

# Planning Committee

30 May 2025

Agenda item number 10

## Local Plan- Preparing the publication version

Report by Planning Policy Officer

---

### Summary

This is the final preparation report for the publication version of the Local Plan. It covers Residential Moorings Need, Addendum to the Gypsy and Traveller Need Assessment and the Duty to Cooperate.

### Recommendation

That Members endorse the Residential Moorings Need clarification letter, Addendum to the Gypsy and Traveller Assessment and the Duty to Cooperate Statement, as evidence to support the Local Plan.

---

## 1. Introduction

- 1.1. This is the final report that brings evidence for the Local Plan to the Planning Committee. In July, the Local Plan will come to Planning Committee for endorsement for Regulation 19 consultation. This paper includes evidence on Residential Moorings, Gypsy and Travellers, and the Duty to Cooperate.

## 2. Residential Moorings Need – clarification letter

- 2.1. Members will be aware that the plan period is now from 2021 to 2042, rather than 2041. The consultant who completed our Residential Moorings Need Assessment has confirmed that the one extra year of the plan period does not alter the need for residential moorings of 48. The letter is at Appendix 1. Members are asked to endorse this clarification letter.

## 3. Gypsy and Traveller Need Assessment – Addendum

- 3.1. Following investigative work at Cobholm Island, Great Yarmouth, the consultants have used our findings of which and how many pitches are immune from planning enforcement to update the figures. In summary, the current need is 12 and the future need is 5. The Assessment is at Appendix 2. Members are asked to endorse this Assessment to replace the current one.

## 4. Duty to Cooperate Statement

- 4.1. This Statement sets out the ways that the Broads Authority cooperates with other relevant organisations. It also includes the outcomes of such cooperation. In terms of housing need, Members will be aware that in Norfolk, there are agreements set out in the Norfolk Strategic Framework which say that if the Broads Authority cannot meet its need, the districts will. The districts have confirmed this is still the case, even with our need being greater than what is written in the current NSPF following the change in methodology for calculating housing need – using stock rather than population projections. As for East Suffolk, a letter is included that sets out a similar agreement – that East Suffolk will meet any unmet need. In terms of Gypsy and Travellers, we will continue to work with Great Yarmouth Borough Council.

Author: Natalie Beal

Date of report: 20 May 2025

Appendix 1 – [Residential moorings need clarification letter](#)

Appendix 2 – [Great Yarmouth Gypsy and Traveller Accommodation Assessment](#)

Appendix 3 – [Duty to Cooperate Statement](#)

30 April 2025

Dear Broads Authority

**Broads Authority Boat Dwellers Accommodation Assessment 2022**

Following recent correspondence about the revised Local Plan period and the accommodation needs of boat dwellers along your waterways, I can confirm that the additional year does not alter the accommodation requirements identified in our assessment.

Best wishes  
Kate

Dr Kate Rust-Ryan  
Director



**GREAT YARMOUTH**  
BOROUGH COUNCIL



**Broads**  
Authority

# Great Yarmouth Gypsy and Traveller Accommodation Assessment (GTAA)

## Final Report

April 2025



Opinion Research Services, The Strand, Swansea, SA1 1AF

#### **Contributors**

Steve Jarman, Michael Bayliss, Elliot Muldoon, Hanna Lloyd, Rhys Evans, Scott Lawrence, Jonathan Lee and Nigel Moore

#### **Fieldwork**

ORS GTAA Fieldwork Team

Enquiries: 01792 535300 · [info@ors.org.uk](mailto:info@ors.org.uk) · [www.ors.org.uk](http://www.ors.org.uk)

© Copyright 2025

Please note that some of the tables include rounded figures. This may result in some column or row totals or % not adding up to 100 or to the anticipated row or column totals due to the use of rounded decimal figures.

The below copyrights acknowledge the open-source data that is provided by the respective bodies and is used throughout this document

May contain Ordnance Survey data © Crown copyright and database right 2025

May contain Royal Mail data © Royal Mail copyright and database right 2025

May contain National Statistics data © Crown copyright and database right 2025

May contain public sector information licensed under the Open Government Licence v3.0

# TABLE OF CONTENTS

<b>1. EXECUTIVE SUMMARY .....</b>	<b>5</b>
Introduction and Methodology.....	5
Background.....	5
Key Findings – Great Yarmouth Borough (excluding the Broads Authority) .....	6
Key Findings – Broads Authority part of Great Yarmouth .....	7
Recommendations – Great Yarmouth Borough .....	9
<b>2. INTRODUCTION .....</b>	<b>11</b>
Definitions .....	11
Legislation and Guidance for Gypsies and Travellers .....	13
<b>3. METHODOLOGY.....</b>	<b>16</b>
Background.....	16
Our approach to Fieldwork .....	16
Desk-Based Review .....	17
Stakeholder Engagement.....	17
Working Collaboratively with Neighbouring Planning Authorities .....	17
Community Engagement .....	17
Bricks and Mortar Households.....	18
Timing of the Fieldwork .....	18
Our Analysis .....	18
Dealing with Undetermined Households .....	19
Calculating the Current and Future Need .....	19
<b>4. GYPSY, TRAVELLER &amp; TRAVELLING SHOWPEOPLE SITES/YARDS AND POPULATION .....</b>	<b>23</b>
Introduction .....	23
Sites and Yards.....	24
MHCLG Traveller Caravan Count .....	25
<b>5. SURVEY OF TRAVELLING COMMUNITIES.....</b>	<b>26</b>
Interviews with Travellers.....	26
<b>6. CURRENT AND FUTURE PITCH PROVISION .....</b>	<b>28</b>
Introduction.....	28
New Household Formation Rates .....	28
Household Planning Status .....	30
Interviews with Gypsies and Travellers in Bricks and Mortar .....	30
Migration/Roadside .....	31
Public Sites.....	31
Gypsy and Traveller Needs Great Yarmouth (excluding the Broads Authority) .....	32
Pitch Needs – Undetermined Gypsies and Travellers .....	33
Travelling Showpeople Needs.....	33
Plot Needs – Travelling Showpeople that met the PPTS 2024 Planning Definition .....	33
Gypsy and Traveller Needs Broads Authority part of Great Yarmouth .....	34
Pitch Needs – Undetermined Gypsies and Travellers .....	35
Travelling Showpeople Needs.....	35
Plot Needs – Travelling Showpeople that met the PPTS 2024 Planning Definition .....	35
Transit Requirements – Great Yarmouth Borough .....	36

<b>7. CONCLUSIONS .....</b>	<b>38</b>
Gypsies and Travellers .....	38
Great Yarmouth (excluding the Broads Authority) .....	38
Broads Authority part of Great Yarmouth .....	38
Recommendations - Great Yarmouth Borough.....	38
Travelling Showpeople – Great Yarmouth Borough.....	39
Transit Provision – Great Yarmouth Borough .....	39
<b>APPENDICES .....</b>	<b>40</b>
Appendix A: Glossary of Terms / Acronyms Used .....	40
Appendix B: Site and Yard List .....	42
Appendix C: Household Interview Questionnaire .....	43
Appendix D: Household Formation Rates .....	50

# TABLE OF FIGURES

Figure 1 – Need for Gypsy and Traveller households in Great Yarmouth (excluding the Broads Authority) 2025-41 .....	7
Figure 2 – Need for Gypsy and Traveller households by year periods .....	7
Figure 3 – Need for Gypsy and Traveller households in the Broads Authority part of Great Yarmouth - 2025-41 .....	8
Figure 4 – Need for Gypsy and Traveller households by year periods .....	8
Figure 5 - Total amount of provision in Broads Authority part of Great Yarmouth April 2025 ....	24
Figure 6 - Total amount of provision in the Broads Authority part of Great Yarmouth - April 2025 .....	25
Figure 7 – Interviews completed in Great Yarmouth (excluding the Broads Authority) .....	26
Figure 8 – Interviews completed in the Broads Authority part of Great Yarmouth .....	26
Figure 9 – Planning status of households in Great Yarmouth (excluding the Broads Authority) ..	30
Figure 10 – Planning status of households in the Broads Authority part of Great Yarmouth .....	30
Figure 11 – Need for Gypsy and Traveller households in Great Yarmouth (excluding the Broads Authority) that met the Planning Definition .....	32
Figure 12 – Need for Gypsy and Traveller households in Great Yarmouth (excluding the Broads Authority) that met the Planning Definition by year periods.....	33
Figure 13 – Need for Gypsy and Traveller households in the Broads Authority part of Great Yarmouth that met the Planning Definition.....	34
Figure 14 – Need for Gypsy and Traveller households in the Broads Authority part of Great Yarmouth that met the Planning Definition by year periods .....	35



# 1. EXECUTIVE SUMMARY

## Introduction and Methodology

- 1.1 The primary purpose of this Gypsy and Traveller Accommodation Assessment (GTAA) is to provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in the Great Yarmouth Borough Council (the Council) area. Great Yarmouth includes two local planning authority areas; Great Yarmouth Borough and parts of the Broads Authority.
- 1.2 This is a partial update to the previous GTAAs that have been completed covering Great Yarmouth Borough and the Broads Authority parts of Great Yarmouth. The GTAA provides a credible evidence base which can be used to support the preparation of Local Plan Policies and, where appropriate, the provision of new Gypsy and Traveller pitches and Travelling Showpeople plots for the period 2025 to 2041 for Great Yarmouth Borough and for the period 2025 to 2042 for the Broads Authority to cover respective Local Plan periods and the 15-year requirements set out in Planning Policy for Traveller Sites (PPTS)<sup>1</sup>. The outcomes of this study supersede the outcomes of the previous GTAA for the Council.
- 1.3 The outcomes of the GTAA have been split to identify figures for Great Yarmouth (excluding the Broads Authority) and for the Broads Authority parts of Great Yarmouth.
- 1.4 The GTAA has sought to understand the accommodation needs of the Gypsy, Traveller and Travelling Showpeople population through a combination of desk-based research, stakeholder interviews, and engagement with members of the Travelling Community. This includes those living on all known sites, yards, and encampments, as well as seeking to engage with households living in bricks and mortar accommodation.
- 1.5 A total of 17 interviews or proxy interviews were completed with Gypsies and Travellers living on sites in Great Yarmouth (excluding the Broads Authority) and a total of 14 interviews with Gypsies and Travellers on sites in the Broads Authority part of Great Yarmouth. No Travelling Showpeople yards were identified in either area.
- 1.6 Following efforts that were made, it was possible to complete 2 interviews with households living in bricks and mortar in the Broads Authority part of Great Yarmouth.
- 1.7 The baseline date for the study is April 2025.

## Background

- 1.8 Gypsy and Travellers Local Plan Policies should give consideration to addressing need from households that meet the 2024 PPTS planning definition through the intensification or expansion of the existing sites and yards where need has been identified. Consideration should then be given to granting planning permission for any temporary and unauthorised sites or yards. If any residual need remains then consideration will need to be given to the allocation of new pitches or plots.

---

<sup>1</sup> Whilst the Broads Authority Local Plan period is from 2021-2042 the GTAA Update has assumed that supply and demand for the period 2021-2025 net to zero.

- <sup>1.9</sup> The Local Planning Authorities should also put in place a Criteria-Based Local Plan Policy (as suggested in Paragraph 11 in the PPTS) to manage the need from Undetermined households, as well as to deal with any potential windfall applications, potential need from in-migration, or from bricks and mortar.
- <sup>1.10</sup> Paragraph 62 of the National Planning Policy Framework (NPPF) 2024 sets out that in determining the minimum number of homes needed, *strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance.*
- <sup>1.11</sup> Paragraph 63 then states that [emphasis added] *Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing with-care and care homes); students; people with disabilities; service families; **travellers**; people who rent their homes and people wishing to commission or build their own homes.*
- <sup>1.12</sup> Footnote 27 to this section states that ‘*Planning Policy for Traveller Sites sets out how travellers’ housing needs should be assessed for those covered by the definition in Annex 1 of that document.*’

## Key Findings – Great Yarmouth (excluding the Broads Authority)

- <sup>1.13</sup> The findings of this report should be considered as part of future housing mix and type within the context of the assessment of overall housing need in relation to Gypsies, Travellers and Travelling Showpeople. Whilst the findings in this report are aggregated totals for the whole of Great Yarmouth (excluding the Broads Authority) the Council have been provided with more detailed breakdowns to support the preparation of any future Local Plan Policies.

### Pitch Needs – Gypsies and Travellers

- <sup>1.14</sup> In April 2025 the Council identified 27 Gypsy and Traveller pitches in Great Yarmouth (excluding the Broads Authority).
- » 1 public site (18 pitches);
  - » 1 site that is tolerated for planning purposes (3 pitches);
  - » 1 public transit site (6 pitches – of which 3 allow permanent occupancy).
- <sup>1.15</sup> Our research concluded that all 21 Gypsy or Traveller households met the 2024 PPTS planning definition of a Traveller.
- <sup>1.16</sup> Our research identified a need for **8 pitches** emerging from the 21 households that met the 2024 PPTS planning definition. This is made up of 4 concealed or doubled-up households or single adults; 4 teenagers who will need a pitch of their own in the next 5 years; and 6 pitches from new household formation, using a formation rate of 1.60% derived from the household demographics. This need is offset by supply from 6 vacant pitches on the public site.
- <sup>1.17</sup> Given that it was possible to complete interviews with households living on all occupied pitches there is **no need from undetermined households**.

- 1.18 The overall pitch needs for Gypsies and Travellers for the period 2025/26 to 2041/42 are summarised in Figure 1.

**Figure 1 – Need for Gypsy and Traveller households in Great Yarmouth (excluding the Broads Authority) 2025-41**

Status	2025-2041
Need from households who meet the Planning Definition	8
Undetermined	0
<b>TOTAL</b>	<b>8</b>

- 1.19 The need from households that meet the planning definition and for undetermined households can be distributed across year periods as shown in **Error! Reference source not found..**

**Figure 2 – Need for Gypsy and Traveller households by year periods**

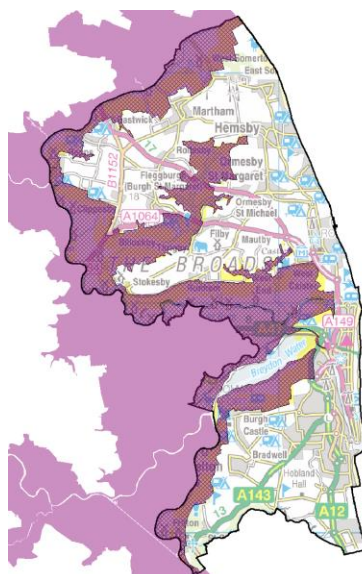
Year Period	Dates	PPTS Need	Undetermined Need
0 – 5	2025-29	2	0
6 – 10	2034-34	2	0
11 – 15	2035-39	3	0
16 – 17	2040-41	1	0
<b>0 – 17</b>	<b>2025-41</b>	<b>8</b>	<b>0</b>

## Plot Needs – Travelling Showpeople

- 1.20 There were no Travelling Showpeople identified living on yards in Great Yarmouth (excluding the Broads Authority) so there is no current or future need for plots.

## Key Findings – Broads Authority part of Great Yarmouth

- 1.21 The assessment of need has also covered the parts of the Broads Authority that are located within Great Yarmouth (see map below). There are 11 small private tolerated Gypsy and Traveller sites located in the Broads Authority part of Great Yarmouth; 1 small private unauthorised site; and 2 bricks and mortar properties occupied by Travellers – all in an area known as Cobholm Island.



- <sup>1.22</sup> The findings of this report should be considered as part of future housing mix and type within the context of the assessment of overall housing need in relation to Gypsies, Travellers and Travelling Showpeople. Whilst the findings in this report are aggregated totals for the Broads Authority parts of Great Yarmouth, the Local Planning Authority have been provided with more detailed breakdowns to support the preparation of any future Local Plan Policies.

## Pitch Needs – Gypsies and Travellers

- <sup>1.23</sup> In April 2025 the Local Planning Authority identified 14 Gypsy and Traveller pitches in the Broads Authority parts of Great Yarmouth.
- » 11 tolerated private sites (13 pitches);
  - » 1 unauthorised private site (1 pitch);
  - » 2 bricks and mortar properties occupied by Travellers.
- <sup>1.24</sup> Our research concluded that all 24 Gypsy or Traveller households met the 2024 PPTS planning definition of a Traveller.
- <sup>1.25</sup> Our research identified a need for **17 pitches** emerging from the 24 households that met the 2024 PPTS planning definition. This is made up of 1 unauthorised pitch; 5 concealed or doubled-up households or single adults; 6 teenagers who will need a pitch of their own in the next 5 years; and 5 pitches from new household formation, using a formation rate of 1.40% derived from the household demographics.
- <sup>1.26</sup> Given that it was possible to complete interviews with households living on all occupied pitches there is **no need from undetermined households**.
- <sup>1.27</sup> The overall pitch needs for Gypsies and Travellers for the period 2025/26 to 2042/43 are summarised in Figure 13.

**Figure 3 – Need for Gypsy and Traveller households in the Broads Authority part of Great Yarmouth - 2025-42**

Status	2025-2042
Need from households who meet the Planning Definition	17
Undetermined	0
<b>TOTAL</b>	<b>17</b>

- <sup>1.28</sup> The need from households that meet the planning definition and for undetermined households can be distributed across year periods as shown in **Error! Reference source not found.4**.

**Figure 4 – Need for Gypsy and Traveller households by year periods**

Year Period	Dates	PPTS Need	Undetermined Need
0 – 5	2025-29	12	0
6 – 10	2034-34	2	0
11 – 15	2035-39	2	0
16 – 18	2040-42	1	0
<b>0 – 18</b>	<b>2025-42</b>	<b>17</b>	<b>0</b>

## Plot Needs – Travelling Showpeople

- <sup>1.29</sup> There were no Travelling Showpeople identified living on yards in the Broads Authority part of Great Yarmouth so there is no current or future need for plots.

