolk. The approaches presented are informed by a review of Local Plan approaches, national best practice and identified current guidance. They are considered to be distinct policy approaches utilising a reasonable range of constraints which together are not seen as unreasonable or overly constrain development opportunities. For each approach further consideration is given to the resource required and the suitability of the current evidence base in order to inform the approach along with an assessment as to whether the approach when combined with the expected time line of the Local Plan could feasibly undertaken in house.

4.2 Each approach is set out with a brief summary, a map showing the area that would be affected, and consequences/ resource required for each. The approaches are as follows:

- Approach 1 – Unconstrained Approach (Existing Approach);
- Approach 2 – Constrained Approach : landscape Designations;
- Approach 3 – Further Environmental Constraints Approach, settlement exclusion and other physical constraints;
- Approach 4 – Environmental, Residential & other Buffers;
- Approach 5 – Approach to Airfields.

## Approach Option 1 – Unconstrained Approach

- 4.3 No areas within North Norfolk would be considered inherently unsuitable for wind energy development or constrained in any way. Wind energy development would be considered acceptable in principle throughout the entirety of the Local Authority Area and proposals would be solely considered against Development Management policies and the current evidence base such as the adopted Landscape Character Assessment. This would be the same as the current approach, where there is no specific area identified as suitable for wind energy and proposals are considered against Core Strategy policies are used including Policy EN7 'Renewable Energy'. Where it must be considered individual/cumulatively that there is no significant adverse effect from the proposal in relation to landscape, townscape and heritage, amenity and nature/biodiversity considerations. A revised DM policy covering renewable energy and or wind generation (large scale and or micro scale) will need to be developed).



Option 1 – Map showing Unconstrained Approach

The red area identified indicates that wind energy proposals would be considered suitable notwithstanding other policy considerations.



Advantages	Disadvantages
Simplest model to implement with Development Management continuing to determine applications against policy consideration.	May not meet Governments objective to define areas suitable for wind turbine development. Does not necessarily seek areas for local approval and has the potential to conflict with the provisions of the NPPF
No 'areas of search' defined therefore removing potential objections from communities.	Lack of any added protection from future development in designated landscapes such as ANOB, Scheduled Parks and the Broads
Allowing future opportunities for all communities to develop proposals which meet identified energy need.	Continued development may have adverse impact on general quality of life in terms of access and enjoyment of the countryside.
Maintaining future opportunities for wind proposals increasing long term growth of the industry.	Potential for impact on tourism activity including key coastal landscape and attractions.
Provides a greater contribution towards national climate change.	Impact on wildlife and heritage impact, light and noise impact
Individual proposals assessed on an individual basis to a set criteria based policy	Current evidence base is not sufficient to identify areas of low, moderate and high landscape sensitivities and does not generally provide sufficient evidence to inform the scale of wind energy development which might be appropriate at any given location within this identified area.( District)
	Development Management and communities haven't got a clear steer of preferred location of wind turbine based on evidence. Each proposal will need to be assessed against the full Local Plan
	Potential objections from local communities

### Examples used across the UK

- 4.4 North Devon and Torridge initially proposed to earmark the entire two local authority areas as potentially suitable for wind energy where it could be demonstrated that the landscape sensitivity for the proposed scale of turbine does not exceed 'Moderate'. In subsequent revisions the policy approach has had to be refined, and although the entire district (s) remain identified as potentially suitable further evidence commissioned allows for the policy approach to differentiate across the District (s) according to the scale of wind turbines and degree of landscape impact and landscape character.
- 4.5 Kings Lynn doesn't define areas across the district and relies on a development management policy which states –*"Decisions regarding wind energy will rely on national policy in the Ministerial Statement of 18 June 2015 and guidance in the renewable and low carbon energy section of the Planning Practice Guidance... And The Council will provide a consistent cross boundary approach with neighbouring North Norfolk District Council by affording greater protection from development within the Norfolk Coast Area of Outstanding Natural Beauty (AONB)."*

## **Approach Implications Risks/ Implications**

- 4.6 Identifying the whole District as suitable for wind energy and turbine development leaves the Council at risk for speculative proposals across the District .In terms of new policy it may not accord with the intentions of the revised legislation and could be seen as an inappropriate response to the matter and one which could potentially be seen to conflict with the provisions of national planning policy which seek local planning authorities to ‘have a positive strategy to promote energy from renewable and low carbon sources’, particularly given the potential wind energy resource that is provided in North Norfolk.
- 4.7 If this approach was chosen then there would be a requirement to add significant further detail. The NPPF foot note 17 requires plans that identify suitable areas for renewable and low carbon development to include details on “what size of development the areas are considered suitable for” i.e in the case of wind energy this would be an indication of the size of turbine. The Landscape Character Assessment would need to be reviewed, as it is generally considered not able to provide sufficient evidence across the whole of the district to distinguish between potential landscape impacts and different scales of turbine development. This would have to be undertaken externally due to the specialist nature of the work and the time constraints to meet current Local Plan time line; this would have to be undertaken immediately.
- 4.8 Work on a Criteria based policy would also be required alongside other Development Management Policy work. This work would be done in house and informed by the revised evidence base.
- Advantages of relying on criteria based policy:
- 4.9 Assessments can be made on a case by case basis depending on the nature, scale and location of the development. Development would not have been ruled out due to its location.

