



Norfolk County Council

Norfolk County Council Comments on the: King’s Lynn and West Norfolk Local Plan 2021-2040: Main Modifications Part 2 (Gypsy, Traveller and Travelling Showpeople) consultation 20 November 2024

1. Overview

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

2. Highway Authority

General Comment

2.1. The Highway Authority (HA) has considered each of the potential Gypsy and Traveller and Travelling Showpeople sites which are proposed to be allocated through the main modification’s consultation. The HA views expressed have considered the nature of the proposed uses and the focus of the response is the adequacy of the access and local highway network given existing uses.

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

2.3. The suitability of the proposed site allocations have been assessed against the technical criteria of the Highway Authority for new allocations and development proposals as they have no formal planning status, see paragraph 2.4 for the detailed comments on each proposed allocation.

2.4. Highway Authority Detailed Comments

Ref	Address	Highway Authority Comment	No of Pitches
GT05		Suitable access appears to be achievable. No provision for off carriageway walking/cycling. The Highway Authority does not object to the provision of 1 additional pitch.	1 pitch

Ref	Address	Highway Authority Comment	No of Pitches
GT09		<p>The carriageway is just one vehicle width but local traffic only as this is not a through road. No off-carriageway walking/ cycling provision.</p> <p>The Highway Authority does not object to the provision of 1 additional pitch.</p>	1 pitch
GT11		<p>The carriageway is just one vehicle width but local traffic only as this is not a through road. No off-carriageway walking/ cycling provision.</p> <p>The Highway Authority does not object to the provision of 1 additional pitch.</p>	1 pitch
GT14		<p>It is recognised that there is an existing site, however the Highway Authority objects to the proposed allocation of an extension to the site as the local highway network not of sufficient standard to support further development, with no clear means of making meaningful improvements.</p> <p>The Highway Authority raises a soundness objection to this allocation. The proposed allocation is not effective as there are no meaningful improvements that can overcome the Highway Authority objection and therefore the site is not considered deliverable.</p>	12
GT15		<p>Suitable access appears to be achievable. No provision for off carriageway walking/cycling</p> <p>The Highway Authority does not object to the provision of 1 additional pitch.</p>	1 pitch

Ref	Address	Highway Authority Comment	No of Pitches
GT17		<p>The local highway network is not of a sufficient standard to support further development, and it is not considered highways impacts upon Small Lode could be satisfactorily overcome in order to accommodate an additional 9 pitches at this site.</p> <p>The Highway Authority raises a soundness objection to this allocation. The proposed allocation is not effective as there are no meaningful improvements that can overcome the Highway Authority objection and therefore the site is not considered deliverable.</p>	9 pitches
GT18		<p>Local highway network is not of sufficient standard to support further development, and it is not considered highways impacts upon Small Lode could be satisfactorily overcome, to accommodate 14 additional pitches on this site.</p> <p>The Highway Authority raises a soundness objection to this allocation. The proposed allocation is not effective as there are no meaningful improvements that can overcome the Highway Authority objection and therefore the site is not considered deliverable.</p>	14 pitches

Ref	Address	Highway Authority Comment	No of Pitches
GT20		<p>It is recognised that the site is already operational, however the Highway Authority objects to the proposed allocation as the local highway network is not of a sufficient standard to support further development, with no clear means of making meaningful improvements.</p> <p>This is compounded by the cumulative traffic impact of further proposed allocations nearby in Upwell/ Outwell on the local highway network. It is not considered highways impacts can be satisfactorily overcome, to accommodate an additional pitch on this site.</p> <p>The Highway Authority raises a soundness objection to this allocation. The proposed allocation is not effective as there are no meaningful improvements that can overcome the Highway Authority objection and therefore the site is not considered deliverable.</p>	1 pitch
GT21		<p>It is recognised that the site is already operational, however the Highway Authority objects to the proposed allocation as the local highway network is not of sufficient standard to support further development, with no clear means of making meaningful improvements.</p> <p>This is compounded by the cumulative traffic impact of further proposed allocations nearby in Upwell/ Outwell on the local highway network. It is not considered highways impacts can be satisfactorily overcome, to accommodate an additional 5 pitches on this site.</p> <p>The Highway Authority raises a soundness objection to this allocation. The proposed allocation is not effective as there are no meaningful improvements that can overcome the Highway Authority objection and therefore the site is not considered deliverable.</p>	5 pitches