## Recommendations – Great Yarmouth Borough

### Gypsy and Traveller Recommendations

- <sup>1.30</sup> A summary of recommendations for addressing need from Gypsies and Travellers are set out below:
- » In general terms need identified in a GTAA is seen as need for pitches. As set out in Chapter 4 of this report, the now withdrawn Government Guidance on Designing Gypsy and Traveller Sites recommended that, as a general guide, an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, parking space for two vehicles and a small garden area. This guidance relates primarily to the provision of pitches on public sites but can also be more broadly applied to the provision of pitches on private sites.
  - » Whilst there is no standard size for a Gypsy and Traveller pitch, Guidance<sup>2</sup> recommends an average pitch size of 320m<sup>2</sup> but also suggests that a variety of pitch sizes – including small, medium and large pitches can enable different sized families to be accommodated on sites (equivalent to two, three and four-bedroom houses) and can contribute to affordability.
  - » For need arising from public sites the Local Planning Authorities will need to consider the expansion or intensification of these sites, or for new sites(s), as it is unlikely that this need could be addressed through the provision of pitches on new private sites.
  - » For need arising from private sites the Local Planning Authorities will need to consider the expansion or intensification of these sites, or to address need through new site/pitch allocations. Where they have been identified the Local Planning Authorities should also consider the regularisation of sites with temporary planning permission and of unauthorised sites.
  - » The Local Planning Authorities will also need to carefully consider how to address any potential needs from Undetermined households; from households seeking to move to Great Yarmouth Borough (in-migration); or from households currently living in bricks and mortar who may wish to move to a site. In terms of the Local Plan Policies, the Local Planning Authorities should continue to use or put in place Criteria-Based Local Plan Policies as suggested in the PPTS.
  - » Future need from new household formation could also be met through natural turnover of pitches over time, or through enforcing against any pitches not found to be occupied by Gypsies or Travellers.
  - » Whilst the findings in this report are aggregated totals for the whole of Great Yarmouth Borough due to data protection issues, the Local Planning Authorities have more detailed data to enable an accurate review of Local Plan allocations to be made.

---

<sup>2</sup> Leeds City Council: *Gypsy and Traveller Site Design Guide* (2020).

## Travelling Showpeople Recommendations

<sup>1.31</sup> A summary of recommendations for addressing need from Travelling Showpeople are set out below:

- » There were no Travelling Showpeople identified living on yards in Great Yarmouth Borough so there is no current or future need for plots.

## Transit Recommendations

<sup>1.32</sup> A summary of recommendations for addressing transit need are set out below:

- » Given that there are low numbers of encampments each year and under-utilised public transit pitches it is not recommended that there is a need for another formal public transit site in Great Yarmouth borough at this time. However, the situation relating to levels of encampments should be monitored to determine if there are any increases in the number of encampments.
- » As well as information on the size and duration of the encampments, this monitoring should also seek to gather information from residents on the reasons for their stay in the local area; whether they have a permanent base or where they have travelled from; and whether they have any need or preference to settle permanently in the local area. This information could be collected as part of a Welfare Assessment (or similar).
- » It is recommended that a review of the evidence base relating to encampments, including the monitoring referred to above, should be undertaken on a Norfolk-wide basis. This will establish whether there is a need for investment in any new transit provision or emergency stopping places, or whether a managed approach is preferable.
- » In the short-term the Local Planning Authorities should continue to use their current approaches when dealing with encampments, and management-based approaches such as negotiated stopping agreements could also be considered.
- » The term 'negotiated stopping' is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent 'built' transit sites but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between the Local Planning Authority and the (temporary) residents regarding expectations on both sides. See [www.negotiatedstopping.co.uk](http://www.negotiatedstopping.co.uk) for further information.
- » Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold-water supply; portaloos; sewerage disposal point and refuse disposal facilities.

## 2. INTRODUCTION

- 2.1 The primary purpose of this Gypsy and Traveller Accommodation Assessment (GTAA), is to provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in The Borough of Great Yarmouth. Great Yarmouth borough includes two local planning authority areas; Great Yarmouth Borough and parts of the Broads Authority.
- 2.2 The outcomes of the GTAA have been split to identify figures for Great Yarmouth (excluding the Broads Authority) and for the Broads Authority parts of Great Yarmouth.
- 2.3 The outcomes of the study will supersede the outcomes of the previous Gypsy, Traveller, and Travelling Showpeople Accommodation Needs Assessment (GTAA) completed for the Local Planning Authorities.
- 2.4 The study provides an evidence base to enable the Local Planning Authorities to comply with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, Planning Policy for Traveller Sites (PPTS) 2024, the Housing and Planning Act (2016), the National Planning Policy Framework (NPPF) 2024, and the Planning Practice Guidance (PPG) 2021.
- 2.5 The GTAA provides a robust assessment of need for Gypsy, Traveller and Travelling Showpeople accommodation in the study area. It can be used to aid the implementation of the Local Planning Authorities' Local Plan Policies and the provision of Traveller pitches and plots covering the period 2025 to 2041 for Great Yarmouth Borough and 2025 to 2042 for the Broads Authority to meet the 15-year requirements of the PPTS and the respective Local Plan periods<sup>3</sup>.
- 2.6 In addition to identifying current and future permanent accommodation needs, it seeks to identify any need for transit provision.
- 2.7 The study covers the needs of Gypsies (including English, Scottish, Welsh and Romany Gypsies), Irish Travellers, New (Age) Travellers, and Travelling Showpeople, but for ease of reference we have referred to the study as a Gypsy and Traveller (and Travelling Showpeople) Accommodation Assessment (GTAA).
- 2.8 The baseline date for the study is April 2025.

## Definitions

### Planning Policy for Traveller Sites (PPTS) 2024

- 2.9 For the purposes of the planning system, the current planning definition of a Traveller is set out in [PPTS \(2024\)](#). The planning definition set out in Annex 1 states that:

*1. For the purposes of this planning policy "gypsies and travellers" means:*

*Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, and all other persons with a cultural tradition of*

---

<sup>3</sup> Whilst the Broads Authority Local Plan period is from 2021-2042 the GTAA Update has assumed that supply and demand for the period 2021-2025 net to zero.



*nomadism or of living in a caravan, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.*

*2. For the purposes of this planning policy, “travelling showpeople” means:*

*Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above.*

*3. For the purposes of this planning policy, “travellers” means “gypsies and travellers” and “travelling showpeople” as defined above.*

*4. For the purposes of this planning policy, “pitch” means a pitch on a “gypsy and traveller” site and “plot” means a pitch on a “travelling showpeople” site (often called a “yard”). This terminology differentiates between residential pitches for “gypsies and travellers” and mixed-use plots for “travelling showpeople”, which may / will need to incorporate space or to be split to allow for the storage of equipment.*

***Planning Policy for Traveller Sites, Ministry of Housing, Communities and Local Government (MHCLG)***

***December 2024***

## Definition of Travelling

- <sup>2.10</sup> One of the most important questions that GTAA’s need to address in terms of applying the planning definition is *what constitutes a nomadic way or life or nomadism*. This has been determined through case law.
- <sup>2.11</sup> **R v South Hams District Council (1994)** – defined Gypsies as “*persons who wander or travel for the purpose of making or seeking their livelihood (not persons who travel from place to place without any connection between their movements and their means of livelihood.)*” This includes ‘born’ Gypsies and Travellers as well as ‘elective’ Travellers such as New Age Travellers.
- <sup>2.12</sup> In **Maidstone BC v Secretary of State for the Environment and Dunn (2006)**, it was held that a Romany Gypsy who bred horses and travelled to horse fairs at Appleby, Stow-in-the-Wold and the New Forest, where he bought and sold horses, and who remained away from his permanent site for up to two months of the year, at least partly in connection with this traditional Gypsy activity, was entitled to be accorded Gypsy status.
- <sup>2.13</sup> In **Greenwich LBC v Powell (1989)**, Lord Bridge of Harwich stated that a person could be a statutory Gypsy if they led a nomadic way of life *only seasonally*.
- <sup>2.14</sup> The definition was widened further by the decision in **R v Shropshire CC ex p Bungay (1990)**. The case concerned a Gypsy family that had not travelled for some 15 years in order to care for elderly and infirm parents. An aggrieved resident living in the area of the family’s recently approved Gypsy site sought Judicial Review of the Local Authority’s decision to accept that the family had retained their Gypsy status even though they had not travelled for some considerable time. Dismissing the claim, the judge held that a



person could remain a Gypsy even if he or she did not travel, provided that their nomadism was held in abeyance and not abandoned.

- <sup>2.15</sup> **Wrexham County Borough Council v National Assembly of Wales and Others (2003)** determined that households and individuals could continue to lead a nomadic way of life with a permanent base which they set out from and return to.
- <sup>2.16</sup> Following the changes to the PPTS in 2024 the planning definition now includes *all other persons with a cultural tradition of nomadism or of living in a caravan*.
- <sup>2.17</sup> As a result is this it can be concluded that all Gypsies and Travellers now meet the PPTS 2024 planning definition of a Traveller.
- <sup>2.18</sup> There were no changes to the planning definition of a Travelling Showperson made in 2024 but it is assumed that all Travelling Showpeople will meet the Annex 1 planning definition.

## Legislation and Guidance for Gypsies and Travellers

- <sup>2.19</sup> Policy concerning Gypsies, Travellers and Travelling Showpeople sits within a complex legislative and national policy framework and this study must be viewed in the context of this legislation and guidance. For example, the following key pieces of legislation and guidance are relevant when developing policies relating to Gypsies, Travellers and Travelling Showpeople:
- » [The Housing Act, 1985](#)
  - » [The Equality Act, 2010](#)
  - » [The Housing and Planning Act, 2016](#)
  - » [Planning Practice Guidance<sup>4</sup> \(PPG\), 2021](#)
  - » [Planning Policy for Traveller Sites \(PPTS\), 2024](#)
  - » [National Planning Policy Framework \(NPPF\), 2024](#)
- <sup>2.20</sup> In addition, Case Law, Ministerial Statements, the outcomes of Local Plan Examinations and Planning Appeals, and Judicial Reviews also need to be taken into consideration. Relevant examples have been included in this report where appropriate.
- <sup>2.21</sup> The primary guidance for undertaking the assessment of housing need for Gypsies, Travellers and Travelling Showpeople is set out in the PPTS (2024). It should be read in conjunction with the National Planning Policy Framework (NPPF) 2024.

## Planning Policy for Traveller Sites (PPTS) 2024

- <sup>2.22</sup> The PPTS (2024, Paragraph 4), sets out the overall aims of the policy in respect of Traveller sites:
- » That local planning authorities should make their own assessment of need for the purposes of planning.
  - » To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites.
  - » To encourage local planning authorities to plan for sites over a reasonable timescale.

---

<sup>4</sup> With particular reference to the sections on Housing needs of different groups (May 2021).

- » That plan-making and decision-taking should protect Green Belt from inappropriate development.
- » To promote more private traveller site provision while recognising that there will always be travellers who cannot provide their own sites.
- » That plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.
- » For local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies.
- » To increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply.
- » To reduce tensions between settled and traveller communities in plan-making and planning decisions.
- » To enable provision of suitable accommodation from which travellers can access education, health, welfare, and employment infrastructure.
- » For local planning authorities to have due regard to the protection of local amenity and local environment.

<sup>2.23</sup> PPTS states in Paragraph 9 that:

*Local planning authorities should set pitch targets for gypsies and travellers as defined in Annex 1 and plot targets for travelling showpeople as defined in Annex 1 which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities.*

<sup>2.24</sup> PPTS goes on to state in Paragraph 10 that Local Planning Authorities should in producing their Local Plan:

- » Identify and annually update a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets.
- » Identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15.
- » Consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on strategic planning issues that cross administrative boundaries).
- » Relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density.
- » Protect local amenity and environment.

<sup>2.25</sup> Local Authorities have a duty to ensure a 5-year land supply to meet any need that is identified Traveller sites. However, PPTS also sets out in Paragraph 11 that:

*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.*

## National Planning Policy Framework (2024)

- <sup>2.26</sup> The most recent version of the NPPF was issued in December 2024.
- <sup>2.27</sup> Paragraph 62 of the NPPF sets out that in determining the minimum number of homes needed, *strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance.*
- <sup>2.28</sup> Paragraph 63 then states that [emphasis added] *Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing with-care and care homes); students; people with disabilities; service families; **travellers**; people who rent their homes and people wishing to commission or build their own homes.*
- <sup>2.29</sup> Footnote 27 to this section states that *'Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document.'*

## Lisa Smith v The Secretary of State for Levelling Up, Housing & Communities and others [2022]

- <sup>2.30</sup> In October 2022 the Court of Appeal handed down judgment in *Lisa Smith v The Secretary of State for Levelling Up, Housing & Communities [2022] EWCA Civ 1391*. The case was a challenge to a specific appeal decision and concerned whether the planning definition of Gypsies and Travellers contained in Annex 1 of the PPTS (2015) is discriminatory against Travellers who are settled and who no longer travel for work due to old age or disability. The Court of Appeal allowed the appeal and quashed the Inspectors decision from 2018 and referred the case back to The Secretary of State for redetermination.
- <sup>2.31</sup> Whilst certain parts of the PPTS planning definition of a Traveller were found to be discriminatory, as the PPTS 2015 itself was not the subject of the case it was not quashed or declared unlawful at this time.
- <sup>2.32</sup> As a result of the Lisa Smith Judgement, changes to the PPTS in 2023, and following consultation on the NPPF in 2024, the Government made changes to the PPTS in December 2024 to effectively bring all Gypsies and Travellers under the current planning definition.

## 3. METHODOLOGY

### Background

- 3.1 Opinion Research Services (ORS) have been undertaking Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessments (GTAA's) for over ten years. Our approach has been regularly refined in light of changes to PPTS in 2015, 2023 and 2024, the Housing and Planning Act (2016), the NPPF (2024), and the PPG (2021), as well as the outcomes of Local Plan Examinations and Planning Appeals.
- 3.2 PPTS contains a number of requirements for local authorities which must be addressed in a GTAA. Paragraph 7 in the PPTS sets out that local authorities should (a) pay particular attention to early and effective community engagement with both settled and traveller communities - including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups; (b) cooperate with travellers, their representative bodies and local support groups; other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs of their areas over the lifespan of their development plan, working collaboratively with neighbouring local planning authorities; and (c) use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions.
- 3.3 ORS would note that the ORS GTAA methodology has been repeatedly found to be sound and robust, including through Local Plan Examinations in multiple areas across England<sup>5</sup>.

### Our approach to Fieldwork

- 3.4 The stages below provide a summary of the methodology that was used to complete this study.



<sup>5</sup> ORS have attended Gypsy and Traveller Local Plan Examination Sessions in areas including Bedford, Brentwood, Bristol, Cambridge, Castle Point, Central Bedfordshire, Cheltenham, Colchester, Cotswold, Daventry, East Hertfordshire, Gloucester, Leicester, Maldon, Milton Keynes, Newark and Sherwood, Newham, Runnymede, South Cambridgeshire, South Northamptonshire, Spelthorne, Tewkesbury, and Waverley.

## Desk-Based Review

- 3.5 The secondary data that was reviewed and collated included:
- » Census data.
  - » Traveller Caravan Count data.
  - » Planning history for existing sites and yards.
  - » Records of unauthorised sites/encampments.
  - » Information on active planning applications and appeals.
  - » Information on active enforcement actions.
  - » Existing Needs Assessments and other relevant local studies.
  - » National and local policy, guidance, and best practice.

## Stakeholder Engagement

- 3.6 Whilst no formal interviews with wider stakeholders were completed for this GTAA Update, detailed discussions were held with key Council and Broads Authority Officers to determine any changes since the previous GTAA was completed.

## Working Collaboratively with Neighbouring Planning Authorities

- 3.7 As this was an update of an existing GTAA there was no formal engagement programme completed with neighbouring planning authorities.

## Community Engagement

- 3.8 Once we have identified all authorised and unauthorised sites/yards and encampments in the study area we seek to complete an interview with each household. ORS use a census (i.e. 100% approach) rather than sampling approach as we consider this to be more robust. Sample based approaches can lead to an underestimate of need and GTAA's using sampling are regularly challenged by the Planning Inspectorate.
- 3.9 ORS make at least three separate attempts to contact a household including leaving calling cards and offering appointments.
- 3.10 Interviews are undertaken by experienced fieldworkers who work on our GTAA studies across England and Wales. To ensure consistency in data collection ORS use a standard questionnaire which can be seen in **Appendix C**. The interview captures current demographic characteristics, their current or future accommodation needs, whether there is any over-crowding or the presence of concealed households and travelling characteristics. It also asks about the type of pitches households may require in the future – for example private or socially rented, together with any features they may wish to be provided.
- 3.11 The survey includes questions about the travelling characteristics of household members. Whilst responses to these questions are less relevant now following the changes to the PPTS in 2024, ORS feel that this is

useful data which supports analysis. This information is useful when seeking to address any identified need as those who do and don't travel may have different pitch/plot requirements.

- 3.12 Where we are unable to complete an interview, we will attempt to gather basic information about each pitch/plot through a proxy interview from sources including neighbouring residents and site management.
- 3.13 In addition to the household interviews fieldworkers make an overall physical assessment of each site to determine any opportunities for intensification or expansion to meet future needs.
- 3.14 Following the completion of the fieldwork by ORS, further work was completed by the Broads Authority to identify some additional demographic information for households that were not identified in the initial site baseline.

## Bricks and Mortar Households

- 3.15 The 2021 Census recorded 52 households who identified as either Gypsies or Irish Travellers, or Roma who lived in a house or bungalow in Great Yarmouth and 39 living in a flat or maisonette.
- 3.16 ORS apply a rigorous approach to making contact with bricks and mortar households as this is a common issue raised at Local Plan Examinations and Planning Appeals. Contacts were sought through a range of sources including the interviews with people on existing sites and yards; information from stakeholder interviews; and information from housing registers. Interviews are sought with all identified households.
- 3.17 Through this approach the GTAA endeavoured to enable households living in bricks and mortar the opportunity to make their views known.
- 3.18 ORS do not make assumptions on the overall needs from household in bricks and mortar based on the outcomes of any interviews that are completed, as in our experience this leads to a significant over-estimate of the number of households wishing to move to a site or a yard. We do not model need from households living in bricks and mortar.

## Timing of the Fieldwork

- 3.19 ORS are fully aware of the transient nature of many travelling communities and subsequent seasonal variations in site and yard occupancy. ORS aim to complete fieldwork during the non-travelling season, and to avoid days of known local or national events.
- 3.20 The fieldwork for this GTAA was completed between May 2024 and March 2025 and researchers were able to collect information on all residents living on sites in Great Yarmouth Borough.

## Our Analysis

### Applying the PPTS Planning Definition

- 3.21 The primary change to the PPTS in December 2024 in relation to the assessment of need was the change to the definition of a Gypsy, Traveller or Travelling Showperson for planning purposes. Wherever possible we use the data collected in household interviews to identify if they meet the planning definition. In some cases information from planning applications and planning appeal Decision Notices is also used.

- 3.22 Through the inclusion of *all other persons with a cultural tradition of nomadism or of living in a caravan* in the Annex 1 definition this now includes all Travellers. There were no changes to the definition of Travelling Showpeople in Annex 1.