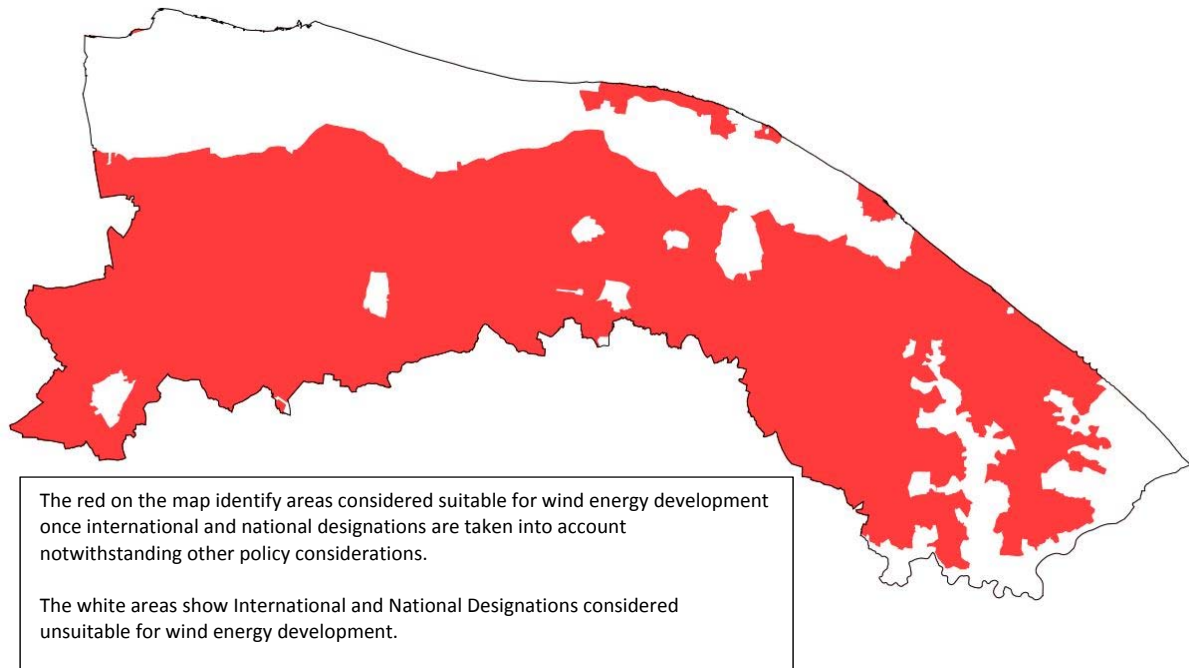
## **Approach 2 – Constrained Approach: landscape Designations**

- 4.10 The District has a high proportion of outstanding landscape including a number of International and National Designations. It could be considered that these designations should be excluded from the area considered suitable for wind development due to the potential impact on the environment and conflict with their designation. This approach would have the potential to rule out much of the sensitive landscape.
- 4.11 The areas covered by International and National Designations and therefore areas excluded could be: the Area of Outstanding Natural Beauty (AONB), Scheduled Parks & Gardens and the Broads Area (outside Planning NNDC Jurisdiction). The areas that fall outside these constraints would then be identified as potential suitable areas for wind development and proposals that fall into these areas would need to be considered against Local Plan criteria based policy. Such a policy would need to reflect a range of local factors such as local community views, ecology, cumulative impacts and take account of Conservation Area Appraisals and is detailed in section 5 of this discussion document.

The PPG States: proposals in National Parks and Areas of Outstanding Natural Beauty, and in areas close to them where there could be an adverse impact on the protected area, will need

Careful consideration. However national policy does not explicitly restrict renewable energy development within nationally important landscape areas. The subject of buffer zones is considered later in this discussion document but it is clear that any criteria based policy would need any turbine proposal to consider the setting of such landscape designations.

Figure 2: Approach 2– Indicative International and National Landscape Designations, Scheduled Parks and Gardens Constrained Approach



Advantages	Disadvantages
Simplest model to implement with defined areas - Development Management continuing to determine applications against policy	Might not meet Governments objective to define areas suitable for wind turbine development.- may be challenged ,
	Current evidence base does not generally provide sufficient evidence to inform the scale of wind energy development suitable in different landscapes which might be appropriate at any given location within the defined in principle zone
No 'areas of search' defined therefore removing potential objections from communities	Continued development may have adverse impact on general quality of life in terms of access and enjoyment of the countryside.
Significant added protection from future development in designated landscapes such as ANOB	Potential for impact on tourism activity including key coastal landscape and attractions.
Allowing future opportunities for all communities outside protected areas to develop proposals which meet identified energy need .i.e	Restricts small scale turbine development in excluded areas along with larger scale. Zone only based on landscape features.

Neighbourhood planning	
Maintaining future opportunities for wind proposals increasing long term growth of the industry.	Potential for further landscape impacts <b>beyond designated landscapes including the immediate setting of the AONB.</b>
Individual proposals in the identified area assessed on an individual basis to a set criteria based policy	Opportunity for consideration of further landscape impacts diminished.

### Resource Required

4.12 Adopting an approach that seeks to recognise important landscapes based on national and international designations and scheduled parks and gardens is seen as appropriate and proportionate to the available evidence.

4.13 A criteria based policy would also be required in order to assess proposals in the remainder of the District which would be considered potentially suitable for wind development. This work could be done in house.

### Implications / Risks

4.14 There is a risk with this approach that it could be challenged at examination, It should however be considered that other Councils have adopted similar approach. The approach would still require a policy in order to determine suitability across the remaining parts of the District. The approach would not protect areas immediately adjacent to the identified landscape designations which could be seen as sensitive especially in terms of visual amenity into and out of the landscape designated area and the impact on any areas setting would need to be part of any criteria based policy. The approach is based on landscape designations only and does not seek to include other designations such as Special Protection Areas, SPAs and Sites of Special Scientific Interest, SSSI,s. The inclusion of such an approach would require an understanding of the reason/ specific feature for the designation of each site and how that potentially impacts wind turbines.

4.15 The Landscape Character Assessment would need to be reviewed, as it is generally considered not able to provide sufficient evidence across the whole of the district to distinguish between potential landscape impacts and different scales of turbine development.

### Approach Option 3 –Further Environmental Constraints Approach and Exclusion of Settlements and Other Physical Constraints.

