

Borough Council of  
**King's Lynn &  
West Norfolk**



## **Borough Council of King's Lynn and West Norfolk Local Plan Examination**

# **Gypsy and Traveller Site Allocation Sequential Test and Exceptions Test Document**

**May 2024**

## 1. Aim of this Document

The National Planning Policy Framework (NPPF) and associated National Planning Practice Guidance (NPPG) [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](http://www.gov.uk) require Local Authorities to use the flood risk 'Sequential Test' in the planning system. The Sequential Test is designed to steer development to areas with the lowest risk of flooding and should be used in areas known to be at risk now and in the future from any source of flooding. As part of the Local Plan, the Council should a sequential risk-based approach to location of development, taking into account, all sources of flood risk, so as to avoid, where possible, flood to people and property.

An initial sift of absolute constraints for all sites was applied through the Gypsy and Traveller Site Assessment Report at an early stage following a "call for land" consultation. The Gypsy and Traveller Site Assessment Report classified each site in terms of their defined flood zones (as defined by the Borough Council). Where a whole site was covered by Flood Zone 3b (the functional floodplain) it was discounted at this early stage.

Flood risk constraints were considered alongside other site-specific issues – including the Council's Spatial Strategy – when identifying suitable areas for development through the Site Selection Methodology.

All available and suitable sites considered for development at this stage, including any reasonable alternatives, these were then assessed through the Council's Gypsy and Traveller Sustainability Appraisal (GTSA) ([https://www.west-norfolk.gov.uk/info/20079/planning\\_policy\\_and\\_local\\_plan/951/local\\_plan\\_review\\_2016-2036\\_examination](https://www.west-norfolk.gov.uk/info/20079/planning_policy_and_local_plan/951/local_plan_review_2016-2036_examination)). This included all relevant planning issues/policies, constraints and opportunities. The GTSA also considered any available evidence to support the Local Plan such as the Strategic Flood Risk Assessment (SFRA) for the Local Plan and those produced for the Gypsy and Traveller consultations.

Where proposed sites are partly or fully within an identified flood zone, the Council undertook a more detailed Strategic Flood Risk Assessment (Level 2) which detailed the scope for development and the mitigation required to reduce the impact from flooding. The Council's Site Assessment Report provides justified reasons as to why each site has or has not been identified for allocation in the Local Plan.

This evidence helped inform this Sequential Test Report. The Council has applied this method to each site contained within the Local Plan and those seen as reasonable alternatives to ensure that the sites are suitable for the preferred uses which have been identified.

### **Sequential Test**

The Sequential Test is applied during preparation of a Local Plan to steer the allocation of development sites towards areas of lowest flood risk. The methodology used in this report conforms to the approach in the NPPF and NPPG Flood Risk and Coastal Change, as set out in Diagram 2 of the NPPG.

Local circumstances must be used to define the area of application of the Sequential Test (within which it is appropriate to identify reasonably available alternatives). The criteria used to determine the appropriate search area relate to the catchment area for the type of development being proposed. For some sites this may be clear, in other cases it may be identified by other Local Plan policies. A pragmatic approach should be taken when applying the Sequential Test. The Council, with advice from the Environment Agency, are responsible for considering the extent to which Sequential Test considerations have been satisfied and will need to be satisfied that the proposed development would be safe and not lead to increased flood risk elsewhere. The Sequential Test does not need to be applied for individual developments under the following circumstances:

- The site has already been allocated in development plan through the Sequential Test;
- Applications for minor development or change of use (except for a change of use to a caravan, camping or chalet site, or to a mobile home or park home site);
- It is normally reasonable to presume and state that individual sites that lie in Flood Zone 1 satisfy the requirements of the Sequential Test; however, consideration should be given to risks from all sources, areas with critical drainage problems and critical drainage areas.

If, following application of the Sequential Test it is not possible for the development to be located in areas with a lower risk of flooding, the Exception Test may have to be applied. The aim of the Exception Test is to ensure that more vulnerable property types, such as residential development can be implemented safely and are not located in areas where the hazards and consequences of flooding are inappropriate. To pass the Exception Test it should be demonstrated that :

- the development would provide wider sustainability benefits to the community that outweigh flood risk; and
- .The development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where, possible will reduce flood risk overall.

### **Exception Test**

The Exception Test should only be applied following the application of the Sequential Test and as set out in Table 3 of the NPPG: Flood Risk and Coastal Change. The NPPF and NPPG explain how the Exception Test should be applied in the allocation of development land in a Local Plan.

Table 1 in the NPPG provide the definition of Flood Zones, Table 2 provides the flood risk vulnerability and flood zone 'incompatibility', and Annex 3 of the NPPF provides the flood risk vulnerability classification.

The allocations assessed in this report fall into the 'Highly Vulnerable' as they provide pitches for caravans to be used for permanent residential homes.

The widespread level of flood risk across the Borough, means that the Council cannot meet all the accommodation needs for Gypsy and Travellers within areas of lower risk from flooding.

Therefore, the document will justify the allocation or safeguarding of land through the Exceptions Test.

## **2. The Sequential Test Study Area**

The Sequential Test study area covers all the Borough of Kings Lynn and West Norfolk. It will include all existing and new available sites for Gypsy and Traveller provision across this area. Those sites that are unavailable for development at this time are discounted (as not being reasonable alternatives) and therefore will not be considered in this assessment.

## **3. The Councils Approach to the Allocation of Land for Gypsy and Traveller Provision**

The provision of Gypsy and Traveller accommodation forms part of the broader housing requirements for the Borough. This provision is considered specialist as it solely relates to the needs of a specific community in particular localities. The needs for Gypsy and Traveller community generally differs from that of settled community in relation to their needs and location. The accommodation needs within the Borough are closely linked with existing families who have established sites , mostly concentrated in the west of the Borough (Fenland areas, around Wisbech).

Most existing sites are privately owned and occupied by individual families. The needs identified within the GTAA are arising from some of these existing sites and in some cases are considered as 'doubling-up' because those individuals are already living on site but require their own pitch(es) within the next five years and/ or beyond; i.e. creation of new households.

These sites are mostly located in the Fenland parts of the Borough. These areas are generally located within areas a high risk from flooding. This means that the Sequential and Exception Tests may need to be applied as appropriate and in accordance with the NPPF and NPPG.

Due to the specific needs of travelling communities, it is not appropriate to assume that any unmet provision can be delivered elsewhere. This has formed part of the consideration through the Exception Test, where appropriate.

As part of the Local Plan preparation an approach to flood risk was agreed between the Council and the Environment Agency. This agreement enabled the Council to sequentially look at sites at a settlement level rather than a Borough wide level in terms of screening potential development sites through the Housing and Employment Land Availability Assessment (HELAA) and the Sustainability Appraisal (SA).

## List of all existing sites and whether they're under consideration for this assessment

The Council will only include those sites in this Sequential Test that are considered available for future development. This information has been provided from the interviews undertaken as part of the GTAA 2023. The Gypsy and Traveller Site Assessment Report details those sites that are or are not considered available at this time. Table 1 below summarises the position of each existing site and whether they have been considered as part of the Sequential Test.

Following the site-screening, and Councils assessment of the suitability of sites on non-flood risk criteria (highways, local benefits etc.), the following sites in GREEN were taken forward to consultation. The RED sites are those discounted for specific reasons. The Council have identified that there are not sufficient suitable, available or deliverable site outside of the flood zones to satisfy the unique nature of the accommodation need. Expansion of existing sites within Flood Zones 2 and/ or 3 has therefore been considered to help address this shortfall.

**Table 1: Sites Considered in the Sequential Test**

Existing Site Name	GT SITE AND MAP REF	Site Considered?
Goshold Park	GT01	No. It is at capacity. Privately owned
Southfork 2, Waterlow Road, Terrington St Clement, King's Lynn	GT02	No. It is at capacity. Privately owned
Micasa, Mill Road, Tilney St Lawrence, King's Lynn, Norfolk	GT03	Not Available at this time. Privately owned
Fairview, 115 Magdalen Road, Tilney St Lawrence, Norfolk	GT04	Not Available at this time. Privately owned
119 - 121 Magdalen Road, Tilney St Lawrence, King's Lynn	GT05	Yes. A direct accommodation need has been identified in the GTAA 2023
12 & 14 High Road, Tilney Cum Islington, King's Lynn	GT06	No, it is at capacity. Privately owned
Springfields Caravan Park, 101 School Road, Tilney St Lawrence	GT07	Not available at this time. Privately owned
Land at Country Park, Jubilee Lane, Marshland St James	GT08	Not available at this time. Privately owned
The Stables, Walpole St Andrew	GT09	Yes. A direct accommodation need has been identified in the GTAA 2023
Eastern Side, Gooses Lane, Walpole St Andrew	GT10	Not available at this time. Privately owned.
Homefields, (Western Side, Goose Lane), Walpole St Andrew	GT11	Yes. A direct accommodation need has been identified in the GTAA 2023

Existing Site Name	GT SITE AND MAP REF	Site Considered?
81 Broadend Road, Walsoken	GT12	No, it is at capacity. Privately owned
3 Long Acre, Biggs Road Clydesdale, Biggs Road	GT13	Not available at this time. Privately owned
West Walton Court, Blunts Drove, Walton Highway and NCC Highway, Blunts Drove, Walton Highway	GT14	Yes. A direct accommodation need has been identified in the GTAA 2023
Land SW Common Road (The Bungalow) Walton Highway	GT15	Yes. A direct accommodation need has been identified in the GTAA 2023
Saddlebow Road (South), King's Lynn, Norfolk	GT16	No it is at capacity. Privately owned
The Lodge, 196 - 198 Small Lode, Upwell (The Caravan Site)	GT17	Yes. A direct accommodation need has been identified in the GTAA 2023
Primrose Farm, Small Lode, Upwell	GT18	Yes. A direct accommodation need has been identified in the GTAA 2023
Dunroamin, Stone House Road, Upwell	GT19	Not available at this time. Privately owned
Botany Bay, Stonehouse Road, Upwell	GT20	Yes. A direct accommodation need has been identified in the GTAA 2023
Four Acres, March Riverside, Upwell	GT21	Yes. A direct accommodation need has been identified in the GTAA 2023
Bluebells, Tip End	GT22	Not available at this time. Privately owned
Haygates Mill, Bartons Drove, Downham Market	GT23	Not available at this time. Privately owned
102 London Road, Downham Market, Norfolk	GT24	Not available at this time. Privately owned
The Oaks, Mill Drove, Northwold SHOWPERSONS	GT25	Yes. A direct accommodation need has been identified in the GTAA 2023
Gullpit Farm, Gullpit Drove, Stow Bridge, King's Lynn	GT26	Not available at this time. Privately owned
Little Acres, Blunts Drove, Walton Highway, Wisbech	GT27	No it is at Capacity
Many Acres (Smithy's Field), Small Lode, Upwell, Norfolk	GT28	Yes. A direct accommodation need has been identified in the GTAA 2023
No 2 The Stables, (Rear of stables), Lynn Road, Wiggshall St Germans	GT29	Yes. A direct accommodation need has been identified in the GTAA 2023

Existing Site Name	GT SITE AND MAP REF	Site Considered?
20 High Road, Tilney Cum Islington, King's Lynn, Norfolk	GT30	No direct accommodation need has been identified in the GTAA 2023 for this site.
Land to the rear of GT17 204 Small Lode	GT31	No it is at capacity
Black Dyke Farm, Hockwold	GT32	No direct accommodation need has been identified in the GTAA 2023 for this site.
1 Longacre, Clydesdale Biggs Road, Walsoken	GT33	No, it is at capacity
Creakesville, The Common, South Creake, Fakenham	GT34	Yes. A direct accommodation need has been identified in the GTAA 2023
Green Acres, 184 Small Lode, Upwell, Norfolk	GT35	No, it is at capacity
Park View (Land Adjacent 3 The Lodge), Small Lode, Upwell		
Jays, The Common, South Creake, Fakenham, Norfolk	GT36	No, it is at capacity
Land behind Many Acres (Smithy's Field), Small Lode, Upwell, Norfolk	GT37	No direct accommodation need has been identified in the GTAA 2023 for this site.
Land Behind GT37 Small Lode, Upwell	GT38	No direct accommodation need has been identified in the GTAA 2023 for this site.
Oak Tree Caravan, South Creake	GT39	Yes. A direct accommodation need has been identified in the GTAA 2023
Poplar Tree Farm, Bailey Lane, Clenchwarton, King's Lynn	GT40	
R/O Plot 1, Green Lane, Walsoken, Wisbech	GT41	
Red Barn, Cowles Drove, Hockwold cum Wilton	GT42	No direct accommodation need has been identified in the GTAA 2023 for this site.
Homefield, Common Rd South, Walton Highway	GT43	No direct accommodation need has been identified in the GTAA 2023 for this site.
Oak Lodge, Northwold	GT50	
The Elms, The Common, South Creake, Fakenham	GT51	No direct accommodation need has been identified in the GTAA 2023 for this site.
The Orchard, Hall Road, Clenchwarton, King's Lynn, Norfolk	GT52	No direct accommodation need has been identified in the GTAA 2023 for this site.