## Dealing with Undetermined Households

- 3.23 A GTAA has to consider the needs of any households where it is not possible to determine if they meet the planning definition – usually because we have been unable to complete an interview. These are defined as undetermined households
- 3.24 Whilst there is no guidance that sets out how the needs of these households should be addressed ORS consider it necessary to estimate potential need from these households. This is an additional need figure over and above the need identified for households that meet the planning definition.
- 3.25 The estimate sought to identify potential current and future need from any pitches/plots known to be temporary or unauthorised; through modelling need from concealed-doubled-up households and from teenagers based on the outcomes from completed interviews; and through new household formation. As the demographics of the undetermined households are unknown, ORS use our national household formation rate of 1.50% in our analysis to estimate future need.
- 3.26 Following the changes to the planning definition in PPTS 2024 it has been assumed that all undetermined households will meet the definition. However, it is recommended that need from undetermined households is addressed through Criteria-Based Local Plan Policies and not through specific allocations.
- 3.27 The ORS approach to addressing the need arising from undetermined households was supported by the Planning Inspector for a Local Plan Examination for Maldon District Council, Essex (29<sup>th</sup> June 2017). He concluded:

*The Council's stance is that any need arising from 'unknowns' should be a matter left to the planning application process. Modifications to Policy H6 have been put forward by the Council setting out criteria for such a purpose, which I consider further below. To my mind, that is an appropriate approach. While there remains a possibility that up to 10 further pitches may be needed, that cannot be said to represent identified need. It would be unreasonable to demand that the Plan provide for needs that have not been established to exist.*

## Calculating the Current and Future Need

- 3.28 To identify need, PPTS requires an assessment for current and future pitch requirements but does not provide a standard methodology for this. However, as with any housing assessment, the underlying calculation can be broken down into a relatively small number of factors. In this case, the key issue is to compare the supply of pitches available for occupation with the current and future needs of the population.

## Supply of Pitches

- 3.29 Our desk-based research and fieldwork determines the vacant, and potentially available supply in the study area:
- » Current vacant pitches/plots.
  - » Pitches/plots currently with planning consent due to be developed within 5 years.
  - » Pitches/plots vacated by people moving to housing.
  - » Pitches/plots vacated by people moving from the study area (out-migration).
- 3.30 It is important when seeking to identify supply from vacant pitches/plots that they are in fact available for general occupation – i.e. on a public or social rented site/yard, or on a private site/yard that is run on a commercial basis with anyone being able to rent a pitch/plot if they are available. Typically, vacant pitches/plots on small private family sites/yards are not included as components of available supply but can be used to meet any current and future need from the family living on the site/yard.

## Current Need

- 3.31 The second stage is to identify components of current need:
- » Households on unauthorised developments for which planning permission is not expected.
  - » Households living on sites/yards with temporary planning permission.
  - » Concealed, doubled-up or over-crowded households (including single adults).
  - » Teenage children in need of a pitch/plot of their own in the next 5 years.
  - » In-migration/roadside.
  - » Households in bricks and mortar needing to move to sites/yards.
  - » Households in need on waiting lists for public sites.
- 3.32 ORS are increasingly identifying households and adult household members who have been forced to leave sites due to over-crowding or exceeding planning conditions on the number of caravans permitted on sites. These households are typically living on the roadside or doubling-up on pitches in neighbouring local authorities. ORS include these households as components of hidden need and term them displaced in-migration.

## Future Need

- 3.33 The final stage is to identify components of future need. This includes the following component:
- » New household formation.
- 3.34 Household formation rates are often the subject of challenge at appeals or examinations. ORS firmly believe that any household formation rates should use a robust local evidence base, rather than simply relying on national precedent. The approach taken is set out in more detail in Chapter 7 of this report.

## Pitch Turnover

- 3.35 Some assessments of need make use of pitch/plot turnover as an ongoing component of supply. ORS do not agree with this approach or with making any assumptions about annual turnover rates. ORS consider that this approach frequently ends up significantly under-estimating need as, in the majority of cases, vacant pitches/plots are not in fact available to meet any local need. The use of turnover has been the



subject of a number of Inspectors Decisions, for example **APP/J3720/A/13/2208767** found a GTAA to be unsound when using turnover and concluded:

*West Oxfordshire Council relies on a GTAA published in 2013. This identifies an immediate need for 6 additional pitches. However, the GTAA methodology treats pitch turnover as a component of supply. This is only the case if there is net outward migration, yet no such scenario is apparent in West Oxfordshire. Based on the evidence before me I consider the underlying criticism of the GTAA to be justified and that unmet need is likely to be higher than that in the findings in the GTAA.*

- <sup>3.36</sup> In addition, Best Practice for Assessing the Accommodation Needs of Gypsies and Travellers<sup>6</sup> produced jointly in June 2016 by organisations including Friends, Families and Travellers, the London Gypsy and Traveller Unit, the York Travellers Trust, the Derbyshire Gypsy Liaison Group, Garden Court Chambers and Leeds GATE concluded that:

*Assessments involving any form of pitch turnover in their supply relies upon making assumptions, a practice best avoided. Turnover is naturally very difficult to assess accurately and in practice does not contribute meaningfully to additional supply so should be very carefully assessed in line with local trends. Mainstream housing assessments are not based on the assumption that turnover within the existing stock can provide for general housing needs.*

- <sup>3.37</sup> As such, other than current vacant pitches/plots that are known to be available, annual pitch/plot turnover has not been considered as a formal component of supply in this GTAA. However, natural turnover of pitches/plots on public and private sites/yards should continue to be monitored by the Local Planning Authorities. In particular, the natural turnover of pitches/plots can help to meet future need over time from new household formation.

## Transit Provision

- <sup>3.38</sup> GTAA studies require the identification of demand for transit provision. While the majority of Gypsies and Travellers have permanent bases either on sites/yards or in bricks and mortar and no longer travel, other members of the community either travel permanently or for part of the year. Due to the mobile nature of the population a range of sites/yards can be developed to accommodate Gypsies and Travellers as they move through different areas.

- » **Transit sites** - full facilities where Gypsies and Travellers might live temporarily (for up to three months) – for example, to work locally, for holidays or to visit family and friends.
- » **Emergency stopping places** - more limited facilities.
- » **Temporary sites and stopping places** - only temporary facilities to cater for an event.
- » **Negotiated stopping places** - agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time.

- <sup>3.39</sup> Transit sites serve a specific function of meeting the needs of Gypsy and Traveller households who are visiting an area or who are passing through on the way to somewhere else. A transit site typically has a

---

<sup>6</sup> See [www.londongypsiesandtravellers.org.uk/resources/](http://www.londongypsiesandtravellers.org.uk/resources/) for details.

restriction on the length of stay of usually around 12 weeks and has a range of facilities such as water supply, electricity, and amenity blocks.

- <sup>3.40</sup> An alternative to or in addition to a transit site is an emergency stopping place. This type of site also has restrictions on the length of time for which someone can stay on it but usually has more limited facilities with typically only a source of water and chemical toilet disposal provided.
- <sup>3.41</sup> Another alternative is negotiated stopping. The term negotiated stopping is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not include permanent built transit sites but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between the local authority and the (temporary) residents regarding expectations on both sides.
- <sup>3.42</sup> Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold-water supply; portaloos; sewerage disposal point and refuse disposal facilities.
- <sup>3.43</sup> The Criminal Justice and Public Order Act 1994 (Section 62a) is particularly important with regard to the issue of Gypsy and Traveller transit site provision. Section 62a of the Act allows the police to direct trespassers to remove themselves and their vehicles and property from any land where a suitable pitch is available for the caravan or each of the caravans on a relevant caravan site which is situated in the local authority's area (or within the county in two-tier local authority areas). Relevant sites need to be managed by a Local Authority or a Registered Social Landlord (RSL). The police have no powers to direct people to private transit sites or yards.
- <sup>3.44</sup> Consideration also has to be given to the Police, Crime, Sentencing and Courts Act which came in to force in June 2022. Part 4 of the Act gives the Police additional powers to deal with unauthorised encampments through new offences relating to residing on land without consent in or with a vehicle and new powers in relation to the seizure of property.
- <sup>3.45</sup> In order to investigate the potential need for transit provision when undertaking work to support the GTAA, ORS sought to undertake analysis of any records of unauthorised sites and encampments, as well as information from the Ministry for Housing, Communities and Local Government (MHCLG) Traveller Caravan Count. The outcomes of the Stakeholder Interviews with Council Officers and with Officers from neighbouring planning authorities were also taken into consideration when determining this element of need in the study area.

## 4. GYPSY, TRAVELLER & TRAVELLING SHOWPEOPLE SITES/YARDS AND POPULATION

### Introduction

- 4.1 One of the main considerations of this GTAA is to provide evidence to support the provision of pitches and plots to meet the current and future accommodation needs of Gypsies, Travellers and Travelling Showpeople.
- 4.2 A pitch is an area normally occupied by one household, which typically contains enough space for one or two caravans but can vary in size<sup>7</sup>. A site is a collection of pitches which form a development for Gypsies and Travellers.
- 4.3 Whilst there is no standard size for a Gypsy and Traveller pitch, guidance<sup>8</sup> recommends an average pitch size of 320m<sup>2</sup>. However it also suggests that a variety of pitch sizes – including small, medium and large pitches can enable different sized families to be accommodated on sites (equivalent to two, three and four-bedroom houses for example) and can contribute to affordability.
- 4.4 For Travelling Showpeople, the most common descriptions used are a plot for the space occupied by one household and a yard for a collection of plots which are typically occupied by Travelling Showpeople.
- 4.5 Whilst there is also no standard size for a Travelling Showpeople plot, guidance<sup>9</sup> recommends an average plot size of 2,000m<sup>2</sup>. However, this should be viewed with some caution given the age of the guidance. In more recent years many Showpeople have sought to diversify their working practices and do not now need as much space for the storage or maintenance of larger rides. Recent planning applications in other local authorities have seen plans for new yards put forward including a variety of plot sizes.
- 4.6 The public and private provision of mainstream housing is also largely mirrored when considering Gypsy and Traveller accommodation. One common form of a Gypsy and Traveller site is a public residential site, which is provided by a Local Authority or by a Registered Provider (usually a Housing Association). Pitches on public sites can be obtained through signing up to a waiting list, and the costs of running the sites are met from the rent paid by the tenants (similar to social housing).
- 4.7 The alternative to a public residential site is a private residential site/yard for Gypsies, Travellers and Travelling Showpeople, respectively. These result from individuals or families buying areas of land and then obtaining planning permission to live on them. Households can also rent pitches/plots on existing private sites/yards.

---

<sup>7</sup> Whilst it has now been withdrawn, *Government Guidance on Designing Gypsy and Traveller Sites* recommended that, as a general guide, an average family pitch must be capable of accommodating an amenity building, a large trailer [a static caravan or park home for example] and touring caravan, parking space for two vehicles and a small garden area.

<sup>8</sup> Leeds City Council: *Gypsy and Traveller Site Design Guide* (2020).

<sup>9</sup> The Showmen's Guild: *Travelling Showpeople's Sites – A Planning Focus* (2007).

- 4.8 These two forms of accommodation are the equivalent to private ownership and private rent for those who live in bricks and mortar housing. Generally, the majority of Travelling Showpeople yards are privately owned and managed.
- 4.9 The Gypsy, Traveller and Travelling Showpeople population also has other types of sites/yards due to its transient nature, as described more fully in Chapter 3. These are known as transit sites and they provide many of the same facilities as a residential site, except that there is a maximum occupancy period of residence which can vary from a few days or weeks to a period of months.
- 4.10 An alternative to a transit site is an emergency or negotiated stopping place. This type of site also has restrictions on the length of time someone can stay on it but has much more limited facilities.
- 4.11 Both of these two types of transit provision are designed to accommodate, for a temporary period, Gypsies, Travellers and Travelling Showpeople whilst they travel.
- 4.12 A number of authorities also operate an accepted encampments policy where short-term stopovers are tolerated without enforcement action.
- 4.13 Further occurrences for the Traveller population are unauthorised developments and encampments. Unauthorised developments occur on land which is owned by the Travellers or with the approval of the landowner, but for which they do not have planning permission to use for residential purposes. Unauthorised encampments occur on land which is not owned by the Travellers and are usually referred to as roadside encampments.

## Sites and Yards

- 4.14 In Great Yarmouth (excluding the Broads Authority) on the base date for the GTAA, there were
- » 1 public site (18 pitches);
  - » 1 private site that is tolerated for planning purposes (3 pitches);
  - » 1 public transit site (6 pitches)<sup>10</sup>.
- 4.15 See **Appendix B: Site and Yard List** for further details.

**Figure 5 - Total amount of provision in Great Yarmouth (excluding the Broads Authority) April 2025**

Category	Sites/Yards	Pitches/Plots
<b>Gypsies and Travellers</b>		
Public sites	1	18
Tolerated sites	1	3
Public transit sites	1	6
<b>Sub-Total</b>	<b>3</b>	<b>27</b>
<b>Travelling Showpeople</b>		
Private yards	0	0
Tolerated yards	0	0
Unauthorised yards	0	0
<b>Sub-Total</b>	<b>0</b>	<b>0</b>
<b>TOTAL</b>	<b>3</b>	<b>27</b>

<sup>10</sup> 3 of these pitches allow for permanent occupancy.

- 4.16 In the Broads Authority part of Great Yarmouth on the base date for the GTAA, there were
- » 11 private sites that are tolerated for planning purposes<sup>11</sup> (13 pitches);
  - » 1 unauthorised private site (1 pitch).

- 4.17 See **Appendix B: Site and Yard List** for further details.

**Figure 6 - Total amount of provision in the Broads Authority part of Great Yarmouth - April 2025**

Category	Sites/Yards	Pitches/Plots
<b>Gypsies and Travellers</b>		
Tolerated sites	11	13
Unauthorised sites	1	1
<b>Sub-Total</b>	<b>12</b>	<b>14</b>
<b>Travelling Showpeople</b>		
Private yards	0	0
Tolerated yards	0	0
Unauthorised yards	0	0
<b>Sub-Total</b>	<b>0</b>	<b>0</b>
<b>TOTAL</b>	<b>12</b>	<b>14</b>

## MHCLG Traveller Caravan Count

- 4.18 Another source of information available on the Gypsy, Traveller and Travelling Showpeople population is the bi-annual Traveller Caravan Count<sup>12</sup> which is conducted by each Local Authority in England on a specific date in January and July of each year<sup>13</sup> and reported to MHCLG. This is a statistical count of the number of caravans on both authorised and unauthorised sites across England.
- 4.19 As this count is of caravans and not households, it makes it more difficult to interpret for a study such as this because it does not count pitches/plots or resident households. The count is merely a 'snapshot in time' conducted by the Local Authority on a specific day, and any unauthorised sites/yards or encampments which occur on other dates will not be recorded. Likewise, any caravans that are away from sites/yards on the day of the count will not be included. As such it is not considered appropriate to use the outcomes from the Traveller Caravan Count in the calculation of current and future need as the information collected during the site/yard visits is seen as more robust and fit-for-purpose. However, the Caravan Count data has been used to support the identification of the need to provide for transit provision and this is set out later in this report.
- 4.20 The most recent Traveller Caravan Count (July 2024) recorded 26 caravans on socially rented sites. The Caravan Count does not separate out information for the Broads Authority part of Great Yarmouth.

<sup>11</sup> Work completed by the Council has determined that these pitches have been occupied for a sufficient period of time meaning that enforcement action is not expedient, and a certificate of lawful use would be granted if sought.

<sup>12</sup> The Gypsy and Traveller Caravan Count was renamed the Traveller Caravan Count due to the inclusion of information on Travelling Showpeople caravans in 2013.

<sup>13</sup> Only in January for Travelling Showpeople.

## 5. SURVEY OF TRAVELLING COMMUNITIES

### Interviews with Travellers

- 5.1 One of the major components of this study was a detailed survey of the Gypsy and Traveller population living in the study area including efforts to engage with the bricks and mortar community.
- 5.2 In Great Yarmouth, excluding the Broads Authority, at the base date for the GTAA, there were 1 public Gypsy and Traveller sites; 1 site that is tolerated for planning purposes; and 1 public transit site identified. See **Appendix B: Site and Yard ListB** for further details.
- 5.3 The table below set out the number of pitches/plots, the number of interviews that were completed, and any reasons why interviews were not able to be completed.

**Figure 7 – Interviews completed in Great Yarmouth (excluding the Broads Authority)**

Site/Yard Type	Pitches /Plots	Interviews	Reasons for not completing interviews/additional interviews
<b>Gypsies and Travellers</b>			
<b>Public Sites</b>			
Gapton Hall	18	6	6 x vacant
<b>Tolerated Sites</b>			
New Cut Farm	3	3	-
<b>Public Transit Sites</b>			
Gapton Hall	6	2	3 x vacant, 1 x double pitch
<b>TOTAL</b>	<b>27</b>	<b>17</b>	

- 5.1 In the Broads Authority part of Great Yarmouth, at the base date for the GTAA, there were 11 site that are tolerated for planning purposes; and 1 unauthorised site identified. See **Appendix B: Site and Yard ListB** for further details.
- 5.2 It was also possible to complete 2 interviews with households living in bricks and mortar.
- 5.3 The table below set out the number of pitches/plots, the number of interviews that were completed, and any reasons why interviews were not able to be completed.

**Figure 8 – Interviews completed in the Broads Authority part of Great Yarmouth**

Site/Yard Type	Pitches /Plots	Interviews	Reasons for not completing interviews/additional interviews
<b>Gypsies and Travellers</b>			
<b>Tolerated Sites</b>			
Bayview Stables (Land adjacent Yaxley)	1	1	-
Blackgate Stables	1	1	-
Bridge Lodge (Land north of The Lodge)	1	1	-

Hunters Lodge (South of Sequoia Lodge)	1	1	-
Maple Lodge/The Stables	2	2	-
NE of The Stables (1)	1	1	-
Sequoia Lodge	1	1	-
Sheltanlee Stud	2	2	-
Showmans (South of Sequoia Lodge)	1	1	-
South of Sheltanlee Stud	1	1	-
Woods Farm (NE of The Stables (2))	1	1	-
<b>Unauthorised Sites</b>			
Corner Plot, Cobholm Island	1	1	-
<b>Bricks and Mortar</b>			
Blackgate Farm	1	1	-
The Lodge	1	1	-
<b>TOTAL</b>	<b>16</b>	<b>16</b>	

## 6. CURRENT AND FUTURE PITCH PROVISION

### Introduction

- 6.1 This section focuses on the pitch/plot provision that is needed in the study area currently and to 2041 for Great Yarmouth Borough and to 2042 for the Broads Authority. This includes both current unmet need and need which is likely to arise in the future<sup>14</sup>. This time period allows for robust forecasts of the requirements for future provision, based upon the evidence contained within this study and also secondary data sources.
- 6.2 We would note that this section is based upon a combination of the household interviews, planning records and the outcomes of discussions with Council Officers and Officers from the Broads Authority. In many cases, the survey data is not used in isolation but instead is used to validate information from planning records or other sources.
- 6.3 This section also identifies whether there is a need for any transit provision.