4.16 In addition to the International and National designations as highlighted in the above approach, further locations could be excluded including the Undeveloped Coast policy (assuming it is carried forward into the emerging Local Plan). Some justification for this can be found in the Placing Renewables in the East of England, 2008 study<sup>7</sup> which identified the North Norfolk Coast as an area that *“exhibits a medium High Sensitivity to commercial wind*

<sup>7</sup> Placing Renewables in the East of England , East of England Regional Assembly 2008

*turbine development. The variety of texture, dynamic and detailed nature of the landscape increases the sensitivity of this landscape to turbine development. The study characterises Medium – High Sensitivity landscape character as areas that are vulnerable to change recommends the landscape is only suitable for small scale wind development<sup>8</sup>.*

4.17 Similarly consideration could be given around excluding urban areas around main towns/ villages within the District (as identified in the Core Strategy SS2 and or emerging local plan) and or all residential areas across the district.

4.18 The PPG States: protecting local amenity is an important consideration which should be given proper weight in planning decisions however the physical nature of the constraint does effectively exclude these areas from large scale wind development and it could be considered that such an approach is not necessary. If this route was chosen the question remains to what extent the urban areas should be identified – the complete dispersed settlement or just the growth locations.

4.19 A further option also exists around the mapping of other physical constraints such as :

- Public roads (A and B roads)
- Railway lines
- Inland water
- Pipelines
- Power lines
- Public footpaths and bridleways

Advantages	Disadvantages
Development Management continuing to determine applications against policy inside identified areas.	Might not meet Governments objective to define areas suitable for wind turbine development.
A reduction rate of development around residential properties, likely to have reduced impact on residents and reduce complaints received.	Concentration and Continued development may have adverse impact on general quality of life in terms of access and enjoyment of the countryside.
Significant added protection from future development in international and national designated landscapes such as ANOB as well as other local designations.	Potential to rule out small scale turbine development in and around settlements
Protect further environmental constraint areas for example Undeveloped Coast.	Significant resource required. It is considered that any application would need to consider these in any case and it is potentially unnecessary.
Allows future opportunities for all communities outside protected areas to develop proposals which meet identified energy need. i.e through neighbourhood planning.	Potential for further landscape impacts beyond designated landscapes including the immediate setting of the AONB.
Maintaining future opportunities for wind proposals increasing long term growth of the industry.	

<sup>8</sup> Placing Renewables in the East of England , East of England Regional Assembly 2008, Table D1.1 Appendix 1, & pages D1-D6

Identifies distinct areas and helps provide reassurance to communities around settlements	Potential to impact properties that aren't within towns, and in towns without an appropriate buffer.
Protect properties within towns from effects.	Increased evidence base
If roads and settlements were mapped then areas of hard /physical constraints are readily identified	

### Resource Required

- 4.20 If this approach was considered then a decision would need to be taken around the advantages / disadvantages and the risk around the use of the settlement hierarchy or the incorporation of all built up areas
- 4.21 In terms of an approach excluding more local environmental designations, it is thought that supporting evidence from an update of the Landscape Character Assessment and or a Landscape Sensitivity study would be required.
- 4.22 Mapping physical constraints such as roads and rail would follow the approach taken in the East of England Renewable and Low Carbon Energy capacity Study 2012, however it is potentially a significant undertaking at local level and it is considered that any application would need to consider these in any case.
- 4.23 Work on a Criteria based policy would also be required alongside other Development Management Policy work. This work could be done in house.

### Risk / Implications

- 4.24 There is a risk that this approach would not meet the Government objective to define suitable areas for wind energy. The approach would require criteria based policy in order to determine suitability across the rest of the District. Although this approach would identify certain areas where physical constraints and softer landscape considerations informed policy development there could be a risk that areas immediately adjacent to the designated areas could be developed. Utilising the settlement hierarchy the approach would also only exclude areas around towns/villages identified as growth locations rather than all settlements / residential properties which could be considered equally as sensitive.

### Approach Option 4 – Buffers including consideration of the setting of designated areas

- 4.25 The dispersed settlement pattern across much of the district effectively excludes areas from further consideration as possible location for large scale wind development and is seen as a robust approach given the physical nature and land use constraint. In addition to the physical constraint of settlements the Council could consider applying buffers around international and national sites (as identified in approach option 2) and around residential areas (approach

option 3). However this does not necessarily mean small scale or single turbines should be excluded in the same way.

### Residential Properties Buffer

4.26 For this approach a buffer of 400m could be placed around all residential properties, as shown in figure 3. In practice a minimum distance required between a wind farm and residential properties is site specific, dependent on the proposed turbine (topple distance) and ambient background noise. A distance of 400-600m is identified as a minimum in the Renewable and Low Carbon Energy Capacity Methodology, DECC 2010<sup>9</sup>. This distance is considered to protect residents from noise, shadow flicker and visual impact associated with all scales of turbines. This is equivalent to applying a buffer of 8 times the rotor diameter, so for a large 2.5MW turbine with 50 metre blade, this would result in a buffer of around 400m. This approach was put forward in North Devon District Council Wind Energy Development Policy options, which was based on 'The Assessment and Rating of Noise from Wind Farms' (ETSU-R-97) good practice 7. This document provided a framework for the measurement of wind farm noise and gave indicative noise levels calculated to offer a reasonable degree of protection to wind farm neighbours, without placing unreasonable restrictions on wind farm development. The ETSU-R-97 document provides some discussion on minimum separation distances with regards to noise impacts (page 46) and concludes that due to the difference in emissions between different turbines, the increase in scale of turbines and wind farms, and varying topographical effects that a minimum distance of 350-400m cannot be relied upon to give adequate protection to neighbours of wind farms.