Ref	Address	Highway Authority Comment	No of Pitches
GT25		<p>It is recognised that the site is already operational, however the Highway Authority objects to the proposed allocation due to the increased slowing stopping and turning movements at the junction of the A134 which is a corridor of movement.</p> <p>The site is also remote with no off-carriageway walking/cycling.</p> <p>The Highway Authority raises a soundness objection to this allocation. The proposed allocation is not effective as there are no meaningful improvements that can overcome the Highway Authority objection and therefore the site is not considered deliverable.</p>	1 pitch
GT28		<p>It is recognised that the site is already operational, however the Highway Authority objects to the proposed allocation as the local highway network is not of sufficient standard to support further development, with no clear means of making meaningful improvements.</p> <p>This is compounded by the cumulative traffic impact of further proposed allocations on Small Lode. It is not considered highways impacts can be satisfactorily overcome, to accommodate 2 additional pitches on this site.</p> <p>The Highway Authority raises a soundness objection to this allocation. The proposed allocation is not effective as there are no meaningful improvements that can overcome the Highway Authority objection and therefore the site is not considered deliverable.</p>	2 pitches

Ref	Address	Highway Authority Comment	No of Pitches
GT29		Subject to being able to achieve access of the required standard, the Highway Authority does not object to this proposed allocation.	1 pitch
GT34		<p>It is not clear how the site is or will be accessed. Assuming this will be via restricted byway, this should be widened to 4.8m and surfaced for 10m from the B1355 to enable accessing vehicles to pass. Cutting of adjacent hedges would need to be secured to achieve acceptable visibility. No facilities for off-carriageway walking / cycling.</p> <p>Subject to securing width improvements and the land for required visibility, the Highway Authority does not object to the proposals.</p>	1 pitch
GT54		<p>Suitable access appears to be achievable. No provision for off carriageway walking/cycling</p> <p>The Highway Authority does not object to the provision of 1 additional pitch.</p>	1 pitch
GT55		<p>This site has a conditioned splay across their site which is not currently adhered to. Should that be maintained the Highway Authority would accept one additional pitch as traffic volumes are low.</p> <p>No opportunity for safe walking /cycling from site.</p> <p>The Highway Authority does not object to the provision of 1 additional pitch subject to meeting the conditioned requirements for access.</p>	1 pitch

Ref	Address	Highway Authority Comment	No of Pitches
GT56		<p>No off-carriageway walking/cycling available but low traffic volumes likely & wide verges available.</p> <p>The Highway Authority does not object to the provision of 9 additional pitches.</p>	9 pitches
GT54		<p>Suitable access appears to be achievable.</p> <p>No provision for off carriageway walking/cycling</p> <p>The Highway Authority does not object to the provision of 1 additional pitch.</p>	1 pitch
GT55		<p>This site has a conditioned splay across their site which is not currently adhered to. Should that be maintained the Highway Authority would accept one additional pitch as traffic volumes are low.</p> <p>No opportunity for safe walking /cycling from site.</p> <p>The Highway Authority does not object to the provision of 1 additional pitch subject to meeting the conditioned requirements for access.</p>	1 pitch
GT56		<p>No off-carriageway walking/cycling available but low traffic volumes likely & wide verges available.</p> <p>The Highway Authority does not object to the provision of 9 additional pitches.</p>	9 pitches
GT59		<p>No off-carriageway walking/cycling provision available but low traffic volumes likely & wide verges available.</p> <p>The Highway Authority does not object to the provision of 4 additional pitches.</p>	4 pitches
GT62		<p>Site remote with no off-carriageway walking/cycling facilities.</p> <p>Subject to demonstration that a suitable access can be achieved, the Highway Authority does not object to the proposed allocation of 2 additional pitches.</p>	2 pitches