### New Household Formation Rates

- 6.4 ORS prepared a Technical Note on Gypsy and Traveller Household Formation and Growth Rates in 2015 and updated it in 2020, and again in 2025. The main conclusions are set out here and the full paper is in Error! Reference source not found.D.
- 6.5 The Technical Note concludes that the growth in the national Gypsy and Traveller population may be as low as 1.25% per annum – much less than the 3.00% per annum often assumed, but still greater than in the settled community. Even using extreme and unrealistic assumptions, it is hard to find evidence for net Gypsy and Traveller population and household growth rates above 2.00% per annum.
- 6.6 In practice, the best available evidence supports a national net household growth rate of 1.50% per annum for Gypsies and Travellers.
- 6.7 This view has been supported by Planning Inspectors in a number of Decision Notices. The Inspector for an appeal in Doncaster that was issued in November 2016 (**Ref: APP/F4410/W/15/3133490**) where the agent acting on behalf of the appellant claimed that a rate closer to 3.00% should be used concluded:

*In assessing need account also needs to be taken of likely household growth over the coming years. In determining an annual household growth rate, the Council relies on the work of Opinions Research Services (ORS), part of Swansea University. ORS's research considers migration, population profiles, births & fertility rates, death rates, household size data and household dissolution rates to determine average household growth rates for gypsies and travellers. The findings indicate that the average annual growth rate is in the order of 1.50% but that a 2.50% figure could be used if local data suggest a relatively youthful population. As the Council has found a strong correlation between Doncaster's gypsy and traveller population age profile and the national picture, a 1.50% annual household growth rate has been used in its 2016 GTANA. Given the rigour of ORS's research and the Council's application of its findings to the local area I accept that a 1.50% figure is justified in the case of Doncaster.*

---

<sup>14</sup> See Paragraphs 3.41 and 3.42 for details of components on current and future need.



- 6.8 Another case was in relation to an appeal in Guildford that was issued in March 2018 (**Ref: APP/W/16/3165526**) where the agent acting on behalf of the appellant again claimed that a rate closer to 3.00% should be used. The Inspector concluded:

*There is significant debate about household formation rates and the need to meet future growth in the district. The obvious point to make is that this issue is likely to be debated at the local-plan examination. In my opinion, projecting growth rates is not an exact science and the debate demonstrates some divergence of opinion between the experts. Different methodologies could be applied producing a wide range of data. However, on the available evidence it seems to me that the figures used in the GTAA are probably appropriate given that they are derived by using local demographic evidence. In my opinion, the use of a national growth rate and its adaptation to suit local or regional variation, or the use of local base data to refine the figure, is a reasonable approach.*

### Local Approach to New Household Formation Rates

- 6.9 This GTAA takes full account of the net local household growth rate per annum calculated on the basis of demographic evidence from the site surveys. The baseline includes all current authorised households, all households identified as being in current need (including concealed/doubled-up households, movement from bricks and mortar and those on waiting lists not currently living on a pitch or plot), as well as households living on tolerated unauthorised pitches or plots who are not included as current need. The assessments of future need also take account of modelling projections based on birth and death rates, household dissolution, and in-/out-migration.
- 6.10 Overall, the household growth rate used for the assessment of future needs is informed by local evidence. This local demographic evidence has been used to adjust the ORS national growth rate of 1.50% up or down based on the proportion of those aged under 18.
- 6.11 However, in certain circumstances where the numbers of households and children are low, or the population age structure cohorts are skewed by certain age groups, it is not appropriate to apply a percentage rate for new household formation. In these cases, a judgement is made on likely new household formation based on the age and gender of the children. This is based on the assumption that 50% of households likely to form will stay in the area. This is based on evidence from other GTAAs that ORS have completed across England and Wales.
- 6.12 The approach that has been applied in Great Yarmouth for this GTAA is set out below:
- » For households in Great Yarmouth (excluding the Broads Authority) 38% of residents were aged under 18 so the ORS national formation rate of 1.50% has been uplifted to 1.60%.
  - » For households in the Broads Authority part of Great Yarmouth 33% of residents were aged under 18 so the ORS national formation rate of 1.50% has been reduced to 1.40%.
- 6.13 In addition, the ORS national rate of 1.50% has been used to estimate growth for undetermined Travellers.
- 6.14 It should also be noted that new household formation has been calculated from year 6 of the GTAA period onwards. New household formation for years 0-5 of the GTAA period is from teenagers in need of a pitch/plot in the next 5 years who have been identified as components of need in the household interviews. This eliminates any double counting in the assessment of need.

## Breakdown by 5 Year Bands

- <sup>6.15</sup> In addition to tables which set out the overall need for Gypsies and Travellers, the overall need has also been broken down by 5-year bands as required by PPTS. The way that this is calculated is by including all current need (from unauthorised pitches/plots, pitches/plots with temporary planning permission, concealed and doubled-up households, 5 year need from teenage children, net movement from bricks and mortar, and in-migration/roadside need) in the first 5 years. The total net new household formation is then split across the remaining GTAA period.

## Household Planning Status

- <sup>6.16</sup> The table below sets out the planning status of households for the Great Yarmouth GTAA. It is important to note that this table records numbers of households and not the number of pitches.

**Figure 9 – Planning status of households in Great Yarmouth (excluding the Broads Authority)**

Status	Meet Planning Definition	Undetermined
<b>Gypsies and Travellers</b>		
Public Sites	16	0
Tolerated Sites	3	0
Public Transit Sites	2	0
<b>TOTAL</b>	<b>21</b>	<b>0</b>

**Figure 10 – Planning status of households in the Broads Authority part of Great Yarmouth**

Status	Meet Planning Definition	Undetermined
<b>Gypsies and Travellers</b>		
Tolerated Sites	21	0
Unauthorised Sites	1	0
B&M	2	0
<b>TOTAL</b>	<b>24</b>	<b>0</b>

- <sup>6.17</sup> Figure 99 shows that for Gypsies and Travellers in Great Yarmouth (excluding the Broads Authority) 21 households meet the planning definition of a Traveller.
- <sup>6.18</sup> Figure 910 shows that for Gypsies and Travellers in the Broads Authority part of Great Yarmouth 24 households meet the planning definition of a Traveller.

## Interviews with Gypsies and Travellers in Bricks and Mortar

- <sup>6.19</sup> Following all of the efforts that were made it was possible to identify and interview 2 households living in bricks and mortar in the Broads Authority part of Great Yarmouth.

## Migration/Roadside

- <sup>6.20</sup> The study also sought to identify any need from households who have been forced to move from sites/yards due to overcrowding and who are currently living on the roadside or on sites/yards in other local authorities – and who have strong family links with households in Great Yarmouth. These are referred to as roadside households or displaced in-migration.
- <sup>6.21</sup> Evidence drawn from stakeholder and household interviews has been considered alongside assessments of need that have been completed in other nearby local authorities. The household interviews identified no households living on roadside predominantly in Great Yarmouth with a need to move to a permanent pitch/plot in the area.
- <sup>6.22</sup> ORS have found no firm evidence from other local studies that have been completed recently of any households wishing to move to Great Yarmouth. Therefore, net migration to the sum of zero has been assumed for the GTAA – which means that net pitch/plot requirements are driven by locally identifiable need rather than speculative modelling assumptions.
- <sup>6.23</sup> It is important to note that any applications for new sites or additional pitches/plots as a result of in-migration should be seen as windfall need and should be dealt with by Criteria-Based Local Plan Policies.

## Public Sites

- <sup>6.24</sup> The Council have confirmed that there are no households on a waiting list for the public site at Gapton Hall, and that there are currently 6 vacant pitches.

## Gypsy and Traveller Needs Great Yarmouth (excluding the Broads Authority)

### Pitch Needs – Gypsies and Travellers that met the PPTS 2024 Planning Definition

- 6.25 Our research identified a need for **8 pitches** emerging from the 21 households that met the 2024 PPTS planning definition over the GTAA period. This is made up of 4 concealed or doubled-up households or single adults; 4 teenagers who will need a pitch of their own in the next 5 years; and 6 pitches from new household formation, using a formation rate of 1.60% derived from the household demographics. This need is offset by supply from 6 vacant pitches on the public site.
- 6.26 Given that it was possible to complete interviews with households living on all occupied pitches there is **no need from undetermined households**.

**Figure 11 – Need for Gypsy and Traveller households in Great Yarmouth (excluding the Broads Authority) that met the Planning Definition**

Gypsy & Traveller – Meeting Planning Definition	Pitches
<b>Supply of Pitches</b>	
Available supply from vacant public and private pitches	6
Available supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
<b>Total Supply</b>	<b>6</b>
<b>Current Need</b>	
Households on unauthorised developments	0
Households on pitches with temporary planning permission	0
Concealed households/Doubling-Up/Over-Crowding	4
5 year need from teenage children	4
Movement from bricks and mortar	0
In-Migration/Roadside	0
Households on waiting lists for public sites	0
<b>Total Current Need</b>	<b>8</b>
<b>Future Need</b>	
New household formation	6
<i>(Household base 25 and formation rate 1.60%)</i>	
<b>Total Future Need</b>	<b>6</b>
<b>Net Plot Need = (Current and Future Need – Total Supply)</b>	<b>8</b>

**Figure 12 – Need for Gypsy and Traveller households in Great Yarmouth (excluding the Broads Authority) that met the Planning Definition by year periods**

Year Period	Dates	Need
0 – 5	2025-29	2
6 – 10	2030-34	2
11 – 15	2035-39	3
16 – 17	2040-41	1
<b>0 – 17</b>	<b>2025-41</b>	<b>8</b>

## Pitch Needs – Undetermined Gypsies and Travellers

<sup>6.27</sup> Given that it was possible to complete interviews with households living on all occupied pitches there is no need from undetermined households.

## Travelling Showpeople Needs

### Plot Needs – Travelling Showpeople that met the PPTS 2024 Planning Definition

<sup>6.28</sup> There were no Travelling Showpeople identified living on yards in Great Yarmouth (excluding the Broads Authority) so there is no current or future need for plots.

## Gypsy and Traveller Needs Broads Authority part of Great Yarmouth

### Pitch Needs – Gypsies and Travellers that met the PPTS 2024 Planning Definition

<sup>6.29</sup> Our research identified a need for **17 pitches** emerging from the 24 households that met the 2024 PPTS planning definition for the full GTAA period. This is made up of 1 unauthorised pitch; 5 concealed or doubled-up households or single adults; 6 teenagers who will need a pitch of their own in the next 5 years; and 5 pitches from new household formation, using a formation rate of 1.40% derived from the household demographics.

**Figure 13 – Need for Gypsy and Traveller households in the Broads Authority part of Great Yarmouth that met the Planning Definition**

Gypsy & Traveller – Meeting Planning Definition	Pitches
<b>Supply of Pitches</b>	
Available supply from vacant public and private pitches	0
Available supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
<b>Total Supply</b>	<b>0</b>
<b>Current Need</b>	
Households on unauthorised developments	1
Households on pitches with temporary planning permission	0
Concealed households/Doubling-Up/Over-Crowding	5
5 year need from teenage children	6
Movement from bricks and mortar	0
In-Migration/Roadside	0
Households on waiting lists for public sites	0
<b>Total Current Need</b>	<b>12</b>
<b>Future Need</b>	
New household formation	5
<i>(Household base 27 and formation rate 1.40%)</i>	
<b>Total Future Need</b>	<b>5</b>
<b>Net Plot Need = (Current and Future Need – Total Supply)</b>	<b>17</b>

**Figure 14 – Need for Gypsy and Traveller households in the Broads Authority part of Great Yarmouth that met the Planning Definition by year periods**

Year Period	Dates	Need
0 – 5	2025-29	12
6 – 10	2030-34	2
11 – 15	2035-39	2
16 – 18	2040-42	1
<b>0 – 18</b>	<b>2025-42</b>	<b>17</b>

## Pitch Needs – Undetermined Gypsies and Travellers

<sup>6.30</sup> Given that it was possible to complete interviews with households living on all occupied pitches there is no need from undetermined households.

## Travelling Showpeople Needs

### Plot Needs – Travelling Showpeople that met the PPTS 2024 Planning Definition

<sup>6.31</sup> There were no Travelling Showpeople identified living on yards in the Broads Authority part of Great Yarmouth so there is no current or future need for plots.

## Transit Requirements – Great Yarmouth Borough

- <sup>6.32</sup> When determining the potential need for transit provision the assessment has looked at data from the MHCLG Traveller Caravan Count; the outcomes of the discussions with Council and Broads Authority Officers; and records on numbers of encampments.

### MHCLG Traveller Caravan Count

- <sup>6.33</sup> Whilst it is considered to be a comprehensive national dataset on numbers of authorised and unauthorised caravans across England, it is acknowledged that the Traveller Caravan Count is a count of caravans and not households. It also does not record the reasons for unauthorised caravans. This makes it very difficult to interpret in relation to assessing future need because it does not count pitches/plots or resident households.
- <sup>6.34</sup> The count is also only a twice yearly (January and July) snapshot in time conducted by local authorities on a specific day, and any caravans on unauthorised sites/yards or encampments which occur on other dates are not recorded. Likewise, any caravans that are away from sites/yards on the day of the count are not included. As such it is not considered appropriate to use the outcomes from the Traveller Caravan Count in the assessment of future transit provision. It does however provide valuable historic and trend data on whether there are instances of unauthorised caravans in local authority areas.
- <sup>6.35</sup> Data from the Traveller Caravan Count shows that there have been no unauthorised caravans recorded in the study area on the Caravan Count days in January and July in recent years.

### Stakeholder Interviews and Local Data

- <sup>6.36</sup> There are 6 public transit pitches on the Gaptown Hall site in Great Yarmouth. Discussions with Council Officers determined that these are very rarely used and that 3 are currently occupied on a permanent basis as a result of this.
- <sup>6.37</sup> Information held by the Local Planning Authorities has indicated that whilst there have been no unauthorised caravans recorded in the Caravan Count in recent years, there were 75 recorded encampments between May 2018 and July 2023 (approximately 12 each year) and that these were all short-term and transient in nature and mainly during the summer months.
- <sup>6.38</sup> This data includes encampments on Great Yarmouth Council land and also some on privately owned land. It is important to note that where private land is concerned, Great Yarmouth Council may not hold all of the relevant data as they only record what is known to them or what they are notified of.

### Transit Recommendations

- <sup>6.39</sup> Given that there are low numbers of encampments each year and under-utilised public transit pitches it is not recommended that there is a need for another formal public transit site in Great Yarmouth borough at this time. However, the situation relating to levels of encampments should be monitored to determine if there are any increases in the number of encampments.
- <sup>6.40</sup> As well as information on the size and duration of the encampments, this monitoring should also seek to gather information from residents on the reasons for their stay in the local area; whether they have a permanent base or where they have travelled from; and whether they have any need or preference to



settle permanently in the local area. This information could be collected as part of a Welfare Assessment (or similar).

- <sup>6.41</sup> It is recommended that a review of the evidence base relating to encampments, including the monitoring referred to above, should be undertaken on a Norfolk-wide basis. This will establish whether there is a need for investment in any new transit provision or emergency stopping places, or whether a managed approach is preferable.
- <sup>6.42</sup> In the short-term the Local Planning Authorities should continue to use their current approaches when dealing with encampments, and management-based approaches such as negotiated stopping agreements could also be considered.
- <sup>6.43</sup> The term 'negotiated stopping' is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent 'built' transit sites but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between the Local Planning Authority and the (temporary) residents regarding expectations on both sides. See [www.negotiatedstopping.co.uk](http://www.negotiatedstopping.co.uk) for further information.
- <sup>6.44</sup> Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold-water supply; portaloos; sewerage disposal point and refuse disposal facilities.

## 7. CONCLUSIONS

- 7.1 This GTAA provides a robust evidence base to enable the Local Planning Authorities to assess the housing needs of the Travelling Community as well as complying with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, the Housing and Planning Act 2016, Planning Practice Guidance 2021, Planning Policy for Traveller Sites 2024, and the National Planning Policy Framework 2024. It also provides an evidence base which can be used to support Local Plan Policies.

### Gypsies and Travellers

#### Great Yarmouth (excluding the Broads Authority)

- 7.2 In Great Yarmouth (excluding the Broads Authority) for the GTAA period 2025 to 2041, there is a need for:
- » 8 pitches for Gypsy and Traveller households that meet the 2024 PPTS planning definition.
  - » No pitches for Undetermined Gypsy and Traveller households.

#### Broads Authority part of Great Yarmouth

- 7.3 In the Broads Authority part of Great Yarmouth for the GTAA period 2025 to 2042, there is a need for:
- » 17 pitches for Gypsy and Traveller households that meet the 2024 PPTS planning definition.
  - » No pitches for Undetermined Gypsy and Traveller households.

### Recommendations - Great Yarmouth Borough

- 7.4 In general terms need identified in a GTAA is seen as need for pitches. As set out in Chapter 4 of this report, the now withdrawn *Government Guidance on Designing Gypsy and Traveller Sites* recommended that, as a general guide, an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, parking space for two vehicles and a small garden area. This guidance relates primarily to the provision of pitches on public sites but can also be more broadly applied to the provision of pitches on private sites.
- 7.5 Whilst there is no standard size for a Gypsy and Traveller pitch, Guidance<sup>15</sup> recommends an average pitch size of 320m<sup>2</sup> but also suggests that a variety of pitch sizes – including small, medium and large pitches can enable different sized families to be accommodated on sites (equivalent to two, three and four-bedroom houses) and can contribute to affordability.
- 7.6 For need arising from public sites the Local Planning Authorities will need to consider the expansion or intensification of these sites, or for new sites(s), as it is unlikely that this need could be addressed through the provision of pitches on new private sites.
- 7.7 For need arising from private sites the Local Planning Authorities will need to consider the expansion or intensification of these sites, or to address need through new site/pitch allocations. Where they have been

---

<sup>15</sup> Leeds City Council: *Gypsy and Traveller Site Design Guide* (2020).

identified the Local Planning Authorities should also consider the regularisation of sites with temporary planning permission and of unauthorised sites.

- <sup>7.8</sup> The Local Planning Authorities will also need to carefully consider how to address any potential needs from Undetermined households; from households seeking to move to Great Yarmouth Borough (in-migration); or from households currently living in bricks and mortar who may wish to move to a site. In terms of the Local Plan Policies, the Local Planning Authorities should continue to use or put in place Criteria-Based Local Plan Policies as suggested in the PPTS.
- <sup>7.9</sup> Future need from new household formation could also be met through natural turnover of pitches over time, or through enforcing against any pitches not found to be occupied by Gypsies or Travellers.
- <sup>7.10</sup> Whilst the findings in this report are aggregated totals for the whole of Great Yarmouth Borough due to data protection issues, the Local Planning Authorities have more detailed data to enable an accurate review of Local Plan allocations to be made.

## **Travelling Showpeople – Great Yarmouth Borough**

- <sup>7.11</sup> There were no Travelling Showpeople living on yards in Great Yarmouth Borough so there is no current or future need for plots.

