

**Representation Form**

Consultation on Gypsy and Travellers and Travelling Showpeople Proposed Sites and Policies document, May 2024

Closing date for submitting representations: **11:59pm, Friday, 21<sup>st</sup> June 2024**

**Part A**

**Section 1: Contact information**

	Respondent details	Agent details (where applicable)
<b>Title:</b>		
<b>First Name:</b>	Very large number	██████
<b>Last Name:</b>		██████████
<b>Organisation (where relevant):</b>		Carta Developers
<b>Address:</b>		██
<b>Postcode:</b>		██████
<b>Telephone:</b>		██████████████████
<b>Email:</b>		██

**Part B**

Please fill in a separate form for each site and/ or policy

**Section 2: Representations**

Which site (reference) and/ or draft policy are you responding on?

Consultation document (name)	Paragraph ref	Site/ policy ref (if applicable)	Site name/ policy title (as applicable)
ALL			

**To which test of soundness does your representation relate?**

The Local Plan (including Gypsy and Travellers and Travelling Showpeople Proposed Sites and Policies) is currently under examination by Planning Inspectors, appointed by the Secretary of State). The Inspectors will assess the Gypsy and Travellers and Travelling Showpeople Proposed Sites and Policies against the soundness tests. Please indicate whether you consider the site and/ or policy about which you are responding is:

[Please tick appropriate box]	YES	NO
Legally compliant?		X
Complies with the Duty to cooperate?		X
Positively prepared (i.e. seeks to meet the area’s objectively assessed needs)?		X
Justified (an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence)?		X
Effective (i.e. deliverable over the plan period)?		X
Consistent with national policy (National Planning Policy Framework: <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/432464/NPPF-2019.pdf">National Planning Policy Framework (publishing.service.gov.uk)</a> )?		X

**Summary of Comments:**

Please give details of why you consider the relevant Gypsy and Travellers and Travelling Showpeople Proposed Site and/ or Policy is sound (“Yes”) or unsound (“No”), with reference to the tests above. Please be as precise as possible.

The Kings Lynn and West Norfolk Borough Council has produced a number of documents to support its Gypsy and Travellers and Travelling Showpeople Proposed Site Allocations and Policy Consultation.

The consultation is based on a Gypsy / Traveller Accommodation Assessment (GTAA) produced for the Kings Lynn and West Norfolk Borough Council in 2023 by an organisation known as ORS.

The GTAA was produced without a tender, and will consequently have been let as a contract based on assurances from ORS that their methodologies and approach was sound. This is not believed to be the case.

ORS conducted the 2016 GTAA and based on its results in 2016 and its identified household formation rates there should not be an increase in need for Gypsy / Traveller accommodation of 3200% identified by ORS in 2023 if the 2016 was GTAA was either reliable or credible. The methodology and assumptions used by ORS have not changed substantially since 2016. ORS has admitted to having produced a large number of GTAA's. These are all identified as being underestimates. This is shown in the accompanying **Table**.

The Council's consultation appears to be based on a flawed GTAA and consequently fails to meet existing needs.

The GTAA is flawed for a number of reasons:

- a) Glossary definitions (ORS agreed to introduce changes but has not). This is the basis of the GTAA survey (provides the required definitions). The ORS definitions led to a family being identified in appeal 3286363 not being identified as inhabiting a Gypsy / Traveller site. It was acknowledged that they would have met the 2012 Planning Policy for Traveller Sites Annex 1 definition but that that their accommodation was not considered to be a Gypsy / Traveller site.
- b) Failure to identify that the number of people and sites counted is an estimate in the GTAA. It is believed that ORS surveyed between 60 – 80% of the Gypsy / Traveller population resident in the Kings Lynn West Norfolk area at the time of their GTAA, and a similar level of sites. It is possible to work out the confidence limits for an estimated population as ORS identified a 3200% increase in need this would be substantial.
- c) Failure to take proper account of the Lisa Smith judgement. ORS identify that they have procured a legal opinion on their interpretation of the Lisa Smith
- d) Failure to take proper account of displacement effects. This in particular relates to people forced to evacuate from the West Norfolk area due to a lack of accommodation. Evidence from planning applications suggests that this is between 60% - 80% of those excluded from the 2023 data capture. These people and their families actively seek resettlement. ORS and other GTAA providers should ask people where they regard their home as being. This need not be the location where they are interviewed.
- e) Failure to take proper account of inward migration and /or forwarding of homeless people to Gypsy / Traveller sites by Local Housing Authorities. This is currently not a significant issue in the KLWNBC area but is in other areas of England.
- f) The GTAA fails to differentiate between the different sites required by Gypsy / Travellers.

Until the GTAA is corrected it is difficult to see how a policy to meet needs can be taken forward. Due to the flawed GTAA a value for money for protocol has been developed using HMT Green Book and LGLUHC methodologies. This identifies the cost to organisations of common good due to failures to meet accommodation needs. An example for the Cottons and Common Road sites are attached.

## Planning Policy for Traveller Sites

Planning Policy for Traveller Sites identifies in its introduction that Local Authorities should make their own assessment of need for the purposes of planning.

**Policy A** identifies that Local Planning Authorities should assemble an evidence base and pay particular attention to:

- a. early and effective engagement with the Traveller community and their representatives.
- b. co-operate with the Traveller community and their representatives to maintain an up-to-date understanding of accommodation needs.
- c. use a **robust [and credible]** evidence base to establish accommodation needs to inform the preparation of local plans.

The majority of LPAs outsource this work to a number of established GTAA providers. A very large number of planning appeals are caused due to there not being a robust evidence base due to GTAA providers giving flawed assurances to LPAs.

The GTAA providers have all developed their own methodologies to identify the accommodation needs of Gypsy / Travellers. These are based on definitions contained in Glossary's that are used to enable data capture.

ORS has worked with organisations like Atkins Consulting to develop methodologies that enable them to meet the requirements in PPTS for Policy B. It has also identified that it is capable of determining if Gypsy / Travellers meet the definition contained in Annex 1 of PPTS, and that it was the authority for determining household formation rate.

ORS in 2016 identified to the KLWNBC that the number of Gypsy / Travellers requiring accommodation in the KLWNBC was **5 pitches until 2036**.

ORS undertook the GTAA that led to the Lisa Smith High Court challenge.

ORS has not consulted the Gypsy / Traveller community or its representatives to develop a common understanding of terms used in its Glossary for data capture.

At least one Gypsy / Traveller in the KLWNBC area had twenty five children and now has about 600 grandchildren and 2,000 great grandchildren, most of which are resident in the KLWNBC area.

ORS was required to engage with the Gypsy / Traveller community in KLWNBC due to a large number of homeless Gypsy / Travellers as a result of its 2016 GTAA being used by LPAs. This was a 'velvet revolution' and according to ORS led to a **3200 per cent** increase in accommodation need, based on the definitions and methodologies it uses.

There is a widespread belief that the definitions, assumptions and methodologies used by ORS have been developed to depress the identifiable need for Gypsy / Traveller accommodation.

It is further believed that ORS will not admit to flaws in its definitions, assumptions and

methodologies as this would invalidate their contracts with LPAs.

The KLWNBC is the first GTAA that has been completed since the Lisa Smith judgement.

KLWNBC have no option but to concede that the 2016 GTAA that they were provided with by ORS was neither robust or credible. ORS are in the same situation.

The issue that comes up is what is different with the 2023 GTAA. It is based on the same methodologies, assumptions and definitions as the 2016 GTAA.

Until ORS develop and agree methodologies, assumptions and definitions with its client group it is likely that it will continue to bring itself into disrepute. ORS need to identify why the 2016 GTAA was not credible or robust and why the 2023 GTAA should be considered as credible and robust. It is in the public interest for ORS and other GTAA providers to develop through peer review a credible methodologies, assumptions and definitions

### **The Policy**

The policy is a good attempt to meet the needs identified by ORS.

- a) There is a particular need for sites that provide starter homes. The Council has refused applications for 19 pitches at two sites) that are mainly made for young families.
- b) There is some concern that some of the smaller sites identified for intensification are not of sufficient size to accommodate the intensification proposed.
- c) There appears to be a significant shortfall in proposed provision.

### **Supporting Documents**

The draft Policy is supported by site assessments, a flood risk protocol, a sustainability assessment and a habitats regulations appraisal. The site assessment and flood risk assessments appear to be of a good quality. The same cannot be said for the Sustainability and Habitats Regulations Assessments. This is mainly because the studies that have been undertaken are based in part on what appear to be flawed Habitat Regulations Assessments conducted for the LPA by other independent consultants.

The Habitat Regulations Assessments are based on an assumption that SSSI sites are also European sites (SACs and SPAs now known as Habitat sites) even if the required habitats and species are not present. Large areas of SACs should be removed from the European designation. This should automatically lead to the area removed losing RAMSAR and SPA designation due to lack of geographical basis. The problem has been caused due to the former Nature Conservation Council wrongly advising DEFRA in the early 1990s that SSSI sites contained species and habitats that were not present. This led to a large number of SSSI sites being designated as SACs which enabled SPA and RAMSAR sites to be created. Following BREXIT EU funding was removed from

conservation organisations. Natural England appears to support bad science by conservation organisations and consultants to avoid having to admit that the basis for habitat Regulations Assessments are flawed to enable taxation on planning applications.

**Conclusion**

The Kings Lynn and West Norfolk GTAA is the first 'procured' by a Local Planning Authority since the Lisa Smith judgement.

Until the 2023 GTAA is corrected it is unlikely that Kings Lynn and West Norfolk BC will be able to develop a meaningful policy to meet the accommodation needs of Gypsy /Travellers.

Correction of the 2023 GTAA will have a cascade effect throughout England and enable better planning decisions to be made. There are issues with having corrected flawed studies procured by Council's from consultants.

(Continue on a separate sheet if necessary.)

**Please note** you should cover succinctly all the information, evidence and supporting information necessary to support/justify your comments.

**Section 4: Examination Hearings**

**This consultation may be followed by further Examination Hearing sessions, scheduled to take place on 3-4 September 2024. Do you consider it necessary to participate in Examination Hearing sessions? (Please select one answer)**

No, I do not wish to participate at the

Yes, I wish to participate at the

Examination Hearing

examination hearing

### Section 5: Data Protection

**Do you wish to be notified further about the Local Plan Examination process, at any of the following stages?**

Schedule of Main Modifications stage (following hearings)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Publication of Inspector's Report	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Adoption of Local Plan	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

*In complying with the General Data Protection Regulation (UK GDPR) and Data Protection Act 2018, King's Lynn and West Norfolk Borough Council confirms that it will process personal data gathered from this form only for the purposes relating to the consultation. It is intended to publish responses to this consultation on the Borough Council's website. However, it should be noted that all personal information (except for names and organisation name, where appropriate) will not be published.*

*When you give consent for us to process data, you have the right to withdraw that consent at any time. If you wish to withdraw your consent, you must notify us at [lpr@west-norfolk.gov.uk](mailto:lpr@west-norfolk.gov.uk) or 01553 616200.*

### Section 6: Signature and Date of Representation

<b>Please sign and date below:</b>	
<b>Signature: (electronic signatures are acceptable)</b>	<b>STUART H CARRUTHERS</b>
<b>Date:</b>	<b>11 JUNE 2024</b>

Please note that, to be considered, your representation will need to be received by **11:59pm on Friday, 21<sup>st</sup> June 2024.**

**TABLE**

**CHANGE IN PITCH NEED IDENTIFIED BY GTAA PROVIDERS**

<b>UK REGION</b>	<b>PREVIOUS GTAA (A)</b>	<b>CURRENT GTAA (B)</b>	<b>Difference between current GTAA and previous GTAA (B-A) (C)</b>	<b>% Change (C/A) * 100</b>
Kings Lynn and West Norfolk	5	156	151	3020
Hambleton Yorkshire	12	75	63	525
East Herts	9	43	34	378
Havering (London)	62	220	158	255
Maidstone (Kent)	159	552	393	247
Winchester (Hampshire)	59	201	142	241
Wiltshire	90	239	149	166
East Hampshire (Hampshire)	19	44	25	132
Basildon (Essex)	89	178	89	100
Test Valley (Hampshire)	38	66	28	74
South Staffordshire (Staffordshire)	87	144	57	66
Waverley (Surrey)	41	65	24	58
St Albans (Hertfordshire)	79	125	46	58
Solihull (West Midlands)	38	53	15	39
<b>Total</b>	<b>787</b>	<b>2161</b>	<b>1374</b>	<b>175</b>

**Source:** ORS presentation to Medway Council (undated believed to be 2022), and KLWNBC GTAA, 2016 and 2023



**Future Options for  
The Cottons  
Traveller Site**  

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**Value for Money Report**  

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**April 2023**

**Future Options for  
The Cottons  
Traveller Site**

**Value for Money Report**

**April 2023**

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# 1. Introduction

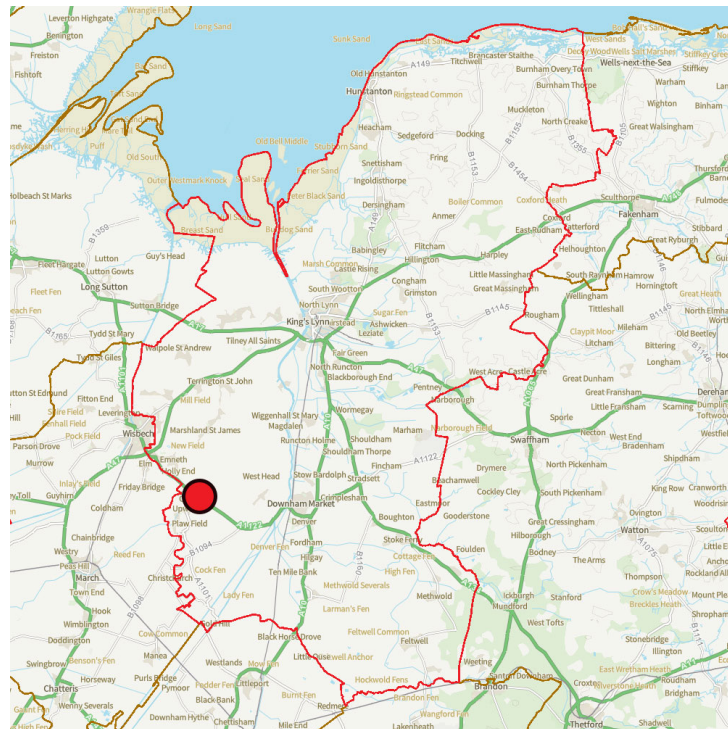


Fig. A - Location of The Cottons Traveller Site in the King's Lynn & West Norfolk Area

## 1.1 About the Author

The report was developed by Henry Hardwicke Carruthers.

Henry read History at the University of Cambridge. He spent seven years working in central government, at departments including the Department for Work & Pensions, the Wales Office, the Department for Business, Innovation & Skills and the Department for Business, Energy & Industrial Strategy.

During his career in government, he led on analysis and policy development, contributing to 2017 and 2018 Budget briefs, scrutinising the cost of projects at the Land Registry, Ordnance Survey and the Green Investment Bank.

He was responsible for independent reports on the Retail Sector and Arbitration, in addition to leading teams responsible for developing regulations for the Single Electricity Market and No Deal Brexit.

Since leaving Government, Henry has provided specialist consulting services on a range of complex, extraordinary residential projects. These have included a complete analysis of Basildon Borough Council's 2020 Town Centre DPD, assessments of the former Dale Farm site and numerous value for money assessments on publicly owned London Gypsy / Traveller Sites.

## 1.2 Purpose

The objective of this report is to provide a robust assessment on future options available to **King's Lynn & West Norfolk District Council** for the private Gypsy / Traveller Site at the **The Cottons** situated at **Cottons Head** in **Outwell, Norfolk**.

The document has been produced as evidence to support present planning applications & appeals.

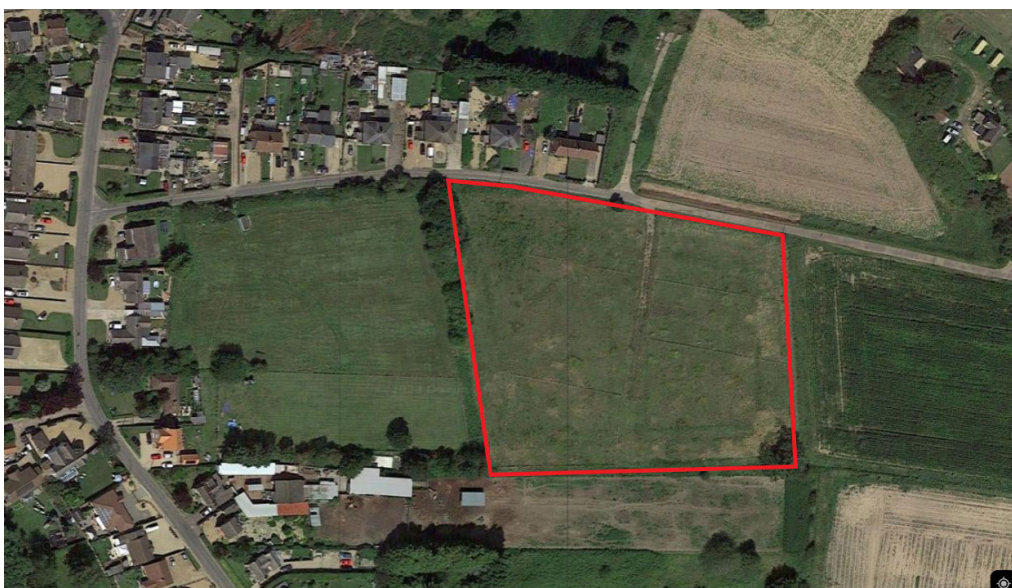
Findings have been informed by bespoke analysis of the situation of the residents at The Cottons Traveller Site.

## 1.3 Methodology

The methodology follows standard HM Treasury Green Book valuation and the Department for Levelling Up, Housing and Communities' (DLUHC) Benefit Cost Ratio guidance.

It uses data from local sites, supplemented by assumptions reflecting local circumstances and planning policy requirements. All calculations and assumptions are provided.

The report assesses the projected public cost (local and national) involved in four specific scenarios. The costs reviewed include scenario specific, projected benefit, health, policing, civil and extraordinary expenditure incurred by both local and national



*Fig. B - Location of The Cottons Traveller Site in the Outwell, West Norfolk*

Government.

All projections are aligned with research on public data-sources, including insights from independent research projects developed by the author.

All methods comply with the guidance set out by DLUHC for assessing the impact of residential, commercial and transport infrastructure investments, and comply with the approach adopted by HM Treasury in Green Book Guidance, which sets out how the UK Government should measure the cost impacts of public projects.

The report provides an assessment of the projected economic and social impact of four future options for The Cottons Traveller Site:

1. Approving residential planning consent at the site;
2. Development of a new, alternative Public Gypsy / Traveller Site on Privately-Owned Land following rejection of residential planning consent at the site;
3. Refusal of planning consent and eviction of the site without the provision of any alternative site for the residents.

An assessment of the development of a Traveller Site on publicly owned land was reviewed, however, a review of public land available in the borough highlighted that there is currently no suitable land available.

## 1.4 Background

The Cottons Traveller Site is a proposed nine pitch, privately-owned Gypsy Traveller Site in the Emneth with Outwell ward of King's Lynn & West Norfolk. The site is situated on the southern border of Robb's Chase. The land is within the village of Outwell.

The land is approximately 1.4 hectares, the site has direct access onto Rob's Chase. The Cottons Traveller Site is proposed to accommodate 37 residents (20 adults and 17 young children) across nine pitches.

The land at Cottons Traveller Site has been owned by the residents since late 2013.

The site is not currently living at the prospective residents are currently classed as homeless. Due to a lack of provision of culturally appropriate accommodation within the borough of King's Lynn & West Norfolk, prospective residents have been forced to live on unauthorised Gypsy / Traveller Sites in the West Norfolk area over the last twenty years.