### Designated Sites Buffer

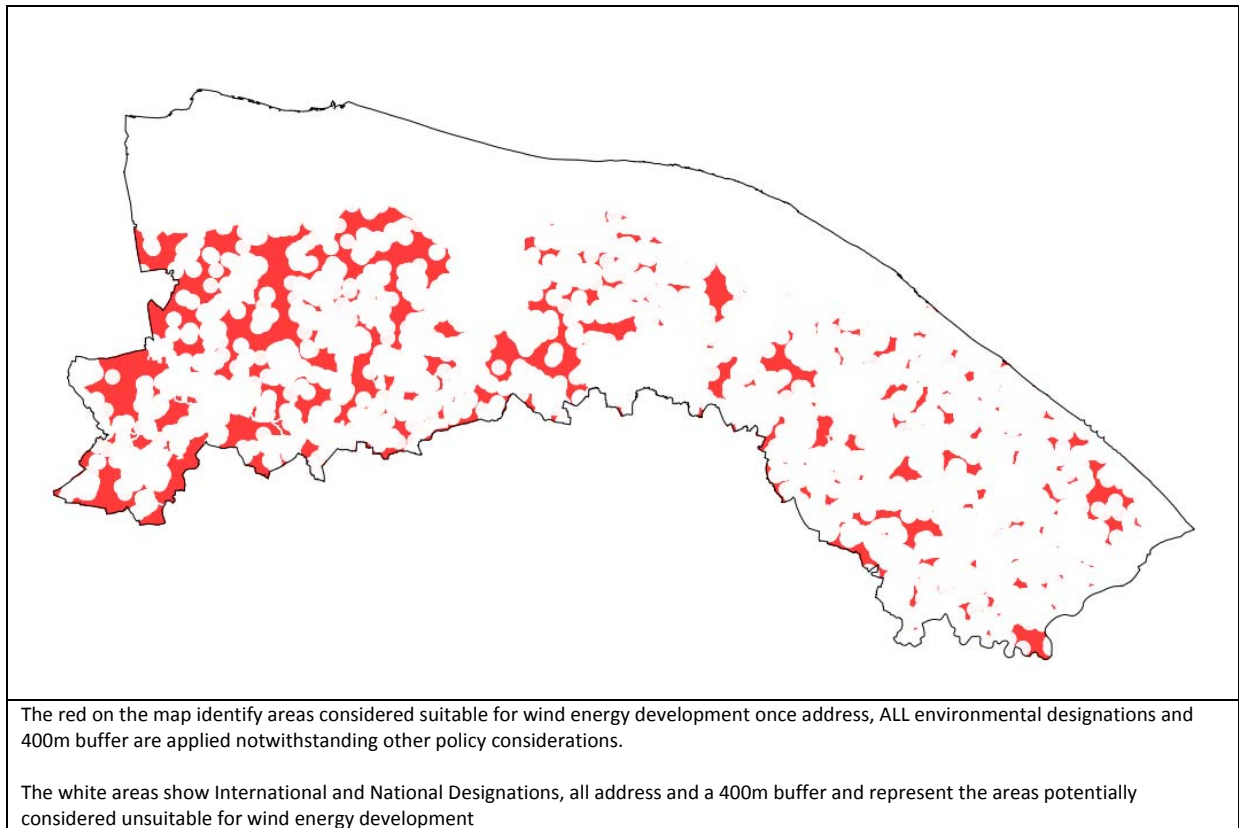
4.27 A buffer around international and national sites could also be considered. A distance for this buffer has not been established as part of this paper as further work would be required to determine a suitable buffer distance. However it is thought establishing a suitable buffer is dependent on the different physical attributes of the landscape in each location and also dependent on the extent of any proposal and the cumulative effects. Given this it would be hard to establish and justify a consistent approach. It is considered more suitable to consider the setting of landscape designations and there on a case by case basis.

4.28 The map below sets out the suitable areas of the District for wind energy (in red) and where development proposals would be considered against an established Development Management policy, the adopted Landscape Character Assessment and Landscape Sensitivity Assessments for North Norfolk. The map shows a buffer of 400m around properties **and the international & national designations** as identified in Approach 2.

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<sup>9</sup> Renewable and Low Carbon Energy Capacity methodology, DECC 2010, page 32

## Approach 4 – Buffers (Indicative)



**\*Note- for this map a 400m buffer was plotted around each international and national environmental designation including SPA, SSSI's etc and address (employment and residential) in North Norfolk and therefore the area shown has the potential to overestimate residential areas and areas landscape designations as put forward above**

Advantages	Disadvantages
Areas identified and which are broadly distributed throughout the District.	Some communities and wards would be potentially divided by identified areas which may result in objections.
A reduced rate of development around residential properties, likely to have reduced impact on residents and reduce complaints received.	Not supported by Government policy. Not likely to be accepted as a Local Plan policy(see below) Hard to justify given the potential significant differences in proposals and lack of supporting evidence
Protect areas surrounding all properties.	Only selective locations considered suitable for wind energy. – may lead to concentrations in some areas
Protect areas surrounding international and national designated sites.	Reduced contribution towards national climate change, renewable energy targets with fewer opportunities to decentralise energy supplies.
Continued development may result in the potential for perceived impacts on the general quality of life in terms of access and enjoyment of the countryside, although designated sites, residential properties afforded additional protection.	Less likely to be able to refuse applications in areas considered 'suitable' in this approach.



Allows future opportunities for all communities outside protected areas to develop proposals which meet identified energy need. i.e through neighbourhood planning. And or develop appropriate buffers around important local designations / assets subject to evidence	Hard to establish an appropriate buffer on smaller assets such as Heritage assets and their settings -
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## Government Policy

4.29 At this current point in time government policy does not include separation distances from residential properties. There have been three Private Members Bills raised in both the House of Commons and the Lords providing proposals for establishing a legal basis for a separation distance between turbines and residential properties.