## **Transit Provision – Great Yarmouth Borough**

- <sup>7.12</sup> Given that there are low numbers of encampments each year and under-utilised public transit pitches it is not recommended that there is a need for another formal public transit site in Great Yarmouth borough at this time. However, the situation relating to levels of encampments should be monitored to determine if there are any increases in the number of encampments.
- <sup>7.13</sup> It is recommended that a review of the evidence base relating to encampments, including the monitoring referred to above, should be undertaken on a Norfolk-wide basis. This will establish whether there is a need for investment in any new transit provision or emergency stopping places, or whether a managed approach is preferable.
- <sup>7.14</sup> In the short-term the Local Planning Authorities should continue to use its current approaches when dealing with encampments, and management-based approaches such as negotiated stopping agreements could also be considered.

# APPENDICES

## Appendix A: Glossary of Terms / Acronyms Used

### Glossary

**Amenity block** meaning a building where basic plumbing amenities are provided. This could include a bath, a shower, a WC and a sink.

**Bricks and mortar** is used to describe mainstream housing.

**Caravan** is used to describe mobile living vehicle used by Gypsies and Travellers. Also referred to as trailers.

**Concealed household** is used to describe households living within other households, who are unable to set up separate family units.

**Doubling-Up** refers to there being more than the permitted number of caravans on a pitch or plot.

**Emergency Stopping Place** is a temporary site with limited facilities to be occupied by Gypsies and Travellers while they travel.

**Green Belt** refers to a land use designation used to check the unrestricted sprawl of large built-up areas; prevent neighbouring towns from merging into one another; assist in safeguarding the countryside from encroachment; and to preserve the setting and special character of historic towns.

**Household Formation** is the process in which individuals form separate households. This is normally though adult children setting up their own household.

**In-migration** refers to movement of households into a region or community.

**Local Plans** are Local Authority spatial planning documents that can include specific policies and/or site allocations for Gypsies, Travellers and Travelling Showpeople.

**Out-migration** refers to the Movement from one region or community in order to settle in another.

**Pitch/plot** is an area of land on a site or development generally home to one household. Can be varying sizes and have varying caravan numbers. Pitches refer to Gypsy and Traveller sites and Plots to Travelling Showpeople yards.

**Private site** is an authorised site owned privately. This can be owner-occupied, rented or a mixture of owner-occupied and rented pitches.

**Site** refers to an area of land on which Gypsies, Travellers and Travelling Showpeople are accommodated in caravans, chalets, or vehicles. Can contain one or multiple pitches or plots.

**Social/Public/Council Site** is an authorised site owned by either the local authority or a Registered Housing Provider.

**Temporary planning permission** refers to a private site with planning permission for a fixed period of time.

**Tolerated site/yard** refers to long-term tolerated sites or yards where enforcement action is not expedient, and a certificate of lawful use would be granted if sought.

**Transit provision** refers to a site intended for short stays and containing a range of facilities. There is normally a limit on the length of time residents can stay.

**Unauthorised Development** refers to caravans on land owned by Gypsies and Travellers and without planning permission.

**Unauthorised Encampment** refers to caravans on land not owned by Gypsies and Travellers and without planning permission.

**Waiting list** is a record held by the local authority or site managers of applications to live on a site.

**Yard** is a name often used by Travelling Showpeople to refer to a site.

## Acronyms and Initials

<b>GTAA</b>	Gypsy and Traveller Accommodation Assessment
<b>LPA</b>	Local Planning Authority
<b>MHCLG</b>	Ministry for Housing, Communities and Local Government
<b>NPPF</b>	National Planning Policy Framework
<b>ORS</b>	Opinion Research Services
<b>PPG</b>	Planning Practice Guidance
<b>PPTS</b>	Planning Policy for Traveller Sites
<b>TSP</b>	Travelling Showpeople

## Appendix B: Site and Yard List

### Great Yarmouth (excluding the Broads Authority)

Site/Yard	Planning Status	Authorised	Unauthorised
<b>Gypsies and Travellers</b>			
Gapton Hall	Public	18	0
Gapton Hall	Public Transit	6	0
New Cut Farm	Tolerated	3	0
<b>TOTAL</b>		<b>27</b>	<b>0</b>

### Broads Authority part of Great Yarmouth

Site/Yard	Planning Status	Authorised	Unauthorised
<b>Gypsies and Travellers</b>			
Bayview Stables (Land adjacent Yaxley)	Tolerated	1	0
Blackgate Stables	Tolerated	1	0
Bridge Lodge (Land north of The Lodge)	Tolerated	1	0
Hunters Lodge (South of Sequoia Lodge)	Tolerated	1	0
Maple Lodge/The Stables	Tolerated	2	0
NE of The Stables (1)	Tolerated	1	0
Sequoia Lodge	Tolerated	1	0
Sheltanlee Stud	Tolerated	2	0
Showmans (South of Sequoia Lodge)	Tolerated	1	0
South of Sheltanlee Stud	Tolerated	1	0
Woods Farm (NE of The Stables (2))	Tolerated	1	0
Corner Plot	Unauthorised	0	1
<b>TOTAL</b>		<b>13</b>	<b>1</b>

## Appendix C: Household Interview Questionnaire



### GYPSY, TRAVELLER & TRAVELLING SHOWMEN ACCOMMODATION NEEDS ASSESSMENT

Site/yard code

Pitch/plot no.

Pitch/plot location

---

#### INTERVIEWER INSTRUCTIONS:

This questionnaire should be used to record information about households that have been interviewed, either with a structured interview (where questions were asked as they are written on the questionnaire) or a semi-structured interview (where the information was gathered through discursive conversation).

Whilst not all households will be prepared to answer every question, it is important to record as much information as possible; but any information that can be provided will be used to inform the assessment. For all questions, you may prompt respondents with the available options as necessary. Please use the "Further Information and Notes" pages towards the end of the form to record any other details that could be relevant to the assessment.

If respondents provide information about other households either living on this site/yard or elsewhere, a separate Proxy Questionnaire should be used to record the information about each additional household.

---

#### INTERVIEWER: READ OUT

Good morning/afternoon/evening. My name is < > and I work for Opinion Research Services (ORS).

The Council is undertaking a Gypsy, Traveller and Travelling Showmen accommodation needs assessment in this area. They have asked ORS to try and contact every household from the Travelling Community living in their area to make sure that the needs assessment is accurate.

This important survey collects information about your accommodation on this site/yard, your own needs and needs of other members of your household, and details about your travelling. The information that you provide will help the Council better understand the accommodation needs of the Travelling Community. It will make sure that needs are properly assessed based on accurate and up-to-date information, so that the needs of every household get counted. The interview should take no more than 20 minutes, and any information that you provide will be treated in strict confidence; so I hope that you will take part.

---

#### INTERVIEWER: READ OUT IF NECESSARY

Only ORS will see your individual answers, the information will be kept secure and confidential and only anonymised data will be sent to the Council. Any information that you provide will be processed by ORS in line with the requirements of the UK Data Protection Act and the EU General Data Protection Regulation (GDPR). For more information, please go to [www.ors.org.uk/privacy](http://www.ors.org.uk/privacy)

If you would like to confirm my identity, you can contact ORS on Freephone 0800 078 9786. If you would like to confirm that ORS is a genuine research practice, you can contact the Market Research Society on Freephone 0800 975 9596.

---

## YOUR CURRENT ACCOMMODATION

---

**Q1. Are you and your household...?**

*INTERVIEWER: READ OUT. CROSS ALL THAT APPLY*

- Romany Gypsy
- Irish Traveller
- English Traveller
- Scottish Gypsy or Traveller
- Welsh Gypsy
- Travelling Showman
- New Traveller
- Non-Traveller
- Prefer not to say

**Q2a. How long have you lived on this site/yard?**

- Less than 12 months
- 12 months but less than 2 years
- 2 years but less than 5 years
- 5 years or longer → GO TO QUESTION 3
- No answer

**Q2b. Where did you previously live?****Q3a. Is this site/yard your permanent base?**

- Yes → GO TO QUESTION 4
- No
- No answer

**Q3b. If not, where is your permanent base?****Q4. Does your household own this site/yard or do you rent your pitch/plot?**

- Own the site/yard
- Privately rent the pitch/plot
- Public rent the pitch/plot
- Housing Association rent the pitch/plot
- No answer

**Q5a. Is this site/yard suitable for the needs of your household?**

- Yes → GO TO QUESTION 6
- No
- No answer

**Q5b Why do you feel that it isn't suitable?**



**Q6a. Do you plan to move from this site/yard within the next five years?**

- Yes
- No → GO TO QUESTION 7
- No answer

**Q6b Why do you plan to move?****Q6c. Where do you plan to live after you have moved?**

- Elsewhere in this council area
- Another council area *WRITE IN*

- No answer

**Q6d. Would you prefer to...?**

- Buy a site/yard or a private pitch/plot
- Rent on a private site/yard
- Rent on a public site
- Live in Bricks and Mortar
- No answer

---

**TRAVELLING**

---

**Q7a. Have you or any other members of your household ever travelled away from your permanent base?**

- Yes
- No → GO TO QUESTION 10
- No answer

**Q7b. How many trips has your household made over the last 12 months?****Q8. What are/were the reasons for travelling from your permanent base?**

- To work, including working/trading at fairs
- Visiting fairs, but not to work
- Visiting family or friends
- Holiday
- Other reasons
- No answer

**INTERVIEWER: PROBE FULLY AND PROVIDE FURTHER DETAILS BELOW**

*If travelling for work, write in profession or trade, including frequency and length of trips*

*If travelling for fairs or other reasons, confirm if this involved any elements of work, and record nature of work undertaken*

*Please write in and continue in Notes section as necessary*

**Q9. Where do you usually stay?****INTERVIEWER: CROSS ALL BOXES THAT APPLY**

- Council transit sites
- Private transit sites
- On the roadside
- With family or friends
- Other WRITE IN
- No answer

**Q10. What are the main reasons for your household not travelling anymore?****INTERVIEWER: CROSS ALL BOXES THAT APPLY**

- Settled now
- Children in school
- Ill health
- Old age
- Nowhere to stop
- No work opportunities
- Other reasons → PROVIDE DETAILS IN NOTES
- No answer

**Q11a. Do you or any other members of your household plan to travel in future?**

- Yes
- No → GO TO QUESTION 12
- No answer

**Q11b. What will be the reasons for travelling?****INTERVIEWER: CROSS ALL BOXES THAT APPLY**

- To work, including working/trading at fairs
- Visiting fairs, but not to work
- Visiting family or friends
- Holiday
- Other reasons
- No answer

---

## HOUSEHOLD DETAILS

---

**Q12. How many people are in your household, and how many separate families are there?**  
**Please count everyone that normally lives on this pitch/plot, including yourself.**

number of people
------------------

number of families
--------------------

**For each person in your household please answer the following questions**

**Q13a What is their relationship to you**

- Husband, wife or partner
- Son or daughter (inc. step-children)
- Brother or sister (inc. step-siblings)
- Mother or father (inc. step-parents)
- Grandchild
- Grandparent
- Relation - other
- Unrelated

**Q13b. What is their gender**

- Male
- Female
- Prefer not to say

**Q13c. What was their age last birthday**

--

**Q13d. Have they travelled away to work in the last 12 months**

- Yes
- No

**Q13e. Do they plan to travel away to work any time in the future**

- Yes
- No

*Repeat for each household member*

---

## ACCOMMODATION NEEDS

---

**Q14a. If anyone currently living with you needs their own separate accommodation, how many pitches/plots are needed for them now, and how many will be needed within the next five years?**

pitches/plots for adults needed now

pitches/plots for adults needed within 5 years

pitches/plots for 13-17 year olds needed within 5 years

**Q14b. Would they want to stay on this site/yard?**

- Yes
- No – want to live elsewhere in this council area
- No – want to move to another council area
- No answer

**Q15. Do you have any children or other family that are not currently living with you who need their own separate accommodation?**

- Yes → PROVIDE DETAILS IN NOTES
- No
- No answer

**Q15b How many pitches/plots would they need?**

**Q15c. Would they want to move to this site/yard?**

- Yes
- No – want to live elsewhere in this council area
- No – want to move to another council area
- No answer

**Q16. If separate accommodation was needed on this site/yard, would there be...?**

**INTERVIEWER: READ OUT. CROSS ONE BOX ONLY**

- Space available on the existing site/yard
- Potential to extend the boundary of the site/yard
- Need for space on another local site/yard
- No answer

**Q17a. Do you own or are you aware of any land that has potential for new pitches/plots?**

- Yes
- No → GO TO QUESTION 18
- No answer

**Q17b. Where is the land and who owns it?****Q18a. Do you have any family or friends, or know anyone from the Travelling Community currently living in Bricks and Mortar who we should contact for this study?**

- Yes
- No → GO TO FURTHER INFORMATION
- No answer

**Q18b. Can you provide contact details for them?**

*INTERVIEWER: IF DETAILS REFUSED, READ OUT*

*If you aren't able to provide their details, please ask them to call ORS on Freephone 0800 078 9786 to make sure that their needs are counted*

---

**FURTHER INFORMATION AND NOTES**

---

**Is there anything else you'd like to tell us about this site/yard, your travelling patterns and any future plans to travel, or the accommodation needs of you and your household?**

## **Appendix D: Household Formation Rates**

# **ORS Technical Note: Gypsy and Traveller Household Formation and Growth Rates**

**January 2025**



Opinion Research Services, The Strand, Swansea SA1 1AF

Enquiries: 01792 535300 · [info@ors.org.uk](mailto:info@ors.org.uk) · [www.ors.org.uk](http://www.ors.org.uk)

© Copyright 2025

The below copyrights acknowledge the open-source data that is provided by the respective bodies and is used throughout this document

May contain Ordnance Survey data © Crown copyright and database right 2024

May contain Royal Mail data © Royal Mail copyright and database right 2024

May contain National Statistics data © Crown copyright and database right 2024

May contain public sector information licensed under the Open Government Licence v3.0

# TABLE OF CONTENTS

**INTRODUCTION.....3**  
Abstracts and Conclusions.....3  
Introduction .....3  
**MODELLING POPULATION AND HOUSEHOLD GROWTH RATES.....4**  
Migration Effects .....4  
Population Profile.....4  
Birth and Fertility Rates.....5  
Death Rates .....6  
Modelling Outputs .....6  
Household Growth .....6  
**CONCLUSIONS.....9**



# 1. INTRODUCTION

## Abstract and Conclusions

- 1.1 National and local household formation and growth rates are important components of Gypsy and Traveller Accommodation Assessments (GTAAs), but until 2013 little detailed work had been done to assess their likely scale. ORS undertook work in 2013 to assess the likely rate of demographic growth for the Gypsy and Traveller population and concluded that the figure could be as low 1.25% per annum, but that best available evidence supports a national net household growth rate of 1.50% per annum.
- 1.2 This analysis was produced as a separate document in 2013 and then updated in 2015 and 2020 in light of comments from academics, planning agents and local authorities.
- 1.3 This current document represents an update to our findings in 2020 to consider the impact of the data from the 2021 UK Census of Population. This shows little change from the 2011 Census, so there is no change in the overall conclusions that support a national net household growth rate of 1.50% per annum.

## Introduction

- 1.4 Compared with the general population, the relative youthfulness of many Gypsy and Traveller populations means that their birth rates are likely to generate higher-than-average population growth, and proportionately higher gross household formation rates.
- 1.5 However, while their gross rate of household growth might be high, Gypsy and Traveller communities' future accommodation needs are, in practice, affected by any reduction in the number of households due to dissolution and/or by movements in/out of the area and/or by transfers into other forms of housing.
- 1.6 Therefore, the net rate of household growth is the gross rate of formation minus any reductions in households due to such factors.

## 2. MODELLING POPULATION AND HOUSEHOLD GROWTH RATES

- <sup>2.1</sup> The basic equation for calculating the rate of Gypsy and Traveller population growth is relatively simple: start with the base population and then calculate the average increase/decrease by allowing for births; deaths; in-/out-migration; and household dissolution.
- <sup>2.2</sup> Nevertheless, deriving satisfactory estimates is difficult because the evidence is often tenuous – so, in this context in 2013, ORS modelled the growth of the national Gypsy and Traveller population based on the most likely birth and death rates. To do so, we supplemented the available national statistical sources with data derived from our own surveys.

### Migration Effects

- <sup>2.3</sup> Population growth is affected by national net migration and local migration (as Gypsies and Travellers move from one area to another). In terms of national migration, the population of Gypsies and Travellers is relatively fixed, with little international migration.
- <sup>2.4</sup> It is in principle possible for Irish Travellers (based in Ireland) to move to the UK, but there is no evidence of this happening to a significant extent and the vast majority of Irish Travellers were born in the UK or are long-term residents.

### Population Profile

- <sup>2.5</sup> The main source for the rate of Gypsy and Traveller population growth is the UK 2011 and 2021 Censuses. The ethnicity question in the 2011 Census included for the first time 'Gypsy and Irish Traveller' as a specific category and this option was repeated in the 2021 Census.
- <sup>2.6</sup> While non-response bias probably means that the size of the population was underestimated, the age profile the 2011 and 2021 Censuses provide is not necessarily distorted and matches the profile derived from ORS's extensive household surveys.
- <sup>2.7</sup> The 2011 Census gave a total population of 54,895 in England, while the 2021 Census shows a population of 67,690, which represents a 23% increase.
- <sup>2.8</sup> However, this is measuring a mixture of real population growth and greater compliance with the Census in 2021. In reality, the true population of Gypsies and Travellers in England is likely to be 200,000-250,000, so both numbers are just a sample of the overall population.
- <sup>2.9</sup> Comparing the 2011 and 2021 Census datasets, the share of the population aged under 16 years has fallen from 31.8% to 30.5%, while the share aged 65 years or more has risen from 3.7% to 4.9%. The older population is still likely to be an under-estimate, but the results are consistent with the pattern seen in almost all population in England of falling birth rates and rising life expectancy.