Blocking the operation of the site will result in 37 prospective residents remaining homeless. No alternative accommodation is available to the residents. The majority of the site's residents are young children, many of whom suffer from severe health challenges.

# 1. Introduction

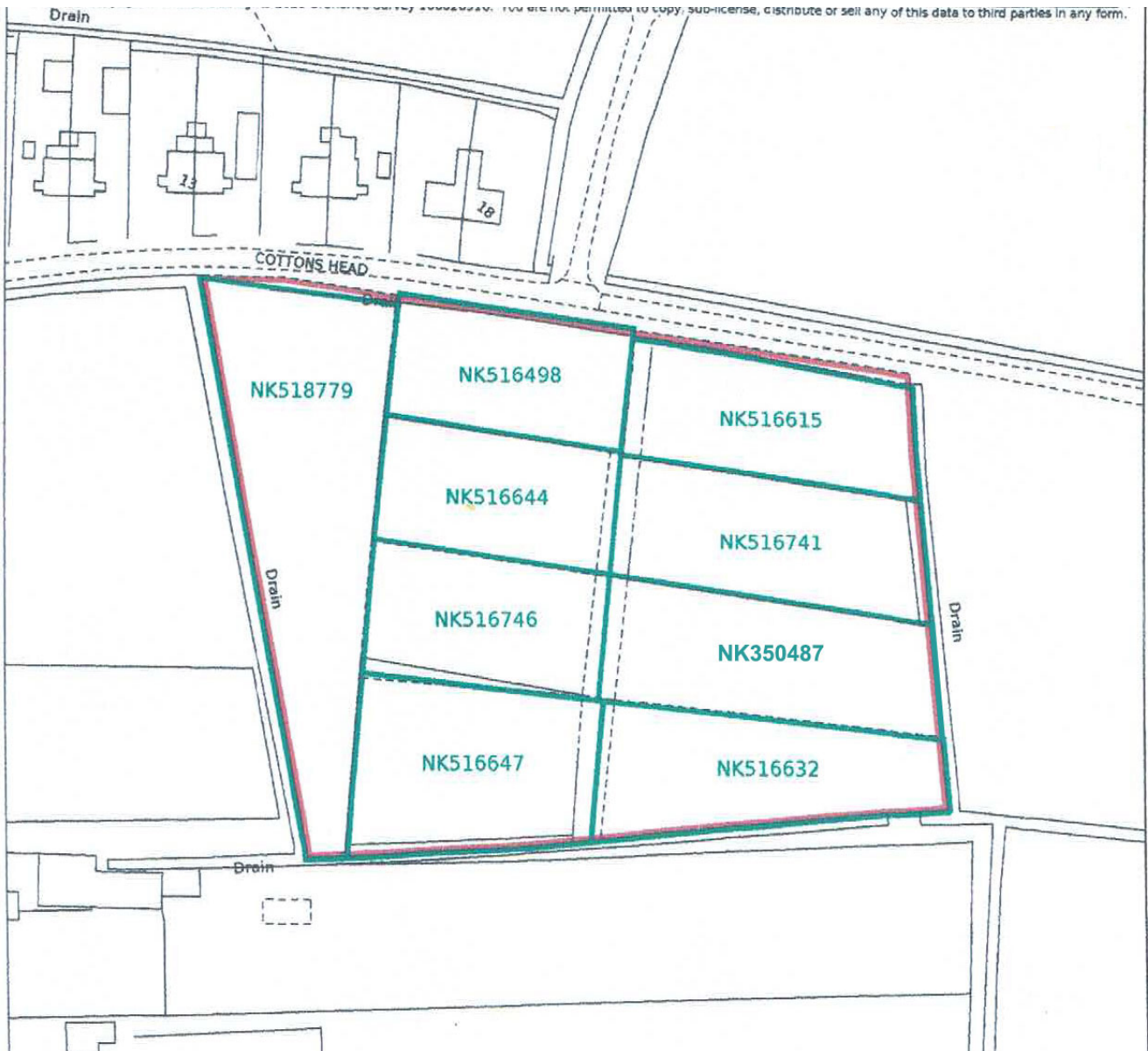


Fig. C - Proposed Layout of Plots at The Cottons Traveller Site

## 1.5 Planning Timeline

- **31 July 2014** - Planning Application submitted for a change of use of agricultural land to a paddock and the siting of residential caravans.
- **4 August 2014** - Planning Application 14/01130/F was formally rejected by the Planning Authority on the grounds that; 1. stationing a residential caravan in open countryside contravenes Policy CS06 of the Authority's Local Development Framework, and no necessary justifications for a change in land use at the site were provided; 2. introducing a caravan and associated residential paraphernalia to the site would detract from

the appearance and character of the locality, contravening the Authority's Planning Policies CS06 and CS12.



# 2. Executive Summary

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## 2.1 Executive Summary

Refusal of planning permission at The Cottons Traveller Site will result in the continued displacement and homelessness of 37 Gypsy / Travellers, almost 50% of whom are children. These families will have no options for alternative accommodation.

King's Lynn & West Norfolk District Council do not have any current provisions or medium-term plans to accommodate homeless Gypsies / Travellers in the catchment. This is despite an acknowledged minimum need of 75 additional pitches in the West Norfolk area, which upon review appears to be a significant underestimate. If The Cottons Traveller Site is not approved, 17 very young children will be made homeless, a situation in which their safety cannot be assured.

Refusal of planning permission at The Cottons Traveller Site will directly contribute to an increase in unauthorised encampments on land not owned by the occupiers in the West Norfolk area.

The local authority has failed to enact their own Traveller policy of providing more pitches in the locality. As a result, unless The Cottons Traveller Site is awarded planning permission, or an accelerated extraordinary plan is developed to provide alternative public Gypsy / Traveller Sites in West Norfolk, residents will be rendered homeless.

To accommodate the extra 37 displaced residents not currently accounted for in the 2016 GTAA, provision of an extra nine public pitches is required. For this to be delivered on a single site, it is estimated that this would cost a minimum of £1.56 million.

King's Lynn & West Norfolk's previous record of ad hoc planning decisions that have awarded a number of Gypsy / Traveller Sites temporary

planning permission for two to three year periods have impacted the validity and effectiveness of all previous GTAA recommendations for increases to pitch provision in the local area. This is because temporary consents have been treated as permanent consents by ORS when completing GTAA's.

Planning assessments conducted by King's Lynn & West Norfolk Borough Council previously determined that The Cottons Traveller Site is not a suitable location for a Gypsy / Traveller Sites because the site is greenfield, and would not be within keeping of the local environment. These conclusions are evidence of the inconsistent application of planning policies. The approved extension of the site at Small Lodge, in Upwell in 2021, is subject to almost exactly the same concerns, however was approved.

It is estimated that the continued, long-term homelessness experienced by the prospective residents of The Cottons Traveller Site will cost both local and central Government approx. £5.72 million over the next ten years. This option offers no benefit to the prospective residents of The Cottons Traveller Site, or the wider community, and instead presents what is arguably a misuse of public funds.

It is projected that it will cost significantly less in the long-term if King's Lynn & West Norfolk District Council developed a new nine pitch Public Gypsy / Traveller Site, in place of allowing the current prospective residents to remain homeless.

However, given the planning context and land availability in West Norfolk, the most cost effective and arguably achievable option would be to award permanent planning permission to The Cottons Traveller Site. This is the only option that, following analysis, falls into an incredibly positive value for money category (an almost unprecedented BCR of 599).





# 3. Traveller Sites Overview



*Fig. D - Location of Saddlebow Caravan Site (Public Gypsy Traveller Site)*

## 3.1 Overview

There is not a comprehensive list of Gypsy / Traveller Sites in King's Lynn & West Norfolk. The most up to date, official review of Gypsy / Traveller Sites in the borough was conducted in the Cambridgeshire, King's Lynn & West Norfolk, Peterborough and West Suffolk Gypsy and Traveller Accommodation Assessment in October 2016.

King's Lynn & West Norfolk has two Public Gypsy / Traveller Sites, Saddlebow Caravan Site (27 pitches) and West Walton Court (16 pitches). This is in addition approx. 47 authorised private Gypsy / Traveller Sites (131 pitches total), and two private unauthorised sites (Little Acres & Spriggs Hollow - 4 pitches).

Independent reviews of additional Gypsy / Traveller Sites in the borough, conducted during the compilation of this report, confirm that this overview is largely inaccurate, and dramatically underestimates the number of Gypsy / Travellers in the borough.

This is emphasised by the authority's awareness that the current 20 adult residents seeking to settle at The Cottons Traveller Site, were not interviewed in the 2016 GTAA, despite all of them being long term residents of the area.

Further, the authority has acknowledged that existing Gypsy / Traveller Sites in the borough suffer from overcrowding. This was the leading reason for the approval of the extension of the private Gypsy / Traveller Site at Small Lodge, Upwell, by an additional four pitches in 2021.

The 2016 GTAA concluded that King's Lynn & West Norfolk required an additional 75 Gypsy / Traveller pitches from 2016-36. To date, the Local Authority has provided no additional pitches. Further, the requirement of 75 additional pitches does not factor in the additional nine that will be required for prospective residents of The Cottons, should planning permission at the site be refused.



**Fig. E** - Location of West Walton Court, Blunts Drove (Public Gypsy Traveller Site)

# 4. Planning Policies

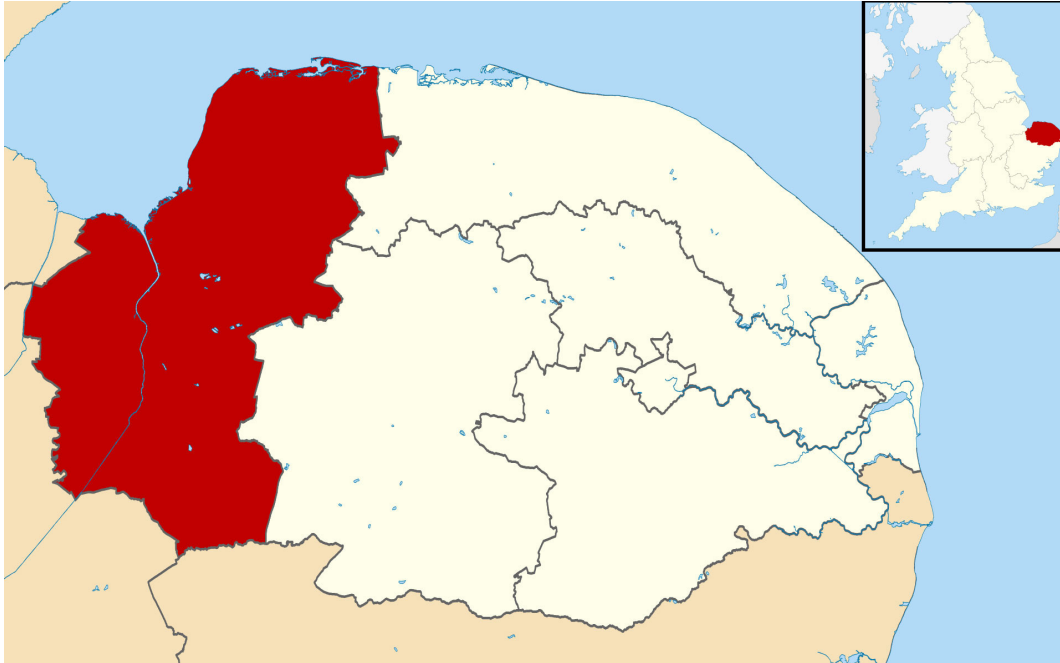


Fig. F - Kings Lynn & West Norfolk

## 4.1 Local Authority Overview

King's Lynn & West Norfolk Borough Council is the planning authority for Outwell, the key rural village service centre that The Cottons Traveller Site is located within. The borough's county authority is Norfolk County Council.

The Borough Council of King's Lynn & West Norfolk's current planning policies are set out in the adopted King's Lynn & West Norfolk Local Development Core Strategy. The Local Plan was adopted in July 2011.

These are supplemented by the Site Allocations & Development Management Policies Plan, adopted in September 2016.

## 4.2 King's Lynn & West Norfolk Local Development Core Strategy 2011 - Relevant Policies

Various policies in the King's Lynn & West Norfolk Local Development Core Strategy 2011 are relevant to the approval of Gypsy / Traveller Sites in Outwell. Each policy is provided below:

### Policy CS01 Spatial Strategy

#### Sustainable development locations

*...our approach will utilise a settlement hierarchy (set out in Policy CS02) to ensure that:*

- *new investment is directed to the most sustainable places;*
- *significant emphasis is placed on brownfield redevelopment within the towns and villages;*
- *the development of sustainable urban extensions to the main towns;*
- *locally appropriate levels of growth take place in selected Key Rural Service Centres and Rural Villages;*

- *new development is guided away from areas at risk of flooding now or in the future, however recognising development may be required within flood risk areas to deliver regeneration objectives within King's Lynn and maintain the sustainability of local communities in rural areas;*
- *approximately 90% of new residential development will take place in areas identified within the settlement hierarchy to ensure reasonable access to services satisfying basic day to day needs;*
- *75% of employment land will be allocated in King's Lynn.*

### **Policy CS06 Development in Rural Areas**

*The strategy for rural areas is to:*

- *promote sustainable communities and sustainable patterns of development to ensure strong, diverse, economic activity;*
- *maintain local character and a high quality environment;*
- *focus most new development in key rural service centres selected from the Settlement Hierarchy Policy CS02;*
- *ensure employment, housing (including affordable housing), services and other facilities are provided in close proximity.*

### **Policy CS09 Housing Distribution**

#### **Gypsies and Travellers and Travelling Showpeople**

*Provision will be made for a minimum of 146 permanent pitches identified in the Regional Spatial Strategy as being needed in the borough between 2006 and 2011 for Gypsies and Travellers.*

*Any deficit will be addressed through working with Registered Social Landlords and additionally with the gypsy and traveller community to bring forward*

*applications on suitable sites.*

*In addition the Borough Council will review by survey the need for additional pitches on an annual basis and judge this against the 3% annual compound increase indicated in Regional policy for the period 2011 - 2021*

*Provision for transit sites and additional provision of permanent sites for Gypsies and*

*Travellers above the 146 pitches will be considered where additional need is demonstrated.*

*Sites for Gypsies, Travellers (or travelling show people) will be given permission where they:*

- *are capable of being serviced by basic utilities;*
- *meet an identified need;*
- *avoid environmentally sensitive areas and areas at risk from flooding;*
- *afford good access to main routes (including the A47(T); A17; A10; A148/9; and A134 ); and*
- *are located within a reasonable distance of facilities and supporting services (such as schools or health provision).*

*The Borough Council will work with partners in county groupings to establish a network of transit sites and appropriate provision for travelling showpeople across the county.*

## **4.3 King's Lynn & West Norfolk Site Allocations & Development Management Policies Plan**

*In the Site Allocations & Development Plan 2016, King's Lynn & West Norfolk Borough Council adopted the KPI for measuring the authority's performance against the it's Traveller Policy by ensuring that there is, "At least 5 years housing land supply at any point in time. Monitored against the housing trajectory [for Gypsy / Traveller appropriate accommodation]"*

# 4. Planning Policies

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At no point have King's Lynn & West Norfolk Borough Council published a five year housing land supply to address the number of new pitches that the Authority are required to deliver to meet demand.

Further, by the authority's own commitment to assess Gypsy / Traveller need against a projected 3% annual compound increase to the number of pitches required, there is no evidence that this has been supplied (Policy CS09).

A 3% annual compound increase of pitches, as suggested in the 2011 Local Plan, is the expected growth rate of Gypsy / Traveller Pitches in the area, which would in 2023, increase projected need from 147 pitches in 2011, to 214 pitches in 2023. Currently, there are an estimated 178 authorised Gypsy / Traveller pitches in King's Lynn & West Norfolk.

## 4.4 Flood Risk

The Cottons Traveller Site is subject to very low flood risk from both rivers & sea and surface water flooding, as illustrated in Figs. G & H.

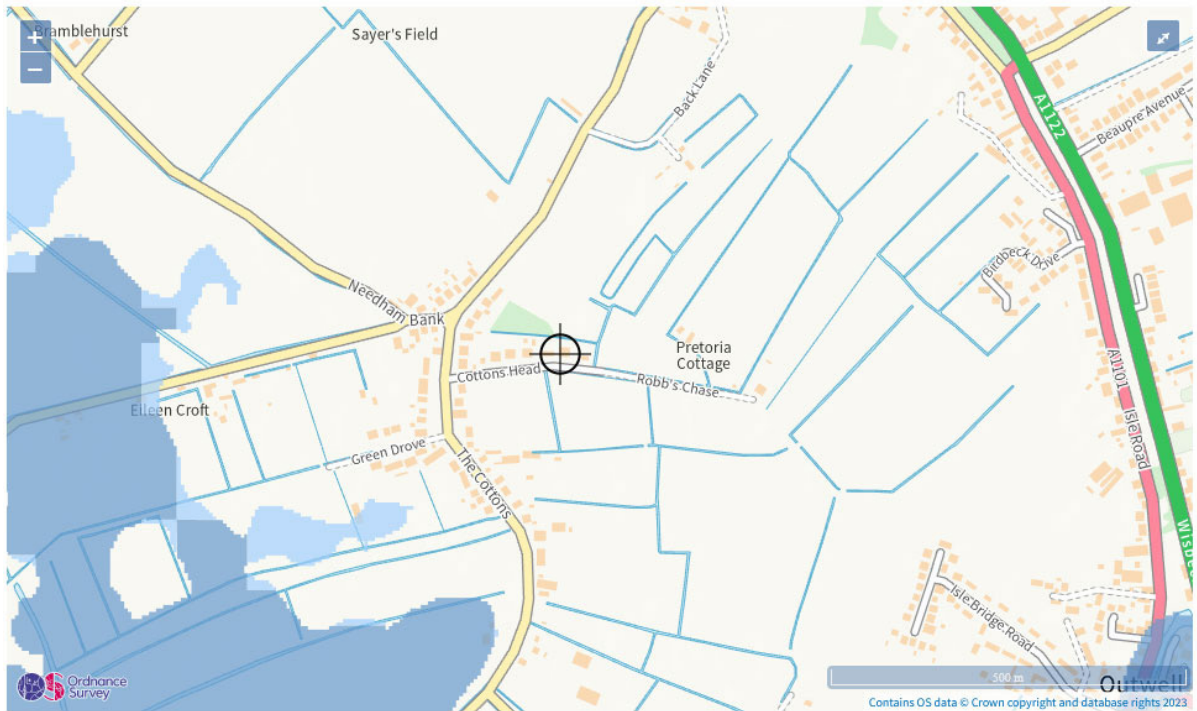
This places the site in a significantly more suitable location (with respect to flood risk), than either of the Public Gypsy / Traveller Sites in the borough. Both Saddlebow Caravan Site and West Walton Court are subject to medium rivers and sea flood risk.

## 4.5 Site Suitability

The Cottons Traveller Site is well located for further development, as a potential site that sits within Outwell, one of the borough's key rural service centres.

The site is subject to minimal flood risk, has existing vehicular access and given the small scale of the proposed site (nine pitches), would arguably not contribute to any further congestion on existing roads linked to the site.