Existing Site Name	GT SITE AND MAP REF	Site Considered?
The Paddocks, Chapel Road, Tilney Fen End	GT53	
The Pines, Methwold Road, Whittington, King's Lynn, Norfolk	GT54	Yes. A direct accommodation need has been identified in the GTAA 2023
Victoria Barn, Land East of Basin Farm, Basin Road, Outwell	GT55	Yes. A direct accommodation need has been identified in the GTAA 2023
Wheatley Bank, Walsoken (South of Worzals paralell to A47)	GT56	Yes. A direct accommodation need has been identified in the GTAA 2023
Whitegates, The Common, South Creake, Fakenham, Norfolk	GT57	No direct accommodation need has been identified in the GTAA 2023 for this site.
19 South Beach Road, Hunstanton	GT58	Yes. A direct accommodation need has been identified in the GTAA 2023
Spriggs Hollow, Wiggenhall St Mary Magdalen	GT59	Yes. A direct accommodation need has been identified in the GTAA 2023
1 Waterlow Road, Waterlow Road, Hay Green, Terrington St Clement	GT60	No direct accommodation need has been identified in the GTAA 2023 for this site.
155 Small Lode	GT61	No it is at capacity
Redgate Farm, Magdalan Road, Tilney St Lawrence SHOWPERSONS	GT62	Yes. A direct accommodation need has been identified in the GTAA 2023
Rope Walk, Appletons Yard - King's Lynn SHOWPERSONS	GT63	No direct accommodation need has been identified in the GTAA 2023 for this site.
Tall Trees, (A1122) Downham Market	GT65	Yes. A direct accommodation need has been identified in the GTAA 2023
Land at Brandon Road, Methwold	GT66	Yes. A direct accommodation need has been identified in the GTAA 2023
Llamedos, Syderstone	GT67	No direct accommodation need has been identified in the GTAA 2023 for this site.
Land SE of Cottons Head, Outwell	GTRA(A)	No direct accommodation need has been identified in the GTAA 2023 for this site.



Existing Site Name	GT SITE AND MAP REF	Site Considered?
		Refused Planning permission due to significant constraints.
Land West of Station Road, West Dereham	GTRA(B)	No direct accommodation need has been identified in the GTAA 2023 for this site. Refused Planning permission due to significant constraints.
Land To the West of Wheatley Bank and South of Wheatley Meadow Country Park Travellers Site Wheatley Bank, Walsoken	GTRA(C)	Planning permission already granted for the site.
Land at The Willows 70 Terrington St Clement	GTRA(D)	No direct accommodation need has been identified in the GTAA 2023 for this site.
Land off Sandy Lane, Blackborough End	GTRA(E)	No direct accommodation need has been identified in the GTAA 2023 for this site.
Land off Hill's Crescent, Gayton	GTRA(F)	No direct accommodation need has been identified in the GTAA 2023 for this site.
School Road, Marshland St James	GTRA(G)	No direct accommodation need has been identified in the GTAA 2023 for this site.
Land to the South of the B1145 – King's Lynn	GTRA(H)	No direct accommodation need has been identified in the GTAA 2023 for this site.
Land at Spring Wood, Reffley Lane, Kings Lynn	GTRA(I)	No direct accommodation need has been identified in the GTAA 2023 for this site.
Land to the North of Church Road, Emneth	GTRA(J)	No direct accommodation need has been identified in the GTAA 2023 for this site.
Land next to the A10 West Winch Village	GTRA(K)	No direct accommodation need has been identified in the GTAA 2023 for this site.
Parcel off Land off Sandy Lane, Blackborough End	GTRA(L)	No direct accommodation need has been identified in the GTAA 2023 for this site.
Parcel off Land off Sandy Lane, Blackborough End	GTRA(M)	No direct accommodation need has been identified in the GTAA 2023 for this site.

Existing Site Name	GT SITE AND MAP REF	Site Considered?
Parcel off Land off Sandy Lane, Blackborough End	GTRA(N)	No direct accommodation need has been identified in the GTAA 2023 for this site.
Land off New Road, Upwell	GTRA(O)	No direct accommodation need has been identified in the GTAA 2023 for this site.

## 4. The Screening of Available Sites

### List of Existing Sites taken forward for proposed allocation

Existing Site Name	GT SITE REF	Authorised Site?	Site considered in this assessment	FZ1	FZ2	FZ3a	Sequential Test Passed?	Exceptions Test Required?
119 - 121 Magdalen Road, Tilney St Lawrence, King's Lynn	GT05	Yes	Yes	0%	100%	0%	Yes	Yes
The Stables, Walpole St Andrew	GT09	Yes	Yes	0%	100%	98%	Yes	Yes
Homefields, (Western Side, Goose Lane), Walpole St Andrew	GT11	Yes	Yes	0%	100%	49%	Yes	Yes
West Walton Court, Blunts Drove, Walton Highway and NCC Highway, Blunts Drove, Walton Highway	GT14	Yes	Yes	0%	100%	100%	Yes	Yes
Land SW Common Road (The Bungalow) Walton Highway	GT15	No	Yes	0%	100%	100%	Yes	Yes
The Lodge, 196 - 198 Small Lode, Upwell (The Caravan Site)	GT17	Yes	Yes	100%	0%	0%	Yes	No
Primrose Farm, Small Lode, Upwell	GT18	Yes	Yes	22%	82%	76%	Yes	Yes
Botany Bay, Stonehouse Road, Upwell	GT20	Yes	Yes	100%	0%	0%	Yes	No
Four Acres, March Riverside, Upwell	GT21	Yes	Yes		42%	25%	Yes	Yes
The Oaks, Mill Drove, Northwold SHOWPERSONS	GT25		Yes	100%	0%	0%	Yes	No
Many Acres (Smithy's Field), Small Lode, Upwell, Norfolk	GT28	Yes	Yes	100%	0%	0%	Yes	No
No 2 The Stables, (Rear of stables), Lynn Road, Wiggenhall St Germans	GT29	No	Yes	0%	100%	100%	Yes	Yes

Existing Site Name	GT SITE REF	Authorised Site?	Site considered in this assessment	FZ1	FZ2	FZ3a	Sequential Test Passed?	Exceptions Test Required?
Creakesville, The Common, South Creake, Fakenham	GT34	Yes	Yes	100%	0%	0%	Yes	No
Oak Tree Caravan, South Creake	GT39	Yes	Yes	100%	0%	0%	Yes	No
The Pines, Methwold Road, Whittington, King's Lynn, Norfolk	GT54	Yes	Yes	100%	0%	0%	Yes	No
Victoria Barn, Land East of Basin Farm, Basin Road, Outwell	GT55	Yes	Yes	100%	0%	0%	Yes	No
Wheatley Bank, Walsoken (South of Worzals parallel to A47)	GT56	Yes	Yes	32%	68%	0%	Yes	Yes
Spriggs Hollow, Wiggshall St Mary Magdalen	GT59	No	Yes	100%	0%	0%	Yes	No
Redgate Farm, Magdalen Road, Tilney St Lawrence SHOWPERSONS	GT62	Yes	Yes	0%	100%	100%	Yes	Yes
Tall Trees, (A1122) Downham Market	GT65	No	Yes	0%	100%	100%	Yes	Yes
Land at Brandon Road, Methwold	GT66	Yes	Yes	100%	05	0%	Yes	No

## 5. The Exception Test

Even if the Sequential Test has been passed, it may also be necessary to pass the Exception Test. The Exception Test is designed to allow appropriate and safe development to proceed in scenarios where the Sequential Test has been passed, i.e. where it has been shown that suitable sites at lower risk of flooding are not available. The table below details the Exceptions Test for those affected sites.

Existing Site Name	GT SITE REF	Exception Test
119 - 121 Magdalen Road, Tilney St Lawrence, King's Lynn	GT05	<p>This is an existing authorised privately owned family site. The accommodation need is directly arising from this specific site within the first five-year period and there is not enough available, suitable and/ or deliverable land to accommodate all this need in a lower risk flood zone in a nearby location. In addition, because it is a direct family accommodation need. It is unlikely that this need would be delivered on any alternative sites in other parts of the Borough.</p> <p>Failure to meet the first five-year accommodation needs for the Gypsy and Traveller community will lead to increased unauthorised encampments, enforcement action taken by the Council, homelessness and displacement individuals and families across the Borough.</p> <p>The Council has produced a Strategic Flood Risk Level 2 Assessment which identifies what needs to be undertaken to make the sites safe for use over their lifetime. Mitigation and site management plans are also recommended and detailed in the specific site tables in that assessment.</p>

Existing Site Name	GT SITE REF	Exception Test
		The applicant must then demonstrate how they can achieve this through their future planning applications for the site.
The Stables, Walpole St Andrew	GT09	<p>This is an existing authorised privately owned family site. The accommodation need is directly arising from this specific site within the first five-year period and there is not enough available, suitable and/ or deliverable land to accommodate all this need in a lower risk flood zone in a nearby location. In addition, because it is a direct family accommodation need. It is unlikely that this need would be delivered on any alternative sites in other parts of the Borough.</p> <p>Failure to meet the first five-year accommodation needs for the Gypsy and Traveller community will lead to increased unauthorised encampments, enforcement action taken by the Council, homelessness and displacement individuals and families across the Borough.</p> <p>The Council has produced a Strategic Flood Risk Level 2 Assessment which identifies what needs to be undertaken to make the sites safe for use over their lifetime. Mitigation and site management plans are also recommended and detailed in the specific site tables in that assessment.</p> <p>The applicant must then demonstrate how they can achieve this through their future planning applications for the site.</p>
Homefields, (Western Side, Goose Lane), Walpole St Andrew	GT11	This is an existing authorised privately owned family site. The accommodation need is directly arising from this specific site within the first five-year period and there is not enough available, suitable and/ or deliverable land to accommodate

Existing Site Name	GT SITE REF	Exception Test
		<p>all this need in a lower risk flood zone in a nearby location. In addition, because it is a direct family accommodation need. It is unlikely that this need would be delivered on any alternative sites in other parts of the Borough.</p> <p>Failure to meet the first five-year accommodation needs for the Gypsy and Traveller community will lead to increased unauthorised encampments, enforcement action taken by the Council, homelessness and displacement individuals and families across the Borough.</p> <p>The Council has produced a Strategic Flood Risk Level 2 Assessment which identifies what needs to be undertaken to make the sites safe for use over their lifetime. Mitigation and site management plans are also recommended and detailed in the specific site tables in that assessment.</p> <p>The applicant must then demonstrate how they can achieve this through their future planning applications for the site.</p>
West Walton Court, Blunts Drove, Walton Highway and NCC Highway, Blunts Drove, Walton Highway	GT14	<p>This is one of two publicly operated Gypsy and Traveller sites within the Borough. The other site (Saddlebow, King's Lynn) is at capacity and has no reasonable likelihood of expanding to meet their accommodation needs. Site GT14 has the potential to double in size and maintain a policy that is open to the public.</p> <p>The site is run by an established housing association and discussions with the Council on its potential expansion has been positively received. The expansion of this site will</p>

Existing Site Name	GT SITE REF	Exception Test
		<p>enable to the Council to offer pitches to the identified displaced need in the GTAA, but also for the accommodation needs that cannot be met on existing sites due to capacity issues. Without this site, it is unlikely that the Council will be able to meet the remaining accommodation needs for the Gypsy and Traveller community within the first five years of the Plan.</p> <p>The Council has produced a Strategic Flood Risk Level 2 Assessment which identifies what needs to be undertaken to make the sites safe for use over their lifetime. Mitigation and site management plans are also recommended and detailed in the specific site tables in that assessment.</p> <p>The applicant must then demonstrate how they can achieve this through their future planning applications for the site.</p>
Land SW Common Road (The Bungalow) Walton Highway	GT15	<p>This is an unauthorised site, but a direct accommodation need has been identified through the GTAA 2023 within the first five-year period. Now this need has been identified, it provides justification for the site to be authorised. When considering other alternative locations, it is unlikely that this accommodation need will be delivered elsewhere due to the need arising from an established family.</p> <p>The landowners do not own any additional land elsewhere. The Council has produced a Strategic Flood Risk Level 2 Assessment which identifies what needs to be undertaken to make the sites safe for use over their lifetime. Mitigation and</p>