**Figure 1 – Age Profile for the Gypsy and Traveller Community in England 2011 and 2021**  
(Source: UK Census of Population 2011 and 2021)

Age Group	People 2021	Cumulative % 2011	People 2021	Cumulative % 2021
Age 0 to 4	5,725	10.4	6,535	9.7
Age 5 to 7	3,219	16.3	3,947	15.5
Age 8 to 9	2,006	19.9	2,547	19.2
Age 10 to 14	5,431	29.8	6,404	28.7
Age 15	1,089	31.8	1,212	30.5
Age 16 to 17	2,145	35.7	2,383	34.0
Age 18 to 19	1,750	38.9	2,107	37.1
Age 20 to 24	4,464	47.1	5,074	44.6
Age 25 to 29	4,189	54.7	4,889	51.9
Age 30 to 34	3,833	61.7	5,189	59.5
Age 35 to 39	3,779	68.5	4,611	66.3
Age 40 to 44	3,828	75.5	4,386	72.8
Age 45 to 49	3,547	82.0	3,982	78.7
Age 50 to 54	2,811	87.1	3,875	84.4
Age 55 to 59	2,074	90.9	3,196	89.1
Age 60 to 64	1,758	94.1	2,423	92.7
Age 65 to 69	1,215	96.3	1,638	95.1
Age 70 to 74	905	97.9	1,432	97.3
Age 75 to 79	594	99.0	882	98.6
Age 80 to 84	303	99.6	552	99.4
Age 85 and over	230	100.0	426	100.0
<b>Total</b>	<b>54,895</b>		<b>67,690</b>	

## Birth and Fertility Rates

- <sup>2.10</sup> The table above provides a way of understanding the rate of population growth through births. The table shows that surviving children aged 0-4 years comprise 9.7% of the Gypsy and Traveller population – which means that, on average, 1.9% of the total population was born each year (over the last 5 years). The same estimate is confirmed if we consider that those aged 0-14 comprise 28.7% of the Gypsy and Traveller population – which also means that almost exactly 2% of the population was born each year.
- <sup>2.11</sup> The total fertility rate (TFR) for the whole UK population is just below 2 – which means that on average each woman can be expected to have just less than two children who reach adulthood.
- <sup>2.12</sup> ORS know of only one estimate of fertility rates of the UK Gypsy and Traveller community, in *'Ethnic identity and inequalities in Britain: The dynamics of diversity'* by Dr Stephen Jivraj and Professor Ludi Simpson (published May 2015). The authors use the 2011 Census data to estimate the TFR for the Gypsy and traveller community as 2.75.

- <sup>2.13</sup> ORS have used our own historic survey data to investigate the fertility rates of Gypsy and Traveller women. The ORS data shows that on average Gypsy and Traveller women aged 32 years have 2.5 children (but, because the children of mothers above this age point tend to leave home progressively, full TFR's were not completed).
- <sup>2.14</sup> On this basis it is reasonable to infer an average of 3 children per woman during their lifetime, which is broadly consistent with the estimate of 2.75 children per woman derived from the 2011 Census. The 2021 Census data is fully consistent with these estimates, so no changes are required to the modelling, but the evidence that the TFR could be falling should be monitored over time.

## Death Rates

- <sup>2.15</sup> Although the above data implies an annual growth rate through births of about 2%, the death rate must also be considered. Whereas the average life expectancy across the whole population of the UK is currently just over 80 years, a Sheffield University study found that Gypsy and Traveller life expectancy is about 10-12 years less than average (Parry et al (2004) *'The Health Status of Gypsies and Travellers: Report of Department of Health Inequalities in Health Research Initiative'*, University of Sheffield).
- <sup>2.16</sup> Therefore, our population growth modelling in 2013 ORS used a conservative estimate of average life expectancy as 72 years – which is entirely consistent with the lower-than-average number of Gypsies and Travellers aged over 70 years in the 2011 Census (and also in ORS's own survey data).
- <sup>2.17</sup> Again, this data is fully consistent with the 2021 Census, which may be showing slight increases in life expectancy, but not sufficient to be inconsistent with the 2013 modelling.

## Modelling Outputs

- <sup>2.18</sup> If a TFR of 3 and an average life expectancy of 72 years are assumed for Gypsies and Travellers, then the ORS modelling projects the population to increase by 66% over the next 40 years – implying a population compound growth rate of 1.25% per annum.
- <sup>2.19</sup> If we assume that Gypsy and Traveller life expectancy increases to 77 years by 2050, then the projected population growth rate rises to nearly 1.50% per annum. To generate an 'upper range' rate of population growth, ORS assumed an implausible TFR of 4 and an average life expectancy rising to 77 over the next 40 years – which then yields an 'upper range' growth rate of 1.90% per annum.
- <sup>2.20</sup> Given the data from the 2021 Census, the figure of 1.25% net population growth appears to be consistent with around 2% of the population being born each year and deaths accounting for around a 0.75% reduction in population.

## Household Growth

- <sup>2.21</sup> In addition to population growth influencing the number of households, the size of households also affects the number. Hence, population and household growth rates do not necessarily match directly, mainly due to the current tendency for people to live in smaller childless or single person households.

- <sup>2.22</sup> Because the Gypsy and Traveller population is relatively young and has many single parent households, a 1.25%-1.50% annual population growth could yield higher-than-average household growth rates, particularly if average household sizes fall or if younger-than-average households' form.
- <sup>2.23</sup> However, while there is evidence that Gypsy and Traveller households already form at an earlier age than in the general population, the scope for a more rapid rate of growth, through even earlier household formation, is limited.
- <sup>2.24</sup> Based on the 2011 and 2021 Census, the tables below compare the age of household representatives in all households in England with those in Gypsy and Traveller households – showing that the latter has many more household representatives aged under-25 years. In the general England population in 2021, 2.7% of household representatives are aged 16-24, compared with 7.4% in the Gypsy and Traveller population, which is consistent with ORS's survey data.
- <sup>2.25</sup> Interestingly, in 2011, 8.7% of all Gypsy and Traveller households were aged under 25 years, but this has fallen to 7.4% in 2021. This is in line with a fall in the general population from 3.6% to 2.7%, which implies households are forming at an older age. This in turn would mean that any population growth would convert to a lower household growth as the growing population forms households at an older age.

**Figure 2 – Age of Head of Household in 2011 (Source: UK Census of Population 2011)**

Age of Household Representative	Households - England	% Households - England	Households – Gypsies and Travellers	% Households – Gypsies and Travellers
Age 24 and under	790,974	3.6%	1,698	8.7%
Age 25 to 34	3,158,258	14.3%	4,232	21.7%
Age 35 to 49	6,563,651	29.7%	6,899	35.5%
Age 50 to 64	5,828,761	26.4%	4,310	22.2%
Age 65 to 74	2,764,474	12.5%	1,473	7.6%
Age 75 to 84	2,097,807	9.5%	682	3.5%
Age 85 and over	859,443	3.9%	164	0.8%
<b>Total</b>	<b>22,063,368</b>	<b>100%</b>	<b>19,458</b>	<b>100%</b>

**Figure 3 – Age of Head of Household in 2021 (Source: UK Census of Population 2021)**

Age of Household Representative	Households - England	% Households - England	Households – Gypsies and Travellers	% Households – Gypsies and Travellers
Age 24 and under	608,361	2.7%	1,537	7.4%
Age 25 to 34	3,067,607	13.7%	4,278	20.6%
Age 35 to 49	5,886,110	26.2%	6,790	32.8%
Age 50 to 64	6,470,425	28.8%	5,318	25.7%
Age 65 and over	6,427,165	28.6%	2,807	13.5%
<b>Total</b>	<b>22,459,668</b>	<b>100%</b>	<b>20,730</b>	<b>100%</b>

- <sup>2.26</sup> The following tables shows that the proportion of single person Gypsy and Traveller households is not dissimilar to the wider population of England; but there are more lone parents and fewer couples without children, amongst Gypsies and Travellers children. This was the case in both 2011 and 2021.

**Figure 4 – Household Type in 2011 (Source: UK Census of Population 2011)**

Household Type	Households - England	% Households - England	Households – Gypsies and Travellers	% Households – Gypsies and Travellers
Single person	6,666,493	30.3%	5,741	29.5%
Couple with no dependent children	7,024,688	31.8%	3,167	16.3%
Couple with dependent children	4,266,670	19.3%	3,683	18.9%
Lone parent with dependent children	1,573,255	7.1%	3,949	20.3%
Lone parent: All children non-dependent	766,569	3.5%	795	4.1%
Other households	1,765,693	8.0%	2,123	10.9%
<b>Total</b>	<b>22,063,368</b>	<b>100%</b>	<b>19,458</b>	<b>100%</b>

**Figure 5 – Household Type in 2021 (Source: UK Census of Population 2021)**

Household Type	Households - England	% Households - England	Households – Gypsies and Travellers	% Households – Gypsies and Travellers
Single person	6,964,704	30.3%	6,264	28.8%
Couple with no dependent children	7,806,819	34.0%	4,411	20.3%
Couple with dependent children	4,662,429	20.3%	4,500	20.7%
Lone parent with dependent children	1,773,926	7.7%	4,634	21.3%
Lone parent: All children non-dependent	1,058,017	4.6%	1,269	5.8%
Other households	725,107	3.2%	689	3.2%
<b>Total</b>	<b>22,991,002</b>	<b>100%</b>	<b>21,767</b>	<b>100%</b>

- <sup>2.27</sup> The key point, though, is that since 21% of Gypsy and Traveller households are lone parents with dependent children, and up to 30% are single persons, there is limited potential for further reductions in average household size to increase current household formation rates significantly – and there is no reason to think that earlier household formations or increasing divorce rates will in the medium term affect household formation rates.
- <sup>2.28</sup> While there are differences with the general population, a 1.25%-1.50% per annum Gypsy and Traveller population growth rate is likely to lead to a household growth rate of 1.25%-1.50% per annum.

### 3. CONCLUSIONS

- 3.1 The best available evidence suggests that the net annual Gypsy and Traveller household growth rate across England is 1.50% per annum. This figure was originally derived from the 2011 UK Census of Population and ORS's own survey but is also fully consistent with the 2021 UK Census of Population.
- 3.2 However, whilst a national rate of 1.50% can be demonstrated, this should be adjusted accordingly to establish local rates based on the demographic breakdown of the population at a local authority level.
- 3.3 Evidence from previous GTAA studies completed by ORS suggest that locally derived rates can vary from 0.50% to 2.75% depending on the number of children aged under 18 in the local Traveller population.
- 3.4 In addition, in certain circumstances where the numbers of households and children are higher or lower than national data has identified, or the population age structure is skewed by certain age groups, it may not be appropriate to apply a percentage rate for new household formation.
- 3.5 In these cases, a judgement should be made on likely new household formation based on the age and gender of the children identified in local household interviews. This should be based on the assumption that 50% of households likely to form will stay in any given area and that 50% will pair up and move to another area, while still considering the impact of dissolution. This is based on evidence from over 170 GTAA's that ORS have completed across England and Wales involving over 7,000 household interviews.



# **Duty to Cooperate Statement**

## **Statement of Cooperation on Strategic Planning Matters In support of the Submission Broads Local Plan**

**May 2025**



# Contents

<b>2</b>	<b>Introduction.....</b>	<b>4</b>
2.1	About this Duty to Cooperate Statement .....	4
2.2	Administrative Geography .....	5
2.3	History of Cooperation. ....	5
2.4	The future of Cooperation .....	5
<b>3</b>	<b>Neighbouring Local Planning Authorities.....</b>	<b>6</b>
3.1	The Broads and its surroundings generally .....	6
3.2	Cooperation mechanisms .....	6
3.3	Co-operation outcomes.....	8
<b>4</b>	<b>Greater Norwich (GN) Joint Local Plan.....</b>	<b>10</b>
4.1	Cooperation mechanisms .....	10
4.2	Co-operation Outcomes .....	10
<b>5</b>	<b>The Coast.....</b>	<b>11</b>
5.1	Co-operation mechanisms.....	11
5.2	4.2 Co-operation outcomes.....	11
<b>6</b>	<b>National Parks family.....</b>	<b>12</b>
6.1	Co-operation mechanisms.....	12
6.2	Co-operation outcomes.....	13
<b>7</b>	<b>The Environment Agency .....</b>	<b>14</b>
<b>8</b>	<b>Historic England.....</b>	<b>14</b>
<b>9</b>	<b>Natural England .....</b>	<b>14</b>
<b>10</b>	<b>Mayor of London.....</b>	<b>14</b>
<b>11</b>	<b>Civil Aviation Authority .....</b>	<b>14</b>
<b>11</b>	<b>Office of Rail Regulation .....</b>	<b>14</b>
<b>12</b>	<b>National Highways .....</b>	<b>15</b>
<b>13</b>	<b>Homes England .....</b>	<b>15</b>
<b>14</b>	<b>Integrated Care Systems and National Health Service Commissioning Board.....</b>	<b>15</b>
<b>15</b>	<b>Transport for London .....</b>	<b>15</b>
<b>16</b>	<b>Integrated Transport Authorities.....</b>	<b>15</b>
<b>17</b>	<b>Marine Management Organisation .....</b>	<b>15</b>
<b>18</b>	<b>LEP and LNPs .....</b>	<b>15</b>
<b>19</b>	<b>19 Housing need in the Broads .....</b>	<b>16</b>
11.1	19.1 Background.....	16
11.2	19.2 Duty to Cooperate with Norfolk LPAs .....	16
11.3	19.3 Duty to cooperate with East Suffolk Council .....	17
<b>12</b>	<b>20 Gypsy and Traveller need in Great Yarmouth Borough.....</b>	<b>17</b>
12.1	20.1 Background.....	17
12.2	20.2 Duty to Cooperate with Great Yarmouth Borough Council .....	17
<b>13</b>	<b>21 Other Cross Boundary strategic issues relevant to the Duty to Cooperate and Local Plan .....</b>	<b>18</b>
13.1	21.1 Nutrient Enrichment.....	18

13.2	21.2 Recreation Impacts .....	18
13.3	21.3 Water quality .....	19
13.4	21.4 Water supply .....	19
13.5	21.5 The Broads itself .....	19
14	Appendix 1: The Broads Executive Area, District Boundaries and County Boundaries. 20	
15	Appendix 2: Assessment of Local Plan against the Norfolk Strategic Framework Agreements (2021) .....	21
16	Appendix 3: Assessment of Local Plan against Marine Plans .....	29
17	Appendix 4: East Suffolk Council Duty to Cooperate Letter May 2025 .....	36

# 1 Introduction

## 1.1 About this Duty to Cooperate Statement

The Localism Act 2011 imposes upon local planning authorities and others a ‘duty to cooperate’ on strategic planning matters (i.e. those that affect more than one planning authority area). The duty requires that a local planning authority engages constructively, actively and on an on-going basis with relevant or prescribed bodies in order to maximise the effectiveness of development plan preparation and strategic matters.

This statement summarises how the Broads Authority has met that requirement in terms of the activity of cooperation and the effectiveness of that cooperation insofar as it relates to the Proposed Local Plan for the Broads. This statement sets out how the Broads Authority has cooperated with the Prescribed Bodies as required by The Town and Country Planning (Local Planning) (England) Regulations 2012 (PART 2) Duty to co-operate as well as other National Parks and neighbouring District Councils. The prescribed bodies are:

- the Environment Agency;
- the Historic Buildings and Monuments Commission for England (known as Historic England);
- Natural England;
- the Mayor of London;
- the Civil Aviation Authority;
- the Homes and Communities Agency;
- each Primary Care Trust established under section 18 of the National Health Service Act 2006 or continued in existence by virtue of that section;
- the Office of Rail Regulation;
- Transport for London;
- each Integrated Transport Authority;
- each highway authority within the meaning of section 1 of the Highways Act 1980 (20) (including the Secretary of State, where the Secretary of State is the highways authority)

The Statement of Consultation that accompanies the Local Plan should also be referred to. This sets out the stages of consultation, which of the bodies were consulted, what was said

and the Broads Authority's response to the representations and how the comments were taken on board.

Section 2 onwards discusses cooperation with the prescribed bodies.

## **1.2 Administrative Geography**

The Broads is a national park equivalent protected landscape. The Broads Authority is a special statutory authority and the sole local planning authority for the Broads Authority Executive Area.

This designated area falls within the administrative area of six district level councils (Broadland, South Norfolk, North Norfolk, East Suffolk, Great Yarmouth Borough and Norwich City), and two county councils (Norfolk and Suffolk) (see [Appendix A](#)). The 'district' councils are local planning authorities only for the part of their respective administrative areas outside the Broads, but they are housing authorities, etc. for the whole of their district, including that within the Broads. Norfolk and Suffolk County Councils are the county and minerals and waste planning authorities for the whole of their respective counties, including the Broads.

A coastal part of the Broads is also within the Norfolk Coast National Landscape. The National Landscape does not have a separate statutory authority, unlike national parks and the Broads, but is managed by the constituent local authorities and Natural England through the Norfolk Coast partnership.

There are 92<sup>1</sup> civil parishes (and two unparished areas) in the Broads designated area. In every case the parish includes land both within and without the Broads boundary (i.e. in two local planning authorities' areas).

## **1.3 History of Cooperation.**

Importantly the 1988 Broads Act Section 17a (as amended) makes it a general duty of all public bodies in exercising their functions to further all 3 of the Broads Authority's purposes. This duty means the Broads Authority has long established relationships with government departments and agencies and a range of other local and public bodies in delivering national park purposes.

## **1.4 The future of Cooperation**

The Levelling up and Regeneration Act 2023 indicates that the Duty to Cooperate will be removed. However, no details as to what precisely will take its places have been provided at the time of writing.

---

<sup>1</sup> Oulton Broad Parish Council was formed in 2017.

## 2 Neighbouring Local Planning Authorities

### 2.1 The Broads and its surroundings generally

Particular considerations apply in the Norwich area, because of the large scale of growth planned there. These are dealt with in separate sections below.

At the eastern end of the Broads, the towns of Great Yarmouth and Lowestoft also have growth planned, but of a much smaller scale. Elsewhere, around the fringes of the Broads area is generally rural, and there is more incremental change planned, including in the towns and other developed areas such as Beccles, Bungay, Hoveton and Stalham. The cross-boundary issues generally tend to be very localised and specific.

The boundary of the Broads was determined in the light of its landscape, navigation and recreational value. The boundary largely follows the extent of the flood plain and typically it includes the river frontage parts of settlements where the greater part of the settlement lies outside the boundary and within the district/ borough council's planning area. In such cases, even if the settlement is identified by the council for some growth, this is usually best accommodated in that council's planning area, as the land within the Broads is constrained by the importance of conserving its nationally important landscape, navigation considerations, and is at a high risk of flooding.

Because the boundary runs through the heart of settlements, it is the case that sites, ownerships and functions may straddle the boundary, and there is sometimes a need to coordinate on not just wider, 'strategic' matters, but also more site-specific matters to ensure that development either side of the boundary is complementary.

### 2.2 Cooperation mechanisms

- a) **Direct links at member level:** Each district and county council appoint one councillor to membership of the Broads Authority. Norfolk County Council has two appointed members while Suffolk County Council and the Districts have one each. A number of the Local Authority Appointed members sit on the Planning Committee. The Planning Committee's role relates to Development Management, Enforcement, Tree Protection Orders, Conservation Areas, Neighbourhood Planning and Local Plan issues. Each consultation stage of the production of the Local Plan was agreed by the Planning Committee as well as Full Authority. The Planning Committee's remit includes responses on consultations from the District councils, demonstrating co-operation works both ways.
- b) **Norfolk Strategic Planning Framework:** The purpose of the Norfolk Strategic Planning Framework (NSPF) is to produce a non-statutory framework for planning authorities across Norfolk about joint working. This ensures that the Duty to Cooperate is discharged and there is beneficial co-operation on strategic planning issues. This document will provide an overarching framework for strategic planning issues across the county, taking account of any key issues in neighbouring areas and beyond with an

emphasis on strategic land use issues with cross boundary implications. It is intended to support and inform the preparation of Local Plans produced by individual planning authorities. The 2021 version of the NSPF can be found [here](#). How the Local Plan meets or addresses the various agreements in the NSPF is assessed at [Appendix 2](#).

