

**On behalf of both Upwell and Outwell parish councils.**

Relating to MM part two and the GTAA site allocations.  
Modification to LP28

Taking both parts (MM377 and MM378) as one.

Both Upwell and Outwell Parish Councils understand the modification to LP28 is largely a technical exercise. Neither parish had a borough council member representing them during the work of the Local Plan Task group which looked in detail at the proposed amendments.

The borough council members on the group do not have a detailed local knowledge, and neither parish council which does, was approached directly at any point.

Both parish councils question the blind acceptance of the ORS surveys when the numbers in the 2016 and 2023 results are so staggeringly different. In the earlier version there was a borough-wide need for five pitches which jumped to more than 100 in 2023. ORS says both were '*robust assessment of current and future need*'. They can't both be correct.

Why has the statistical information gathered by ORS not been shared to enable consultees to better understand its interpretation of the data set?

We note the reduction in the number of pitches (F92) across the borough, but both councils, particularly Upwell, have major concerns over the cumulative impact of another 23 dwellings (GTs 17 & 18) on Small Lode, (stated in the MM as Upwell/Outwell).

Quote from the HRA report: '*Gypsy and Traveller and Travelling Showpeople accommodation is considered a form of housing.*'

Under no circumstances would brick/other housing be considered outside the development boundary.

Highways objections for both GT17/18 are central. '*Local highway network not of sufficient standard to support further development, and it is not considered highways impacts on Small Lode could be satisfactorily overcome, to accommodate (26) additional pitches at this site. The Highway Authority objects to these proposed allocations.*'

Permission for application 21/00492 (elsewhere in the borough) was refused for, among other reasons, the '*lack of pedestrian street lighting & access. The location is not currently served with street lights and does not have pedestrian access (a footpath).*' This is the case in Small Lode, a former water course now a single track road for much of its length and heavily used by agricultural traffic.

MM378 indicates an additional 14 pitches at Primrose Farm alone. It currently has permission for one, but clearly has more. So is this number to 'expand' the site, or is it 14 on top of the number actually on site? Has anyone actually been to both villages to see the reality? For further information see the link

<https://maps.app.goo.gl/vzfRT6F3o574iwdB7> where both GTs 17 and 18 can be seen via Google.

Both parish councils remind the council that while neither the Local Education Authority or the local NHS Trust responded to the consultation earlier this year, as pointed out in F92 - Upwell Academy, Downham Market High School and the health centre are at capacity. The cemeteries in both villages are also full. Both the health centre and village primary school were consulted by the parish council.

At the MIQ meeting in September it was agreed the additional pitches at Small Lode would be for family members. It's not clear how this will be verified or defined - but 23 extra dwellings for two families more than exceeds the ORS' own statistical probability. In the case of 'travellers' not meeting the 'definition', could pitches elsewhere in the borough not be allocated?

The entire 'expansion' of a total of 40 pitches proposed for the borough falls in our two villages. But there are 14 vacant plots in Tilney St Lawrence and ten 'undeveloped' in South Creake as of 2023, according to the GTAA survey.

*'Best available evidence suggests that the net annual Gypsy and Traveller growth rate is 1.5 per cent,'* says the 2023 report.

There are also four 'intensifications' of existing sites in the two villages.

We are also both concerned at the phrase 'windfall sites' mentioned within the modification.

*"The remainder of the plan period from 2030-2040 will be met through windfall sites,"* it says. Given the majority of sites are already allocated in our two villages, it would seem likely these 'windfall' sites will also be within our parishes.

With regard to the proposed amendments for policy LP02 (F47, appendix 4) says *'The level of growth for rural settlements which comprise tiers 4-6 of the Settlement Hierarchy is largely provided for by existing grants of planning permission and sites allocated in this Plan or a Neighbourhood Plan. **Windfall development will also take place in tiers 4-6. However, this should be confined to sites located within development boundaries except where sites are allocated through a Neighbourhood Plan. This restriction is intended to protect villages from over development, promote local choice, and protect their character and distinctiveness.'***

The Index of Multiple Deprivation is based on (income, employment, education, health, crime, barriers to housing and services and living environment.) The Gypsy and Traveller sites existing/proposed in Upwell/Outwell lie in areas of the Borough that are in the 20% most deprived in the country. Why does BCKLWN consider these are the best areas for the sites to be based, and not in less-deprived areas? Both the Tilney St Lawrence and South Creake sites would offer better access to services and employment opportunities (as shown by their higher rating in the IMD).

In the recently updated (December 2023) Planning Policy for Traveller Sites, published via the Department for Communities and Local Government, it states that when considering future provision it must:

Paragraph 4

Subsection

C - *'encourage local planning authorities to plan for sites over a reasonable timescale'*

J - *'enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure.'*

K - *'for local planning authorities to have due regard to the protection of local amenity and local environment'*

Paragraphs 11-13

11. Criteria should be set to guide land supply allocations where there is identified need. Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward. Criteria based policies should be fair and should facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community.

12. In exceptional cases, where a local planning authority is burdened by a large-scale unauthorised site that has significantly increased their need, and their area is subject to strict and special planning constraints, then there is no assumption that the local planning authority is required to plan to meet their traveller site needs in full.

13. Local planning authorities should ensure that traveller sites are sustainable economically, socially and environmentally. Local planning authorities should, therefore, ensure that their policies:

- a) promote peaceful and integrated co-existence between the site and the local community
- b) promote, in collaboration with commissioners of health services, access to appropriate health services
- c) ensure that children can attend school on a regular basis
- d) provide a settled base that reduces both the need for long-distance travelling and possible environmental damage caused by unauthorised encampment
- e) provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there or on others as a result of new development
- f) avoid placing undue pressure on local infrastructure and services
- g) do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans
- h) reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability.

Policy C: *Sites in rural areas and the countryside*

*'When assessing the suitability of sites in rural or semi-rural settings, local planning authorities should ensure that the scale of such sites does not dominate the nearest settled community.'*

Why are existing brownfield sites in the borough not being looked at for potential sites?