Existing Site Name	GT SITE REF	Exception Test
		<p>site management plans are also recommended and detailed in the specific site tables in that assessment.</p> <p>The applicant must then demonstrate how they can achieve this through their future planning applications for the site.</p>
Primrose Farm, Small Lode, Upwell	GT18	<p>This is an existing authorised privately owned family site. The accommodation need is directly arising from this specific site within the first five-year period and there is not enough available, suitable and/ or deliverable land to accommodate all this need in a lower risk flood zone in a nearby location. In addition, because it is a direct family accommodation need. It is unlikely that this need would be delivered on any alternative sites in other parts of the Borough.</p> <p>Failure to meet the first five-year accommodation needs for the Gypsy and Traveller community will lead to increased unauthorised encampments, enforcement action taken by the Council, homelessness and displacement individuals and families across the Borough.</p> <p>The Council has produced a Strategic Flood Risk Level 2 Assessment which identifies what needs to be undertaken to make the sites safe for use over their lifetime. Mitigation and site management plans are also recommended and detailed in the specific site tables in that assessment.</p> <p>The applicant must then demonstrate how they can achieve this through their future planning applications for the site.</p>

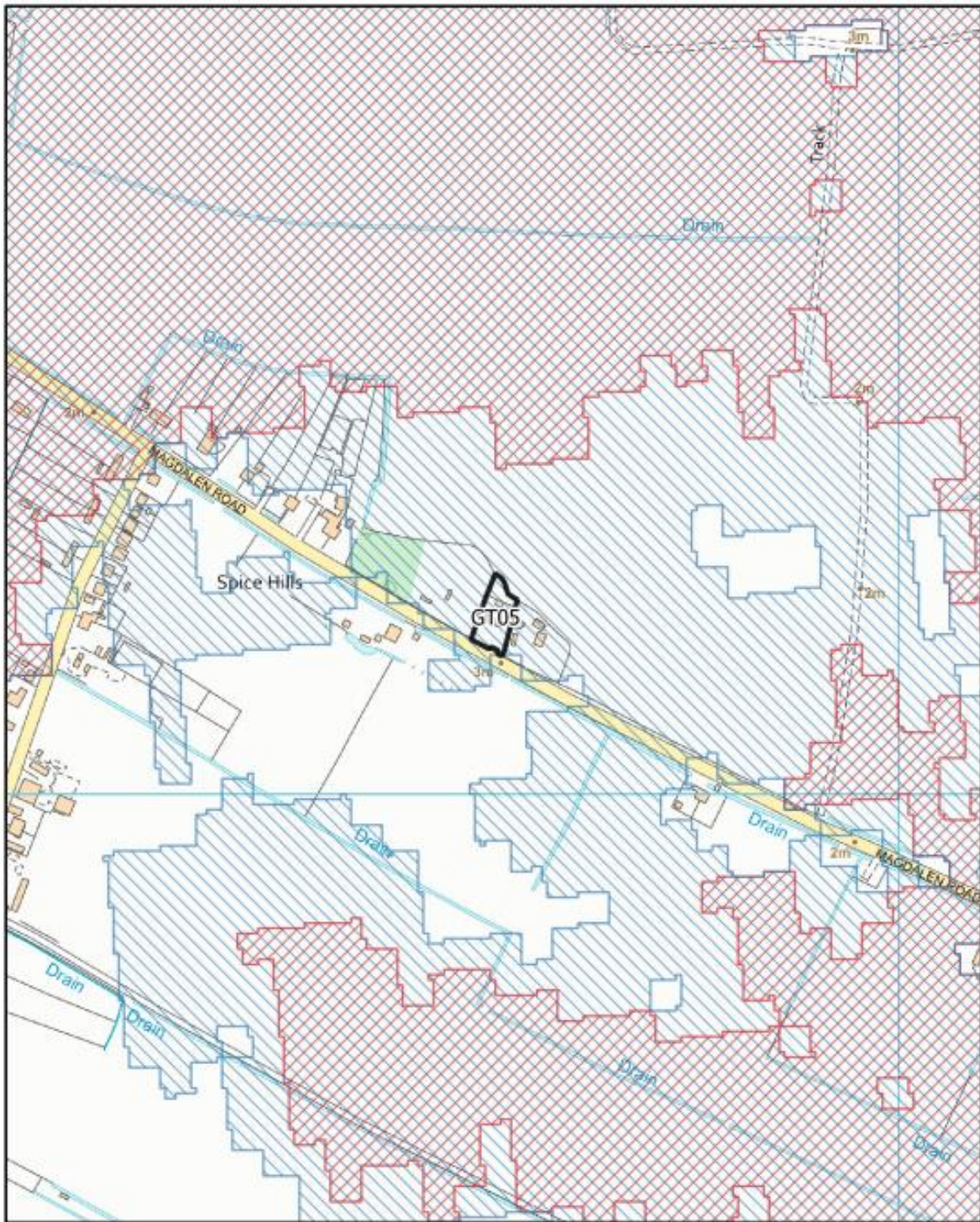
Existing Site Name	GT SITE REF	Exception Test
Four Acres, March Riverside, Upwell	GT21	<p>This is an existing authorised privately owned family site. The accommodation need is directly arising from this specific site within the first five-year period and there is not enough available, suitable and/ or deliverable land to accommodate all this need in a lower risk flood zone in a nearby location. In addition, because it is a direct family accommodation need. It is unlikely that this need would be delivered on any alternative sites in other parts of the Borough.</p> <p>Failure to meet the first five-year accommodation needs for the Gypsy and Traveller community will lead to increased unauthorised encampments, enforcement action taken by the Council, homelessness and displacement individuals and families across the Borough.</p> <p>The Council has produced a Strategic Flood Risk Level 2 Assessment which identifies what needs to be undertaken to make the sites safe for use over their lifetime. Mitigation and site management plans are also recommended and detailed in the specific site tables in that assessment.</p> <p>The applicant must then demonstrate how they can achieve this through their future planning applications for the site.</p>
No 2 The Stables, (Rear of stables), Lynn Road, Wighenhall St Germans	GT29	<p>This is an existing authorised privately owned family site. The accommodation need is directly arising from this specific site within the first five-year period and there is not enough available, suitable and/ or deliverable land to accommodate all this need in a lower risk flood zone in a nearby location. In addition, because it is a direct family accommodation need. It</p>

Existing Site Name	GT SITE REF	Exception Test
		<p>is unlikely that this need would be delivered on any alternative sites in other parts of the Borough.</p> <p>Failure to meet the first five-year accommodation needs for the Gypsy and Traveller community will lead to increased unauthorised encampments, enforcement action taken by the Council, homelessness and displacement individuals and families across the Borough.</p> <p>The Council has produced a Strategic Flood Risk Level 2 Assessment which identifies what needs to be undertaken to make the sites safe for use over their lifetime. Mitigation and site management plans are also recommended and detailed in the specific site tables in that assessment.</p> <p>The applicant must then demonstrate how they can achieve this through their future planning applications for the site.</p>
Wheatley Bank, Walsoken (South of Worzals paralell to A47)	GT56	<p>Only part of this site is within Flood Zone 2. The area available for development is not within the flood zone. This is an authorised site and a direct accommodation need has been identified for this site within the first five-year period. The Council has produced a Strategic Flood Risk Level 2 Assessment which identifies what needs to be undertaken to make the sites safe for use over their lifetime. Mitigation and site management plans are also recommended and detailed in the specific site tables in that assessment.</p> <p>The applicant must then demonstrate how they can achieve this through their future planning applications for the site.</p>

Existing Site Name	GT SITE REF	Exception Test
Redgate Farm, Magdelan Road, Tilney St Lawrence TRAVELLING SHOWPEOPLE	GT62	<p>This is an existing authorised privately owned family site for Travelling Showpeople. The accommodation need is directly arising from this specific site within the first five-year period and there is not enough available, suitable and/ or deliverable land to accommodate all this need in a lower risk flood zone in a nearby location. In addition, because it is a direct family accommodation need. It is unlikely that this need would be delivered on any alternative sites in other parts of the Borough.</p> <p>Failure to meet the first five-year accommodation needs for the Gypsy and Traveller community will lead to increased unauthorised encampments, enforcement action taken by the Council, homelessness and displacement individuals and families across the Borough.</p> <p>The Council has produced a Strategic Flood Risk Level 2 Assessment which identifies what needs to be undertaken to make the sites safe for use over their lifetime. Mitigation and site management plans are also recommended and detailed in the specific site tables in that assessment.</p> <p>The applicant must then demonstrate how they can achieve this through their future planning applications for the site.</p>
Tall Trees, (A1122) Downham Market	GT65	<p>This is an unauthorised site, but a direct accommodation need has been identified through the GTAA 2023 within the first five-year period. It is now considered that the travellers on site meet the definition as identified within the PPTS 2023. Now this need has been identified, it provides justification for</p>

Existing Site Name	GT SITE REF	Exception Test
		<p>the site to be authorised. When considering other alternative locations, it is unlikely that this accommodation need will be delivered elsewhere due to the need arising from an established family.</p> <p>The landowners do not own any additional land elsewhere. The Council has produced a Strategic Flood Risk Level 2 Assessment which identifies what needs to be undertaken to make the sites safe for use over their lifetime. Mitigation and site management plans are also recommended and detailed in the specific site tables in that assessment.</p> <p>The applicant must then demonstrate how they can achieve this through their future planning applications for the site.</p>




Appendix 3: Flood Risk Map for each site taken forward for proposed allocation



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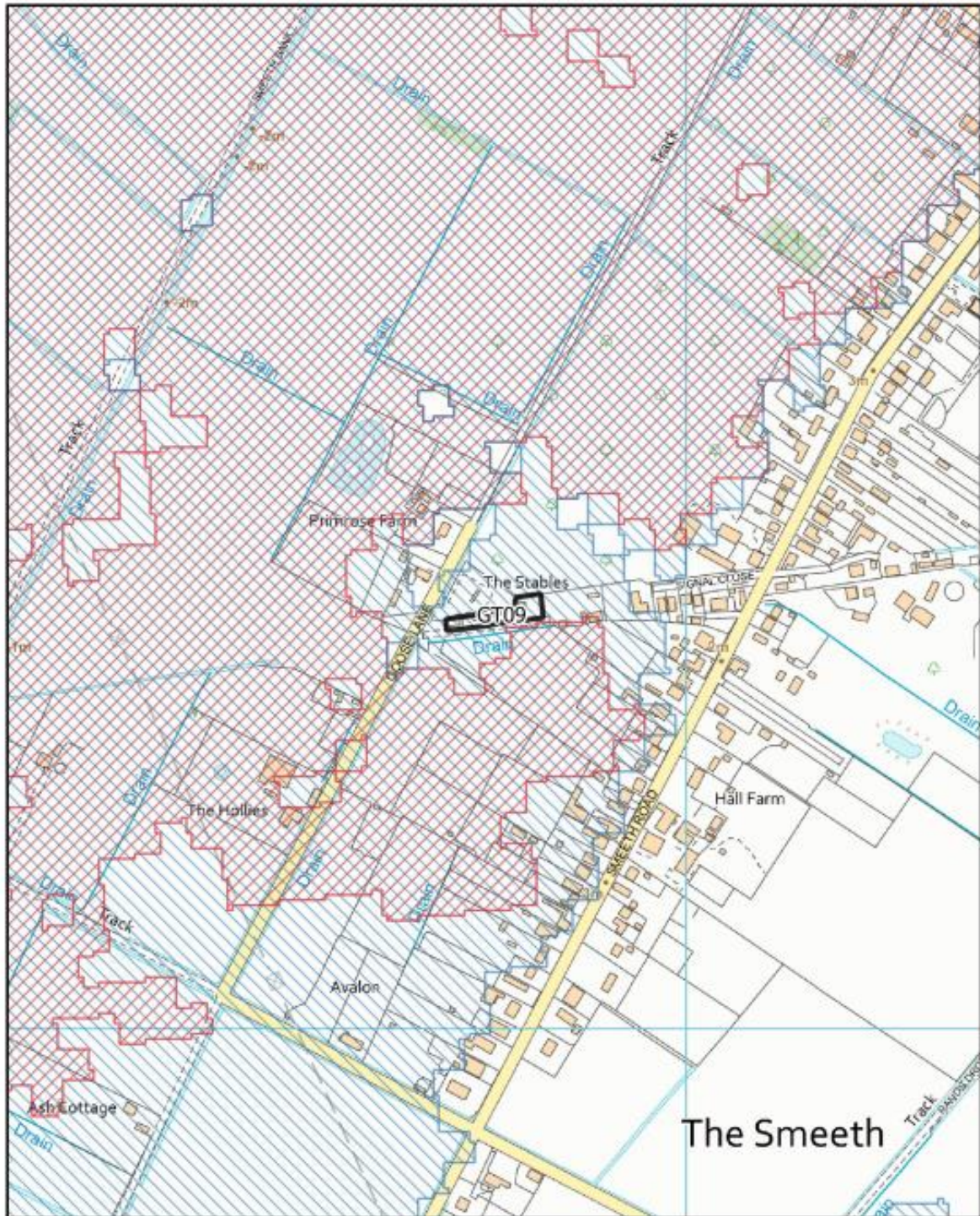
**GT05**