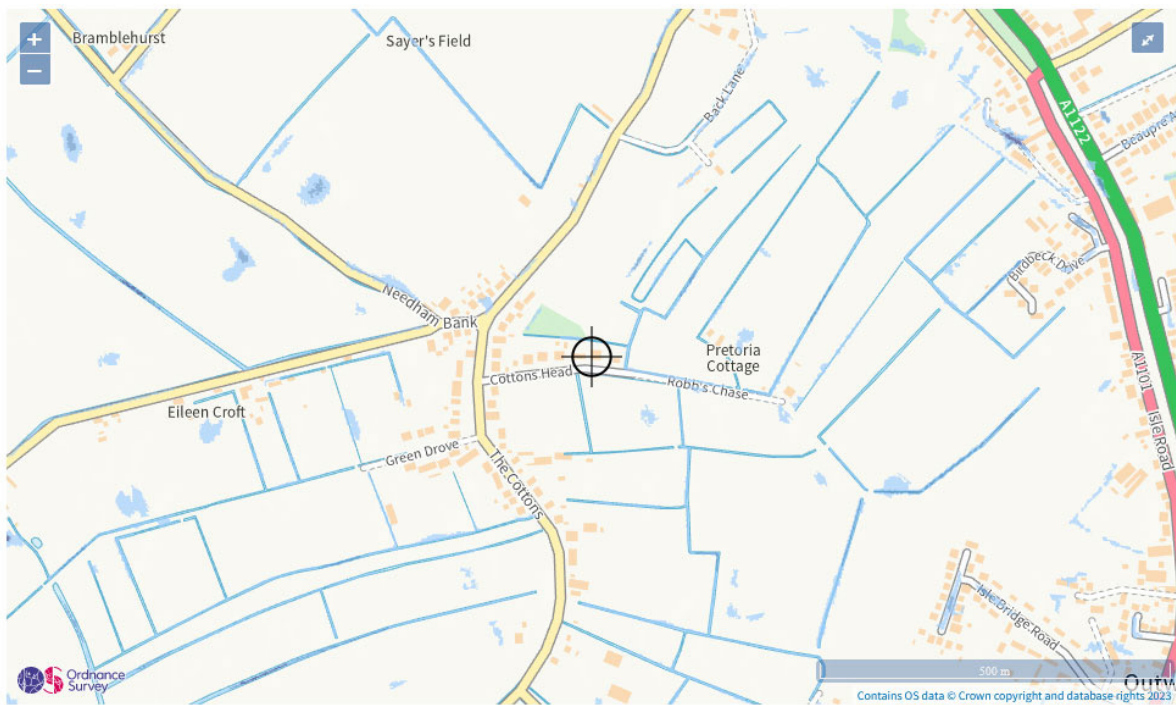
Further, there is a clearly evidenced need for additional, culturally appropriate, Gypsy / Traveller accommodation in the borough. This need for additional accommodation is clearly not being met by the local authority, despite their own policy commitments to do so. In place of the development of alternative accommodation, it is clear that no alternative site will be forthcoming for The Cottons' prospective residents.



Extent of flooding from rivers or the sea

● High 
 ● Medium 
 ● Low 
 ● Very low 
 ⊕ Location you selected

**Fig. G** - Map of The Cottons Traveller Site's Risk of Flooding from Rivers or the Sea (very low)



Extent of flooding from surface water

● High 
 ● Medium 
 ● Low 
 ○ Very low 
 ⊕ Location you selected

**Fig. H** - Map of The Cottons Traveller Site's Risk of Flooding from Surface Water (very low)

# 5. Cost Future Options

To assess the benefit cost ratio of each potential future option, a set of costs and assumptions are required. The projected cost of each element considered for each future option is provided below.

Projected costs are grouped together by type:

1. Establishing a new Public Gypsy / Traveller Site
2. Variations in local and public social spend
3. Variations in local authority income

All costs are supported by primary and secondary sources.

## 5.1 Cost of Establishing New Public Gypsy / Traveller Site(s) In King's Lynn & West Norfolk

Inability to attain privately secured accommodation will render the prospective residents of The Cottons Traveller Site homeless. Residents have no means to relocate from the area and require culturally appropriate accommodation. Residents cannot be rehoused under existing provisions, as existing public & authorised private Gypsy / Traveller Sites in King's Lynn & West Norfolk and the wider county of Norfolk have failed to meet pitch shortfalls identified since 2016.

Further, the failure of any recent Gypsy / Traveller Accommodation Assessments in King's Lynn & West Norfolk to identify the existing Traveller community that seeks to reside at the Cottons, indicates that the evidence base for these reports is severely lacking, as previous enforcement action confirms that King's Lynn & West Norfolk Borough Council is aware of this community, yet has failed in their statutory duty to assess and provide for their accommodation requirements.

Should King's Lynn & West Norfolk Borough Council meet its statutory obligation to provide necessary accommodation for these displaced residents, there is a direct cost associated with the development of

a new public Gypsy / Traveller Site.

Two principle costs are involved when establishing a new Gypsy / Traveller Site:

- Land acquisition
- Construction (including provision of amenities, hardstanding, amenity blocks, etc)

For this costing, it is assumed that the displacement of residents at The Cottons Traveller Site will require nine pitches, either across a single or multiple sites.

### Land Acquisition

Should King's Lynn & West Norfolk Borough Council opt to develop a new Public Gypsy / Traveller Site, an appropriate parcel of land will need to be privately acquired, as a review of brownfield land owned by the borough confirms that there is currently no suitable site for development. To accommodate the currently homeless, prospective population at The Cottons Traveller Site, a minimum nine pitch site is required, which will necessitate a minimum land area of 1.4 hectares.

### Private Land Acquisition

2019 VOA Land Value Estimates project land acquisition in King's Lynn & West Norfolk per hectare as approx. £1.15 million for residential land, £450,000 for brownfield and £21,000 for agricultural land.<sup>23</sup>

Accounting for King's Lynn & West Norfolk's current application of planning policies on greenfield sites, it is unlikely that a suitable greenfield site can be located for a new Public Gypsy / Traveller Site. As a result, it is assumed that they would have to opt for brownfield or residential land. Assuming appropriate brownfield land can be secured, it is estimated that a single, 1.4ha site would cost approx. £630,000.

### Site Construction

The cost of providing the necessary infrastructure for a new public Gypsy / Traveller Site is not insignificant. For these public sites, the financial burden of construction would sit with King's Lynn &



West Norfolk Borough Council.

Although the number of new public Gypsy / Traveller sites and cost profiles related to their construction are limited, cost estimates are available.

The estimated cost to establish the public Gypsy / Traveller Site at Burn Airfield, a 12 pitch site, in North Yorkshire, a locality with similar land value profiles to Norfolk, was estimated at between £850,000 and £940,000.<sup>30</sup> Prior to the development of the Burn Airfield Gypsy Traveller Site, the land at Burn Airfield was publicly-owned, so land acquisition was not a cost involved at this site. The construction cost was provided in 2012, so for this case inflation has been applied. This results in an adjusted estimated cost of £940,000 for the construction of a nine pitch site. This aligns with lower figure estimates of the cost of construction of a single pitch, which range from £100,000 to £250,000 depending on the Local Authority.

## 5.2 Social Costs

A significant proportion of the social costs stemming from each outcome cannot be quantified. These are often more impactful on individuals and communities than measured social costs.

Nonetheless, certain elements of this cost can be measured.

Displaced and homeless populations require significantly more locally and nationally funded support than settled populations, linked to a single area. This is well documented in studies on varying forms of homelessness. The immediate, measurable costs are an increase in out of work benefits, increased health costs, a loss of local authority education funding for children who frequently move across an area and the cost of temporary accommodation.

In this report, these costs have been measured as increases in spending compared to an average sample (Gypsy / Traveller community) and loss of funding.

**Benefits.** Added working-age benefit spend is measured as an additional £77 per person, per

week. The proportion of individuals assessed as in receipt of benefits is dependent on each scenario.

**Education.** Due to the nomadic character of the prospective community at The Cottons Traveller Site, and the additional hostility that each of these communities will continue to face if they remain homeless, it is assumed that all primary age children will be forced to change schools frequently, or will be unable to attend. All are classed as vulnerable children, who either already qualify for, or will qualify for pupil premium funding. These children's removal from schools will result in a direct loss of funding to the Local Education Authority of £1,385 per annum per primary school aged child.

**Health.** Even short periods of homelessness are well documented to be linked to moderate to serious health conditions. This is linked to isolation, the difficulty of accessing GP surgeries, particularly in the event that homeless communities are habitually forced to move on, and poor access to basic sanitary rights. This is modelled as an added cost, in the form of more of the studied community requiring the highest cost per patient for medical interventions caused by homelessness. The average NHS patient costs the NHS approximately £2,400 per annum. The most expensive patient categories cost the NHS approximately £9,780. This is an increase of £7,380 per annum, per person. This is applied to a specific proportion of the site's populations per annum, subject to the individual scenario.

**Temporary Accommodation.** Although it is projected that in the event of continued homelessness, the majority of prospective residents at The Cottons Traveller Site will be forced to continue to resort to establishing short-term unauthorised encampments across the King's Lynn & West Norfolk, it is also projected that many mothers with children will require temporary accommodation support from King's Lynn & West Norfolk Borough Council.

Short-term lets at bedsits and hotels typically cost significantly more than long term rented accommodation. Although likely an underestimate, for those who do qualify for temporary accommodation, the cost is modelled at the rate of the annual benefit cap for those living outside of London, minus other

# 5. Cost Future Options

assumed working age benefits. For those with children, this equates to approximately £16,000 per annum. While some of this funding would be provided in the form of Housing Benefit, a significant proportion of this will also come out of Discretionary Housing Payments which are funded by the Local Authority.

## 5.2 Variations In Local Spend & Income

### Loss of Income

Mechanisms are not in place to levy land-based tax on displaced populations. The lack of a permanent physical location prevents Local Authorities from receiving tax contributions from transient populations. Although more challenging to project, the absence of a fixed physical location for habitation severely reduces an individual's employment opportunities. This acts as one of the most significant barriers to becoming a net contributor to the UK economy. Although not measured in this study, failing to provide appropriate accommodation for the prospective residents of The Cottons Traveller Site will render the entire working population unemployed.

It is assumed that specific scenarios will result in a total loss of Council Tax income from these populations. This loss of income is measured at a Band B rate at approximately £1,615 per pitch, per annum.

### Policing Costs

An independent study into the additional policing costs associated with temporary Gypsy / Traveller sites in Essex concluded that policing cost per person at these sites was approximately £930 per annum, in comparison to the national average spend of just under £200 per person per annum. The average spend on policing per person in Norfolk was approximately £199.22 in 2021/22. The difference in spend for individuals on an unauthorised Gypsy / Traveller Site and the average population is estimated at approximately £733 per annum.

This increased spend is directly linked to increased local patrols, reported crimes and often unnecessary police presence at unauthorised Gypsy / Traveller Sites. Often, these were found to be initiated by

coordinated community efforts. These costs are incurred at a much higher frequency at short-term unauthorised encampments on land not owned by the occupiers.

### Eviction & Unauthorised Encampment Clearance

Failure to provide suitable accommodation for the prospective residents of The Cottons Traveller Site will result in 37 people remaining homeless. Lacking the means to relocate from the area or acquire additional land, it is assumed that residents will be forced to establish unauthorised pitches on land that they do not own.

Any unlawful encampments initiated by the failure of the authority to provide suitable accommodation will result in a direct cost, payable by the authority. When smaller scale encampments occur, they are typically cleared quickly and civil proceedings are raised against the occupants.

Based on figures from Dorset and South Norfolk District Council, it is estimated that a small unauthorised site can be cleared at a total cost of £4,000 (bailiff, legal and clearance fees). The time frame for eviction is modelled at taking 12 months. After an eviction, if no alternative accommodation is provided, individuals set up another unauthorised encampment on land not owned by themselves. This results in another eviction.

### Planning Costs

The Local Government Association estimates that the cost of approving a planning application is approximately 60% more than the figure charged to the applicant. This is a cost assumed by King's Lynn & West Norfolk Borough Council. The cost of submitting a planning application for the site is estimated at £4,500 for a nine pitch site. This results in an estimated cost to the authority of approximately £6,700.

### 5.4 Unaddressed Costs

Long term impact of homelessness. Many impacts of homelessness cannot be quantified in this study. These include long-term mental health issues, increased probability of offending, poor educational outcomes, long-term unemployment and a

dramatically increased likelihood of both adults and children experiencing repeat homelessness. While these impacts cannot be quantified, the results are arguably more severe and long-term than those reviewed in this report.

### **5.5 Time Period Reviewed**

To more effectively review the consequences of each scenario, projections are provided over a ten year period.

It is estimated that the delivery and eventual opening of any form of Public Gypsy / Traveller Site will take a minimum of five years on privately acquired land, as per King's Lynn & West Norfolk Borough Council's planning timescales.

# 6. Future Options

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This section provides an overview of future options available when addressing the homelessness of prospective residents of The Cottons Traveller Site. Each is supported by **Table 1** (expanded in **Table 2**).

## **Option 1 - Award Residential Planning Permission at The Cottons Traveller Site**

If permanent planning permission is awarded at The Cottons Traveller Site, the 37 people who have experienced homelessness for over a decade will finally achieve long-term, appropriate accommodation.

By granting permanent planning permission to The Cottons Traveller Site, it is projected that King's Lynn & West Norfolk Council will increase land based tax revenues through formal collection of Council Tax at a projected rate of 50% of the pitches at the site, delivering an estimated £80,000 over a ten year period

While a small cost is involved in this option, specifically relating to the necessary administrative costs associated with the planning applications of approximately £6,700, this is minor compared to the financial and social consequences of alternative options.

The projected unadjusted ten year benefit of this option is approx. £83,000. However, the adjusted benefit is projected at approx. £4 million. The significant difference between the adjusted and unadjusted benefits are explained by the substantial continued cost incurred by King's Lynn & West Norfolk Borough Council, caused by the long-term homelessness of the site's prospective residents.

This delivers an unadjusted cost benefit ratio of 0.05, and an adjusted cost benefit ratio of 599. An adjusted cost benefit ratio of over 5 is unprecedented and considered to be extremely good value for money.

## **Option 2 - Develop New Public Gypsy / Traveller Site on Privately-Owned Land**

To finally address the homeless status of 37 individuals, King's Lynn & West Norfolk Borough Council has the option of delivering alternative, publicly funded, culturally appropriate accommodation in the form of a single, 1.4ha Public Gypsy / Traveller Sites. This would need to be developed on privately-owned land, as currently, there is not a suitable publicly-owned brownfield site.

It is assumed that the minimum timescale for delivering this option would be five years. During the five year lead in time, the authority has the option to either grant temporary planning permission to the existing site, or to provide temporary accommodation for the period. However, if King's Lynn & West Norfolk Borough Council proceeds with this option, it is assumed that they would not award temporary planning permission to The Cottons Traveller Site. As a result, this option has been modelled to incur significant spend on temporary accommodation, with 75% of adult residents opting for this at the projected cost of £1.15 million. It is projected that a small proportion of residents (25%) will be unable to access temporary accommodation. Without an alternative site, they will be forced to form a series of small, unauthorised encampments across West Norfolk at an estimated cost of £180,000 over five years to the authority.

The continued displacement of the prospective residents for a minimum of five years is estimated to add £465,000 to health expenditure, £300,000 to working age benefit expenditure, a loss of funding of £120,000 to the local education services, while adding an additional £110,000 to police expenditure over a ten year period.

The estimated cost of land acquisition is approx. £630,000, with site construction estimated at

Costs	Option 1 <i>Residential Planning Permission Awarded</i>	Option 2 <i>Develop New Public Gypsy / Traveller Site (Privately-Owned Land)</i>	Option 3 <i>Provide No Appropriate Accommodation (Status Quo)</i>
New Public Traveller Site(s)	£0	£1,570,000	£0
Land Devaluation (Loss)	£0	£600,000	£0
Administration Costs	£6,700	£6,700	£0
Unauthorised Encampment Clearance (10 yr)	£0	£180,000	£360,000
CIL & New Homes Bonus	£3,200	£3,200	£0
Council Tax Revenue (10 yr)	£80,000	£10,000	£0
Education Costs (additional 10 yr)	£0	£120,000	£240,000
Health Cost (additional 10 yr)	£0	£465,035	£650,000
Policing Cost (additional 10 yr)	£0	£108,599	£140,000
Benefit Cost (additional 10 yr)	£0	£300,000	£400,000
Relative Spend (adjusted)	£10,000	£2,910,000	£0
Relative Benefit (adjusted)	£4,000,000	£1,770,000	£0
Benefit Cost Ratio (adjusted)	600	0.61	1.00
Value for Money Category	Very Good	Poor	Moderate

**Table 1 - Overview of Future Options at The Cottons Traveller Site**

£940,000.

Given King's Lynn & West Norfolk's planning policies, it is assumed that no greenfield site will be deemed suitable for the development of a public Gypsy / Traveller Site. Instead, the development will require the change of use of a brownfield site. Establishing a public Gypsy / Traveller Site on a brownfield site will effectively render the value of the land to that of agricultural land, which is estimated to result in a loss of land value of approx. £600,000.

The total estimated adjusted spend of this option is approx. £2.9 million, with an estimated benefit of

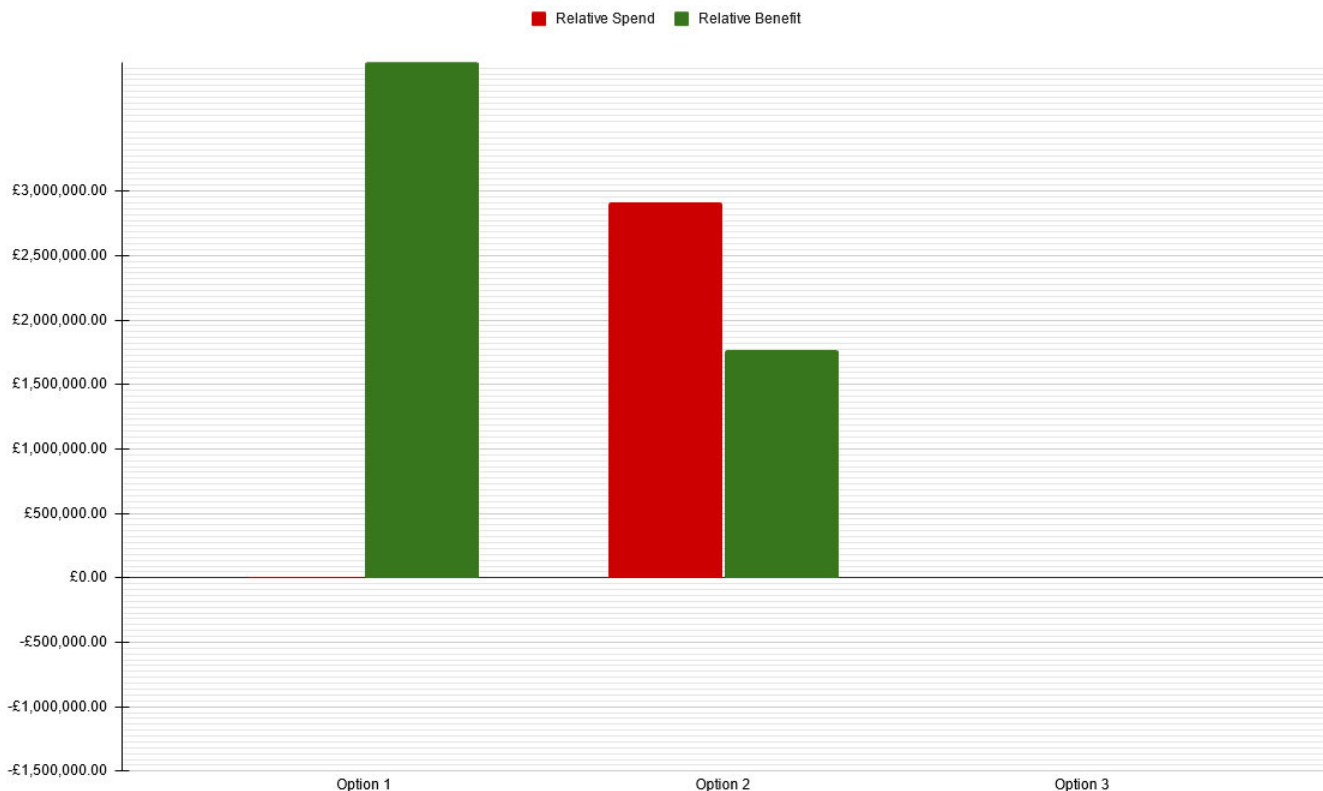
£1.77 million. This delivers an adjusted cost benefit ratio of 0.61. The value of money rating for this option is poor.