- *Wind Turbines (Minimum Distances from Residential Premises) Bill [House of Lords] 2010-12*
- *Onshore Wind Turbines (Proximity of Habitation) Bill [House of Commons] 2010-12*
- *Wind Turbines (Minimum Distance from Residential Premises) Bill [House of Lords] 2012-13*

4.30 With the planning guidance (PPG) stating that “**Local planning authorities should not rule out otherwise acceptable renewable energy developments through inflexible rules on buffer zones or separation distances.** Other than when dealing with set back distances for safety, distance of itself does not necessarily determine whether the impact of a proposal is unacceptable. Distance plays a part, but so does the local context including factors such as topography, the local environment and near-by land uses. This is why it is important to think about in what circumstances proposals are likely to be acceptable and plan on this basis.”

## Separation distances used across the UK

4.31 A number of Councils have sought to introduce minimum separation distances between wind turbines and residential properties into their local plans, with varying degrees of success. The table below provides a range of examples to illustrate both the range of distances selected and the ‘status’ of the approach.

Local Authority Approaches			
Cherwell District Council	800m	Informal planning guidance Recommends separation distances between turbines and settlements/dwellings, based on amenity and other issues such as landscape, noise, heritage, safety and shadow flicker.	Adopted 'without status'
Lincolnshire County Council	700m (2km if there are noise issues)	Wind Energy Position Statement: This is a set of guidelines that the County Council prepared and hoped local planning authorities would take into account in decision making. In reality they carry very little weight.	No Status
Milton Keynes Council	Sliding scale approximately 10 times height	Supplementary Planning Guidance based on noise / safety.	Quashed 'no status' <sup>11</sup>
Aberdeenshire Council	Specified minimum distances for specific turbine models, ranging from 125m to 630m.	Planning Guidance note on noise <sup>12</sup> . The Council's Environmental Health section has calculated a range of minimum separation distances that will be required for a number of specified turbine models to limit noise to an acceptable level.	Planning Guidance Note

Local Authority Approaches			
Wiltshire Council	Sliding scale up to 3km	The Wiltshire Core Strategy submission document proposed a range of minimum distances that would be applied and set out the intention to prepare additional guidance on the matter. The Inspector considered the distances were unjustified in light of the evidence provided and considered they would unduly restrict the scope for larger turbines.	Inspector removed text from Plan as considered unjustified
Allerdale Council	800m	The supporting text of Policy S19 in Allerdale's Local Plan expects a minimum separation distance of 800m between wind turbines (over 25m) and residential properties. It allows for some flexibility where site specific characteristics make it appropriate to vary the threshold.	Adopted July 2014

4.32 It should be noted that research has shown that Allerdale District Council are the only council to have a distance away from residential adopted within their Local Plan, which requires 800m between turbines and properties but does allow for flexibility with the policy stating ‘*where it can be demonstrated through evidence that there is no unacceptable impact on residential amenity. Shorter distances may also be appropriate if there is support from the local community*’. The inspector stressed that taking into account the specific topographical conditions for that area that an 800m distance would not be “unreasonably excessive”.

## Planning Appeals

4.33 The following table shows planning appeals across the country in relation to distances from residential properties.

### Appendix 3: Wind Turbine Planning Appeals

PINS Ref	Year	Location	Distance	Details	Notes and Quotes
APP/D2510/A/1 2/2176754	2013	Lincolnshire	800m	8 turbines (115m)	'The appellants were able to show by reference to other appeal and called-in application decisions that in England, no property 800m or more from a wind farm scheme had been judged to be potentially affected by the visual presence of turbines to the extent that the living conditions of its residents would be unacceptably harmed.'
APP/P2114/A/1 0/2125561	2011	Isle of Wight	900m	3 turbines (125m)	'Given the distance to the nearest dwellings, along with the local topography, I do not consider that there are any special circumstances or factors which would apply here to indicate that both construction and operational noise from the proposed wind farm could not be adequately controlled by the conditions suggested to the Inquiry.'
APP/X2410/A/1 0/2134009	2011	Leicestershire	610 m	1 Turbine (132m)	'The noise assessment indicates that the limit could be comfortably met.'
APP/C1625/A/0 9/2116088	2010	Gloucestershire	400m	1 Turbine (70m)	'Given the distance of the site from the nearest properties, there would be no likelihood of disturbance to local residents from any sounds arising from the movement of wind through the structure'
APP/D2510/A/1 0/2121089	2010	Lincolnshire	700m	8 Turbines (2Mw)	'As to the totality of noise considerations there is no justifiable basis to conclude that this is a factor to be weighed against the project.'
APP/R1038/A/0 9/2107667 And APP/P1045/A/0 9/2108037	2010	Derbyshire	650m	5 Turbines (126m)	'Living conditions would be unacceptably harmed, to varying degrees, by noise and visual impact.'

APP/J1915/A/09 /2104406	2010	Hertfordshire	750m	3 Turbines (119m)	'I conclude on the third issue that neighbouring residents would not suffer unacceptable disturbance from noise or shadow flicker'
APP/M0933/A/0 8/2090274	2009	South Lakeland	600m	6 Turbines (120m)	'I consider that the turbines are unlikely to cause unacceptable noise at nearby dwellings.'
APP/L2630/A/08 /2084443	2008	Norfolk	700m	7 turbines (125m)	A distance of 700m from the nearest residential dwelling was found to be appropriate.
APP/B3030/A/0 8/2072487	2008	Nottinghamshire	800m	5 turbines (100m)	A distance of between 600 and 800m from the nearest residential dwelling was also found to be appropriate.
APP/X2220/A/0 8/2071880	2008	Dover	1km	5 turbines (125m)	From the nearest dwelling (360m), the Inspector found that the turbine would be 'looming', 'unpleasantly overwhelming', and 'unpleasantly overwhelming and unavoidable' impact extended to dwellings within 800m. At a settlement 1km away from the turbines, the impact too would be dominating and unavoidable.
APP/V3310/A/0 6/2031158	2008	Somerset	440m	5 turbines (120m)	'There is no clear evidence that noise from the turbines, noise related problems or shadow flicker would cause any unacceptable harm to living conditions locally, especially if controlled by appropriate conditions.'
APP/W0530/A/0 5/1190473	2006	Cambridgeshire	800m	16 turbines (100m)	Inspector considered that the impact of the turbines on a settlement 800m away would be significant. The turbines were found to completely dominate the character and appearance of the area, and the appeal was dismissed.

