



Norfolk County Council

Norfolk County Council Comments on the: King’s Lynn and West Norfolk Gypsy and Traveller Proposed Sites and Policy 26 June 2024

1. Overview

1.1. Thank you for consulting the County Council of the above consultation. Please see below the Highway Authority and the LLFA responses.

2. Highway Authority

General Comment

2.1. The Highway Authority (HA) has considered each of the potential Gypsy and Traveller and Travelling Showpeoples’ (GTTS) sites put forward in this round of consultation on the King’s Lynn and West Norfolk Local Plan. The HA views expressed have considered the nature of the proposed uses and the focus of the response is the adequacy of the access and local highway network given existing uses.

2.2. It is recognised that, in many cases, the proposed Local Plan site-specific allocations are being made retrospectively to accommodate growth in existing resident families.

2.3. The suitability of the proposed site allocations have been assessed against the technical criteria of the Highway Authority for new allocations and development proposals as they have no formal planning status.

Highway Authority Detailed Comments

Ref	HA Comment
GT 14	Local highway network is not of sufficient standard to support further development and it is not considered highways impacts upon Blunts Drove could be satisfactorily overcome, to accommodate 10 additional pitches on this site. The Highway Authority objects to this proposed allocation.
GT17	Local highway network is not of sufficient standard to support further development, and it is not considered highways impacts upon Small Lode could be satisfactorily overcome, to accommodate 9 additional pitches at this site. The Highway Authority objects to this proposed allocation.

Ref	HA Comment
GT18	<p>Local highway network is not of sufficient standard to support further development and it is not considered highways impacts upon Small Lode could be satisfactorily overcome, to accommodate 13 additional pitches on this site.</p> <p>The Highway Authority objects to this proposed allocation.</p>
GT21	<p>It is recognised that the site is already operational, however the Highway Authority objects to the proposed allocation as the local highway network is not of sufficient standard to support further development, with no clear means of making meaningful improvements.</p> <p>This is compounded by the cumulative traffic impact of further proposed allocations nearby in Upwell/ Outwell on the local highway network. It is not considered highways impacts can be satisfactorily overcome, to accommodate 5 additional pitch on this site.</p> <p>The Highway Authority objects to this proposed allocation.</p>
GT05	<p>Suitable access appears to be achievable.</p> <p>No provision for off carriageway walking/cycling.</p> <p>The Highway Authority does not object to the provision of 1 additional pitch.</p>
GT09	<p>The carriageway is just one vehicle width but local traffic only as this is not a through road.</p> <p>No off-carriageway walking/ cycling.</p> <p>The Highway Authority does not object to the provision of 1 additional pitch.</p>
GT11	<p>The carriageway is just one vehicle width but is used by local traffic only as this is not a through road.</p> <p>No off-carriageway walking/ cycling.</p> <p>The Highway Authority does not object to the provision of 1 additional pitch.</p>
GT15	<p>The Highway Authority does not object to the formalisation of one pitch and provision of 1 additional pitch.</p>
GT20	<p>It is recognised that the site is already operational, however the Highway Authority objects to the proposed allocation as the local highway network is not of sufficient standard to support further development, with no clear means of making meaningful improvements.</p> <p>This is compounded by the cumulative traffic impact of further proposed allocations nearby in Upwell/ Outwell on the local highway network. It is not considered highways impacts can be satisfactorily overcome, to accommodate an additional pitch on this site.</p> <p>The Highway Authority objects to this proposed allocation.</p>