- c) **Joint Strategic Planning Member Group Meeting<sup>2</sup> – Norfolk**. This meets quarterly and cross boundary issues are discussed with the way forward recommended for each constituent LPA to then take forward.
- d) **Informal discussions and meetings** are held between planning policy officers on sites and issues with cross boundary implications, on occasions involving directors of planning and individual council or authority members. For example, a quarterly meeting is held between East Suffolk Council and Great Yarmouth Borough Council and the Broads Authority. There is also a bi-annual meeting with Norfolk County Council.
- e) **Ongoing engagement at officer level** (usually head of planning policy) takes place through the Norwich Strategic Planning Group (meeting monthly). There is a Suffolk equivalent which meets on an ad hoc basis.
- f) Joint working with relevant district councils takes place regarding the **Neighbourhood Plans<sup>3</sup>** that straddle both Local Planning Authority boundaries.
- g) **Specific discussions at officer level** occur on emerging cross boundary issues by telephone, email and meetings. For example, quarterly meetings with Norfolk and Suffolk Historic Environment officers.
- h) **Formal consultations** are undertaken on development plan documents, supplementary planning documents, and planning applications with potential cross-boundary implications.
- i) The Broads Authority is a member, and sits on the management group, of the **Norfolk Coast National Landscape Partnership**.
- j) The Broads Authority is a member of the **Norfolk Biodiversity Partnership** along with the relevant local authorities (Breckland, Broadland, Great Yarmouth, Kings Lynn and West Norfolk, North Norfolk, Norwich, South Norfolk), Natural England and the Environment Agencies, together with bodies not subject to the 'duty to cooperate', Anglian Water, British Trust for Ornithology, Royal Society for the Protection of Birds, Farming and Wildlife Advisory Group, Forestry Commission, Norfolk and Norwich Naturalists' Society, Norfolk Biodiversity Information Service, Norfolk Geodiversity Partnership, and Norfolk Wildlife Trust, University of East Anglia and Water Management Alliance.

---

<sup>2</sup> [Norfolk Strategic Planning Member Forum - Norfolk County Council](#)

<sup>3</sup> [Neighbourhood planning \(broads-authority.gov.uk\)](#)

- k) The Broads Authority is a member of the ***Suffolk Biodiversity Partnership***, along with Suffolk County Council.
- l) There are arrangements with ***Norfolk and Suffolk County Councils*** for the provision of advice and services in relation to historic environment and archaeology advice.
- m) The Authority's remit differs from a local council; the Broads Authority is a local planning authority but does not have other ***statutory responsibilities*** in, for example; housing, economic development<sup>4</sup>, environmental health, education, and highways. The Authority works closely with these local authority departments in both plan-making and decision-taking to enable connections with other authorities at an officer level.
- n) ***Joint evidence base production.*** Some evidence base to support Local Plan production has been commissioned jointly, see the next section for detail. In general, where one of the Authority's constituent districts has commissioned evidence to support its Local Plan, it tends to cover the entire district, including that part of the district in the Broads Authority Executive Area.

## 2.3 Cooperation outcomes

Agreement or coordination on approach and issues relating to a range of sites either side of the Broads boundary. These relate to both cross-boundary planning issues and sites within the Broads where the Authority's role of local planning authority needs to be coordinated with the relevant council's other responsibilities. Examples include;

- Open space – assessed by the districts and the new Local Plan seeks to allocate these areas of open space.
- Norfolk and Suffolk County Council regarding safeguarded minerals sites.
- Masterplan and emerging SPD for East Norwich Strategic Regeneration Area. While this is mostly in Norwich it includes a piece of land which is in the Broads.
- Retail – working with East Suffolk and North Norfolk relating to a combined approach to joint areas of retail.
- Joint Supplementary Planning Document with Great Yarmouth, East Suffolk and North Norfolk Councils on Coastal Adaptation.
- Endorsing Great Yarmouth Open Space SPD and East Suffolk Open Space and Affordable Housing SPDs.

---

<sup>4</sup> That being said, in undertaking its functions, the Broads Authority must have regard to the needs of agriculture and forestry and the economic and social interests of those who live or work in the Broads.

- Cross-boundary conservation areas, Conservation Area Appraisals and Article 4 directions with each of Broadland, Great Yarmouth, Norwich, North Norfolk, South Norfolk and East Suffolk Councils.
- Broads (and hinterland) Landscape Capacity Study Wind-Turbines, for Photo-Voltaics and Associated Infrastructure, with input from South Norfolk District and Great Yarmouth.
- With Neighbourhood Plans adopted and more being produced, joint working is required to assist in their production as well as ensure the regulatory steps are met.
- Broads Biodiversity Action Plan (2009), Broads Biodiversity Audit (2011), Broads Biodiversity and Water Strategy (2013); Norfolk Biodiversity Action Plan; Suffolk Biodiversity Action Plan 2012.
- Officer level support in planning appeals where there are cross-boundary impacts, e.g. wind turbines in Hemsby (GYBC) and near Beccles (East Suffolk DC).



### **3 Greater Norwich (GN) Joint Local Plan**

Norwich City, Broadland District, and South Norfolk District, working with Norfolk County Council, have combined as part of the Greater Norwich Growth Partnership (GNGP). They produced a Greater Norwich Local Plan. The Broads Authority is an active member of the GNGP with officers and members involved.

Although the western part of the Broads is within the general area of the Joint Local Plan, the Authority decided at an early stage to produce its own Local Plan for the Broads area separately. This is because of the very different issues and considerations applying in the Broads.

The growth is planned to take place entirely outside the Broads and within the GNGP Joint Local Plan area, but there are a range of cross boundary and complementary issues.

#### **3.1 Cooperation mechanisms**

The Broads Authority is an active member of the GNGP with Officers attending the working group meetings, Director attending the Director Board and Member attending the joint Member Group meetings.

The Broads Authority is part of the statutory consultations on the GNGP Joint Local Plan.

#### **3.2 Cooperation Outcomes**

The GNGP Local Plan covers the wider Norwich area (including beyond the boundaries of Norwich City Council) but excludes the Broads area.

The Broads is recognised by the GNGP for its national importance, and for its contribution to the economy, environment and quality of life of the sub-region. The identification of the potential for large scale growth in the wider Norwich area has been informed by the sensitivities and value of the Broads.

## 4 The Coast

The coast in the vicinity of the Broads is low lying and has been breached on a number of occasions and, separately, eroded significantly. The anticipated effects of climate change and other factors suggest a likely increase in frequency and severity of such events and processes.

The Broads' ecological, economic, community and landscape values and qualities are highly vulnerable to the effects of any future breach or over-topping of the coast, both in the vicinity of any breach and far inland. As well as the flooding likely to result, the incursion of salt seawater would seriously affect internationally protected habitats and species, as well as the Broads ecology more generally.

The coast is also a key part of the Broads landscape, and well-loved for its accessible but remote feeling beach and dunes, distinct habitats and species associated with the sea face of the coast, the brackish waters and soils on its landward side, and the intervening dunes. The combination of sensitive nature and visitor pressures (for instance, viewing of seals and their pups on the beach in the winter is extremely popular) requires careful management.

### 4.1 Cooperation mechanisms

The Authority has been involved in the development of the adopted shoreline management plan (SMP) for the area, and the action planning to implement this and inform future plans. Recently, a group of coastal authorities (Norfolk and Suffolk Planning Policy Officers) has produced a joint [Coastal Adaptation SPD](#).

### 4.2 Cooperation outcomes

The Shoreline Management Plan 6 (Kelling Hard to Lowestoft Ness) provides for intervention to hold the current line of the coast of the Broads for the medium term, while investigating the long-term sustainability of this option.

A widening appreciation of the political, technical and community challenges in facing coastal change and other potential climate change impacts.

Increasing recognition by the coastal defence community that changes in this particular part of the coast could have a wide range of major impacts on the Broads stretching far inland, and of a need to further investigate and understand the risks and opportunities, including those further inland than the coastal strip itself.

Increased understanding of potential climate change effects on the area and the identification of a range of trial potential adaption measures.

An adopted Coastal Adaptation SPD.

## 5 National Parks family

Strategic planning matters – those that affect more than one planning area - are not limited to those areas which are contiguous. The Broads is part of the UK family of national parks, and for all their differences there are many issues which affect them jointly. They are largely rural areas with the highest status of protection and a national role in recreation and tourism, dependent on fragile ways of life and communities to maintain their distinctive landscapes, under great housing pressure for second homes and retirement, and highly vulnerable to erosion of their special qualities through incremental change. As such they need special treatment. National planning policies conceived primarily with urban and suburban areas of growth and regeneration in mind can be highly inappropriate. Special care and creativity are needed to ensure both that the national parks and the Broads are suitably conserved and developed, and to ensure that they make their full contribution to the quality of life and the economy of the areas around them and the nation more generally.

### 5.1 Cooperation mechanisms

The Broads Authority works closely at both officer and member level with the national park authorities, which are each the local planning authority for their national park area, to address emerging issues and share best practice.

Of particular relevance to the planning of the national parks and the Broads are the following standing officer working groups;

- Chief Executives
- Heads of Planning Policy
- Heads of Planning
- Historic Environment Officers
- England Agriculture and Rural Development
- Landscape
- Ecologists
- Recreation and Tourism

The National Parks also submit joint representations in response to Government consultations including on planning policy and have ongoing dialogue with DEFRA, DCLG, the Planning Inspectorate, etc. evidence to national commissions and enquiries (e.g. Rural Affordable Housing Commission).

## 5.2 Cooperation outcomes

Continuation of the special treatment of national parks and the Broads in the National Planning Policy Framework.

Enhanced policies and approaches to issues such as affordable housing, accommodation of housing growth, climate change mitigation and adaption, wind farms and other renewable generation, contribution of development to landscape, wildlife, cultural heritage and recreation.

## **6 The Environment Agency**

Long standing close working arrangements (including joint projects) between the organisations on a range of issues, especially on planning policies for flood risk zones (a major issue in the Broads), flood defences, Shoreline Management Plan, water quality and resources, navigation matters, recreation, etc. Previous and current joint projects including EA/BA funding of a Catchment Officer. Statutory consultations, including on preparation of the Local Plan. The EA is also involved in the Norfolk Strategic Planning Officers Group and the production of the Norfolk Strategic Planning Framework and on the Member Forum.

## **7 Historic England**

General consultation on planning documents. Liaison regarding the way forward with regard to the Broads and Archaeology. Historic England are also standing invitees and regularly attend the Norfolk Conservation Officers meetings and Suffolk Conservation Officers Forum meetings. Discussion over projects such as the Water Mills and Marshes (a Heritage Lottery Funded scheme which delivered landscape scale benefits) and specific historic buildings and conservation areas.

## **8 Natural England**

Long-standing close working arrangements (including joint projects) between the organisations on a range of issues around land and water management including Biodiversity Action Plans, climate change. Previous joint projects including NE/BA funding of an officer to work on non-native species issues. Statutory consultations, including on the Local Plan.

## **9 Mayor of London**

While not directly relevant to the Broads area, work has been ongoing in relation to cooperating over the wider Southeast of England. Members have attended some meetings. Norfolk County Council Officers and South Norfolk District Council Leader (in his role as chair of the Norfolk Strategic Framework) have represented Norfolk in meetings.

## **10 Civil Aviation Authority**

No relevant strategic issues have arisen during the review period. The Authority has previously commented on consultation documents from Norwich International Airport, and drawn its attention to the issue of tranquillity in the Broads area as a matter for consideration in planning the airport's use of its controlled airspace.

## **11 Office of Rail Regulation**

No relevant strategic issues have arisen during the period. The Authority is a signatory to the East Anglia Rail Prospectus. It has also had extensive involvement with Network Rail in relation to issues around the maintenance, operation and any potential replacement of the

aged swing and lifting rail bridges across the Broads' rivers (which affect navigation as well as rail services and passengers, and the accessibility of the area to visitors) at all levels from navigation rangers and rail bridge operators to BA Chief Executive and NR Directors.

## **12 National Highways**

No relevant strategic issues have arisen during the review period. It is noted that there are intentions to improve the Acle Straight and roundabouts in Great Yarmouth and there is a policy that emphasises the issues to consider when producing the scheme. National Highways is supportive of this policy.

## **13 Homes England**

No relevant strategic issues have arisen during the review period.

## **14 Integrated Care Systems and National Health Service Commissioning Board**

No relevant strategic issues have arisen during the review period. The small scale development in the Broads area is unlikely to affect healthcare planning. As set out in the [Local Infrastructure Study](#), NHS England is not currently aware of a specific need for additional health facilities within the Broads Executive Area. There is currently sufficient capacity to cope with the existing populations in the area. Additionally there is not at present, due to capacity reasons, a need to expand the health facilities outside the Broads Executive Area into the Broads Executive Area.

## **15 Transport for London**

Not relevant to the Broads area.

## **16 Integrated Transport Authorities**

None relevant to the Broads area.

## **17 Marine Management Organisation**

Formal consultations between the Authority and the MMO, including on the Broads Local Plan. An assessment of the Local Plan against the East Onshore and Offshore Marine Plan is included at [Appendix 3](#).

## **18 LEP and LNPs**

The funding for these ended in 2023.

## 19 Housing need in the Broads

### 19.1 Background

Despite undertaking three calls for sites (one at each of the Local Plan consultation stages and one in December 2024) no new suitable residential dwelling sites came forward for allocation in the review of the Local Plan.

The Local Plan will include two sites allocated for residential dwellings, these already have planning permission and have commenced but are not yet built out. They are THU1 (16 dwellings) and OUL3 (76 dwellings). NOR1 Utilities Site in Norwich is a very constrained site and is allocated for mixed use which could include around 250 dwellings, although this is not considered a housing allocation.

The housing numbers as set out in the submitted version of the Local Plan are as follows:

The Objectively Assessed Housing Need for the Broads is as follows:

<b>District</b>	<b>Objectively Assessed Housing Need</b>	<b>Annual average from 2021 to 2042 (22 years)</b>
Broadland	316	14.37
North Norfolk	293	13.32
Norwich	17	0.77
South Norfolk	204	9.27
Great Yarmouth	177	8.05
East Suffolk	70	3.18
<b>Total:</b>	<b>1,077</b>	<b>49</b>

For the avoidance of doubt, each element of the Broad's Objectively Assessed Need identified in the table above for each of the six districts also forms part of each district's objectively assessed need and is not in addition to.

Completions and permissions between April 2021 and April 2025 as well as allocations in this Local Plan (that have not commenced). This shows a residual need of 1,034 dwellings.

It should be noted that before the Local Plan is adopted, there will be at least one more monitoring period, and any completions or permissions in those monitoring periods will be deducted from the residual need.

### 19.2 Duty to Cooperate with Norfolk LPAs

As mentioned previously in this document (section 2.2 a and b), Norfolk LPAs worked together to produce the Norfolk Strategic Planning Framework. Two agreements are relevant to meeting the housing need of the Broads and these are copied below.

Agreement 12 – The Broads Authority will meet its calculated portion of the wider housing requirement as far as is compatible with the protection of the Broad’s landscape and special qualities.

Agreement 13 – South Norfolk, Norwich City, Broadland, North Norfolk, and Great Yarmouth Councils will seek to include appropriate provision within their Local Plans to address the housing needs arising from the parts of the Broads Authority area overlapping their administrative boundaries if these cannot be met within the Broads Local Plan.

Effectively, as Agreement 12 is not met, Agreement 13 comes into force.

The NSPF was being updated at the time of writing this Duty to Cooperate Statement, but the agreements are still to be included, and South Norfolk, Norwich City, Broadland, North Norfolk, and Great Yarmouth Councils have agreed to meet the housing need of the Broads Authority.

### **19.3 Duty to cooperate with East Suffolk Council**

East Suffolk Council is not part of the Norfolk Strategic Planning Framework and so has confirmed how we cooperate through a Duty to Cooperate Letter that is at [Appendix 4](#). That is if the Broads Authority is unable to meet the need for 70 dwellings in the East Suffolk part of the Broads, East Suffolk will take on meeting the need. It acknowledges that the need for the Broads part of East Suffolk is part of East Suffolk’s need and not additional to it. The letter goes on to say that further Duty to Cooperate discussions will occur when East Suffolk produce its new Local Plan.

## **20 Gypsy and Traveller need in Great Yarmouth Borough**

### **20.1 Background**

The need for the Broads Authority comes from the Great Yarmouth Borough part of the Broads. The need for the next five years is 12 pitches, and future need is 5 pitches. In terms of the 5 pitch future needs, this is addressed through a Development Management policy.

### **20.2 Duty to Cooperate with Great Yarmouth Borough Council**

Despite undertaking three calls for sites (one at each of the Local Plan consultation stages and one in December 2024) no Gypsy and Traveller sites came forward for allocation in the Local Plan.

In terms of the need for 12 pitches over the next 5 years, we will continue to work with Great Yarmouth Borough Council.



## 21 Other Cross Boundary strategic issues relevant to the Duty to Cooperate and Local Plan

### 21.1 Nutrient Enrichment

Alongside all other local planning authorities in Norfolk, the Broads Authority received a letter dated 16 March 2022 from Natural England concerning nutrient pollution in the protected habitats of the Broads Special Area of Conservation (SAC) and Ramsar site. This letter advised that new development comprising overnight accommodation located within the catchment of these Habitats Sites has the potential to cause adverse impacts on site integrity due to nutrient pollution.

Nutrient pollution in rivers, lakes and estuaries has an adverse effect by causing eutrophication and algal blooms, harming delicate ecosystems and resulting in unfavourable conditions. The majority of nutrient pollution from residential properties enters waterbodies via treated discharges from wastewater treatment works (WWTW).

The policy applies to residential developments leading to overnight stays and non-residential development that, by virtue of its scale, may draw people from outside the catchments of the SACs and/or generate unusual quantities of surface water and/or (by virtue of the processes undertaken) contain unusual pollutants within surface water run-off. It only applies to certain areas of Norfolk and not, at the time of writing, any of Suffolk. It applies to development within the nutrient neutrality catchment of the Broads SAC and Broadland Ramsar.

Potential mitigation measures are detailed in this [report](#). At the time of writing [Norfolk Environmental Credits](#) has been set up to invest in local environmental schemes which will provide nutrient neutrality mitigation and generate credits for development to demonstrate that nutrients can be offset. Part 7 of the Levelling Up and Regeneration Act (2023) places a duty on water companies discharging to affected catchment areas to upgrade those WWTW defined by the LURA amendments to the Water Industry Act, that are identified as nutrient significant plants within the designated sensitive catchments, serving a population equivalent of 2,000 to achieve the highest technological levels for nutrient removal by 1 April 2030. In addition, the Natural England-led Nutrient Mitigation Scheme is progressing and will allow developers to purchase nutrient credits to demonstrate nutrient neutrality.