### **Option 3 - Provide No Alternative Accommodation**

This option involves the refusing planning permission at The Cottons Traveller Site, while King's Lynn & West Norfolk Borough Council provide no alternative accommodation for the 37 homeless, prospective residents.

This option would leave the 37 individuals, of which almost 50% are children, homeless. With no

# 6. Future Options



*Fig. 1 - Graph of relative benefit of each option against spend.*

option for alternative accommodation, a history of residency in the county and no means of securing an alternative permanent site, this option assumes that all residents would stay within the locality (West Norfolk and the surrounding county), forming a series of unauthorised encampments on land that they do not own.

This option has no associated monetary benefit.

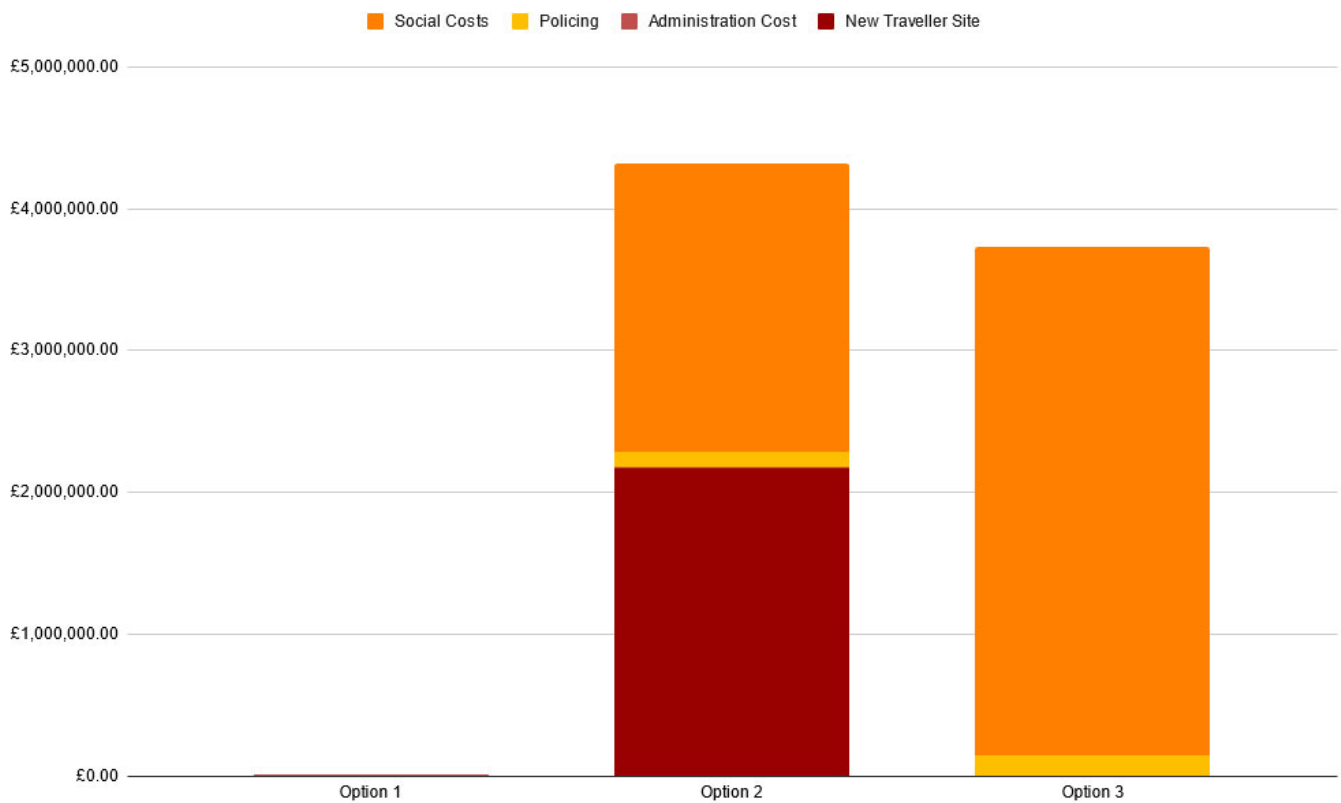
Forcing 37 people to remain homeless for a projected ten year period would result in significant additional spend on policing (estimated £140,000), working age benefits (£400,000, not including housing benefit) and health spend, due to exasperation of serious existing long-term conditions an evidenced proportion of the population already suffer from, and developed by currently healthy residents due to a sustained period of homelessness (£650,000).

Over a ten year period, it is estimated that the total

cost of proceeding with this option would be £5.7 million. Unlike Options 1 & 2, the rate that this cost increases after the ten year period reviewed is set to accelerate, not decrease.

As there is no measurable monetary benefit when proceeding with this option, it delivers a cost benefit ratio of 0, falling in the very poor value for money category. However, as this option reflects the circumstances faced by current prospective residents, it is considered the status quo option. As the status quo option, its value for money category is artificially increased to '1', which is an 'adequate' VfM category. This is misleading, because in no way are the outcomes of the continuation of this situation adequate.

Overall, this is the most expensive option for King's Lynn & West Norfolk Borough Council to pursue.



*Fig. J - Breakdown of Relative Costs by Type for the three future options*

## Conclusion

Out of the options considered, Option 1 delivers the only positive value for money outcome for King's Lynn & West Norfolk Borough Council. Further, it is the preferred option for the prospective community at The Cottons Traveller Site.

Option 3, presents the worst value for money option for the local authority. It would also deliver the most severe consequences to 37 long-term, borough residents who the authority has a duty of care to house, while requiring high levels of public expenditure that will benefit no section of the wider community.

Although Options 2 is feasible, the expenditure and timescales required to open new public Gypsy / Traveller Sites is prohibitive.

Further, it is highly unlikely that King's Lynn & West

Norfolk Borough Council will be able to deliver new sites within the required timescales.

# 6. Future Options

Costs	Option 1 <i>Residential Planning Permission Awarded</i>	Option 2 <i>Develop New Public Gypsy / Traveller Site (Privately-Owned Land)</i>	Option 3 <i>Provide No Appropriate Accommodation (Status Quo)</i>
Land Acquisition Costs (Total)	£0.00	£630,000.00	£0.00
Loss In Land Value (Total)	£0.00	£600,000.00	£0.00
New Public Traveller Site – Construction Costs	£0.00	£940,000.00	£0.00
Administration Costs (planning)	£6,700.00	£6,700.00	£0.00
Temporary Accommodation	£0.00	£1,150,000.00	£2,300,000.00
Unauthorised Encampment Clearance Costs (Total)	£0.00	£180,000.00	£360,000.00
Community Infrastructure Levy (Total)	£0.00	£0.00	£0.00
New Homes Bonus Payment (First Year)	£3,200.00	£3,200.00	£0.00
Council Tax Revenue (+/gain -/ loss) (1 year)	£8,100.00	£900.00	£0.00
Council Tax Revenue (+/gain -/ loss) (10 year)	£80,000.00	£10,000.00	£0.00
Opposed Eviction Costs (Total)	£0.00	£0.00	£0.00
Education Funding Loss (Total)	£0.00	£120,000.00	£240,000.00
Health Costs pa (Total)	£120,000.00	£160,000.00	£180,000.00
Health Costs 10 year (Total)	£1,160,000.00	£1,630,000.00	£1,810,000.00
Policing Cost pa (Total)	£10,000.00	£20,000.00	£20,000.00
Policing Cost 10 year (Total)	£70,000.00	£180,000.00	£210,000.00
Benefit Costs pa (Total)	£40,000.00	£70,000.00	£80,000.00
Benefit Costs 10 year (Total)	£400,000.00	£700,000.00	£800,000.00
Total Costs / Loss of Revenue (unadjusted) (not including land devaluation)	£1,560,000.00	£5,520,000.00	£5,720,000.00
Total Costs / Loss of Revenue (unadjusted) (including land devaluation)	£1,560,000.00	£6,120,000.00	£5,720,000.00
Adjusted Relative Cost (Option 3 is Status Quo)	-£4,160,000.00	-£200,000.00	£0.00
Relative Spend	£10,000.00	£2,910,000.00	£0.00
Relative Benefit	£4,000,000.00	£1,770,000.00	£0.00
Benefit Cost Ratio (Unadjusted)	0.05	0.0021	0.00
Benefit Cost Ration (Adjusted)	<b>599.79</b>	<b>0.61</b>	<b>1.00</b>
VfM Category	<b>Very Good</b>	<b>Poor</b>	<b>Moderate</b>

Table 2- Cost Benefit Analysis of Future Options Available for The Cottons Traveller Site







**Future Options for  
Common Road,  
Walton Highway  
Traveller Site**

**Value for Money Report**

**January 2024**

**Future Options for  
Common Road,  
Walton Highway  
Traveller Site**

**Value for Money Report**

January 2024

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# 1. Introduction



Fig. A - Location of Common Road Traveller Site in the King's Lynn & West Norfolk Area

## 1.1 About the Author

The report was developed by Henry Hardwicke Carruthers.

Henry read History at the University of Cambridge. He spent seven years working in central government, at departments including the Department for Work & Pensions, the Wales Office, the Department for Business, Innovation & Skills and the Department for Business, Energy & Industrial Strategy.

During his career in government, he led on analysis and policy development, contributing to 2017 and 2018 Budget briefs, scrutinising the cost of projects at the Land Registry, Ordnance Survey and the Green Investment Bank.

He was responsible for independent reports on the Retail Sector and Arbitration, in addition to leading teams responsible for developing regulations for the Single Electricity Market and No Deal Brexit.

Since leaving Government, Henry has provided specialist consulting services on a range of complex, extraordinary residential projects. These have included a complete analysis of Basildon Borough Council's 2020 Town Centre DPD, assessments of the former Dale Farm site and numerous value for money assessments on publicly owned London Gypsy / Traveller Sites.

## 1.2 Purpose

The objective of this report is to provide a robust assessment on future options available to **King's Lynn & West Norfolk District Council** for the **private Gypsy / Traveller Site at Common Road in West Walton, West Norfolk**.

The document has been produced as evidence to support present planning applications & appeals.

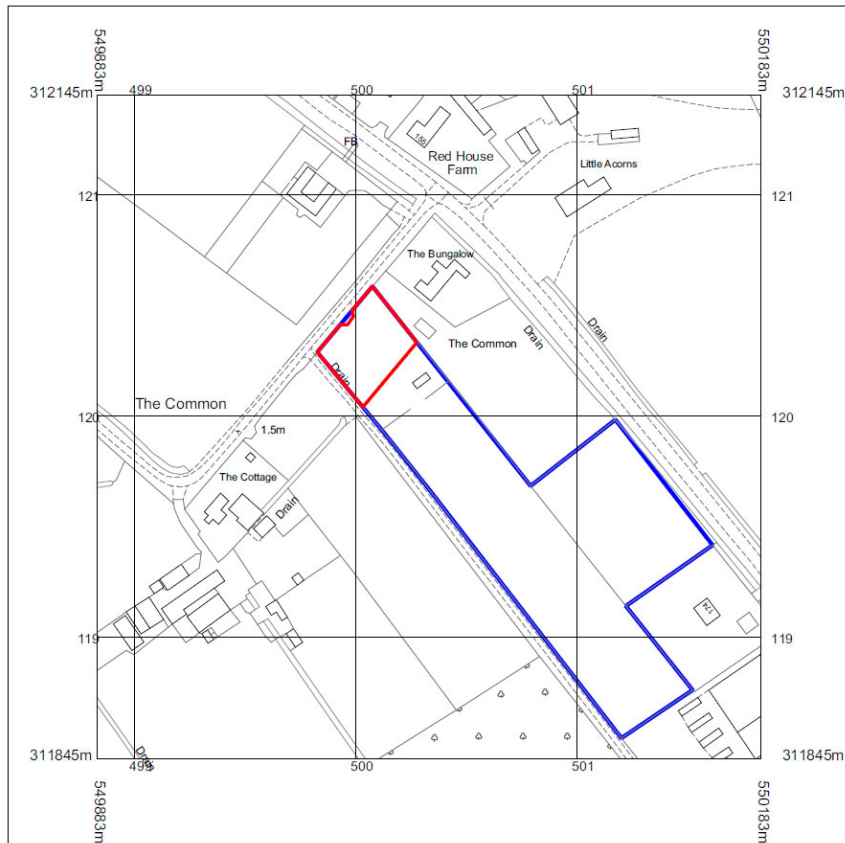
Findings have been informed by bespoke analysis of the situation of the residents at Common Road Traveller Site.

## 1.3 Methodology

The methodology follows standard HM Treasury Green Book<sup>1</sup> valuation and the Department for Levelling Up, Housing and Communities' (DLUHC) Benefit Cost Ratio guidance.<sup>2</sup>

It uses data from local sites, supplemented by assumptions reflecting local circumstances and planning policy requirements. All calculations and assumptions are provided.

The report assesses the projected public cost (local and national) involved in three specific scenarios. The costs reviewed include scenario specific, projected benefit, health, policing, civil and



**Fig. B** - Location of Common Road Traveller Site in the West Walton, West Norfolk<sup>3</sup>

extraordinary expenditure incurred by both local and national Government.

All projections are aligned with research on public data-sources, including insights from independent research projects developed by the author.

All methods comply with the guidance set out by DLUHC for assessing the impact of residential, commercial and transport infrastructure investments, and comply with the approach adopted by HM Treasury in Green Book Guidance, which sets out how the UK Government should measure the cost impacts of public projects.

The report provides an assessment of the projected economic and social impact of three future options for Common Road Traveller Site:

1. Approving residential planning consent at the site;
2. Development of a new, alternative Public Gypsy / Traveller Site on privately-owned land following rejection of residential planning consent at the site;
3. Refusal of planning consent and eviction of the site without the provision of any alternative site for the residents.

An assessment of the development of a Traveller Site on publicly owned land was reviewed, however, a review of public land available in the borough highlighted that there is currently no suitable land available.

## 1.4 Background

Common Road Traveller Site is a single pitch Gypsy / Traveller Site on the outskirts of West Walton. It sits within the West Walton ward of King's Lynn & West Norfolk.

Situated on the southern perimeter of Common Road, the site is approximately 0.13 hectares. The site has direct access to Common Road via a northern access road.

Although situated within the open countryside, the site is surrounded by residential developments to the east, west and north.

Despite King's Lynn & West Norfolk Borough Council's assessment to the contrary, the site offers better access to amenities than a number of site's reviewed as suitable for residential development in the council's current review of the Local Plan 2016-36 (see **Section 4**).

The site sits approx. 17 minutes walk, or a three minute cycle from the rural service centre Walton Highway, and approximately 25 minutes travel via public transport away from the major urban centre of Wisbech in the neighbouring county of Cambridgeshire.

At present, two adults occupy the site, which is

# 1. Introduction



Fig. C - Block Plan submitted with the initial application for planning permission at Common Road Traveller Site

currently subject to the stationing of caravans and has been used as a residential site since 2021. Planning permission was sought for a single residential pitch at the site in March 2021. This application was refused on 9 August 2022.<sup>4</sup>

The consequences of refusal of planning permission are significant. If planning permission is refused, it will render the residents homeless. If these residents are made homeless, it will be the Local Authority's responsibility to rehouse them in culturally appropriate accommodation.

## 1.5 Planning History

The site at Common Road, Walton Highway is subject to a limited planning history.

- **12 March 2021** (Planning Ref: 21/00492/F) - A planning application seeking permission for a single residential Gypsy / Traveller pitch at the site was received by King's Lynn & West Norfolk Borough Council.<sup>5</sup>
- **9 August 2021** - King's Lynn & West Norfolk Borough Council refused planning permission on application 21/00492/F. Refusal of planning permission was given on four grounds:
  1. Gypsy / Traveller Status was not proven. The evidence that supported the planning application did

not satisfactorily prove that the applicant should be considered under the 2016 Gypsy / Traveller Planning definition.

2. Lack of Pedestrian Street Lighting & Access. The location is not currently served with street lights and does not have pedestrian access.
3. Insufficient Access to Amenities. The location is not suitable for a new Gypsy / Traveller Site because it is not within sufficient proximity of the nearest town, West Walton.
4. Lack of Remediation of Flood Zone Risk. The site sits within Flood Zone 3, and is subject to medium risk of flooding from the Sea & Rivers.<sup>6</sup>



# 2. Executive Summary

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## 2.1 Executive Summary

Refusal of planning permission at Common Road Traveller Site will render two people homeless. The site's current residents have occupied the land since 2021, and are long term residents of the borough, King's Lynn & West Norfolk. They are known Gypsy / Travellers. If they are removed from the land, they will be rendered homeless. This is because they have no alternative options for accommodation, and as evidenced in King's Lynn & West Norfolk's GTAA 2023, there is currently a significant shortfall of alternative Gypsy / Traveller Sites in the borough.

Should the residents be rendered homeless, they will have no alternative but to establish unauthorised encampments on land they do not own, or to be supplied with temporary accommodation at the long-term expense of the local authority.

King's Lynn & West Norfolk District Council do not have any current provisions or medium-term plans to accommodate homeless Gypsies / Travellers in the catchment. This is despite an acknowledged minimum need of 76 additional pitches in the West Norfolk area for the period 2023-28.<sup>7</sup>

Refusal of planning permission at Common Road Traveller Site will directly contribute to an increase in unauthorised encampments on land not owned by the occupiers in the West Norfolk area.

Having supplied just 13 additional pitches since 2016, despite a previously identified shortfall of at least 35 Gypsy / Traveller pitches identified in the GTAA 2016, it is highly unlikely that the borough council's own efforts will address this challenge.<sup>8</sup>

To accommodate the two displaced residents, provision for a single new public Gypsy / Traveller

pitch is required. For this to be delivered on a single site, it is estimated that this would cost a minimum of approx. £250,000.

King's Lynn & West Norfolk's previous record of ad hoc planning decisions that have awarded a number of Gypsy / Traveller Sites temporary planning permission for two to three year periods have impacted the validity and effectiveness of all previous GTAA recommendations for increases to pitch provision in the local area. This is because temporary consents have been treated as permanent consents by ORS when completing GTAAs.

It is estimated that the continued, long-term homelessness experienced by the prospective residents of Common Road Traveller Site will cost both local and central Government between approx. £60,000 and £80,000 in additional expenditure over the next ten years. This option offers no benefit to the residents of Common Road Traveller Site, or the wider community, and instead presents what is arguably a misuse of public funds.

It is projected that it will cost significantly less in the long-term (10+ years) if King's Lynn & West Norfolk Borough Council developed a new single pitch Public Gypsy / Traveller Site, in place of allowing the current prospective residents to remain homeless.

However, given the planning context and land availability in West Norfolk, the most cost effective and arguably achievable option would be to award permanent planning permission to Common Road Traveller Site. This is the only option that, following analysis, does not fall into a negative value for money category, meaning it is the lowest cost, and arguably the most humane option available to King's Lynn & West Norfolk District Council.

# 3. Traveller Sites Overview



*Fig. D - Location of Saddlebow Caravan Site (Public Gypsy Traveller Site)*

## 3.1 Overview

At the time of writing, there are an estimated 74 known Gypsy / Traveller Sites in the borough of King's Lynn & West Norfolk. Two of these sites are public, Saddlebow Caravan Site and West Walton Court (**Figs. D & E**). These public sites provide an estimated 44 pitches in the borough. Of the remaining 72 Gypsy / Traveller Sites, 54 have permanent planning permission, four are unauthorised but tolerated and a remaining 12 are unauthorised and not tolerated.