Ref	HA Comment
GT28	<p>It is recognised that the site is already operational, however the Highway Authority objects to the proposed allocation as the local highway network is not of sufficient standard to support further development, with no clear means of making meaningful improvements.</p> <p>This is compounded by the cumulative traffic impact of further proposed allocations on Small Lode It is not considered highways impacts can be satisfactorily overcome, to accommodate 2 additional pitches on this site.</p> <p>The Highway Authority objects to this proposed allocation.</p>
GT29	<p>Existing hedge must be trimmed back on inside of the bend. Existing access and internal site arrangements improved to provide a single perpendicular access from the carriageway edge. If this is done the Highway Authority does not object to the provision of 1 additional pitch.</p>
GT34	<p>It is not clear how the site is or will be accessed, assuming this will be via restricted byway, this should be widened to 4.8m and surfaced for 10m from the B1355 to enable accessing vehicles to pass. Cutting of adjacent hedges would need to be secured to achieve acceptable visibility. No facilities for off-carriageway walking / cycling.</p> <p>Subject to securing width improvements and the land for required visibility, the Highway Authority would not object to this proposed allocation.</p>
GT54	<p>Suitable access appears to be achievable. No provision for off carriageway walking/cycling. The Highway Authority does not object to the provision of 1 additional pitch</p>
GT55	<p>This site has a conditioned splay across their site which is not currently adhered to. Should that be maintained the Highway Authority would accept one additional pitch as traffic volumes are low.</p> <p>No opportunity for safe walking /cycling from site.</p> <p>The Highway Authority does not object to the provision of 1 additional pitch subject to meeting the conditioned requirements for access.</p>
GT56	<p>No off-carriageway walking/cycling available but low traffic volumes likely & wide verges available.</p> <p>The Highway Authority does not object to the provision of 9 additional pitches.</p>

Ref	HA Comment
GT59	It is not clear that a safe point of access with suitable visibility can be achieved. If suitable visibility can be achieved, the Highway Authority does not object to the formalisation of the one existing pitch and provision of 4 additional pitches.
GT66	Site remote with no off-carriageway walking/cycling. The Highway Authority does not object to the provision of 1 additional pitch.
GT65	Acceptable visibility appears to be achievable; it should be noted that the access is located at a corridor of movement albeit within a 40mph speed limit. No objections to an additional 5 pitches subject to relocation of the existing sign in the highway verge.
GT25	It is recognised that the site is already operational, however the Highway Authority objects to the proposed allocation due to the increased slowing stopping and turning movements at the junction of the A134 which is a corridor of movement. Site remote with no off-carriageway walking/cycling. The Highway Authority objects to the proposed allocation of 2 additional pitches.
GT62	Site remote with no off-carriageway walking/cycling facilities. Subject to demonstration that a suitable access can be achieved, the Highway Authority would not object to the proposed allocation of 2 additional pitches.

2.4. Should you have any queries with the above comments please contact Richard Doleman (Principal Infrastructure Development Planner) at richard.doleman@norfolk.gov.uk or call 01603 223263.

3. Lead Local Flood Authority

3.1. The County Council, as Lead Local Flood Authority (LLFA) have reviewed the following documents submitted as part of the King's Lynn and West Norfolk Gypsy and Traveller Potential Sites and Policy Consultation May 2024 and would wish to make the following comments.

3.2. Gypsy and Traveller Potential Sites and Policy Consultation Document May 2024 and associated documents.

General Observations

- 3.3. Given that the LLFA not been provided with a complete set of GIS Shape Files, and the limited timeframe available for responses to be returned to the LPA, the LLFA has focused this latest response on the sites identified in the consultation documents for intensification / changes in pitch numbers, along with any new proposed sites which have not been previously reviewed by the LLFA. This latest consultation response should be read in conjunction with our previous response of 12th March 2024.
- 3.4. The LLFA would welcome the inclusion of complete GIS Shape Files as part of any future consultations to aid our assessment of the proposals. The LLFA also note that there appears to be some duplication / discrepancies within the latest documents which may need clarifying in any finalised documents.
- 3.5. The LLFA note that as advised in our previous response, not all sources of flood risk have been considered within the documents and site assessments which could lead to a site being promoted when there is an unidentified risk on site. The LLFA recommends that further consideration is undertaken to the risks associated with all sources of flooding.