Ref	Address	Highway Authority Comment	No of Pitches
GT65		<p>It is recognised that the site is already operational, however the Highway Authority objects to the proposed allocation due to the increased slowing stopping and turning movements at the junction of the A134 which is a corridor of movement.</p> <p>Site remote with no off-carriageway walking/cycling provision.</p> <p>The Highway Authority raises a soundness objection to this allocation. The proposed allocation is not effective as there are no meaningful improvements that can overcome the Highway Authority objection and therefore the site is not considered deliverable.</p>	5 pitches
GT66		<p>Site remote with no off-carriageway walking/cycling. The Highway Authority does not, however, object to the provision of 1 additional pitch.</p>	1 pitch

- 2.5. Should you have any queries with the above comments please contact Richard Doleman (Principal Infrastructure Development Planner) at



3. Lead Local Flood Authority

MM378 New Policies - Sites for Gypsies, Travellers and Travelling Showpeople and Caravans, Park Homes and Park Homes and Houseboats

- 3.1. In MM378 the Lead Local Flood Authority (LLFA) notes the text states:

"j. address all forms of flood risk (coastal inundation, fluvial, pluvial and groundwater) through a site-specific Flood Risk Assessment (FRA) in line with Policy LP25;

k. Provide a flood evacuation plan for the site that has been agreed by the Environment Agency and the Local Flood Authority."

- 3.2. The LLFA notes that National Planning Policy Framework (NPPF) Paragraph 173.e is clear that *"safe access and escape routes are included where appropriate, as part of an agreed emergency plan."*

- 3.3. However, the LLFA would point out that it is not the LLFA's role to provide that agreement, but rather the relevant local authority officers in the resilience team or emergency planning team. The LLFA would require the agreement to be

provided as part of the planning application. This applies to all proposed development.

- 3.4. The LLFA suggests an amendment to section K to remove the reference to the Local Flood Authority, to be amended as follows: '*k. Provide a flood evacuation plan for the site that has been agreed by the Environment Agency and the Local Flood Authority*'.
- 3.5. In addition, the LLFA notes the agreed emergency plans must be provided as part of the planning application in support of the site-specific FRA.

Policy Map Schedule for Proposed Gypsy, Traveller and Travelling Showpeople allocations

- 3.6. In the Policy Map Schedule for Proposed Gypsy, Traveller and Travelling Showpeople allocations it is clear that a number of the proposed sites are at flood risk although it is not clear from the mapping from which source or the significance of the associated flood risk. The LLFA refers the local authority to the NPPF Annex 3 which identifies that a 'Highly Vulnerable' classified use is: "*Caravans, mobile homes and park homes intended for permanent residential use.*"
- 3.7. When reviewed against the Table 2 Flood risk Vulnerability and Flood Zone 'incompatibility', it is identified that 'Highly Vulnerable' uses are not permitted in Flood Zone 3a and 3b or equivalent surface water flood risk areas. While 'Highly Vulnerable' proposed development in Flood Zone 2 or equivalent surface water flood risk areas require the application of the exception text. This information will need to be appropriately reflected in all the relevant policies.
- 3.8. The LLFA therefore questions whether all the proposed sites are appropriately located and whether they are placing vulnerable users at risk of flooding unnecessarily. For example, GT18 is in close proximity of GT17 and GT28. However, GT18 appears to be at significant higher flood risk. Other proposed GT sites appear to be at higher levels of flood risk such as GT14, GT15, GT59, GT62 and GT65.
- 3.9. The LLFA notes there is an inconsistency in the drawing of the extents of GT28 and GT17 and GT18 that will need to be resolved.
- 3.10. Informative - The LLFA notes the Flood Risk vulnerability tables identify flood risk in relation to Flood Zones. However, the LLFA also notes that paragraph 168 states "The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from **any** source." Therefore, the LLFA considers the equivalent surface water flood risk areas to the Flood Zones when applying the sequential and exception test is in accordance with NPPF.

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