The most recent assessment of Gypsy / Traveller Sites in the borough is the 2023 King's Lynn & West Norfolk Gypsy and Traveller Accommodation Assessment, published in June 2023. This found an immediate five year need (2023-28) of 76 additional Gypsy / Traveller pitches.

## 3.2 Additional Gypsy / Traveller Pitch Supply

The 2019/20 King's Lynn & West Norfolk Authority Monitoring Report confirmed that between financial years 2015/16 and 2019/20, only 13 additional Gypsy / Traveller pitches were delivered in the borough.<sup>9</sup> This is despite an identified need of at least an additional 35 Gypsy / Traveller pitches over the period 2016 to 2036 projected in the GTAA 2016.<sup>10</sup>

Further, King's Lynn & West Norfolk Borough Council's most recent Housing Land Trajectory and Five Year Housing Land Supply (2020/21) included no reference of how the required additional provision of Gypsy / Traveller pitches required by the borough will be achieved.<sup>11</sup>

As a result, the current local context and assessment of the site must take into account that there is currently no existing, or forthcoming culturally appropriate accommodation for Gypsy / Travellers available. Hence, development of a private site is the only option available to the residents currently living at Common Road, Walton Highway Traveller Site.



*Fig. E - Location of West Walton Court, Blunts Drove (Public Gypsy Traveller Site)*

### **3.3 GTAA 2023**

The most recent Gypsy and Traveller Accommodation Assessment (GTAA) for the borough of King's Lynn & West Norfolk was published in June 2023. This report updated the previous GTAA, the joint Cambridgeshire, King's Lynn & West Norfolk, Peterborough and West Suffolk GTAA, published in October 2016.

The GTAA 2023 identified that at the time of research, King's Lynn & West Norfolk had a total of 58 Gypsy / Traveller Sites with permanent planning permission (two public sites), providing approximately 172 pitches. In addition, there were four unauthorised Gypsy / Traveller that were tolerated and 12 unauthorised sites.<sup>12</sup>

When assessing future Gypsy / Traveller accommodation requirements for the borough, the report found that at the time of the report's development, there was no supply of pitches at existing sites. Further, for the period 2023-27 an additional 76 Gypsy / Traveller pitches were required in the borough. For the period 2023-39, it was assessed that a total of 102 additional Gypsy / Traveller pitches will be required in the borough.<sup>13</sup>

The GTAA 2023 provides clear evidence that there is a demonstrable, immediate need for additional Gypsy / Traveller pitches in King's Lynn & West Norfolk. Further, it shows that at present, there is not currently an adequate supply of Gypsy / Traveller pitches.

Despite this evidence, and King's Lynn & West Norfolk Borough Council's current ongoing review of the Local Plan 2016-2036, no new potential Gypsy / Traveller sites identified in the 2019 or 2020 Housing and Economic Land Availability Assessments.

# 4. Access To Services

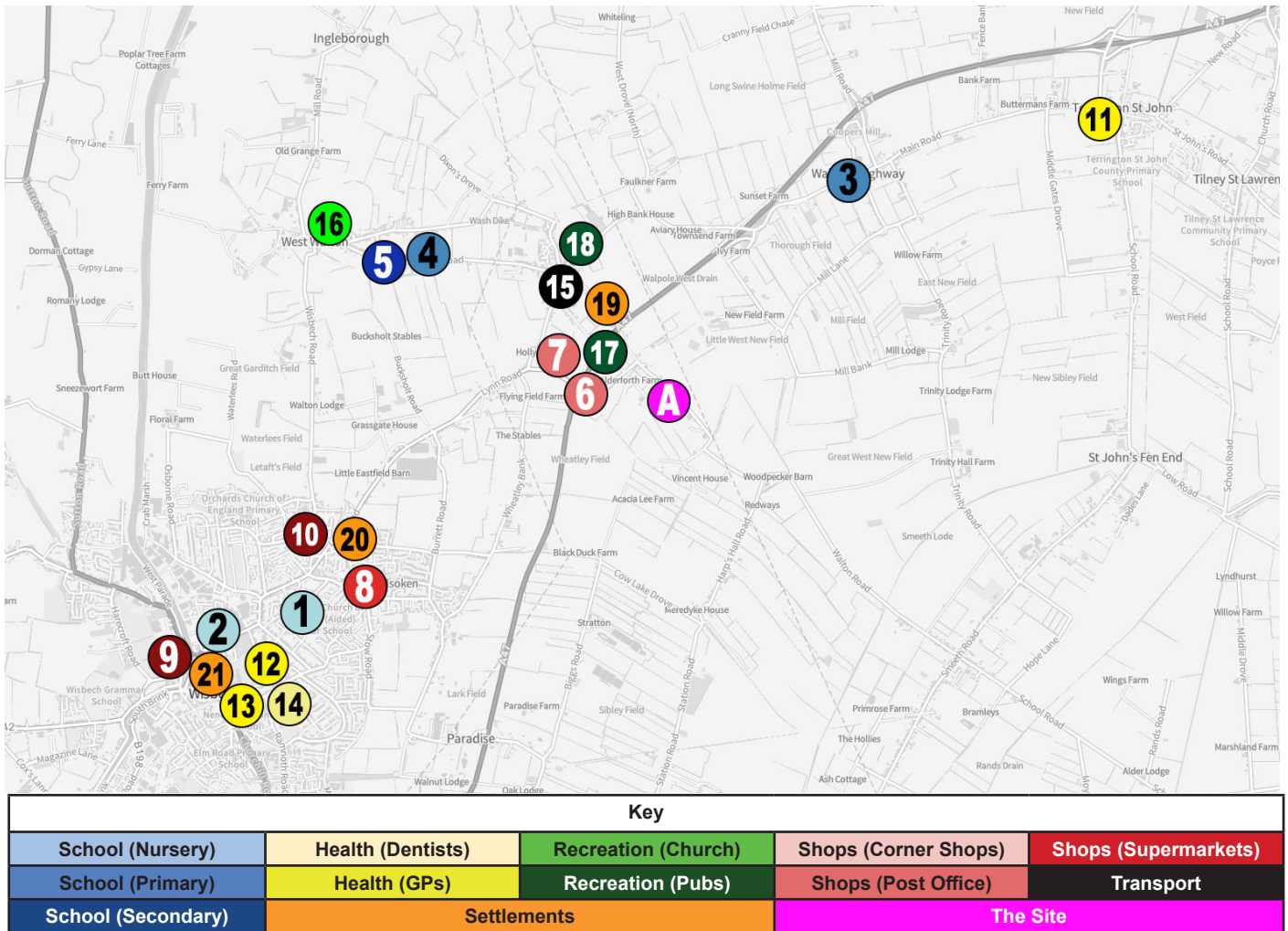


Fig. F - Partial Map of Services & Amenities from point A (Common Road Traveller Site), supported by Table 1 overleaf

## 4.1 Overview

The initial planning application seeking to establish a single pitch at Common Road Traveller Site was rejected, in part, following King's Lynn & West Norfolk Borough Council's assessment that the site did not provide adequate access to services.

This is challenging to prove, because at no point in any of the relevant planning policy documents for King's Lynn & West Norfolk, is an explicit definition of what is deemed as a suitable distance from services for a residential development.

Instead, the relevant policies in the 2011 Core Strategy feature generic statements that cannot be objectively measured. CS08 - Sustainable Development states that new developments should have, "good access links for walking and cycling,"<sup>14</sup> while CS06 - Development in Rural Areas states that, "The strategy for [development in] rural areas

is to... ensure employment, housing (including affordable housing), services and other facilities are provided in close proximity."<sup>15</sup>

## 4.2 Partial Map of Local Services and Amenities

Given the lack of explicit definitions to assess whether a proposed development site has suitable access to amenities, a partial amenity assessment has been conducted for Common Road Traveller Site. As per the limited definitions provided by King's Lynn & West Norfolk Borough Council, this assesses the actual distance and travel time (not as the crow flies), from the site to a range of basic services, assessing whether there are walking, cycling and public transport options.

This study assesses proximity to the nearest local centre, major town (as defined in the 2011 Core Strategy), local shop (specifically a corner shop),

Ref	Location	Distance (crow flies km)	Distance (miles / km)	Walk (mins)	Cycle (mins)	Drive (mins)	Public Transport (mins)
A	Common Road Traveller Site, PE14 7ER	N/A	N/A	N/A	N/A	N/A	N/A
1	Clarkson Infant & Nursery School, Trafford Rd, Wisbech, PE13 2ES	3.4	2.7 / 4.3	N/A	14	9	N/A
2	Wisbech Day Nursery, 29 Lynn Rd, Wisbech, PE13 3DD	4.2	3.1 / 5.0	N/A	17	8	26 mins (A excel from the Highwayman to Peterborough)
3	Walpole Community County Primary School, School Rd, Walpole Highway, Wisbech, PE14 7QQ	2.3	2.0 / 3.2	N/A	11	5	21 mins (C excel from Highwayman to Kings Lynn)
4	West Walton Primary School, School Rd, West Walton, Wisbech, PE14 7HA	2.3	1.7 / 2.8	35	11	5	N/A
5	Marshland High School, School Rd, West Walton, Wisbech, PE14 7HA	2.4	2.1 / 3.4	N/A	12	5	25 mins (12 mins walk, 13 minutes bus) - School Bus 10 from St Pauls Road / Starbucks Junction to Marshland High School
6	Shell, North, Walton Highway, Wisbech, PE14 7BD	0.7	0.5 / 0.8	12	3	2	N/A
7	Worzals Garden Centre & Farm Shop, Lynn Rd, Wisbech, PE14	0.85	0.7 / 1.1	15	4	2	N/A
8	Old Walsoken Post Office, 25 Kirkgate St, Wisbech, PE13 3QR	2.9	2.5 / 4.0	N/A	14	6	30 mins (A excel from Highwayman to Peterborough)
9	ALDI Wisbech, Sandyland, Wisbech PE13 1NX	4.5	3.5 / 5.6	N/A	18	8	30 mins (A excel from the Highwayman to Peterborough)
10	Morrisons Daily, 17 Walton Rd, Wisbech, PE13 3EN	3	2.6 / 4.2	N/A	13	6	25 mins (A excel from the Highwayman to Peterborough)
11	St John's Surgery, Main Road, Wisbech, PE14 7RR	4.3	4.6 / 7.4	N/A	18	7	22 mins (C excel from the Highwayman to Kings Lynn)
12	Clarkson Surgery, Clarkson Surgery, 9 De Havilland Rd, Wisbech, PE13 3AN	4.1	3.2 / 5.1	N/A	17	8	28 mins (A excel from the Highwayman to Peterborough)
13	North Cambridgeshire Hospital, Churchill Rd, Wisbech, PE13 3AB	4.2	3.3 / 5.3	N/A	18	9	30 mins (A excel from the Highwayman to Peterborough)
14	Wisbech Community Dental Service, Rowan Lodge, North Cambs Hospital, The Park, Wisbech, PE13 3AB	4.2	3.3 / 5.3	N/A	18	9	30 mins (A excel from the Highwayman to Peterborough)
15	Highwayman Bus Stop, Walton Highway	1.2	0.9 / 1.4	17	N/A	4	N/A
16	Saint Mary's Parish Church, West Walton, Wisbech PE14 7ET	3.1	2.8 / 4.5	N/A	16	7	22 mins (46 from Highwayman to Wisbech)
17	Worzals Bar & Grill, Lynn Rd, Walton Highway, Wisbech PE14 7DA	0.85	0.7 / 1.1	15	5	2	N/A
18	The Highwayman, Lynn Rd, Walton Highway, Wisbech, PE14 7DE	1.3	1.4 / 2.3	30	6	4	N/A
19	Walton Highway	0.9	0.9 / 1.4	17	6	3	N/A
20	Walsoken	2.7	2.4 / 3.9	N/A	11	5	23 mins (A excel from Highwayman to Peterborough)
21	Wisbeach	4.5	3.3 / 5.3	N/A	15	8	25 mins (A excel from the Highwayman to Peterborough)
22	King's Lynn	14.7	11.2 / 18	N/A	78	18	44 mins (C excel from the Highwayman to King's Lynn)

**Table 1 - Proximity of Amenities to Common Road Traveller Site**

supermarket, early years school, primary school, secondary school, GP and dentist.

The partial amenity assessment is provided in **Fig. F** and **Table 1**.

This assessment found that all basic services, a rural service centre and a town centre are accessible from the site within a 20 minutes cycle, and more importantly, within 30 minutes walk or in under 30 minutes via public transport. This includes an early years school, a primary school and a secondary school. Further, a dentist is accessible from the site

within 30 minutes.

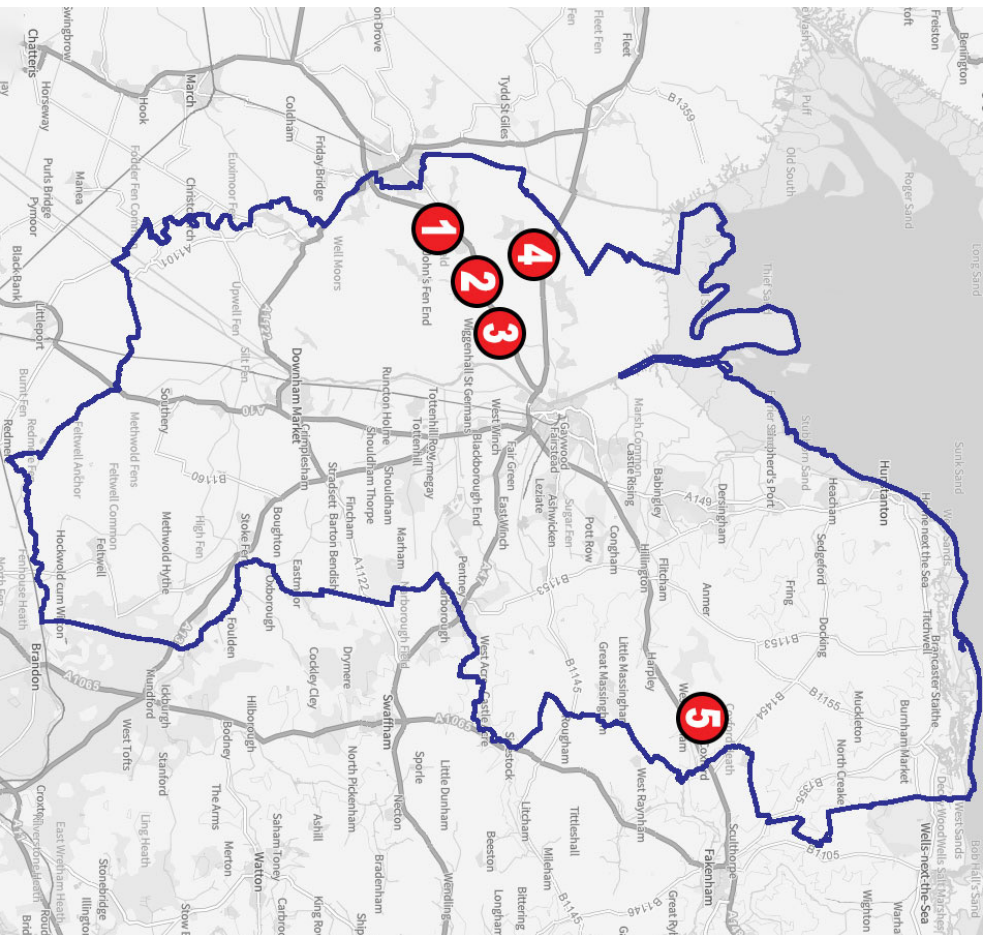
Using the definitions of 20 minutes or less cycle time and 30 minutes or less walking distance or travel time on public transport, which are arguably more exacting than many other, better connected boroughs in England, Common Road Traveller Site offers good access to all basic services.

Further, as noted in section 4.3 below, the site offers better access to most services than a number of sites earmarked as housing allocations for King's Lynn & West Norfolk's Local Plan review.

Address	Common Road Traveller Site (1)				Land East of Hall Road, Walpole Highway (2)				Land east of School Road, Terrington St John (3)				Land South of Walnut Road, Walpole St Peter (4)				Land off Fakenham Road, East Rudham (5)			
Ref	N/A				G106.1				G94.1				G109.1				G31.1			
	Distance (miles)	Walking (mins)	Cycling (mins)	Public Transport	Distance (miles)	Walking (mins)	Cycling (mins)	Public Transport	Distance (miles)	Walking (mins)	Cycling (mins)	Public Transport	Distance (miles)	Walking (mins)	Cycling (mins)	Public Transport	Distance (miles)	Walking (mins)	Cycling (mins)	Public Transport
Rural Service Centre <sup>16</sup>	0.9	17	6	N/A	1.8	39	9	19	0.6	13	4	N/A	4.5	99	25	57	0.3	7	1	N/A
Main Town <sup>17</sup>	West Watton Highway				Terrington St John <sup>22</sup>				Terrington St John				Terrington St Clement				East Rudham			
	3.3	74	15	25	5	111	25	20	6.3	138	32	18	9.6	209	55	44	14.1	305	71	171
GP surgery	Wisbech				Wisbech				Wisbech				King's Lynn				Hunstanton			
	4.3	76	18	22	1.4	31	7	16	0.4	8	2	N/A	3.3	73	17	41	4.2	93	23	N/A
Early years school	St John's Surgery, PE14 7RR				St John's Surgery, PE14 7RR				St John's Surgery, PE14 7RR				St John's Surgery, PE14 7RR				Great Massingham Surgery, PE32 2JQ			
	2.7	61	14	26	4.5	100	30	24	4.2	93	22	76	4.5	99	25	50	3	65	15	N/A
Primary school	Clarkson Infant & Nursery School, PE13 2ES				Clarkson Infant & Nursery School, PE13 2ES				Ladybirds Pre-School, PE34 4HD				Ladybirds Pre-School, PE34 4HD				Blossoms Childcare Nursery West Raynham, NR21 7PA			
	2	42	11	21	0.4	9	2	N/A	0.1	1	1	N/A	0.8	17	4	N/A	0.7	14	4	N/A
Secondary school	Walpole Community County Primary School, PE14 7QQ				Walpole Community County Primary School, PE14 7QQ				Terrington St John Community Primary School, PE14 7SG				Anthony Cutton Primary School, PE14 7NG				Rudham Church of England Primary School, PE31 8RE			
	2.1	34	12	25	3	66	15	29	4.6	101	25	48	4.1	89	22	43	6	131	34	39
Corner Shop	Marshland High School, PE14 7HA				Marshland High School, PE14 7HA				St Clement's High School, PE34 4LZ				Westfield House School, PE34 4EX				Fakenham Academy, NR21 9QT			
	0.5	12	3	N/A	0.2	5	2	N/A	0.3	6	2	N/A	2.1	46	11	N/A	1.6	34	13	N/A
Supermarket	Shell Watton Highway, PE14 7BD				Walpole Stores, PE14 7QA				Bisa Convenience Store, PE14 7RR				Walpole Stores LTD, PE14 7QA				Andy's General Stores, PE31 6TD			
	3.5	55	13	30	5.1	112	34	24	7.4	163	44	37	4.7	102	25	53	6.2	135	32	45
	ALDI Wisbech, PE13 3QR				ALDI Wisbech, PE13 3QR				Lidl Wisbech, PE14 0RG				Central Co-op Food - Terrington St Clement, PE34 4NG				Tesco Superstore Fakenham, NR21 9DX			

**Table 2 - Actual Distance and Travel Time via Walking, Cycling and Public Transport to the closest service for sites 1-5**  
Note that cycle journey times of 20 minutes or more are considered unrealistic and marked red, while walking or public transport journeys of more than 30 minutes are considered unrealistic and marked red