Source: Allerdale Local Plan (Part 1) Wind Turbine Separation Distance Topic Paper May 2013

## Resource Required

- 4.34 If buffers are applied then this would need to be justified through appropriate evidence. Including where the buffer should apply and the distance of a buffer based on different size turbines. This could be done through a technical approach, best guidance or by case by case basis.
- 4.35 An update of the Landscape Character Assessment and or a Landscape Sensitivity study would be required. This would have to be undertaken externally. However to meet current Local Plan time line, this would have to be undertaken immediately
- 4.36 The approach would require criteria based policy in order to determine suitability across the rest of the District.
- 4.37 If this route was taken more accurate work would need to be undertaken to map buffers around settlements. As above there is also an option of mapping hard constraints such as roads and other utility infrastructure.

## Risks / Implications

- 4.38 There are risks associated with applying buffers to environmental designations and to residential properties. It is unlikely that one distance would be appropriate for the whole District and might be ruling out otherwise suitable locations. It would also go against national guidance and be challengeable.
- 4.39 A standard approach for the whole of North Norfolk with one distance is likely to be at risk of being challenged. It might be most appropriate to determine a suitable buffer distance on a case by case basis, based on criteria based policy, however this might also be difficult to justify.
- 4.40 The national PPG states that wind turbines should not be ruled out through inflexible rules on buffer zones and separation distances.

## Other buffers

- 4.41 There are other significant constraints which, in general, are likely to inhibit the development of large wind energy developments. These have not been included above as there could be either: a) some variation and uncertainty in their spatial extent or b) the possibility to develop within the area concerned but with appropriate mitigation. These are as follows:

a) Buffers around Heritage Assets

- 4.42 Buffers could also be introduced around heritage assets, this could include:

- Listed buildings
- Conservation areas
- World Heritage Sites

- Scheduled Ancient Monuments
- Registered parks and gardens

4.43 The planning guidance states: *As the significance of a heritage asset derives not only from its physical presence, but also from its setting, careful consideration should be given to the impact of wind turbines on such assets. Depending on their scale, design and prominence a wind turbine within the setting of a heritage asset may cause substantial harm to the significance of the asset. Great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting;*

4.44 However it is considered that the impacts of heritage could be considered through a general policy and not through the identification of suitable areas in the local plan. Four main reasons 1) given the unknown scale of proposals and the local nature of impacts it would be hard to apply a consistent buffer / approach . 2) Cumulative impacts are also a considerations. 3) if the asset falls into an areas identified as suitable a community could further develop the the policy in relation to local historic impacts subject to evidence in a NP.4) considered resource intensive

b) Biodiversity and Ecology

4.45 Specifically the impact of wind energy on bird/bats sites and migration zones which might lead to priority habitats and species being excluded from suitable areas. It is considered that biodiversity assessments are best addressed at a site level through a criteria based policy requirement. There may be cases where mitigation measures may enable development to proceed in some areas. However early indications are that the Habitats Regulation Assessment of the Local Plan is likely to review migration patens in Birds and provide commentary and evidence in relation to policy formation in this area . Early indications are that this could be a consideration in areas to the west of the district.

4.46 The planning guidance states: *Evidence suggests that there is a risk of collision between moving turbine blades and birds and/or bats. Other risks including disturbance and displacement of birds and bats and the drop in air pressure close to the blades which can cause barotrauma (lung expansion) in bats, which can be fatal. Whilst these are generally a relatively low risk, in some situations, such as in close proximity to important habitats used by birds or bats, the risk is greater and the impacts on birds and bats should therefore be assessed. The map below taken from the RSPB shows a wind farm sensitivity map of North Norfolk in terms of ecological.*



c) Local topography

4.47 It is an important factor in assessing whether wind turbines and large scale solar farms could have a damaging effect on landscape and recognise that the impact can be as great in predominately flat landscapes as in hilly or mountainous areas;

D) Cumulative Impacts

4.48 Cumulative impacts require particular attention, especially the increasing impact that wind turbines and large scale solar farms can have on landscape and local amenity as the number of turbines and solar arrays in an area increases.

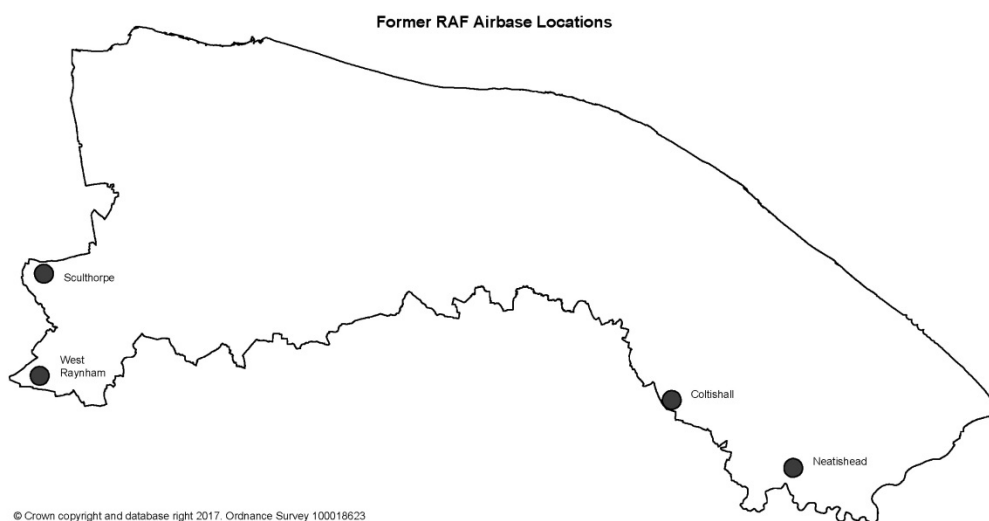
### **Approach Option 5 – To identify vacant airfields as areas within the District suitable for Wind Energy**