-  Gypsy & Traveller Sites
-  Floodzone 2
-  Floodzone 3a






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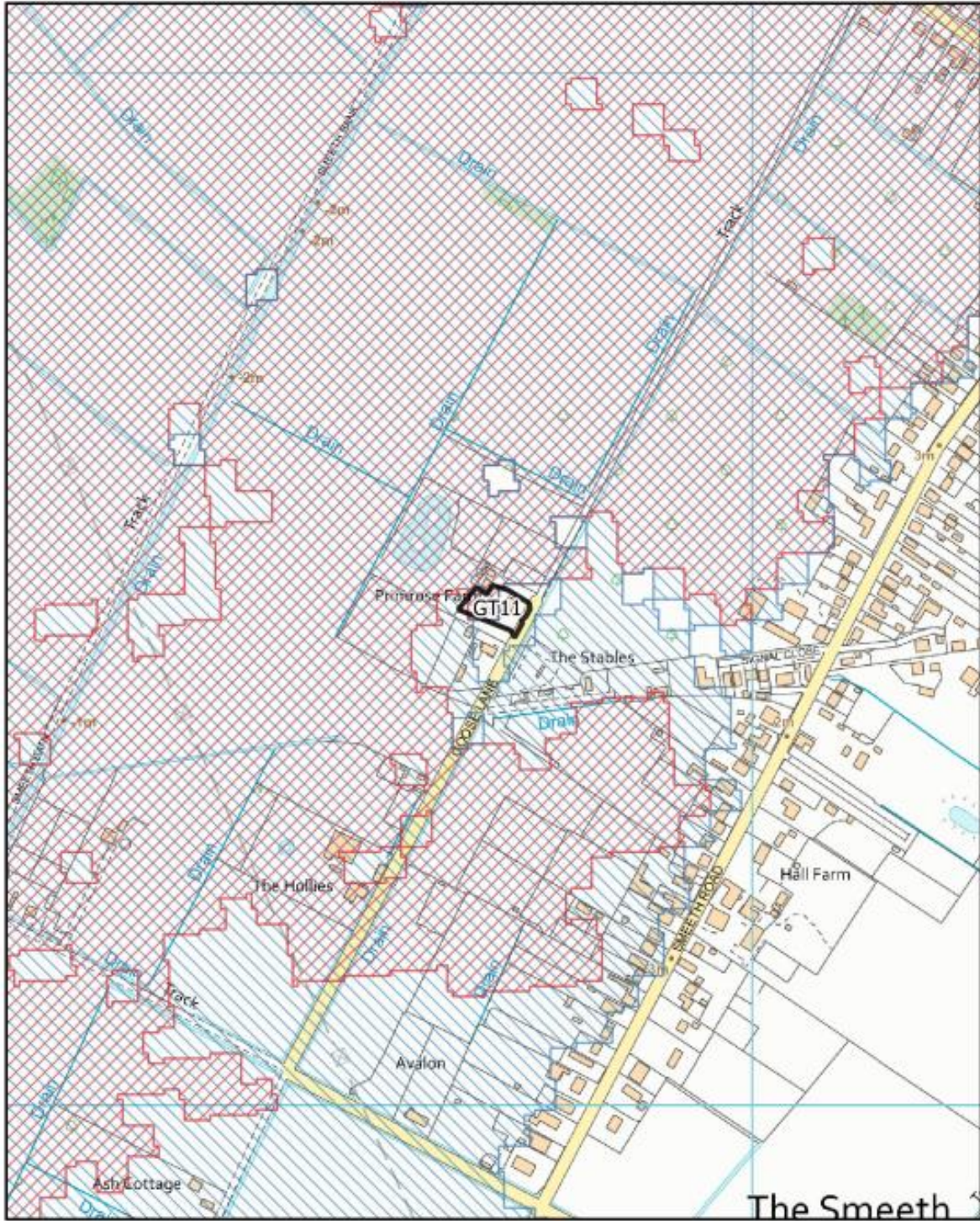
- GT09**
-  Gypsy & Traveller Sites
  -  Floodzone 2
  -  Floodzone 3a



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**GT11**

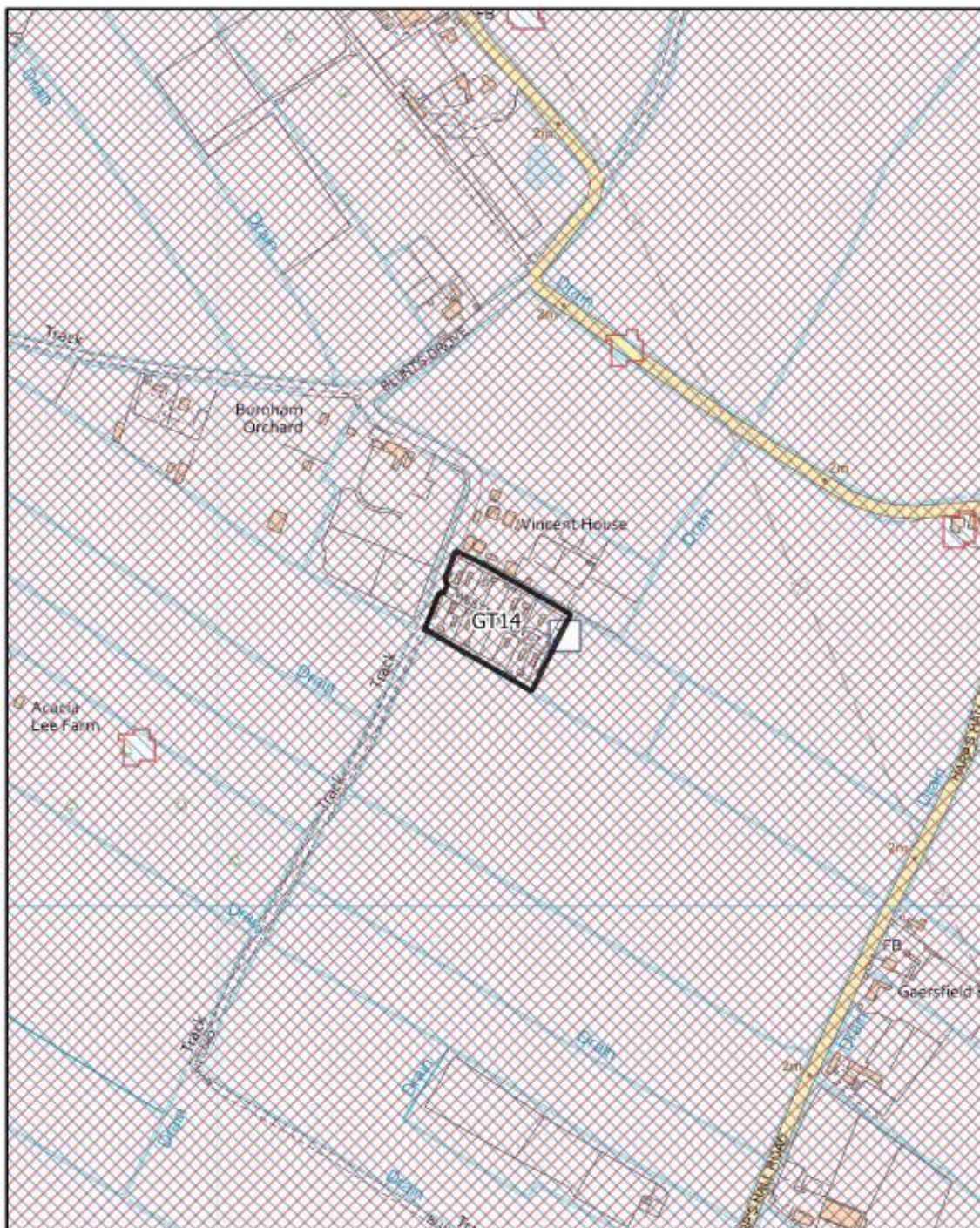
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-  Floodzone 2
-  Floodzone 3a



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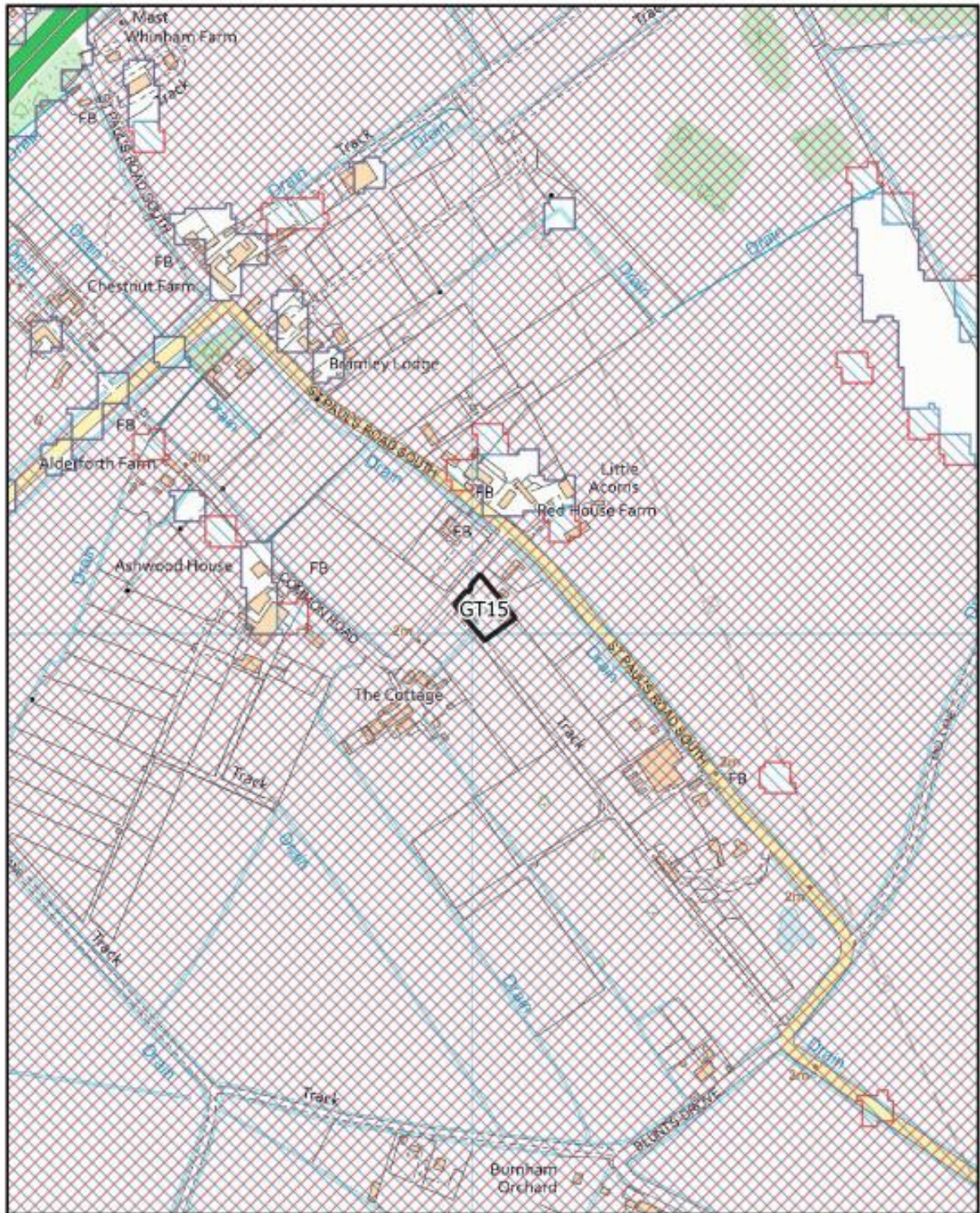
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-  Floodzone 2
-  Floodzone 3a