# 4. Access To Services



**Fig. G - Location of four Local Plan Review Sites (2-5) and Common Lane Traveller Site in King's Lynn & West Norfolk**

## 4.3 Access to Amenities against Locations Considered 'Good'

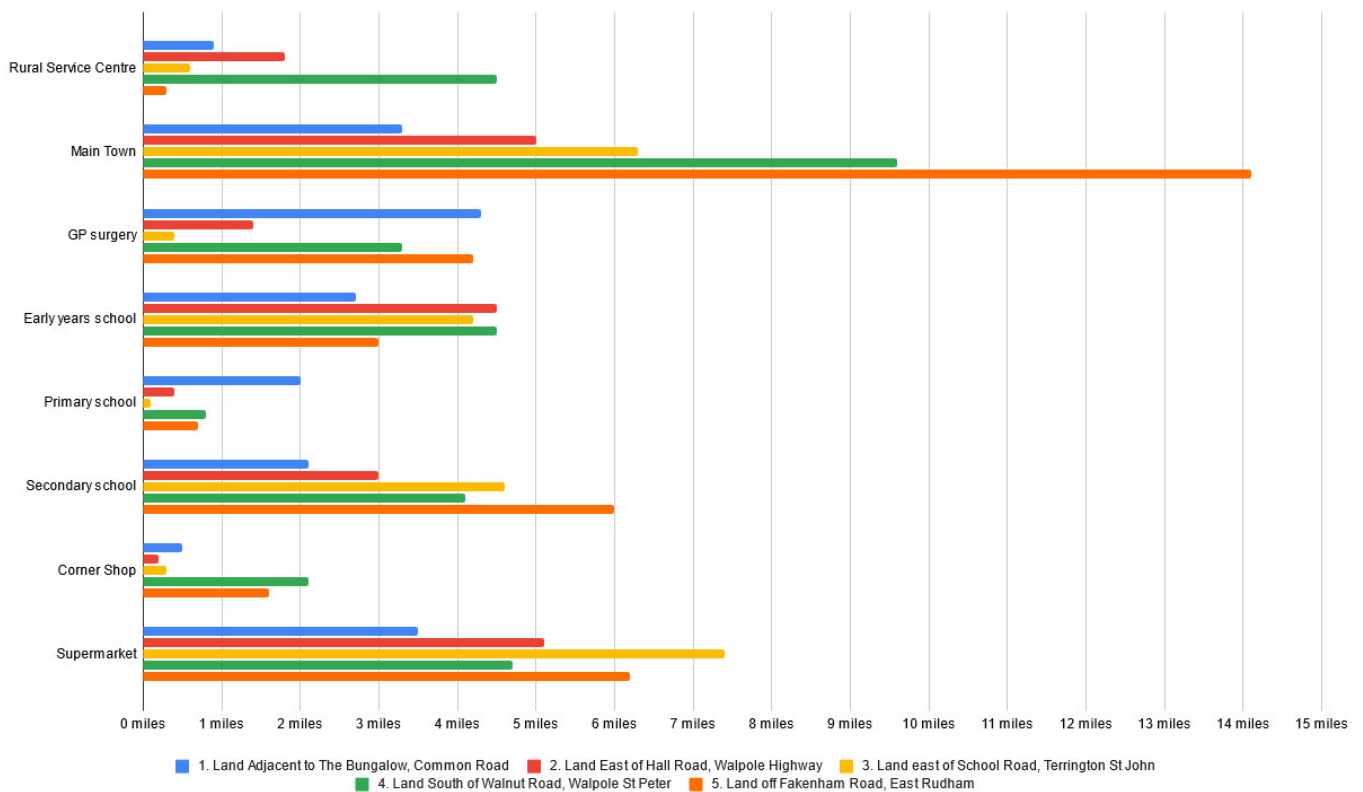
In light of the lack of a proper definition of what constitutes 'good access' to amenities from King's Lynn & West Norfolk Borough Council, Common Lane Traveller Site's proximity to basic amenities is compared directly to sites submitted for the forthcoming Local Plan 2016-36 Review, that have been deemed to have 'good' access to amenities.

To provide a robust assessment, prospective residential sites from a range of locations have been selected. These sites are listed below with their respective policies:

1. Common Lane Traveller Site
2. G106.1 - Land East of Hall Road, Walpole Highway<sup>18</sup>
3. G94.1 - Land east of School Road, Terrington St John<sup>19</sup>
4. G109.1 - Land South of Walnut Road, Walpole St Peter<sup>20</sup>
5. G31.1 - Land off Fakenham Road, East Rudham<sup>21</sup>

The location of each site is illustrated in **Fig. G**, this is supported by Table 2 on the page overleaf, which provides the actual distance and travel time of each of each basic service to each individual site.

# 4. Access To Services



Graph 1 - Actual Distance from Sites 1-5 to Closest Service

## 4.4 Suitable Locations for Cycling To Services

As illustrated in **Graph 2**, the land at Common Road Traveller Site is the only site reviewed that is within a 20 minutes or less cycle of all reviewed amenities. Out of the eight amenities reviewed, the site at Walpole St Peter (4) was not within 20 minutes or less cycling distance from five; the nearest rural service centre (as defined in the 2011 Core Strategy), the nearest main town, an early years school, a secondary school and a supermarket.

The prospective sites at Terrington St John (3) and East Rudham (5) are similarly poorly located. With respect to accessing services via a bicycle, Common Road Traveller Site offers significantly better overall access to basic services than all four other sites reviewed.

## 4.5 Suitable Locations for Walking or Taking Public Transport to Services

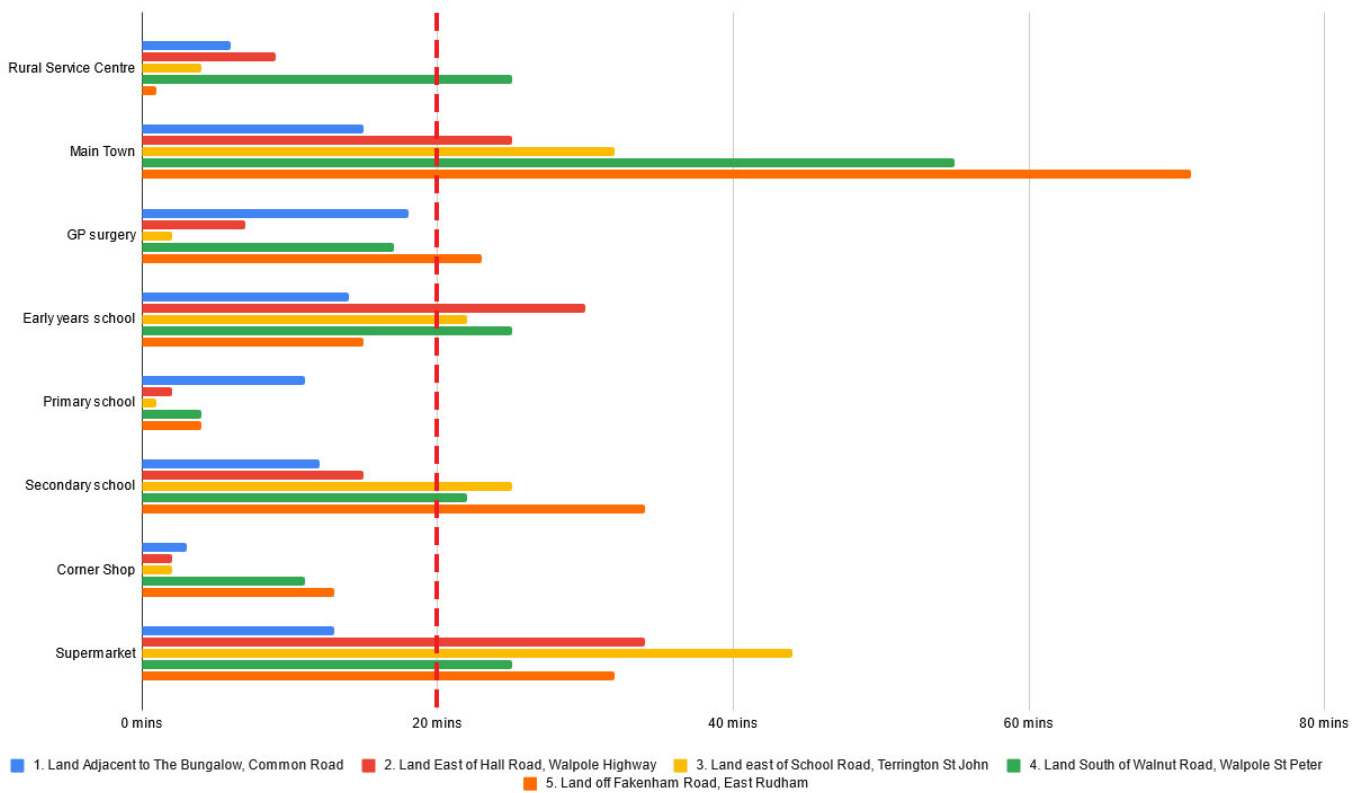
Unfortunately, given the rural nature of King's Lynn & West Norfolk as a borough, the majority of 'rural service centres' as defined in the 2011 Core Strategy, do not offer basic services. Further, from the majority of these 'rural service centres', basic services cannot be accessed via walking (in under 30 minutes).

To illustrate this, note that three of the four reviewed development locations that have been assessed as offering 'good' access to services, are located over an hour's walk (in some cases over two hours, from the nearest GP surgery, secondary school and basic supermarket).

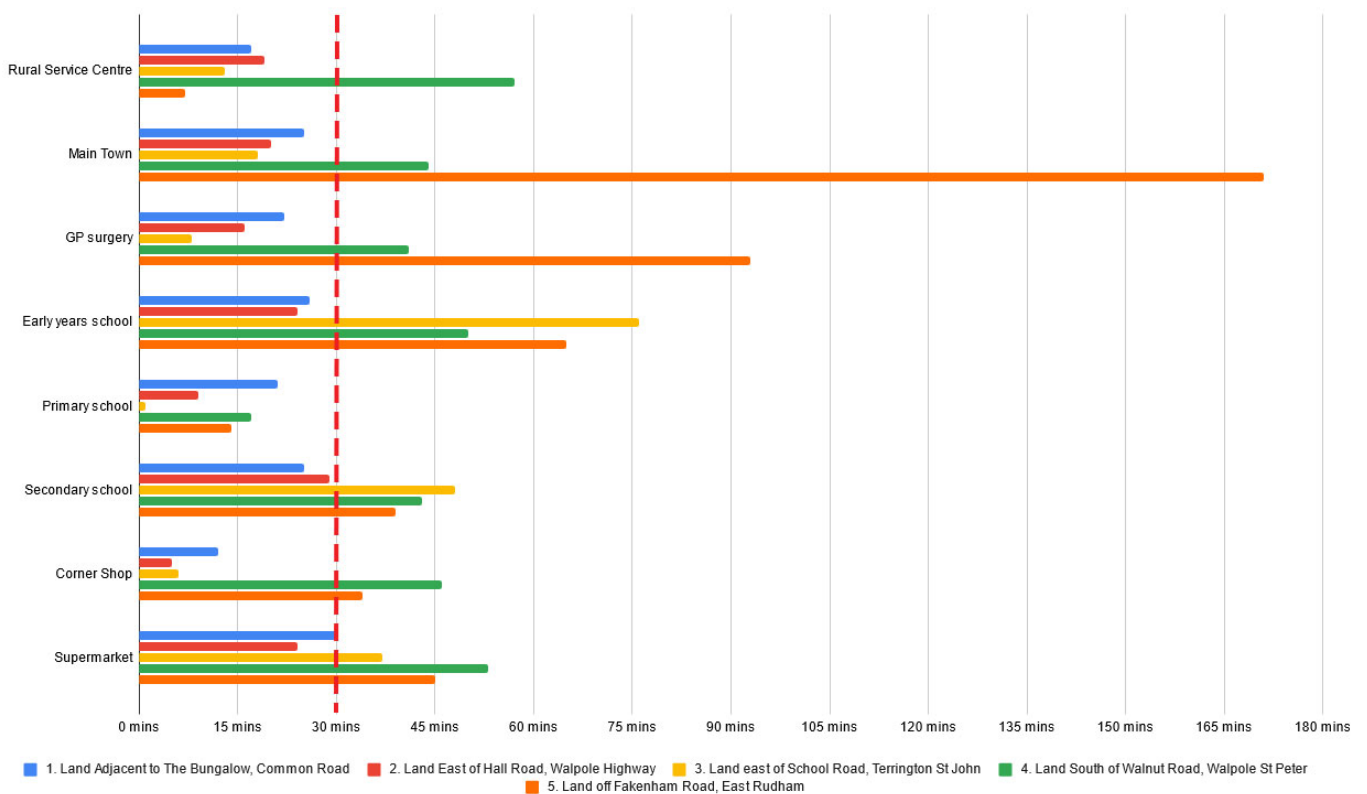
As a result, to more fairly assess access to services, the shortest travel time between public transport and walking has been taken to compare each site's access to services in **Graph 3**.

Using this method of comparison, only two of the





**Graph 2 - Cycling Travel Time from Sites 1-5 to Closest Service**



**Graph 3 - Walking / Public Transport Travel Time from Sites 1-5 to Closest Service**

# 4. Access To Services

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five sites are within either 30 mins walk or 30 mins via public transport of all reviewed amenities. These sites are Common Road Traveller Site (1) and Site 2 at Walpole Highway.

Ultimately, this shows that for at least three of the reviewed sites that King's Lynn & West Norfolk Borough Council has assessed to offer 'good' access to services, at least three cannot realistically support residents who do not drive. Further, the locations of these three developments clearly do not support the borough's policy of 'promoting travel by foot or bicycle'.

## 4.6 Conclusion

Given that Common Road Traveller Site offers better access to amenities than other sites that have been assessed as offering 'good' access to amenities, and given the circumstances of the site, that it supports two adults, rather than proposals for 10-15 unit residential developments, King's Lynn & West Norfolk's refusal of the site's application for planning permission on the basis that the site does not offer suitably good access to services should be dismissed.

# 5. Planning Policies

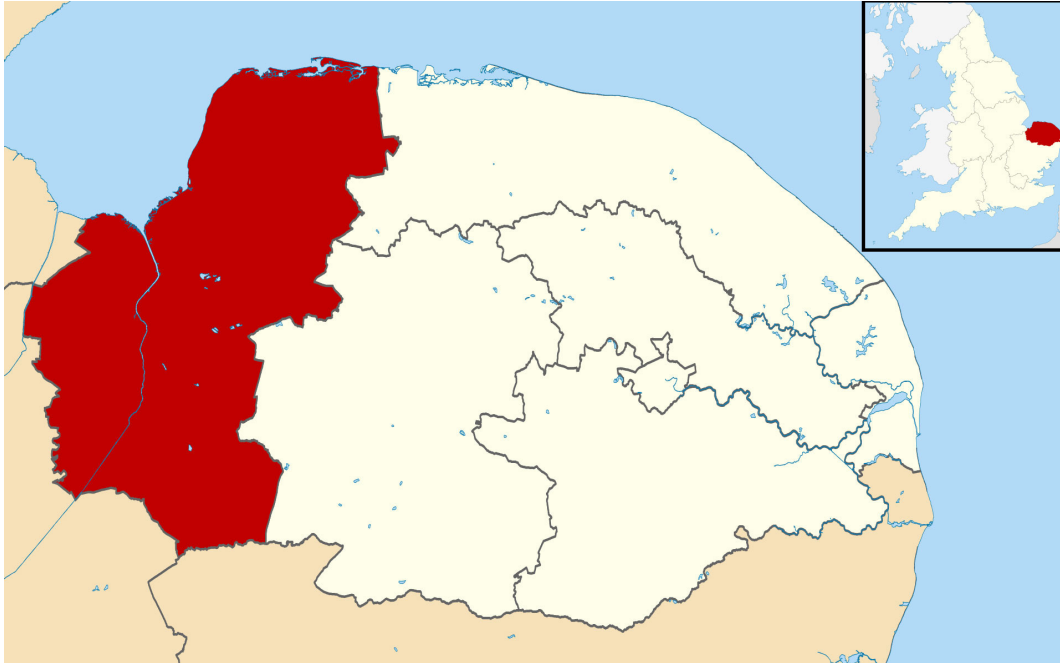


Fig. H - Kings Lynn & West Norfolk

## 5.1 Local Authority Overview

King's Lynn & West Norfolk Borough Council is the planning authority for West Walton, the area Common Road Traveller Site is located within. The borough's county authority is Norfolk County Council.

The Borough Council of King's Lynn & West Norfolk's current planning policies are set out in the adopted King's Lynn & West Norfolk Local Development Core Strategy. The Local Plan was adopted in July 2011.

These are supplemented by the Site Allocations & Development Management Policies Plan, adopted in September 2016.

Although King's Lynn & West Norfolk Borough Council are currently conducting a review of the 2016-2036 DPD, as of yet, no new formal policies have been adopted.

## 5.2 King's Lynn & West Norfolk Local Development Core Strategy 2011 - Relevant Policies

Various policies in the King's Lynn & West Norfolk Local Development Core Strategy 2011 are relevant to the approval of Gypsy / Traveller Sites in West Walton. Each policy is provided below:

### **Policy CS01 Spatial Strategy - Sustainable development locations**

*...our approach will utilise a settlement hierarchy (set out in Policy CS02) to ensure that:*

- *new investment is directed to the most sustainable places;*
- *significant emphasis is placed on brownfield redevelopment within the towns and villages;*
- *the development of sustainable urban extensions to the main towns;*
- *locally appropriate levels of growth take place in selected Key Rural Service Centres and Rural Villages;*
- *new development is guided away from areas*

# 5. Planning Policies

at risk of flooding now or in the future, however recognising development may be required within flood risk areas to deliver regeneration objectives within King's Lynn and maintain the sustainability of local communities in rural areas;

- approximately 90% of new residential development will take place in areas identified within the settlement hierarchy to ensure reasonable access to services satisfying basic day to day needs;
- 75% of employment land will be allocated in King's Lynn.<sup>23</sup>

## Policy CS06 Development in Rural Areas

The strategy for rural areas is to:

- promote sustainable communities and sustainable patterns of development to ensure strong, diverse, economic activity;
- maintain local character and a high quality environment;
- focus most new development in key rural service centres selected from the Settlement Hierarchy Policy CS02;
- ensure employment, housing (including affordable housing), services and other facilities are provided in close proximity.<sup>24</sup>

## Policy CS09 Housing Distribution

### Gypsies and Travellers and Travelling Showpeople

Provision will be made for a minimum of 146 permanent pitches identified in the Regional Spatial Strategy as being needed in the borough between 2006 and 2011 for Gypsies and Travellers.

Any deficit will be addressed through working with Registered Social Landlords and additionally with the gypsy and traveller community to bring forward applications on suitable sites.

In addition the Borough Council will review by survey the need for additional pitches on an annual basis and judge this against the 3% annual compound increase indicated in Regional policy for the period

2011 - 2021

Provision for transit sites and additional provision of permanent sites for Gypsies and Travellers above the 146 pitches will be considered where additional need is demonstrated.

Sites for Gypsies, Travellers (or travelling show people) will be given permission where they:

- are capable of being serviced by basic utilities;
- meet an identified need;
- avoid environmentally sensitive areas and areas at risk from flooding;
- afford good access to main routes (including the A47(T); A17; A10; A148/9; and A134 ); and
- are located within a reasonable distance of facilities and supporting services (such as schools or health provision).