4.49 Other considerations include Aviation and exclusion areas such as:

- Civilian airports
- Aerodromes
- Military airfields and airbases
- MOD training areas
- Explosive safeguard areas
- MOD exclusion areas
- Radar sites

4.50 An alternative or additional approach would be to identify vacant airfields as areas where wind energy development could be considered acceptable in principle. Vacant airfields tend to be remote with lower populations and limited number of dwellings. The areas also tend to be less affected by national and international designations than other areas across the District. It could therefore be considered that wind energy could have a lower impact on landscape, townscape and residential amenity than other approaches listed. The proposals that fall within this area would then be considered against Development Management Policies and the adopted Landscape Character Assessment. To date however these have been used to support the provision of renewable energy through solar power.

4.51 The map below shows the former RAF airfields in the district ,



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Advantages	Disadvantages
A site would be clearly identified to where wind energy development would be suitable, making it easier for the decision maker dealing with an application.	Continued development in one location may result in the potential for perceived impacts on the general quality of life in terms of access and enjoyment of the area within that location.
A reduction rate of development around residential properties, likely to have reduced impact on residents and reduce complaints received.	Some communities and wards would be potentially divided by identified area which may result in objections.
Likely to meet Governments objective to define areas suitable for wind turbine development.	Only selective locations considered suitable for wind energy maybe challenged as overly restrictive - Would require increased evidence to justify allocation of individual sites and non-suitability of other areas.
Protect areas surrounding international and national designated sites.	Reduced contribution towards national climate change, renewable energy targets with fewer opportunities to decentralise energy supplies.
Would protect the majority of the District including Heritage assets and their settings.	Less likely to be able to refuse applications in areas considered 'suitable' in this approach.
	Significant solar power already in existence on these sites.
	May not be deliverable due to infrastructure requirements

### Example

4.52 The Local Plan Submission for Hull City Council has identified Employment/Port Areas, Farmland, Open Space greater than 2.5m and education sites greater than 1 hectare as areas considered to be potentially suitable for wind turbines. Areas that are excluded from this are: Historic parks, local nature reserves, cemeteries, green corridors and Conservation Areas.

### **Risk and Resource Required**

- 4.53 This approach would provide consistency when identifying areas for wind energy development, focussing all development to airfields and thereby taking the impact away from the rest of the District. However airfields may be constrained and further evidence would be required to determine the suitability of the airfields for wind energy; considering the infrastructure available, the impact on the surrounding areas and the feelings of the local communities. This approach would also require an update of the Landscape Character Assessment and the DM policy.
- 4.54 The approach may not be viable given the remoteness from the electricity network for some of the former airbase.



## 5 Conclusions

- 5.1 Given the revised national policy context, producing a new Local Plan which does not consider the requirements for on shore wind generation **potentially introduces a level of risk to plan making**. A failure to address the requirements could introduce a potential soundness issue. It could also leave the council at risk of planning applications for Wind Turbines for the entirety of the District and at risk at appeal. It is therefore important that the approach chosen and the alternative considered are complete and fully justified. Any approach that seeks to unnecessarily rule out the delivery of future wind energy development in the District could be considered restrictive.
- 5.2 However with this in mind, it is important that the need for renewable or low carbon energy does not automatically override environmental protections and hard constraints. And the approaches including these environmental protections (all but approach 1) therefore should be considered highly.
- 5.3 An early indication from this paper would suggest that developing a policy approach based around the identification of important landscape designations and a criteria based policy to aid in the determination of applications on a case by case basis outside sensitive areas could be explored further. Such an approach could lead to the identification of potentially suitable areas a consistent approach across the whole District whilst giving added protection to national and international Landscaped designated areas. Any DM policy would have to ensure that the setting of such landscape is considered - Buffer zones are not considered to be justified.
- 5.4 The Landscape Character Assessment would need to be reviewed, as it is generally considered not able to provide sufficient evidence across the whole of the district to distinguish between potential landscape impacts and different scales of turbine development and inform what size of development is considered suitable in each landscape area.
- 5.5 It is clear that whatever approach is chosen that a criteria based policy will also be required. This policy will then be used to assess future planning application and also be used to consider the wind energy sites put forward through the Call for Sites. Further work will go into developing this considering the points and concerns raised following the discussion of this paper.
- 5.6 The following considerations should be made within the criteria based policy. The policy and alternatives will all be subject to a Sustainability Appraisal (SA):
- Landscape and visual impact, including the setting of Landscape designations and conservation areas
  - Townscape and Historic features
  - Residential amenity
  - Nature , ecology and biodiversity considerations
  - Local interest/ people – potential
  - Archaeology,

- Air traffic
- Turbine size thresholds(micro generation)
- Cumulative impacts

Suggested that an approach would be to:

- request that all individual proposals for development within any defined area would be required to undertake compulsory pre application community consultation prior to submission of a formal planning application
- Supported by appropriately detailed landscape visual impact assessment which builds on the adopted Landscape Character Assessment.

Note adopting the approach of identifying areas means that the will not generally be able to grant consent for any wind energy development proposals that fall outside of areas identified areas as suitable for wind energy development. This would include any community led and rural diversification schemes as well as those proposed on a speculative basis, including micro generation. Community led schemes and other proposals for wind energy development which fall outside of the Local Plan's identified areas could only be enabled where communities choose to identify their locations within additional areas suitable for wind energy development in a Neighbourhood Plan.