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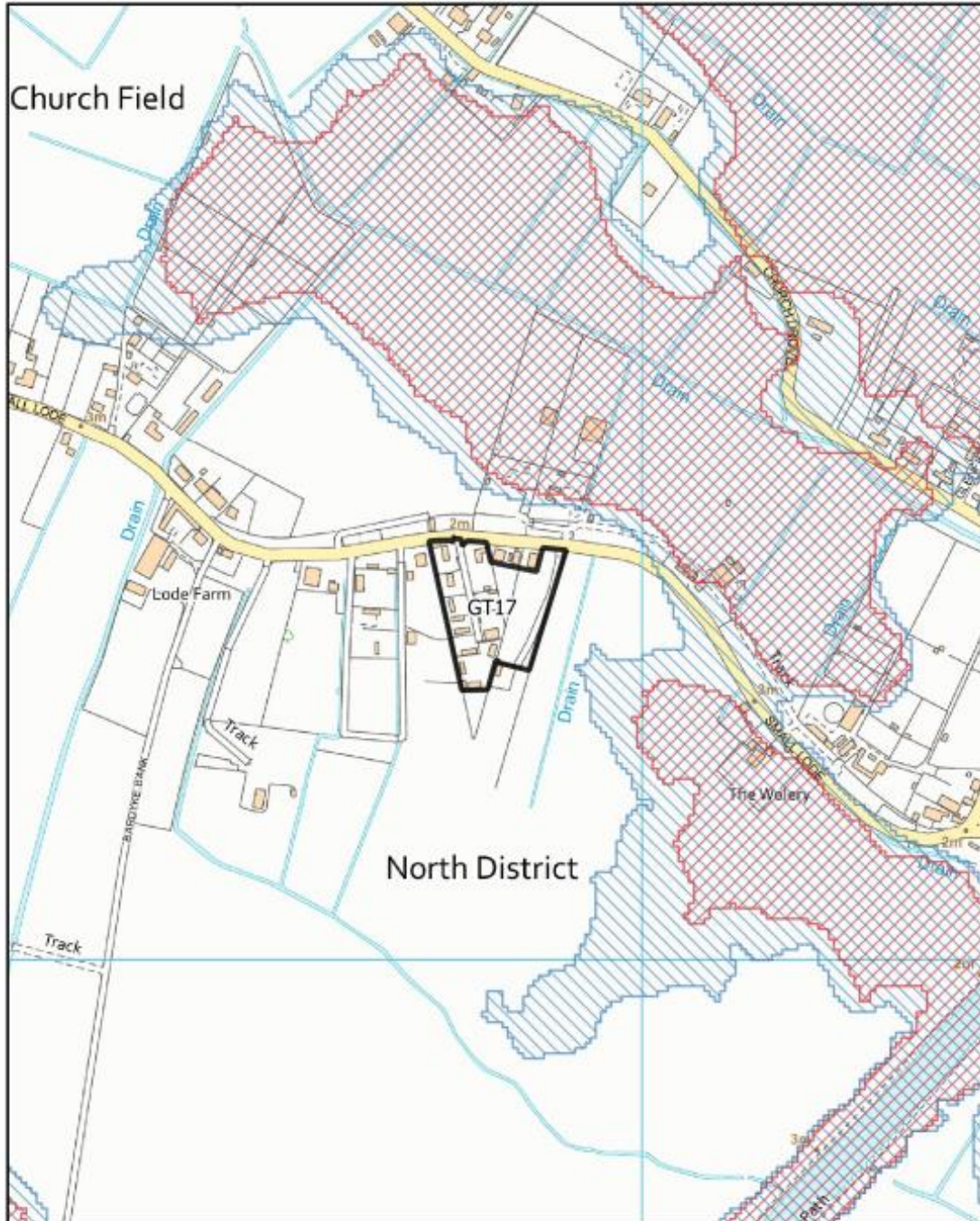
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-  Floodzone 2
-  Floodzone 3a



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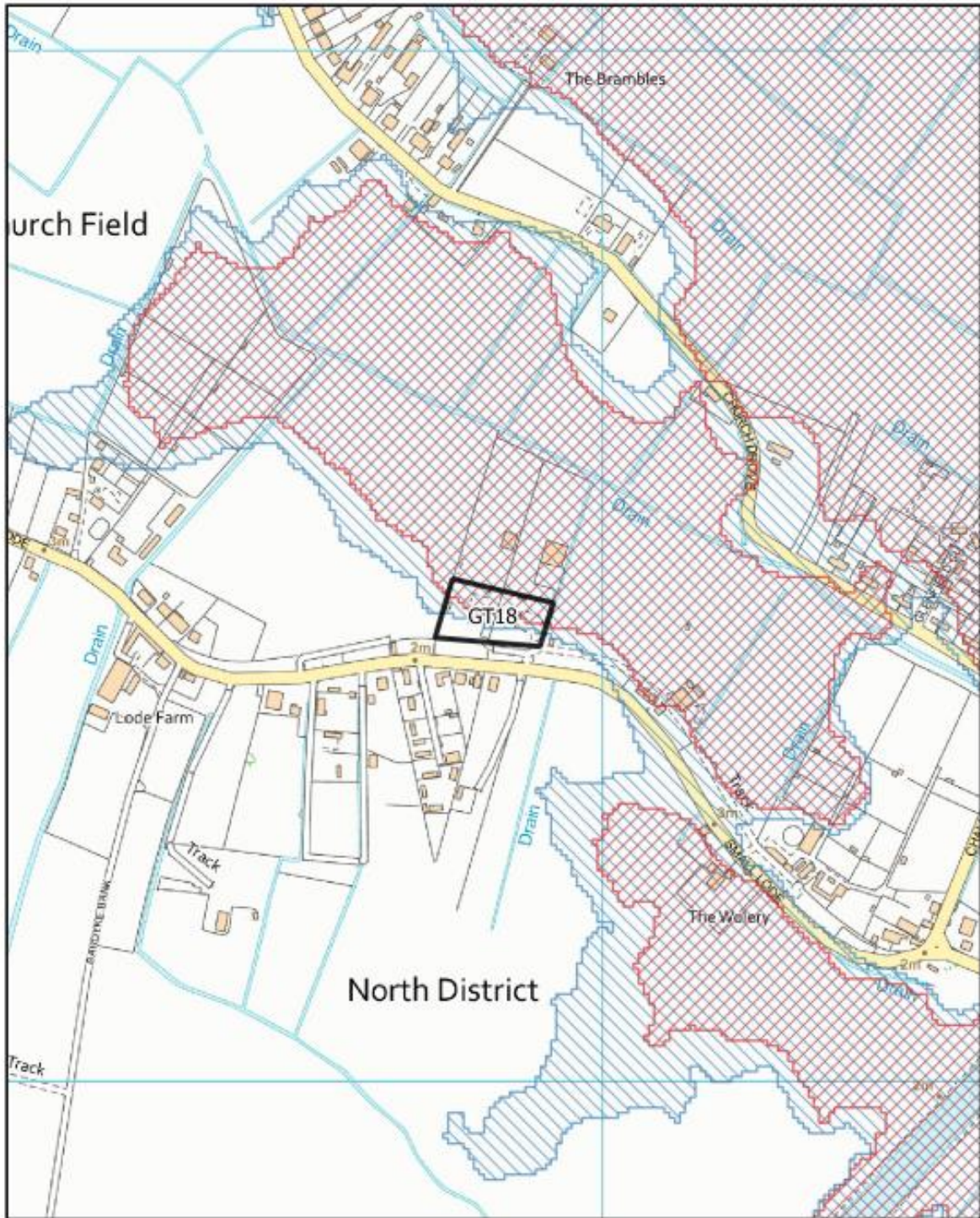
**GT17**

-  Gypsy & Traveller Sites
-  Floodzone 2
-  Floodzone 3a



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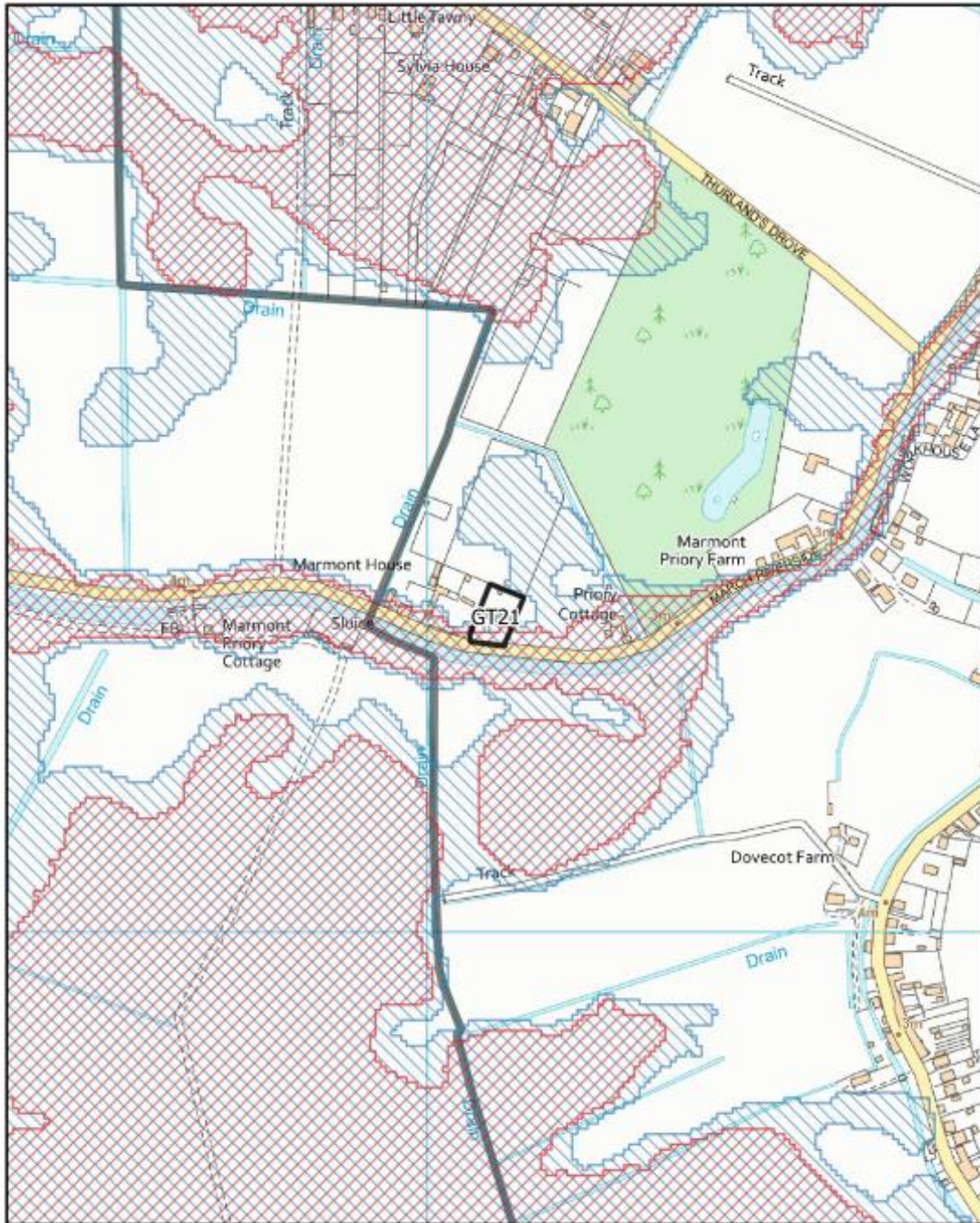
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-  Floodzone 2
-  Floodzone 3a