LLFA Site Specific Comments relating to Gypsy and Traveller Potential Sites

- 3.6. The LLFA have reviewed the following sites as part of this consultation

Existing Sites to be intensified / change in no of pitches:

- GT14: Land Rear of West Walton Court, Blunts Drove, Walton Highway
- GT17: Land at The Lodge, Small Lode, Upwell
- GT18: Land at 2 Primrose Farm, Small Lode, Upwell
- GT21. Land at Four Acres, Upwell

New Sites Proposed (which did not form part of the January 2024 consultation)

- GT15: Land SW Common Road (The Bungalow) Walton Highway
- GT29: Number 2, The Stables, Marshland St James
- GT65: Tall Trees. Downham Road, Salters Lode, Downham Market
- The LLFA also note that a GIS Shapefile has now been included for proposed site GT66: Land at Brandon Road, Methwold which was not available at the previous consultation stage. Therefore, the LLFA has also been reviewed this site and included comments on the Excel spreadsheet
- We also note that a number of sites have been removed for inclusion following the previous consultation.

- 3.7. A comprehensive review of the new proposed sites and amended sites has been produced and can be found in the Excel document titled *FW2024_0389 – LLFA Response – Sites Review (Excel)*.

3.8. As advised in our previous response, please note the LLFA's response is specific to surface water flood risk. No other sources of flood risk (including but not limited to fluvial and coastal flooding; flooding from artificial sources; groundwater flooding and sewer flooding) have been reviewed as part of this consultation.

3.9. The following criteria have been used in our review:

- **Surface Water Flood Risk**

- These have been reviewed for the 3.33%, 1.0% and 0.1% Annual Exceedance Probability (AEP) events for surface water flooding.
- Where deemed necessary, site-specific comments have been provided.
- Assessment of onsite flood risk is proportionate to the site size and the flood risk significance.

- **Reports of Internal and Anecdotal (inclusive of external) Flooding**

- Reviewed with the LLFAs current flood records (which date back to 2011).
- Onsite and flood records within 500m of the site boundary have been reported.
- Please note all external flood records are deemed to be anecdotal.

- **Watercourses**

- These have been reviewed and identified when onsite or within 100m proximity to the site boundary.
- If a watercourse does not fall within the provided site boundaries (even if it is on the edge of the site boundary) this has been classed as offsite.
- Watercourses have been defined (ordinary watercourse, main river etc)
- We have not defined the ownership of the watercourses in this assessment.
- We have not reviewed offline watercourses, blind ditches or pond features as part of this review. Further investigation will be needed to assess these features, their type and whether they are connected to the wider drainage network.
- We have not defined whether the features are obstructed by housing or roads etc.

- **Surface Water Sewer Systems**

- Reviewed against Anglian Water sewer mapping.

- Both onsite and offsite surface water sewers with 100m of the site boundary have been reported.
- We have not defined whether the features are obstructed by housing or roads etc.

- **Additional Information**

- Source Protection Zones (SPZs) (If applicable)
- Internal Drainage Boards (IDBs) (If applicable)

- **We have then reported:**

1. Would local flood risk/surface water drainage constraints be severe enough to prevent development of the site?
2. Recommendations ranging from standard information required at planning through to requiring review and potential removal if deemed appropriate.

3.10. Where appropriate, we have provided additional site-specific comments. For ease of use, we have produced a traffic light system based on the recommendations column:

- **Red** - Recommend a review of the site and potential removal from the local plan.
- **Orange** - Significant information required at the planning stage.
- **Green** - Standard information required at the planning stage.

3.11. Please note that the provided site review document and this letter should be read in conjunction with each other.

3.12. Should you have any queries with the above comments please contact the Lead Local Flood Authority at llfa@norfolk.gov.uk.

4. **Children's Services**

4.1. No Comments

5. **Historic Environment**

5.1. No comments.

6. **Minerals and Waste**

6.1. No Comments.

7. **Natural Environment**

7.1. No Comments.