## **Appendix**

### **Further Work and Evidence**

Wind Energy Supplementary Planning Document (Examples are Cornwall, Rugby, Cumbria and Bath & North East Somerset)

Landscape Sensitivity Analysis (Bath) –

This document provides an assessment of the landscape sensitivity to wind energy development in Bath and forms part of the evidence base to inform policies within the Local Plan. The document uses the Local Character Assessment as a basis to consider the landscape and visual impact of wind energy on each LCA character area. The document also considers the impact of wind turbines on designations such as the ANOB and Conservation Area. The document provides maps and tables showing the impact of different sized wind turbines on the LCA character areas.

This type of document might need to be produced to inform policies and to ensure that there is evidence to back up any sites proposed as suitable for wind energy in North Norfolk.

Strategic Environmental Assessment

A Strategic Environmental Assessment would consider all of the significant environmental impacts of wind energy developments. Further work would be required to establish if a SEA is required.

## Direct Links from Document

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North Devon and Torridge Council (December 2015) 'North Devon and Torridge Local Plan: Wind Energy Development - Policy Options' Available from: [http://consult.torridge.gov.uk/portal/planning/localplan/wind\\_energy\\_options](http://consult.torridge.gov.uk/portal/planning/localplan/wind_energy_options)

North Norfolk District Council (September 2008) 'Core Strategy incorporating Development Management Control Policies' Available from: <https://www.north-norfolk.gov.uk/tasks/planning-policy/view-core-strategy/>

North Norfolk District Council (June 2009) 'Landscape Character Assessment SPD' Available from: <https://www.north-norfolk.gov.uk/tasks/planning-policy/view-core-strategy/>

RSPB 'UK wind farm sensitivity map' Available from: <https://ww2.rspb.org.uk/our-work/our-positions-and-casework/our-positions/climate-change/action-to-tackle-climate-change/uk-energy-policy/wind-farms/mapping-and-locational-guidance>

## Other Links

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Department of Energy and Climate Change (July 2011), 'National Policy Statement for Renewable Energy Infrastructure (EN-3)'. Available from: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/47856/1940-nps-renewable-energy-en3.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/47856/1940-nps-renewable-energy-en3.pdf)

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Infrastructure' Available from: <http://www.cumbria.gov.uk/planning-environment/countryside/countryside-landscape/civi/civi.asp>

## Appendix 1: Renewable and low-carbon capacity assessment methodology

No	Parameter	Description	Assessment requirement	Where to source data from
<b>Opportunity assessment - natural and technically accessible resource</b>				
1	Wind speed	Average annual wind speed in a 1sq km grid - indicating wind availability (m/s)	Apply a lower limit of 5m/s measured at 45m above ground level (agl) – i.e. consider all areas with wind speed at and above 5m/s at 45m agl .	UK Wind speed database (NOABLE) <sup>8</sup>
2	Wind turbine size	Typical capacity of turbines	Apply standard average turbine size of 2.5 MW installed capacity  (dimensions:, tip height: 135m, rotor diameter:100m, hub height: 85m)	no data required
3	Wind turbine density	Maximum installed capacity in a unit of area (MW/km <sup>2</sup> )	Apply distance between turbines of 5 rotor diameters or a benchmark of 9MW/km <sup>2</sup> – whichever results in the greater capacity deployment figure.	no data required
<b>Constraints assessment - physically accessible and practically viable resource</b>				
4	Non-accessible areas	Areas where wind turbines cannot be installed due to physical environment constraints	Exclude from the assessment the following areas (footprint): <ul style="list-style-type: none"> <li>Roads (A, B and motorways)</li> <li>Railways</li> <li>Inland waters (rivers, canals, lakes and reservoirs)</li> <li>Built-up areas (settlement polygons)</li> <li>Airports</li> <li>MOD training sites</li> </ul>	GIS layers:  OS Strategi <sup>®2</sup> - includes data on roads, railways, inland waters and built-up areas (cities, towns, villages – as polygons)  MOD
5	Exclusion areas	Areas where wind developments are unlikely to be permitted.	Exclude from the assessment the following areas: <ul style="list-style-type: none"> <li>Ancient semi-natural woodland</li> <li>Sites of historic Interest (but no buffer to be applied)</li> <li>Buffer around roads and rail lines: tip height + 10% (=150m)</li> <li>Buffer around all built-up areas (settlement polygons – as defined in OS Strategi<sup>®</sup>): 600m</li> <li>Buffer around all airports and airfields: 5Km.</li> <li>Civil Air Traffic Control</li> </ul>	GIS layers:  OS Strategi <sup>®</sup>  Multi Agency 'MAGIC' database <a href="http://www.magic.gov.uk">www.magic.gov.uk</a>  MOD

No	Parameter	Description	Assessment requirement	Where to source data from
			constraints	
			<ul style="list-style-type: none"> <li>• MOD training areas</li> <li>• Explosive safeguarded areas, danger areas near ranges</li> </ul>	
6	Designated Landscapes and Nature Conservation Areas	Potential for renewable energy within these areas	For internationally and nationally recognised landscape and nature conservation designations, apply the 5-step approach specified at the end of Chapter 3 in order to assess the overall type and level of renewable energy infrastructure that could be accommodated within these designations.	Multi Agency 'MAGIC' database <a href="http://www.magic.gov.uk">www.magic.gov.uk</a>
7	MOD constraints	Additional exclusion areas relating to MOD sites and radar issues	Consult with the MOD for specific regional advice on any additional constraints that may need to be applied including: <ul style="list-style-type: none"> <li>• MOD sites (other operational and unused land)</li> <li>• Air defence and air traffic control radar – request MOD to indicate what amount (ha, km<sup>2</sup> or %) of the accessible resource should be further excluded from the assessment due to radar constraints.</li> <li>• Other safeguarded areas</li> <li>• Danger areas and MOD bye laws</li> </ul>	MOD Aviation safeguarding maps <a href="http://www.restats.org.uk/safe_guarding_maps.htm">http://www.restats.org.uk/safe_guarding_maps.htm</a>

Source: SQW Energy and Land Use Consultants