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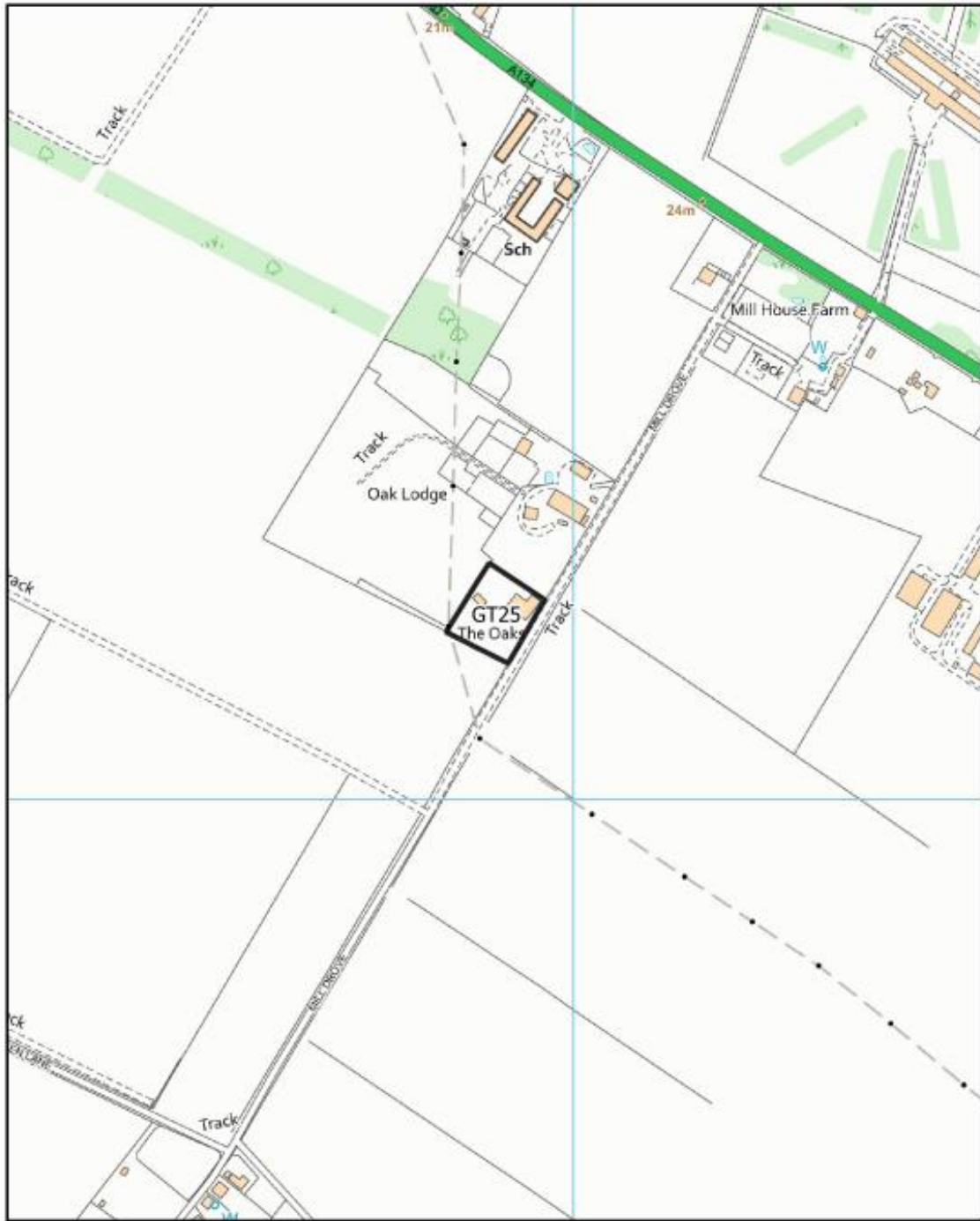
GT21

-  Gypsy & Traveller Sites
-  Floodzone 2
-  Floodzone 3a



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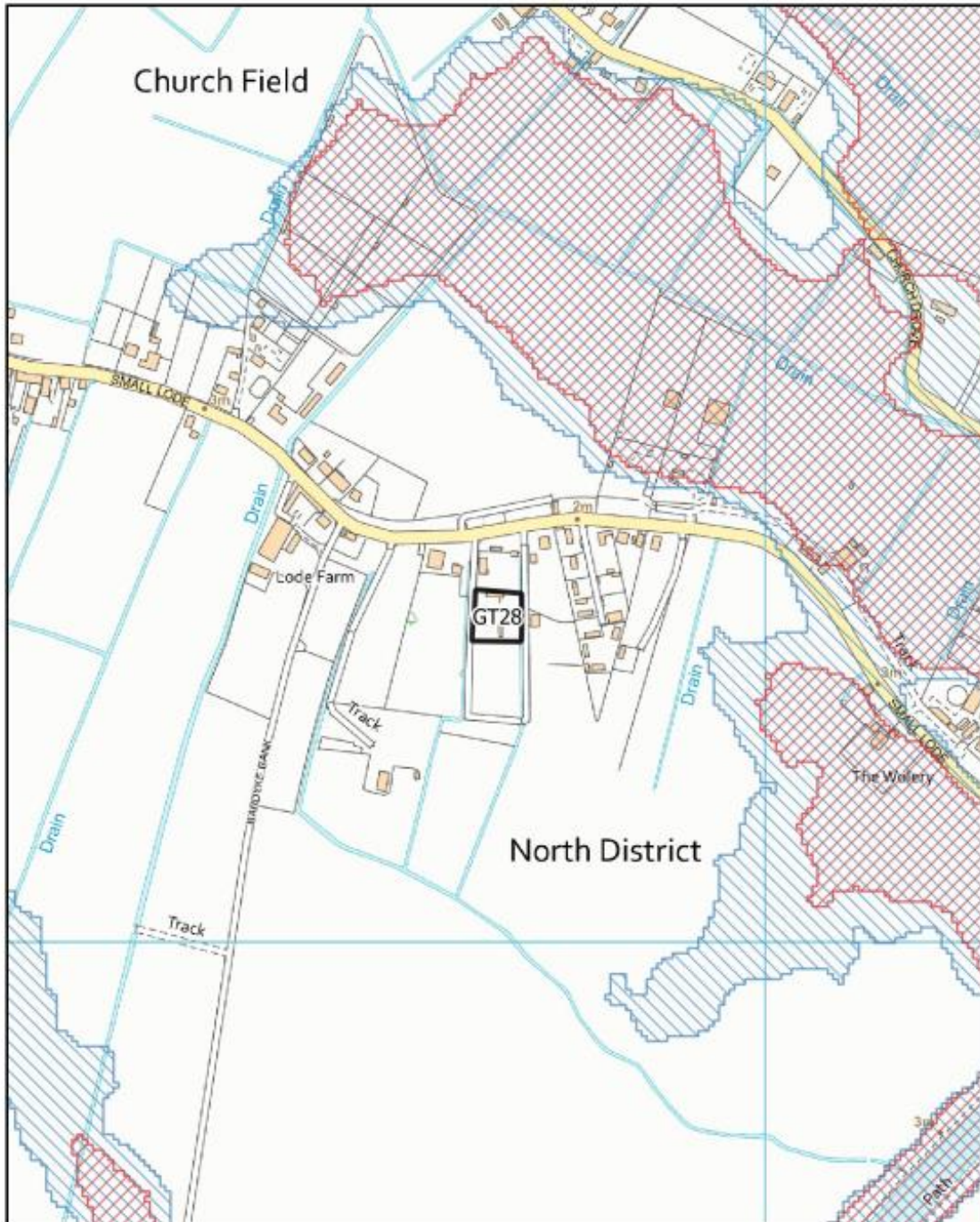
**GT25**

-  Gypsy & Traveller Sites
-  Floodzone 2
-  Floodzone 3a



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**GT28**

-  Gypsy & Traveller Sites
-  Floodzone 2
-  Floodzone 3a



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**GT29**

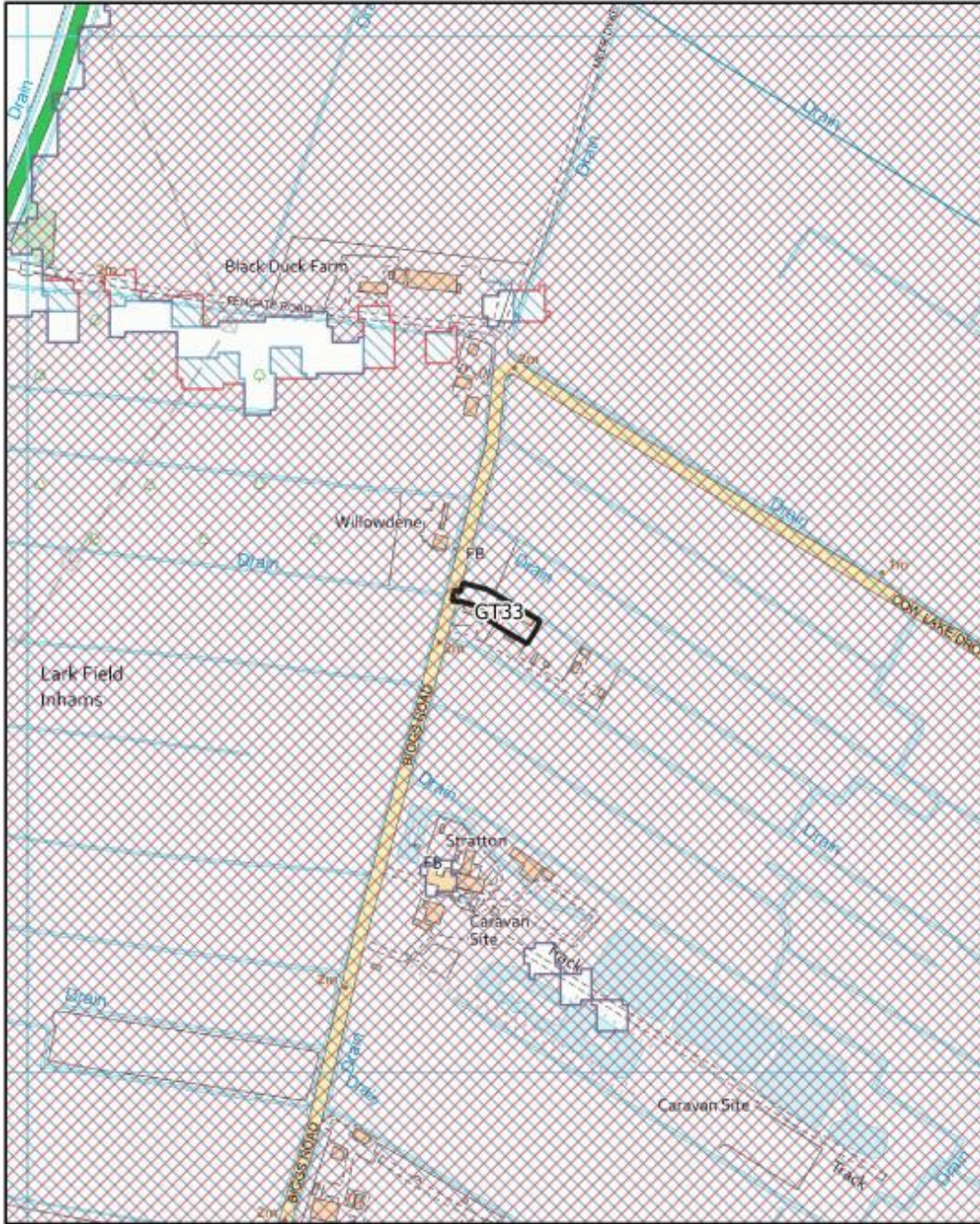
-  Gypsy & Traveller Sites
-  Floodzone 2
-  Floodzone 3a



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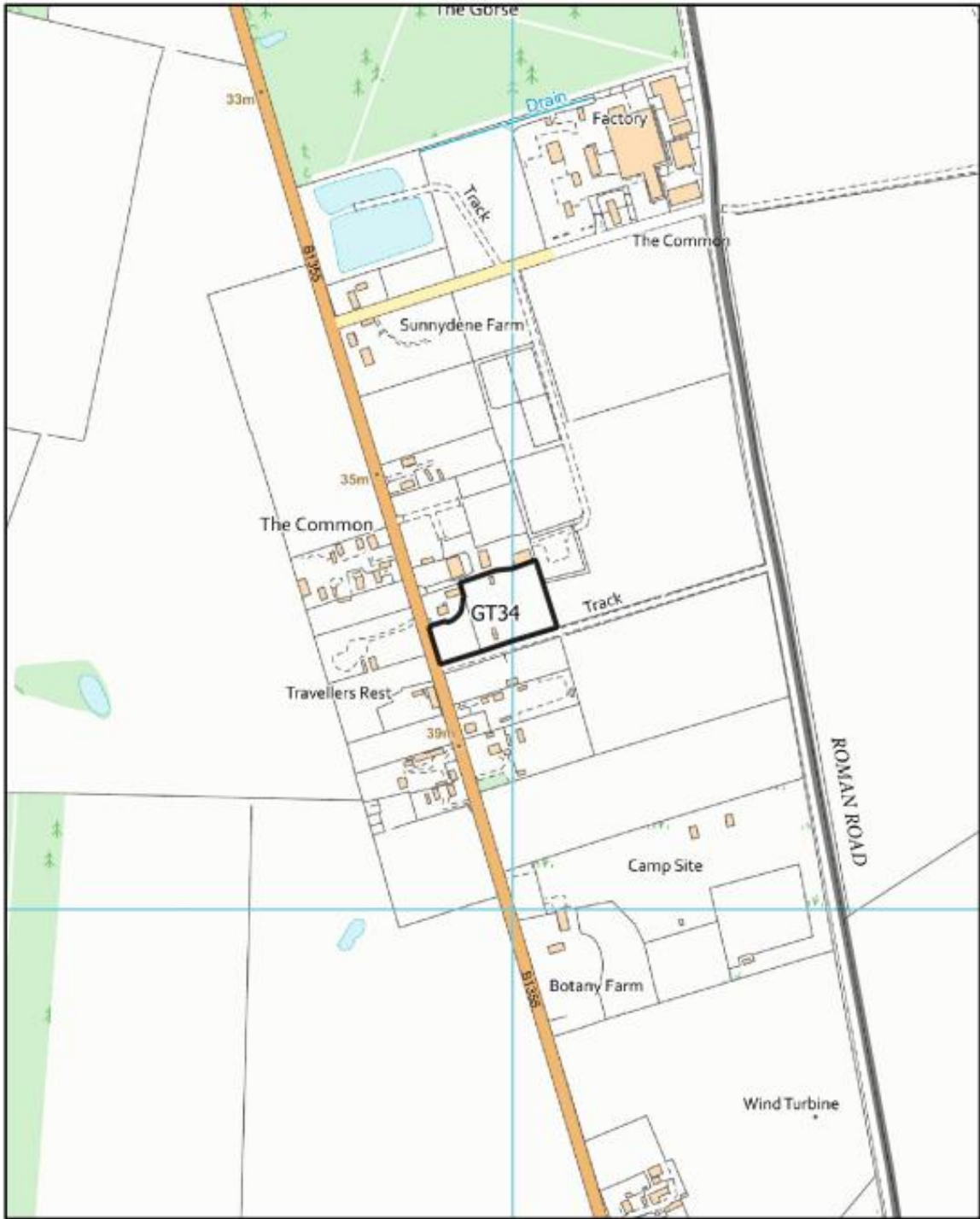
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-  Gypsy & Traveller Sites
-  Floodzone 2
-  Floodzone 3a