The Borough Council will work with partners in county groupings to establish a network of transit sites and appropriate provision for travelling showpeople across the county.<sup>25</sup>

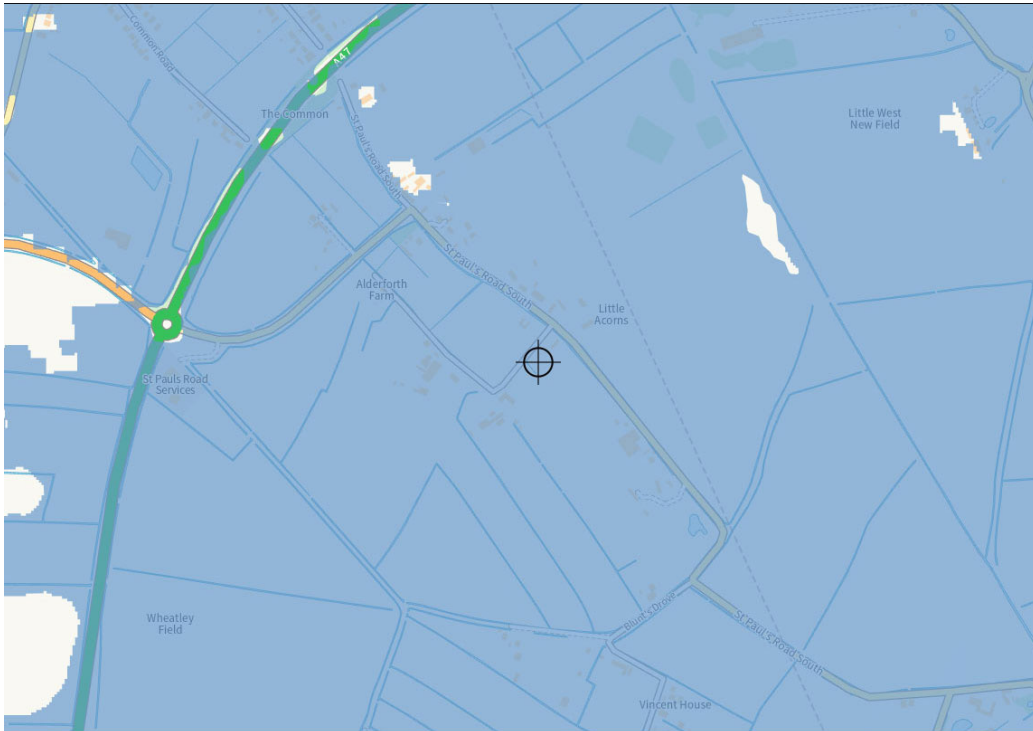
## 4.3 King's Lynn & West Norfolk Site Allocations & Development Management Policies Plan

In the Site Allocations & Development Plan 2016, King's Lynn & West Norfolk Borough Council adopted the KPI for measuring the authority's performance against the it's Traveller Policy by ensuring that there is, "At least 5 years housing land supply at any point in time. Monitored against the housing trajectory [for Gypsy / Traveller appropriate accommodation]"<sup>26</sup>

At no point have King's Lynn & West Norfolk Borough Council published a five year housing land supply to address the number of new pitches that the Authority are required to deliver to meet demand.

Further, by the authority's own commitment to assess Gypsy / Traveller need against a projected 3% annual compound increase to the number of pitches required, there is no evidence that this has been supplied (Policy CS09).

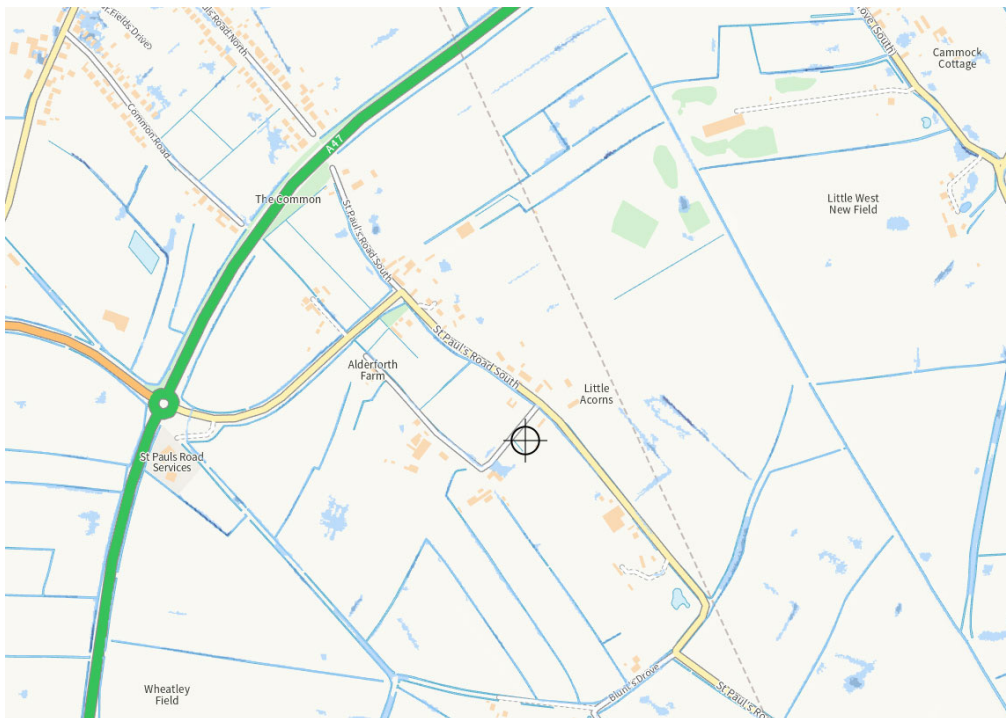
A 3% annual compound increase of pitches, as



Extent of flooding from rivers or the sea

● High 
 ● Medium 
 ● Low 
 ● Very low 
 ⊕ Location you selected

**Fig. I - Map of Common Road Traveller Site's Risk of Flooding from Rivers or the Sea (medium)**



Extent of flooding from surface water

● High 
 ● Medium 
 ● Low 
 ○ Very low 
 ⊕ Location you selected

**Fig. J - Map of Common Road Traveller Site's Risk of Flooding from Surface Water (very low)**

# 5. Planning Policies

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suggested in the 2011 Local Plan, is the expected growth rate of Gypsy / Traveller Pitches in the area, which would in 2023, increase projected need from 147 pitches in 2011, to 214 pitches in 2023. Currently, there are an estimated 172 authorised Gypsy / Traveller pitches in King's Lynn & West Norfolk.

## 5.4 Flood Risk

Common Road Traveller Site is subject to moderate flood risk from rivers & sea. The site has a very low flood risk from surface water. (Figs. I & J)

To address the site's moderate flood risk from rivers and sea, a flood risk management plan has been developed, as per the local authority's planning requirements.

It should be noted that this flood risk is the same flood risk apparent at both of the borough's Public Gypsy / Traveller Sites, Saddlebow Caravan Site and West Walton Court.

## 5.5 Site Suitability

Common Road Traveller Site is an occupied, unauthorised Gypsy / Traveller Site.

The site is well situated for the adult residents, located within 3 miles of both West Walton and Wisbech, one of Cambridgeshire's largest market towns. The distance from services is typical of rural housing developments in Norfolk (as noted in Section 4), and significantly better than most approved residential developments in the borough

(again, see Section 4).

Planning approval was initially refused at the site on grounds including lack of pedestrian access to the site and a lack of street lights on both Common Road South and St Pauls South. However, other residential sites have been approved for residential use in the immediate vicinity without such challenges, despite the same planning policies being applicable at the time of both decisions.

Red House Barn (within 120m from Common Road Traveller Site) was granted residential planning permission for the conversion of a barn to a residential dwelling in November 2004.

An outbuilding on Ashwood House (within 250m of Common Road Traveller Site) was approved for a change in land use from agricultural to residential in 2008.

Both of these sites are subject to the same alleged challenges as those at Common Road Traveller Site.

Further, there is a clearly evidenced need for additional, culturally appropriate, Gypsy / Traveller accommodation in the borough. This need for additional accommodation is clearly not being met by the local authority, despite their own policy commitments to do so. It is clear that no alternative site will be forthcoming for the residents of Common Road. Refusal of planning permission at the site will render the prospective residents homeless in the immediate future, resulting in a significant increase in expenditure, as detailed in **Sections 6 & 7**.

# 6. Cost Future Options

To assess the benefit cost ratio of each potential future option, a set of costs and assumptions are required. The projected cost of each element considered for each future option is provided below.

Projected costs are grouped together by type:

1. Establishing a new Public Gypsy / Traveller Site
2. Variations in local and public social spend
3. Variations in local authority income

All costs are supported by primary and secondary sources.

## 6.1 Cost of Establishing New Public Gypsy / Traveller Site(s) In King's Lynn & West Norfolk

Refusal of planning permission at Common Road Traveller Site will render two people homeless. Residents cannot be rehoused under existing provisions, as existing public & authorised private Gypsy / Traveller Sites in King's Lynn & West Norfolk and the wider county of Norfolk have failed to meet pitch shortfalls identified since 2016.

Further, the failure of any recent Gypsy / Traveller Accommodation Assessments in King's Lynn & West Norfolk to identify the Gypsy / Traveller community looking to move onto Common Road Traveller Site, despite having lived at various sites in the district for the majority of their lives, indicates that the evidence base for these reports is not fit for purpose.

Should King's Lynn & West Norfolk Borough Council refuse to grant planning permission at Common Road Traveller Site, but the authority meets its statutory obligation to provide necessary accommodation for homeless residents, there is a direct cost associated with the development of a new, bespoke public Gypsy / Traveller Site.

Two principle costs are involved when establishing a new Gypsy / Traveller Site:

- Land acquisition
- Construction (including provision of amenities, hardstanding, amenity blocks, etc)

For this costing, it is assumed that the displacement of the prospective residents at Common Road will require a minimum of one pitch site.

### Land Acquisition

Should King's Lynn & West Norfolk Borough Council opt to develop a new Public Gypsy / Traveller Site, an appropriate parcel of land will need to be privately acquired. This is because no suitable brownfield land owned by the authority exists. A minimum one pitch site would be required, which will necessitate a minimum land area of 0.13 hectares.<sup>26</sup>

### Private Land Acquisition

2019 VOA Land Value Estimates project land acquisition in King's Lynn & West Norfolk per hectare as approx. £1.15 million for residential land, £450,000 for brownfield and £21,000 for agricultural land.<sup>27</sup>

Accounting for King's Lynn & West Norfolk's current application of planning policies on greenfield sites, it is unlikely that a suitable greenfield site can be located for a new Public Gypsy / Traveller Site. As a result, it is assumed that they would have to opt for brownfield or residential land. Assuming appropriate brownfield land can be secured, it is estimated that a single, 0.13 ha site would cost approx. £50,000.

### Site Construction

The cost of providing the necessary infrastructure for a new public Gypsy / Traveller Site is not insignificant. For these public sites, the financial burden of construction would sit with King's Lynn & West Norfolk Borough Council.

Although the number of new public Gypsy / Traveller sites and cost profiles related to their construction are limited, cost estimates are available.

Previously, South Norfolk District Council has estimated that the cost of developing a single pitch

# 6. Cost Future Options

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Gypsy / Traveller Site in Norfolk costs a minimum of £200,000, not including land acquisition. As a result, this study has modelled the cost of erecting a single, new pitch at £200,000. This spend would happen in spite of the existence of a perfectly suitable pitch currently at Common Road Traveller Site.

## 6.2 Social Costs

A significant proportion of the social costs stemming from each outcome cannot be quantified. These are often more impactful on individuals and communities than measured social costs.

Nonetheless, certain elements of this cost can be measured.

Displaced and homeless populations require significantly more locally and nationally funded support than settled populations, linked to a single area. This is well documented in studies on varying forms of homelessness. The immediate, measurable costs are an increase in out of work benefits, increased health costs and the cost of temporary accommodation.

In this report, these costs have been measured as increases in spending compared to an average sample (Gypsy / Traveller community) and loss of funding.

**Benefits.** Added working-age benefit spend is measured as an additional £77 per person, per week. The proportion of individuals assessed as in receipt of benefits is dependent on each scenario.

**Health.** Even short periods of homelessness are well documented to be linked to moderate to serious health conditions. This is linked to isolation, the difficulty of accessing GP surgeries, particularly in the event that homeless communities are habitually forced to move on, and poor access to basic sanitary rights. This is modelled as an added cost, in the form of more of the studied community requiring the highest cost per patient for medical interventions caused by homelessness. The average NHS patient

costs the NHS approximately £2,400 per annum. The most expensive patient categories cost the NHS approximately £9,780. This is an increase of £7,380 per annum, per person. This is applied to a specific proportion of the site's populations per annum, subject to the individual scenario.

**Temporary Accommodation.** Although it is projected that in the event of homelessness, the residents of Common Road will be forced to resort to establishing short-term unauthorised encampments across King's Lynn & West Norfolk, it is also projected that others will seek temporary accommodation support from King's Lynn & West Norfolk Borough Council.

Short-term lets at bedsits and hotels typically cost significantly more than long term rented accommodation. Although likely an underestimate, for those who do qualify for temporary accommodation, the cost is modelled at the rate of the annual benefit cap for those living outside of London, minus other assumed working age benefits. This equates to approximately £16,000 per annum. While some of this funding would be provided in the form of Housing Benefit, a significant proportion of this will also come out of Discretionary Housing Payments which are funded by the Local Authority.

## 6.3 Variations In Local Spend & Income

### Loss of Income

Mechanisms are not in place to levy land-based tax on displaced populations. The lack of a permanent physical location prevents Local Authorities from receiving tax contributions from transient populations. Although more challenging to project, the absence of a fixed physical location for habitation severely reduces an individual's employment opportunities. This acts as one of the most significant barriers to becoming a net contributor to the UK economy. Although not measured in this study, failing to provide appropriate accommodation for the residents of



# 6. Cost Future Options

Common Road Traveller Site will render the working population unemployed.

It is assumed that specific scenarios will result in a total loss of Council Tax income from these populations. This loss of income is measured at a Band B rate at approximately £1,600 per annum.<sup>28</sup>

## Policing Costs

An independent study into the additional policing costs associated with temporary Gypsy / Traveller sites in Essex concluded that policing cost per person at these sites was approximately £930 per annum,<sup>29</sup> in comparison to the national average spend of just under £200 per person per annum. The average spend on policing per person in Norfolk was approximately £199.22 in 2021/22.<sup>30</sup> The difference in spend for individuals on an unauthorised Gypsy / Traveller Site and the average population is estimated at approximately £733 per annum.

This increased spend is directly linked to increased local patrols, reported crimes and often unnecessary police presence at unauthorised Gypsy / Traveller Sites. Often, these were found to be initiated by coordinated community efforts. These costs are incurred at a much higher frequency at short-term unauthorised encampments on land not owned by the occupiers.

## Eviction & Unauthorised Encampment Clearance

Failure to provide suitable accommodation for the prospective residents of Common Road Traveller Site will result in two people becoming homeless. These people lack the means to relocate from the area or acquire additional land. As Gypsy / Travellers who require culturally appropriate accommodation, it is assumed that residents will be forced to establish unauthorised pitches on land that they do not own.

Any unlawful encampments initiated by the failure of the authority to provide suitable accommodation will result in a direct cost, payable by the authority. When smaller scale encampments occur, they are typically cleared quickly and civil proceedings are raised against the occupants.

Based on figures from Dorset and South Norfolk District Council, it is estimated that a small unauthorised site can be cleared at a total cost of £4,000 (bailiff, legal and clearance fees). The time

frame for eviction is modelled at taking 12 months. After an eviction, if no alternative accommodation is provided, individuals set up another unauthorised encampment on land not owned by themselves. This results in another eviction.

## Planning Costs

The Local Government Association estimates that the cost of approving a planning application is approximately 60% more than the figure charged to the applicant. This is a cost assumed by King's Lynn & West Norfolk Borough Council. The cost of submitting a planning application for the site is estimated at £490 for a single pitch site. This results in an estimated cost to the authority of approximately £740.<sup>31</sup>

## 6.4 Unaddressed Costs

Long term impact of homelessness. Many impacts of homelessness cannot be quantified in this study. These include long-term mental health issues, increased probability of offending, poor educational outcomes, long-term unemployment and a dramatically increased likelihood of both adults and children experiencing repeat homelessness. While these impacts cannot be quantified, the results are arguably more severe and long-term than those reviewed in this report.

## 6.5 Time Period Reviewed

To more effectively review the consequences of each scenario, projections are provided over a ten year period.

It is estimated that the delivery and eventual opening of any form of Public Gypsy / Traveller Site will take a minimum of five years on privately acquired land, as per King's Lynn & West Norfolk Borough Council's planning timescales.

# 7. Future Options

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This section provides an overview of future options available when addressing future options at Common Road Traveller Site. Each is supported by **Table 3** (expanded in **Table 4**).

## **Option 1 - Award Residential Planning Permission at Common Road Traveller Site (Status Quo)**

When comparing the benefit cost ratio of the three future options available at Common Road Traveller Site, Option 1 is treated as the Status Quo option.

If permanent planning permission is awarded at Common Road Traveller Site, the two prospective residents will avoid, what would likely be, long-term homelessness, while achieving culturally appropriate accommodation at no extra cost to the local authority.

By granting permanent planning permission, it is projected that King's Lynn & West Norfolk Council will increase land based tax revenues through formal collection of Council Tax by £16,100 (rounded to £20,000 in tables) over a ten year period

While a small cost is involved in this option, specifically relating to the necessary administrative costs associated with the planning applications of approximately £740, this is minor compared to the financial and social consequences of alternative options.

The projected unadjusted ten year benefit of this option is approx. £16,500 against an unadjusted £91,000 spend. However, while there is a continued social spend associated with this option, it does not deviate considerably from that of a settled community. Rather, against the other two options, this option presents a relative saving of approx. £500,000-£550,000.

This delivers an unadjusted cost benefit ratio of 0.18, and an adjusted cost benefit ratio of 1. This

option delivers a cost benefit ratio of 1 because it is the Status Quo option. Any option of 1 or above is considered acceptable. Although it may seem low, compared to the other two options, a BCR of 1 presents the most desirable outcome.

## **Option 2 - Develop New Public Gypsy / Traveller Site on Privately-Owned Land**

If planning permission at Common Road Traveller Site is refused, two people will be rendered homeless, due to the consequences of their eviction from their current, short-term accommodation.

To address this situation, King's Lynn & West Norfolk Borough Council has the option of delivering alternative, publicly funded, culturally appropriate accommodation in the form of a single 0.13ha Public Gypsy / Traveller Site.

This would need to be developed on privately-owned land, as currently, there is not a suitable publicly-owned brownfield site.

It is assumed that the minimum timescale for delivering this option would be five years. During the five year lead in time, the authority has the option to either grant temporary planning permission to the existing site, or to provide temporary accommodation for the period. However, if King's Lynn & West Norfolk Borough Council proceeds with this option, it is assumed that they would not award temporary planning permission to Common Road Traveller Site.

As a result, this option has been modelled to incur significant spend on temporary accommodation, with 50% of adult residents opting for this at the projected cost of £100,000. It is projected that a small proportion of residents (50%) will be unable to access temporary accommodation. Without an alternative site, they will be forced to form a series of small, unauthorised encampments across West

Costs	Option 1 Residential Planning Permission Awarded (Status Quo)	Option 2 Develop New Public Gypsy / Traveller Site (Privately-Owned Land)	Option 3 Provide No Appropriate Accommodation
New Public Traveller Site(s)	£0	£250,000	£0
Land Devaluation (Loss)	£0	£40,000	£0
Administration Costs	£700	£700	£0
Unauthorised Encampment Clearance (10 yr)	£0	£80,000	£160,000
CIL & New Homes Bonus	£400	£400	£0
Council Tax Revenue (10 yr)	£20,000	£10,000	£0
Education Costs (additional 10 yr)	£0	£0	£0
Health Cost (additional 10 yr)	£0	£25,137	£40,000
Policing Cost (additional 10 yr)	£0	£5,870	£10,000
Benefit Cost (additional 10 yr)	£0	£30,000	£40,000
Relative Spend (adjusted)	£0	£510,000	£490,000
Relative Benefit (adjusted)	£0	£10,000	£0
Benefit Cost Ratio (Adjusted)	1	0.0145	0.00
Value for Money Category	Moderate	Poor	Very Poor

Table 3 - Overview of Future Options at Common Road Traveller Site

Norfolk at an estimated cost of £80,000 over five years.

