



Representation Form

Consultation on additional evidence base documents, September 2023

Closing date for submitting representations: 11:59pm, Friday, 20th October 2023

Part A

Section 1: Personal Details

| | |
|--------------------------------|------------|
| Title: | |
| First Name: | Stuart |
| Last Name: | Carruthers |
| Job Title (where relevant): | |
| Organisation (where relevant): | |
| Address: | [REDACTED] |
| Postcode: | [REDACTED] |
| Telephone: | [REDACTED] |
| Email: | [REDACTED] |

Section 2: Agent Details (if applicable)

Please supply the details below of any agent you have working on your behalf.

| | |
|-------------------|--|
| Agent name: | |
| Address: | |
| Postcode: | |
| Telephone number: | |
| Email: | |

Part B

Please fill in a separate form for each document

Section 3: Representations

Which Document are you responding on?

| Examination Library ref | Document name | Paragraph No(s) |
|-------------------------|---|-----------------|
| F44 | King's Lynn & West Norfolk Borough Council Gypsy, and Traveller Accommodation Assessment (GTAA) | Entire document |

Summary of Comments:

Please be as precise as possible as to why you support or object to the evidence and/or any suggested main modifications to the Plan contained in the document, providing the relevant paragraph and/or policy number for each point.

The document seeks to replace an earlier document produced by ORS in 2016. This document was neither robust or credible as demonstrated by the updated document.

The Gypsy / Traveller community collaborated with ORS to produce a more accurate population estimate for F44. It is estimated that a coverage of about 60% - 70% of the Gypsy / Traveller population was secured.

There are issues with the definitions used by ORS. A large number of people excluded from the 2016 GTAA were included in the 2023 GTAA. The majority of these had been homeless since 2016.

The issues are sensitive as many Gypsy / Travellers are unable to secure land in Flood Zone 1 in which to live and if they develop in Flood Zone 3 they need a building to meet Environment Agency requirements for a safe refuge. The Kings Lynn Council has argued that buildings developed by Gypsy / Travellers do not form of a Gypsy site even if the occupiers are Gypsy's. This resulted in appeal decision 3286363.. and is going to lead to an application for a caravan site next to a perfectly good dwelling to enable Gypsy / Travellers to have somewhere to sleep.

ORS has conceded that the definitions used for the survey were incorrect. The Kings Lynn Council has disputed this.

It is noted that Social Gypsy / Traveller in the borough are developed in Flood Zone 3.

The Kings Lynn Council is seeking to limit its search for Gypsy sites to Flood Zone 1.

(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, at the discretion of the Planning Inspectors. Do you consider it necessary to participate in Examination Hearing sessions? (Please select one answer)

No, I do not wish to participate at the Examination Hearing

Yes, I wish to participate at the 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 or 01553 616200.

Section 6: Signature and Date of Representation

| | |
|---|---------------------|
| Please sign and date below: | |
| Signature: (electronic signatures are acceptable) | Stuart H CARRUTHERS |
| Date: | 20/10/23 |

Please note that, to be considered, your representation will need to be received by 11:59pm on Friday, 20th October 2023.