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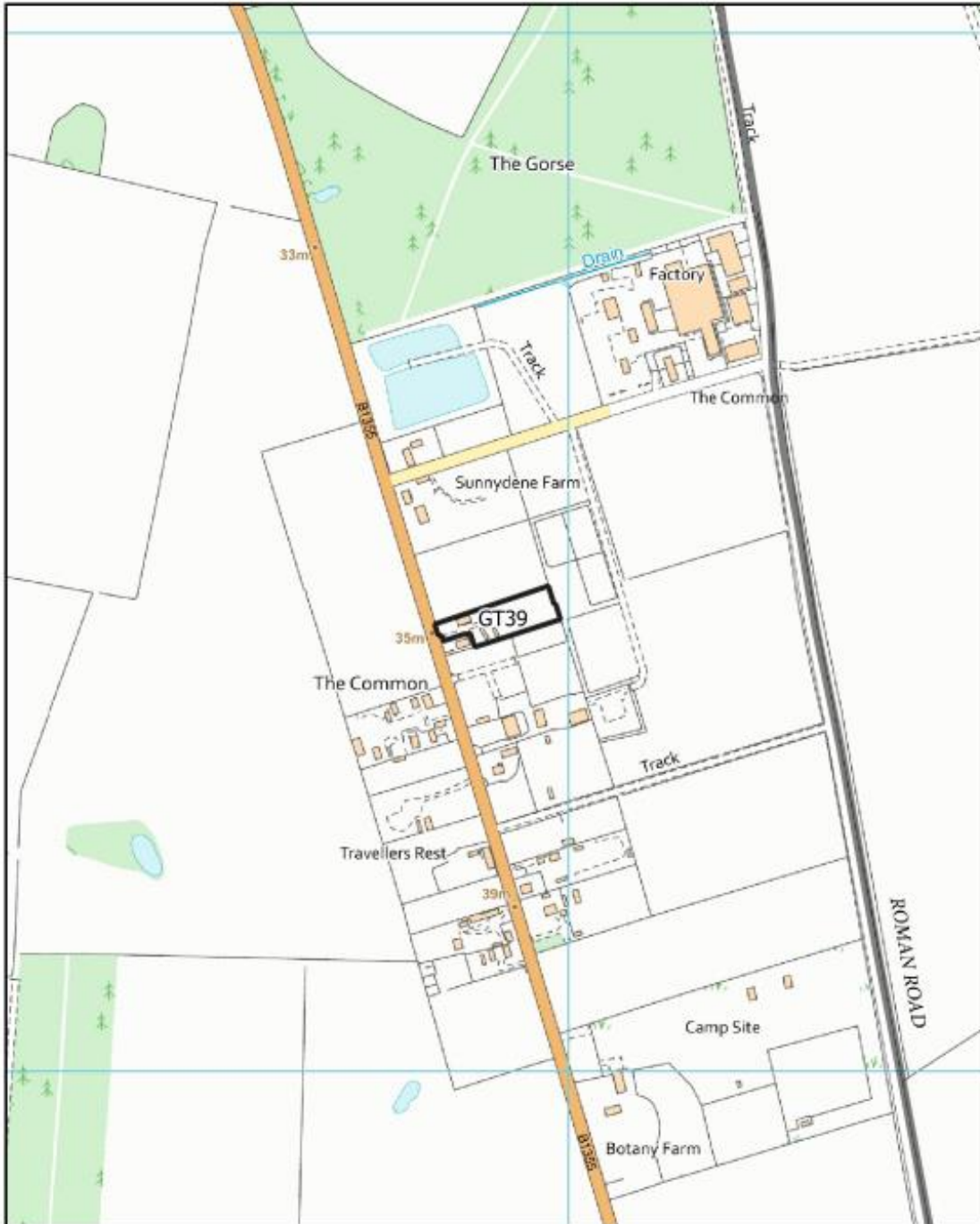
**GT34**

-  Gypsy & Traveller Sites
-  Floodzone 2
-  Floodzone 3a



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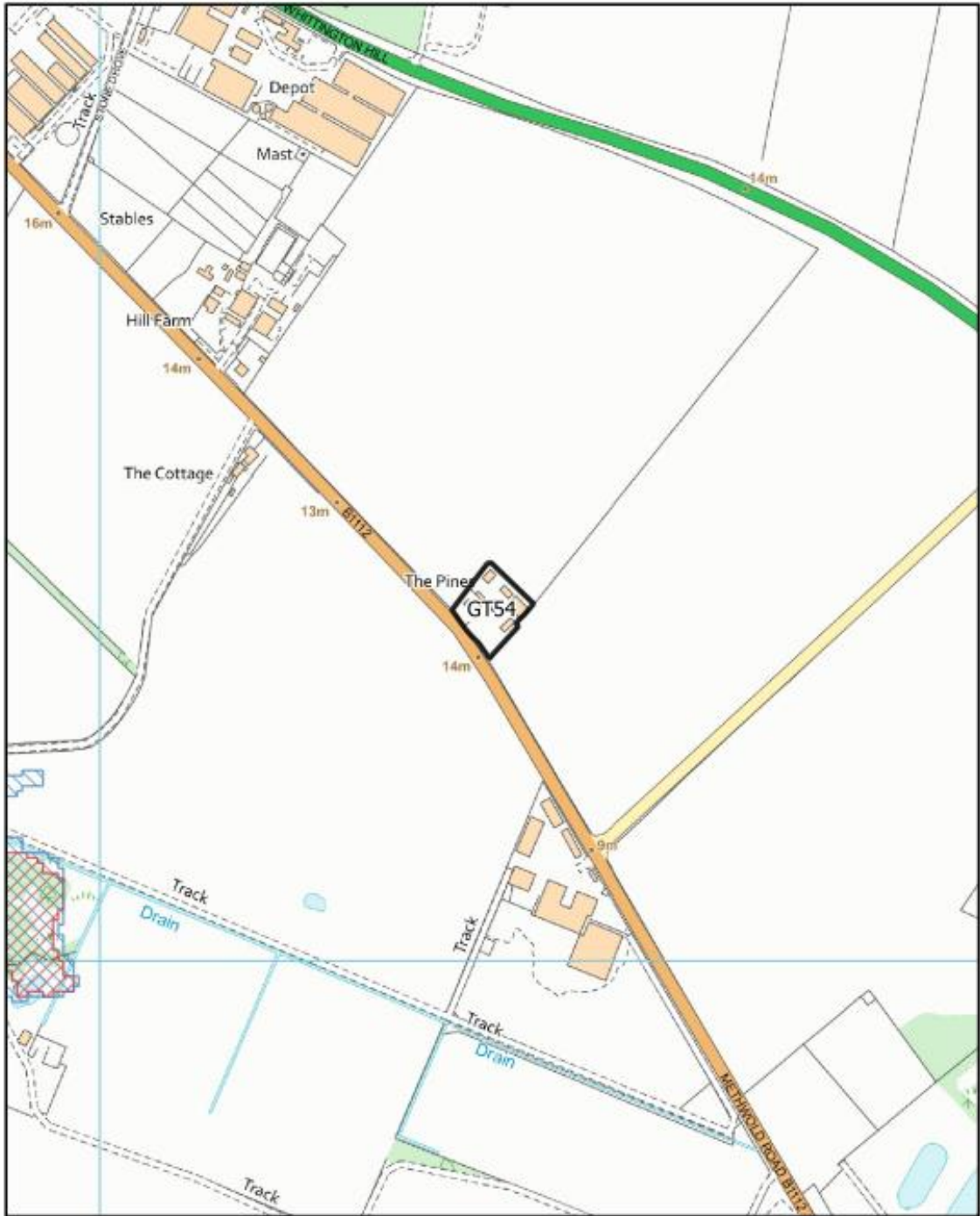
**GT39**

-  Gypsy & Traveller Sites
-  Floodzone 2
-  Floodzone 3a



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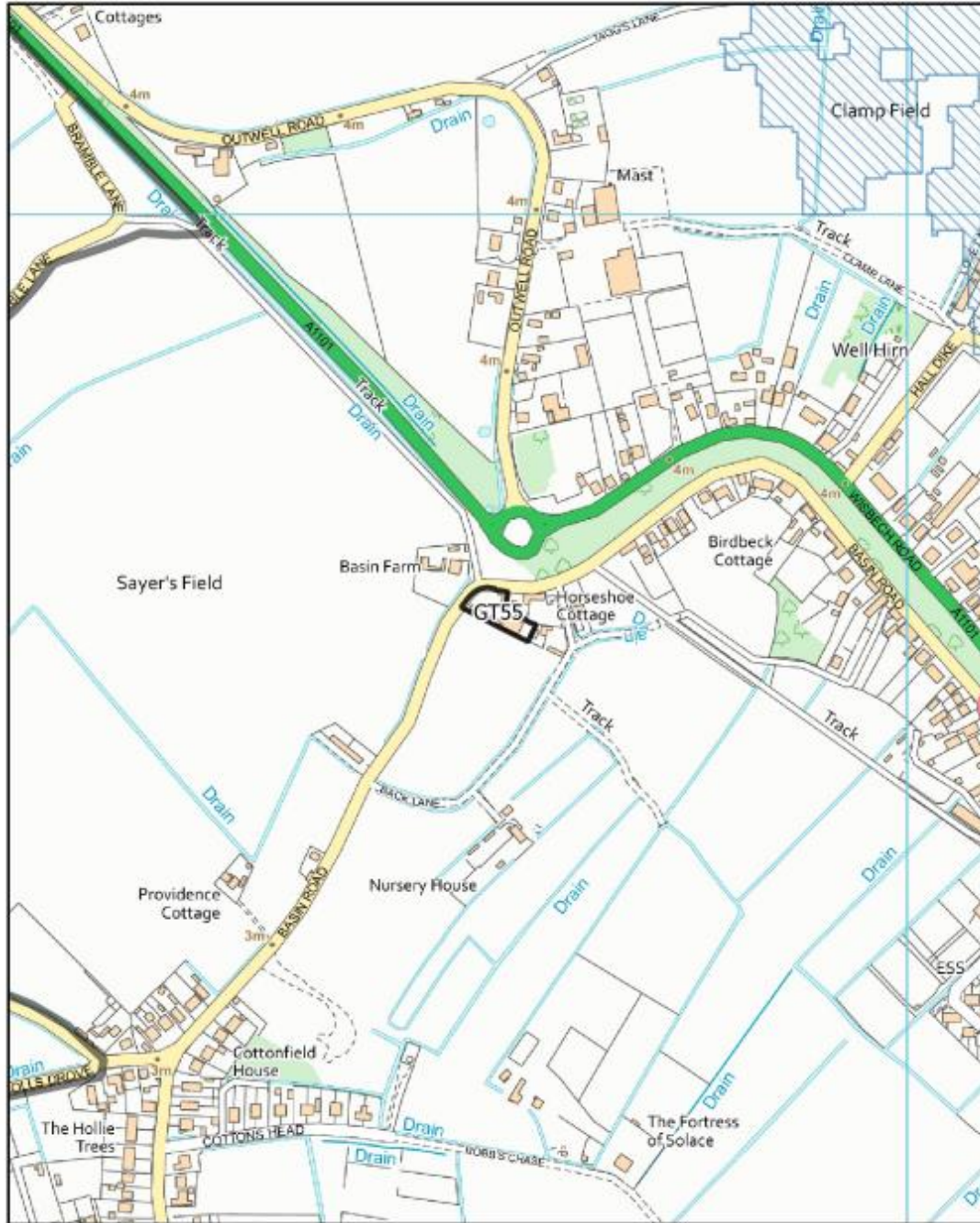
**GT54**