The continued displacement of the prospective residents for a minimum of five years is estimated to add £25,000 to health expenditure, £30,000 to working age benefit expenditure and £6,000 to police expenditure over a ten year period.

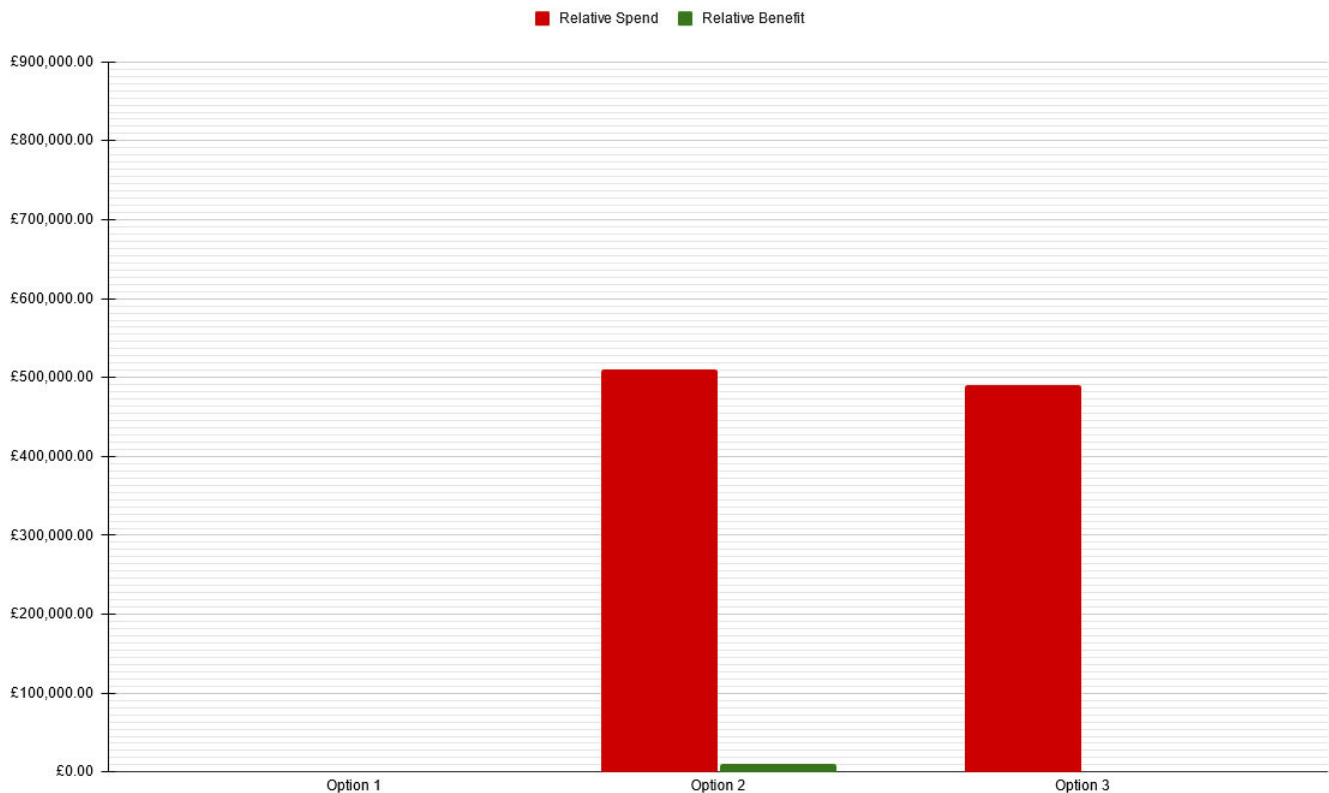
The estimated cost of land acquisition is approx. £45,000, with pitch construction estimated at £200,000.

Given King's Lynn & West Norfolk's planning policies, it is assumed that no greenfield site will be deemed suitable for the development of a public

Gypsy / Traveller Site. Instead, the development will require the change of use of a brownfield site. Establishing a single, public Gypsy / Traveller Site on a brownfield site will effectively render the value of the land to that of agricultural land, which is estimated to result in a loss of land value of approx. £40,000. This loss in land value is not factored into the final Benefit Cost Ratio (BCR).

The total estimated adjusted spend of this option is approx. £500,000, with an estimated benefit of £7,500. This delivers an adjusted cost benefit ratio of 0.0145. The value of money rating for this option is poor.

# 7. Future Options



*Fig. K - Graph of relative benefit of each option against spend.*

## Option 3 - Provide No Alternative Accommodation

This option involves the refusing planning permission at Common Road Traveller Site, while King's Lynn & West Norfolk Borough Council provide no alternative accommodation for the two residents, who they know, with the loss of this site, will become homeless.

With no option for alternative accommodation, a history of residency in the county and no means of securing an alternative permanent site, this option assumes that all residents would stay within the locality (West Norfolk and the surrounding county), forming a series of unauthorised encampments on land that they do not own.

This option has no associated monetary benefit.

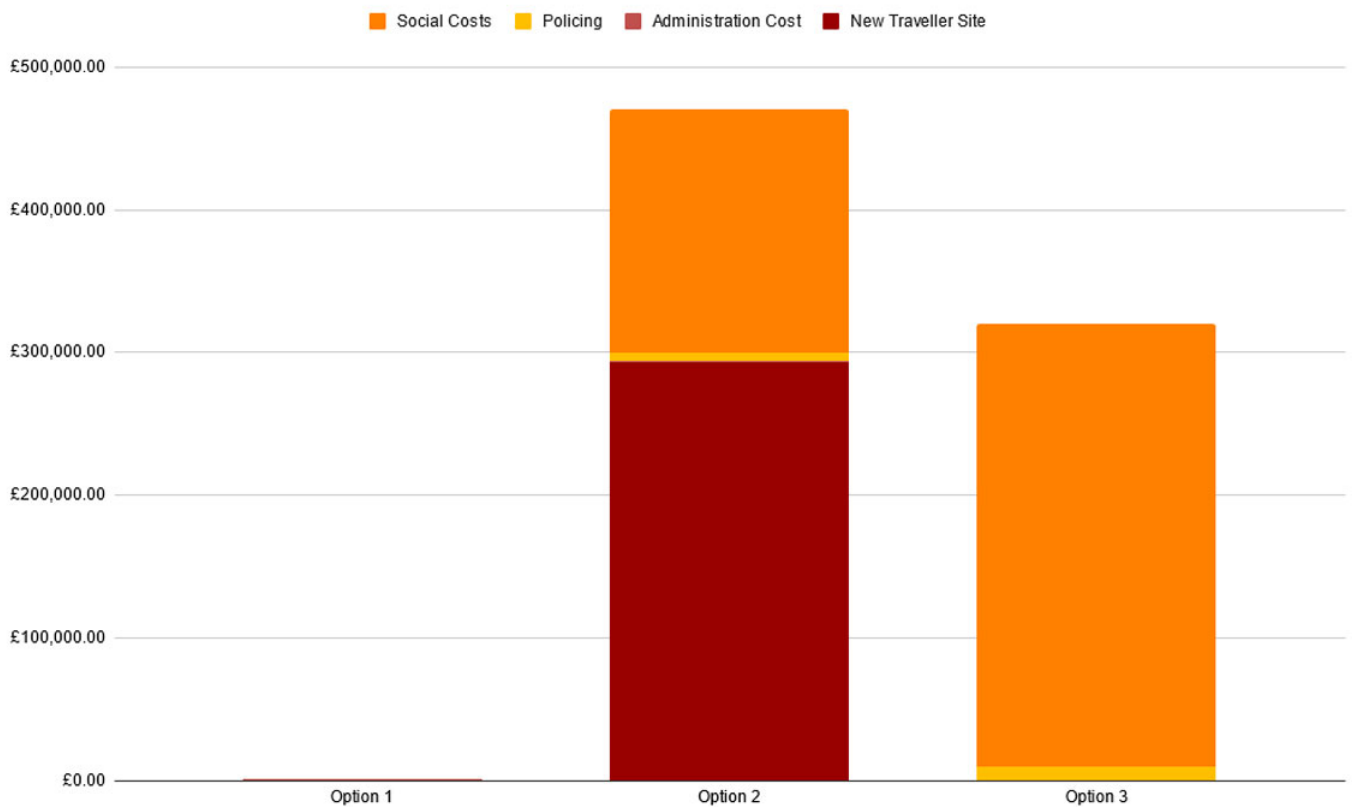
Forcing two people to become homeless for a projected ten year period would result in significant

additional spend on policing (estimated £7,300), working age benefits (£40,000, not including housing benefit) and health spend, due to exasperation of serious existing long-term conditions suffered by the current residents, due to a sustained period of homelessness (£35,000).

Over a ten year period, it is estimated that the total cost of proceeding with this option would be approx. £500,000. Unlike Options 1 & 2, the rate that this cost increases after the ten year period reviewed is set to accelerate, not decrease.

As there is no measurable monetary benefit when proceeding with this option, it delivers a cost benefit ratio of 0, falling in the very poor value for money category.

In the long-term, this is the most expensive option for King's Lynn & West Norfolk Borough Council to pursue.



*Fig. L - Breakdown of Relative Costs by Type for the three future options*

## Conclusion

Out of the options considered, Option 1 delivers the only positive value for money outcome for King's Lynn & West Norfolk Borough Council. Further, it is the preferred option for the residents of Common Road Traveller Site.

Refusal of planning permission at the site will not result in the land being returned to its original state, as the current residents do not have the financial means of doing so. This is particularly emphasised by the seriousness of the fact that unless they can occupy this site, the residents will be rendered homeless.

Option 3 presents the worst value for money option for the local authority. It would also deliver the most severe consequences to four long-term residents at the site, who the authority has a duty of care to house,

while requiring high levels of public expenditure that will benefit no section of the wider community.

Although Options 2 is feasible, the expenditure and timescales required to open new public Gypsy / Traveller Sites is prohibitive.

It is highly unlikely that King's Lynn & West Norfolk Borough Council will be able to deliver new sites within the required timescales to prevent this population from either facing homelessness and being forced to establish new, unauthorised encampments, or causing the authority to commit to a significant, but largely unnecessary additional spend.

# 7. Future Options

Costs	Option 1 <i>Residential Planning Permission Awarded (Status Quo)</i>	Option 2 <i>Develop New Public Gypsy / Traveller Site (Privately-Owned Land)</i>	Option 3 <i>Provide No Appropriate Accommodation</i>
Land Acquisition Costs (Total)	£0.00	£50,000.00	£0.00
Loss In Land Value (Total)	£0.00	£40,000.00	£0.00
New Public Traveller Site – Construction Costs	£0.00	£200,000.00	£0.00
Administration Costs (planning)	£700.00	£700.00	£0.00
Temporary Accommodation	£0.00	£120,000.00	£230,000.00
Unauthorised Encampment Clearance Costs (Total)	£0.00	£80,000.00	£160,000.00
Community Infrastructure Levy (Total)	£0.00	£0.00	£0.00
New Homes Bonus Payment (First Year)	£400.00	£400.00	£0.00
Council Tax Revenue (+/gain -/loss) (1 year)	£1,600.00	£700.00	£0.00
Council Tax Revenue (+/gain -/loss) (10 year)	£20,000.00	£10,000.00	£0.00
Opposed Eviction Costs (Total)	£0.00	£0.00	£0.00
Education Funding Loss (Total)	£0.00	£0.00	£0.00
Health Costs pa (Total)	£10,000.00	£10,000.00	£10,000.00
Health Costs 10 year (Total)	£60,000.00	£90,000.00	£100,000.00
Policing Cost pa (Total)	£0.00	£0.00	£0.00
Policing Cost 10 year (Total)	£0.00	£10,000.00	£10,000.00
Benefit Costs pa (Total)	£0.00	£10,000.00	£10,000.00
Benefit Costs 10 year (Total)	£40,000.00	£70,000.00	£80,000.00
Total Costs / Loss of Revenue (unadjusted) (not including land devaluation)	£90,000.00	£600,000.00	£580,000.00
Total Costs / Loss of Revenue (unadjusted) (including land devaluation)	£90,000.00	£640,000.00	£580,000.00
Adjusted Relative Cost (Option 1 is Status Quo)	£0.00	£550,000.00	£490,000.00
Relative Spend	£0.00	£510,000.00	£490,000.00
Relative Benefit	£0.00	£10,000.00	£0.00
Benefit Cost Ratio (Unadjusted)	0.1812	0.0113	0.0000
Benefit Cost Ratio (Adjusted)	<b>1.00</b>	<b>0.0145</b>	<b>0.0000</b>
VfM Category	<b>Moderate</b>	<b>Poor</b>	<b>Very Poor</b>

Table 4 - Cost Benefit Analysis of Future Options available for Common Road Traveller Site

# Endnotes

1. The Green Book 2022, HM Treasury - <https://www.gov.uk/government/publications/the-green-book-appraisal-and-evaluation-in-central-government>
2. DLUHC Appraisal Guide, Department for Levelling Up, Housing & Communities - <https://www.gov.uk/government/publications/dluhc-appraisal-guide/dluhc-appraisal-guide>
3. Location Plan, Planning Ref: 21/00492/F
4. Planning Ref: 21/00492/F, Borough Council of King's Lynn & West Norfolk Planning Portal
5. Ibid
6. Notice of Decision - Refusal of Planning Permission, Ref: 21/00492/F, King's Lynn & West Norfolk Council, 9 August 2021
7. Pg. 40, King's Lynn & West Norfolk GTAA 2023
8. Section 12.20.1.4, Local Plan Review Pre-Submission Stage 2021, King's Lynn and West Norfolk Borough Council
9. Pg. 17, Authority Monitoring Report (AMR) 2018/19 & 2019/20, King's Lynn & West Norfolk Borough Council, December 2020
10. Pg. 123, Cambridgeshire, King's Lynn & West Norfolk, Peterborough and West Suffolk GTAA 2016, October 2016
11. Local Plan Task Group Supplementary Documents, Housing Trajectory & Five Year Housing Land Supply (2020/21), King's Lynn & West Norfolk Borough Council, Wednesday, 11th May 2022 - [https://www.west-norfolk.gov.uk/info/20079/planning\\_policy\\_and\\_local\\_plan/753/5-year\\_housing\\_land\\_supply\\_and\\_housing\\_delivery\\_test\\_hdt](https://www.west-norfolk.gov.uk/info/20079/planning_policy_and_local_plan/753/5-year_housing_land_supply_and_housing_delivery_test_hdt)
12. Pg. 30, King's Lynn & West Norfolk GTAA 2023
13. Pg. 40, King's Lynn & West Norfolk GTAA 2023
14. Pg. 32, Policy CS08 - Sustainable Development, King's Lynn & West Norfolk Core Strategy 2011
15. Pg. 26, Policy CS06 - Development in Rural Areas, King's Lynn & West Norfolk Core Strategy 2011
16. Rural service centres are defined on pg. 19 of the King's Lynn and West Norfolk Core Strategy 2016-2036. Rural service centres include, Brancaster with Brancaster Staithe / Burnham Deepdale, Burnham Market, Castle Acre, Clenchwarton, Dersingham, Docking, East Rudham, Feltwell with Hockwold cum Wilton, Great Massingham, Grimston / Pott Row with Gayton, Heacham, Marham, Methwold with Northwold, Snettisham, Stoke Ferry, Terrington St Clement, Terrington St John with St John's Highway / Tilney St Lawrence, Upwell/Outwell, Watlington, West Walton / West Walton Highway. It should be noted that over 40% of these apparent 'key rural service centres' do not feature a single convenience store, and instead appear to have been classed as 'Key Rural Service Centres' because they either have an antiques shop or a pub. As per King's Lynn & West Norfolk's aim to reduce the need for people to walk and cycle, the majority of these locations do not support this aim.
17. Main towns are defined as King's Lynn, Hunstanton, Downham Market and Wisbech (Wisbech is not explicitly included in the 2011 Core Strategy because it is in Cambridgeshire not Norfolk, however, in practice, this has absolutely no bearing on residents).
18. G106.1 - Land East of Hall Road, Walpole Highway. King's Lynn & West Norfolk Borough Council provided the following assessment regarding this site's access to services, "14.23.1.4 In terms of proximity to services, the site is reasonably close to Main Road where the majority of village services are located. Norfolk County Council as the local highway authority made no objection to the allocation of the site for small scale frontage development onto Hall Road, subject to provision of safe access and local improvements to the footway links." - Section 14.23.1.4, Local Plan Review Pre-Submission Stage 2021, King's Lynn and West Norfolk Borough Council
19. G94.1 - Land east of School Road, Terrington St John. King's Lynn & West Norfolk Borough Council provided the following assessment regarding this site's access to services, "12.20.1.4 In addition, the site is well position in relation to local services, particularly the primary school which is situated immediately opposite. The site is also within reasonable walking/cycling distance to Main Road where the majority of local services are located. Site access is obtainable from School Road as supported by the Local Highway Authority subject to the its design and layout." - Section 12.20.1.4, Local Plan Review Pre-Submission Stage 2021, King's Lynn and West Norfolk Borough Council (note the typos are lifted from the original document developed by King's Lynn & West Norfolk Borough Council)
20. G109.1 - Land South of Walnut Road, Walpole St Peter. King's Lynn & West Norfolk Borough Council provided the following assessment regarding this site's access to services, "12.22.1.5 The services in Walpole St. Peter and Walpole St Andrew are largely scattered throughout the settlements, and whilst the allocated site does not score among the highest in terms of proximity to services, it is reasonably close to some services including a bus stop and shop." To note, it is not close to any services, barring a primary school.
21. G31.1 - Land off Fakenham Road, East Rudham. King's Lynn & West Norfolk Council provided the following statement regarding access to amenities at this site, "12.7.1.9 The Council considers this option for growth to be favourable, as the site scored the highest of those available in the village in terms of sustainability and is supported by East Rudham Parish Council. The site has the benefit of being connected to local services, helping reduce the need for residents to use cars to access key services and maximising the potential to walk, cycle and utilise public transport." Again, this is highly inaccurate. If Policy G31.1 scored the highest on access to services out of all available villages in King's Lynn & West Norfolk, then no village in King's Lynn & West Norfolk is suitable for residential development, if the LA are serious about their policy commitments.
22. Although Walpole Highway is the closest village, it is not classed as a key rural service centre. The closest rural service centre is Terrington St John
23. Pg. 14, King's Lynn & West Norfolk Core Strategy 2011
24. Pg. 26, Policy CS06 - Development in Rural Areas, King's Lynn & West Norfolk Core Strategy 2011
25. Pg. 32, Policy CS08 - Sustainable Development, King's Lynn & West Norfolk Core Strategy 2011
26. Site Allocations & Development Plan 2016, King's Lynn & West Norfolk Council 2016
27. An area of 0.13 hectares for a one pitch site is based on the current densities at the two public sites in the borough of King's Lynn & West Norfolk
27. Land value estimates for policy appraisal 2019, VOA & Department for Levelling Up, Housing & Communities - <https://www.gov.uk/government/publications/land-value-esti>

mates-for-policy-appraisal-2019

28. West Walton Council Tax Rates 2023/24, King's Lynn & West Norfolk Borough Council 29. Cost of Policing at Gypsy / Traveller Sites, Independent Research & Report, August 2021

30. HMICFRS Value for Money Profile Kent 2022 - <https://www.justiceinspectorates.gov.uk/hmicfrs/our-work/article/value-for-money-inspections/value-for-money-profiles/value-for-money-dashboards/>

31. The Actual Cost of Planning, Local Government Association, 2016