-  Gypsy & Traveller Sites
-  Floodzone 2
-  Floodzone 3a



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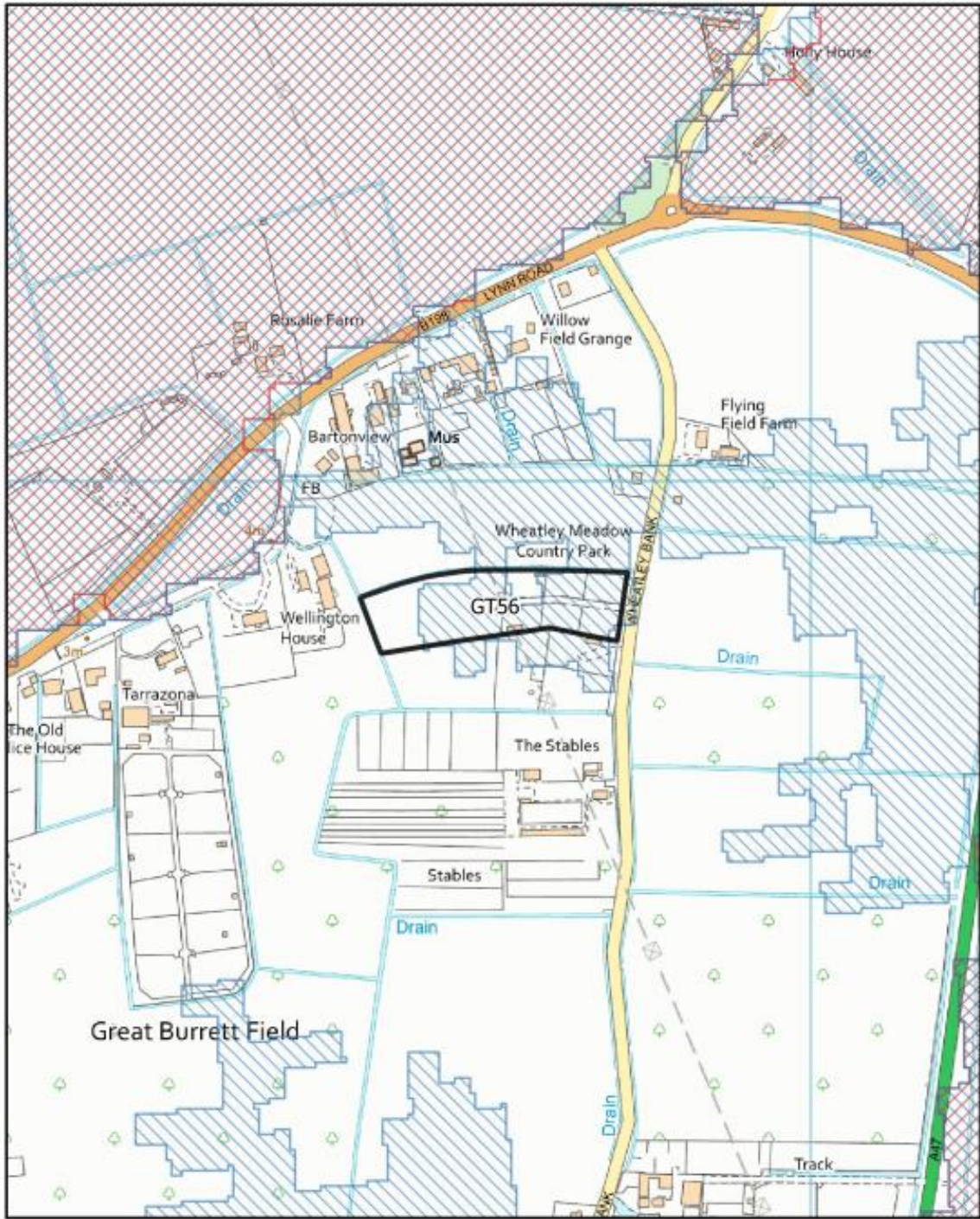
**GT55**

-  Gypsy & Traveller Sites
-  Floodzone 2
-  Floodzone 3a



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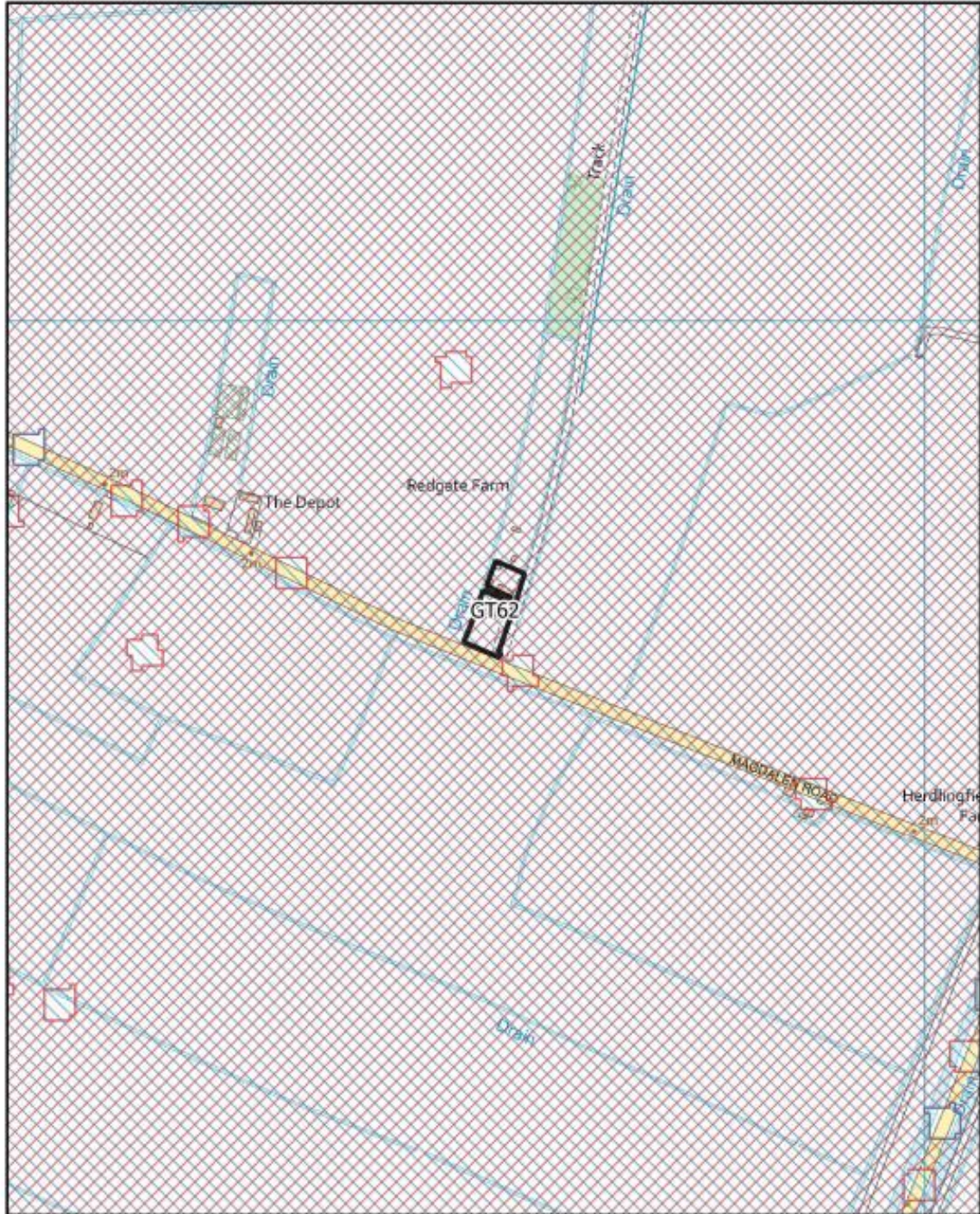
**GT56**

-  Gypsy & Traveller Sites
-  Floodzone 2
-  Floodzone 3a



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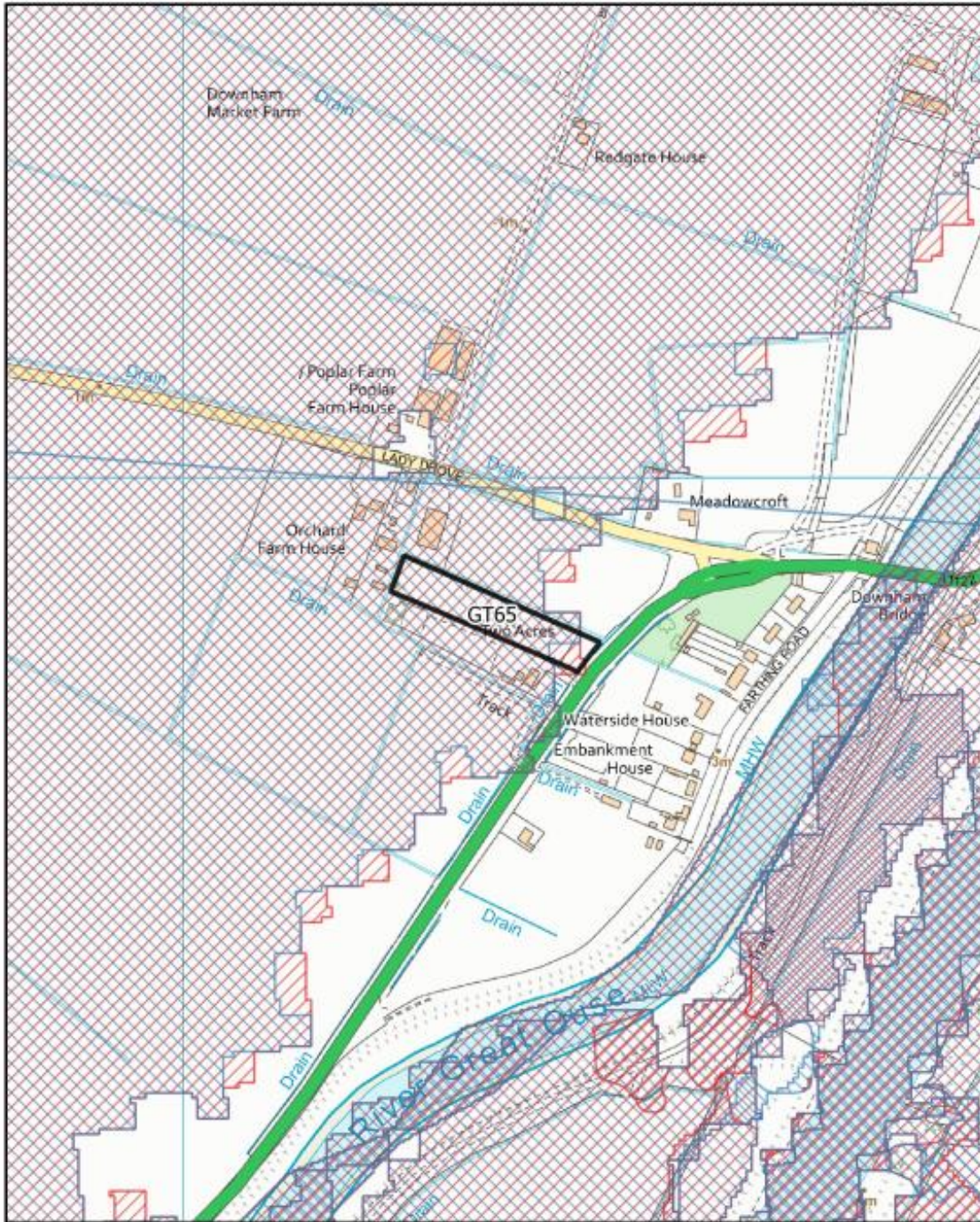
**GT62**

-  Gypsy & Traveller Sites
-  Floodzone 2
-  Floodzone 3a






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**GT65**

-  Gypsy & Traveller Sites
-  Floodzone 2
-  Floodzone 3a



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