### 21.2 Recreation Impacts

Increased recreational pressure at Habitats Sites can result in damage to habitats through erosion and compaction, troubling of grazing stock, causing changes in behaviour to animals such as birds at nesting and feeding sites, spreading invasive species, dog fouling, tree climbing etc. Typically, disturbance of habitat and species is the unintentional consequence of people's presence which can impact distribution of habitat types and breeding success and survival. Increased development has the potential to increase recreational pressures on Habitat Sites which are accessible to the public.

The [Suffolk Coast Recreation Disturbance Avoidance and Mitigation Strategy \(RAMS\)](#) and the [Norfolk Recreation Avoidance and Mitigation Strategy \(RAMS\)](#) aim to reduce the impact of increased levels of recreational use on Habitat Sites (also often called European Sites), due to new residential development in Norfolk and the Suffolk Coast area, and to provide a simple, coordinated way for developers to deliver mitigation for their developments. The RAMS project allows for a strategic approach to mitigating the in-combination effects of development on these designated areas and allows mitigation to be delivered across the project area. The tariffs increase each year with inflation; for the most up to date information see [here](#).

The Norfolk Local Planning Authorities have worked together in relation to the Norfolk RAMS scheme and the relevant Suffolk Local Planning Authorities have worked together in relation to the Suffolk Coast RAMS scheme.

### 21.3 Water quality

What happens upstream, can affect downstream regardless of local planning authority areas. To some extent, water quality is addressed through nutrient enrichment. There is also the [Broadland Catchment Partnership](#). The Broads Authority and Norfolk Rivers Trust co-host the Broadland Catchment Partnership to help co-ordinate joined up and targeted water and land management. The partnership is involving local people, organisations and businesses in developing and carrying out actions. Partners are making the most of existing funding, seeking more innovative sources, and highlighting incentives to encourage best practice across all sectors.

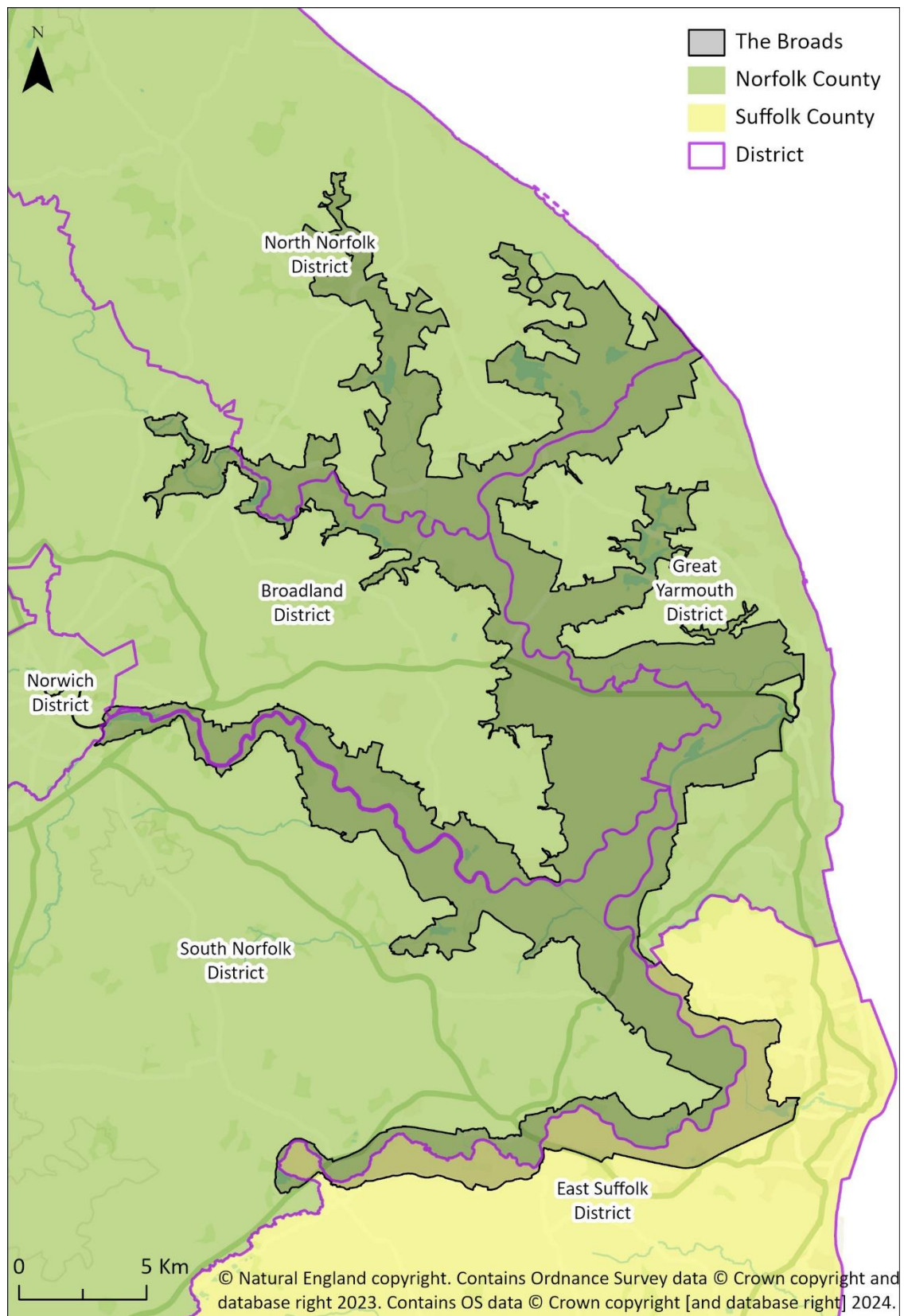
### 21.4 Water supply

The east is an area of water stress. The Local Plan for the Broads has a policy that seeks 110 l/h/d use for new residential dwellings and seeks other buildings to be water efficient. The approach to 110 l/h/d is a county-wide approach that is part of the Norfolk Strategic Framework.

### 21.5 The Broads itself

The Broads is a protected landscape and is part of 6 district council areas. The Levelling Up and Regeneration Act, which received Royal Assent on 26 October 2023, amended Section 17A of the Norfolk and Suffolk Broads Act 1988. Section 17A creates a general duty of public bodies and this was amended to replace 'shall have regard to' with 'must seek to further' the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the Broads, promoting opportunities for the understanding and enjoyment of the special qualities of the Broads by the public; and protecting the interests of navigation.

## Appendix 1: The Broads Executive Area, District Boundaries and County Boundaries.



## Appendix 2: Assessment of Local Plan against the Norfolk Strategic Framework Agreements (2021)

Agreement	How the Local Plan addresses this
<p>Agreement 1 - That when preparing new Local Plans which seek to identify levels of Objectively Assessed Need for housing the Norfolk Planning Authorities will produce documents which provide for the development needs of their areas until at least 2036.</p>	<p>The local housing need, residential moorings need and Gypsy and Traveller need is to 2042.</p>
<p>Agreement 2 - In preparing their Local Plans the Norfolk Planning Authorities will seek to positively contribute towards the delivery of the following vision.</p> <p>By the middle of the 21st century Norfolk will be increasingly recognised nationally for having a strong and vibrant economy providing high quality economic opportunities for residents in urban and rural areas. Its settlements and key infrastructure will be physically resilient to the impacts of climate change. The natural, built and historic environments will be enhanced through the regeneration of settlements, safeguarding and enhancement of current assets and networks, improving both biodiversity and the quality of life and Health for residents. Housing needs will be met in full in socially inclusive communities. The County will be better connected by having good transport links to major cities in the UK and Europe and excellent digital connectivity. A good relationship between homes and jobs will minimise the need to travel and residents will have choice about how they meet their demand for local travel.</p>	<p>The Local Plan includes policies relating to the economy, air quality, greenhouse gas emissions, housing need, health and biodiversity.</p>
<p>Agreement 3 - By 2036, through co-operation between the Norfolk Authorities and preparation of Development Plans, Norfolk will seek to maximise the delivery of the following objectives (in no particular order):</p> <ul style="list-style-type: none"> <li>• To realise the economic potential of Norfolk and its people</li> <li>• To reduce Norfolk's greenhouse gas emissions and improving air quality as well as reducing the impact from, exposure to, and effects of climate change</li> <li>• To address housing needs in Norfolk</li> <li>• To improve the quality of life and health for all the population of Norfolk</li> <li>• To improve and conserve Norfolk's rich and biodiverse environment</li> </ul>	
<p>Agreement 4 –To produce and maintain an assessment of housing needs covering the three contiguous and non-overlapping broad market areas of Great Yarmouth, Central Norfolk and West Norfolk</p>	<p>Agreement out of date.</p>

Agreement	How the Local Plan addresses this
Agreement 5 - That Great Yarmouth and King's Lynn and West Norfolk will each continue to prepare separate Local Plans for their areas.	No action for the Local Plan for the Broads.
Agreement 6 - That Breckland and North Norfolk will continue to prepare separate Local Plans for their areas whilst Broadland District Council, Norwich City Council and South Norfolk Council will co-operate on a new Greater Norwich Local Plan that will replace the current Joint Core Strategy and various other existing Local Plan documents in this area.	No action for the Local Plan for the Broads.
Agreement 7 - That, in view of the very distinct issues facing the Broads Authority Area, spatial planning matters will continue to be best addressed by way of a standalone Broads Local Plan.	A Local Plan for the Broads is being produced.
Agreement 8 – Norfolk Authorities will work positively to assist the New Anglia Covid 19 Economic Recovery Restart Plan	Generally, the Broads Authority has done this, but 5 years on, this may be out of date.
Agreement 9 - The list of locations in section 5 are the Tier One Employment sites and should be the focus of investment to drive increasing economic development in key sectors and protected from loss to other uses.	These do not fall within the Broads Authority Executive Area.
<p>Agreement 10 - The recently adopted and emerging Local Plans for the area will include appropriate policies and proposals to recognise the importance of the above cross boundary issues and interventions;</p> <p>The role of Greater Norwich</p> <p>Cambridge to Norwich Technology Corridor</p> <p>A47 Corridor</p> <p>Offshore Energy Sector / Ports of Great Yarmouth &amp; Lowestoft</p> <p>Norfolk Coast, the Broads and the Brecks</p> <p>A10 corridor</p>	<p>The Local Plan for the Broads has a policy relating to work on the A47 as it runs through the Broads (Acle Straight).</p> <p>As set out in this Statement, the Broads Authority have been and will continue to be involved in Greater Norwich.</p>

Agreement	How the Local Plan addresses this
<p>Agreement 11 - When determining their respective Local Plan housing targets each Norfolk Authority, working together where desirable, will aim to deliver at least the local housing need as identified in the most up to date evidence (Table 9). Where this would result in unsustainable development, agreement will be sought with other authorities, initially within the same Housing Market Area, to ensure sufficient homes are provided to meet identified needs and demands in the area until at least 2036.</p>	<p>The Local Plan does not allocate residential dwellings. The need for the Broads is part of, not additional to, the need of the districts.</p> <p>The Local Plan allocates sites for residential moorings.</p> <p>The Local Plan does not meet the Gypsy and Traveller need. We will work with Great Yarmouth Borough Council in meeting this need.</p>
<p>Agreement 12 – The Broads Authority will meet its calculated portion of the wider housing requirement as far as is compatible with the protection of the Broad’s landscape and special qualities.</p>	<p>The Local Plan does not allocate residential dwellings. The need for the Broads is part of, not additional to, the need of the districts.</p>
<p>Agreement 13 – South Norfolk, Norwich City, Broadland, North Norfolk, and Great Yarmouth Councils will seek to include appropriate provision within their Local Plans to address the housing needs arising from the parts of the Broads Authority area overlapping their administrative boundaries if these cannot be met within the Broads Local Plan</p>	<p>Districts have agreed to do this.</p>
<p>Agreement 14 – Broadland, Norwich City, and South Norfolk Councils will seek to deliver an additional supply of homes within the Greater Norwich Local Plan to ensure the housing needs arising from the City Deal are met in full.</p>	<p>No action for the Local Plan for the Broads.</p>

Agreement	How the Local Plan addresses this
<p>Agreement 15 - The Norfolk Planning Authorities will quantify the need for, and plan to provide for, the specialist accommodation needs of the elderly, students, gypsy and travelling Show People, and those residing in other specialist types of accommodation and working together will ensure that the distribution of provision responds to locally identified needs</p>	<p>This need was not broken down to a need for the Broads Authority.</p> <p>The Local Plan does not allocate residential dwellings.</p> <p>The need for the Broads is part of, not additional to, the need of the districts.</p> <p>There is a development management policy in the Local Plan to help determine such schemes.</p>
<p>Agreement 16 – All Norfolk Planning authorities will produce their Housing and Economic Land Availability Assessments to the standard Norfolk methodology</p>	<p>Completed.</p>
<p>Agreement 17 - To minimise the risk of slow delivery over the next plan period, where it is sustainable to do so, the following will be done:</p> <ul style="list-style-type: none"> <li>• Housing strategies will seek to allocate a range of different sizes of sites, where such sites are available and would result sustainable development.</li> <li>• Clear evidence and demonstration of ability to deliver development will be required prior to the allocation of larger sites for development.</li> </ul>	<p>The Local Plan does not allocate residential dwellings.</p> <p>There are policies in the Local Plan relating to housing mix.</p>

Agreement	How the Local Plan addresses this
<p>Agreement 18 - Norfolk authorities agree to endorse the Planning in Health: An Engagement Protocol Between Local Planning Authorities, Public Health and Health Sector Organisations in Norfolk and undertake its commitments. Norfolk authorities agree to consider matters relating to healthy environments and encouraging physical activity and fully integrated these into a potential Norfolk-wide design guide and local design codes (which will inform local plans and neighbourhood plans), drawing on key guidance such as Building for a Healthier Life and Active Design.</p>	<p>The Broads Authority have endorsed this and there is a related policy in the Local Plan.</p>
<p>Agreement 19 - Norfolk Planning Authorities agree that climate change is an urgent, strategic cross boundary issue which will be addressed at the heart of Local Plans. To do this, the Authorities agree to give consideration to the approaches in the NSPF Climate Change research Paper of this report when the relevant policies are next being reviewed and updated as part of the Local Plan process and their appropriateness considered against local factors including viability of developments. Norfolk Planning Authorities agree to collectively review the latest evidence and advice on a regular basis and to update this research to ensure that the most appropriate actions are being undertaken to support climate change initiatives.</p>	<p>The Local Plan includes policies to address climate change.</p>
<p>Agreement 20 - Norfolk Planning Authorities agree to work together to investigate the production of a county wide climate change best practice guide/design guide and produce a brief for this work. This work will help facilitate climate change and healthy living initiatives across the county by providing high level principles.</p>	<p>The Local Plan includes policies to address climate change.</p>
<p>Agreement 21– Norfolk Authorities have agreed to become members of WRE, and to work collaboratively with its other members in the development of the Norfolk Water Strategy to ensure the project delivers the best outcomes for the county. Norfolk Authorities will also work collaboratively as part of WRE to enable the successful co-creation of WRE's wider Regional Plan.</p>	<p>Broads Authority is heavily involved in WRE. Water is a key issue that the Local Plan seeks to address.</p>
<p>Agreement 22 – Norfolk is identified as an area of serious water stress, the Norfolk Planning Authorities have agreed that when preparing Local Plans to seek to include the optional higher water efficiency standard (110 litres/per person/per day) for residential development.</p>	<p>Policy requiring 110 l/h/d included in the Local Plan.</p>



Agreement	How the Local Plan addresses this
<p>Agreement 23 – The Norfolk Authorities, Anglian Water and Essex and Suffolk Water have agreed to provide regular and timely updates to each other on the delivery of development sites and proposed utility projects to ensure that development is aligned with water and wastewater infrastructure. LPAs will produce Habitat Regulation Assessments, as required, that will also consider impact of development on sensitive sites</p>	<p>HRA produced. AWS and E and S Water involved in the Local Plan throughout its production.</p>
<p>Agreement 24 - To support the high-speed broadband provision in emerging Local Plans Norfolk Planning Authorities will consider the extent to which they could require highspeed broadband to be delivered as part of new developments and consider the promotion of Fibre to the Premises (FTTP) to smaller sites. Norfolk Planning Authorities will consider policies to require all residential developments over 10 dwellings and all employment developments to enable FTTP and strongly encourage FTTP on smaller sites.</p>	<p>The new Local Plan will include a draft policy, but this issue may not be addressed through Building Regulations.</p>
<p>Agreement 25 - To maximise the speed of rollout of 5G telecommunications to Norfolk, Norfolk Planning Authorities will continue to engage with Mobile Network Operators and Mobile UK on their 5G rollout plans for Norfolk. When reviewing Local Plans and updating relevant policies, Local Planning Authorities agree to have regard to the shared objectives for extending 4G coverage and the rollout of 5G infrastructure in Norfolk produced by the technical group, taking into account material planning considerations.</p>	<p>There is a policy relating to this in the Local Plan.</p>
<p>Agreement 26: Norfolk Planning authorities will continue to work closely with the County Council and school providers to ensure a sufficient supply of school places and land for school expansion or new schools and use S106 and / or Community Infrastructure Levy funds to deliver additional school places where appropriate. The authorities agree to continue supporting the implementation of the County Council's Planning Obligations Standards as a means of justifying any S106 payments or bid for CIL funds needed to mitigate the impact of housing growth on County Council infrastructure.</p>	<p>No need has been identified by Norfolk County Council to reflect the allocations in the Local Plan.</p>

Agreement	How the Local Plan addresses this
<p>Agreement 27 - Norfolk Planning Authorities and the MMO agree that there are currently no strategic planning issues remaining to be identified and that there is no conflict at a strategic level between the NSPF and adopted Marine Plans. Both parties agree to continue to work together in the preparation of Local Plans being brought forward in Norfolk and any review of the MMOs Marine Plans. Both parties have identified the following areas of common strategic issues: •</p> <p>Infrastructure • Governance • Heritage • Marine Protected areas • Marine and coastal employment • Sustainable port development • Energy – offshore wind and oil and gas • Access for tourism and recreation • Sustainable and aquaculture fisheries in small harbour towns • AONB and Seascape and landscape (character and natural beauty) • Biodiversity • Marine aggregates • Cabling • Water quality/water supply and sewerage • Climate change/ Coastal erosion and coastal change management</p>	<p>See <a href="#">Appendix 3</a></p>
<p>Agreement 28: In recognition of: a) the importance the Brecks, the Broads and the Area of Outstanding National Beauty, together with environmental assets which lie outside of these areas, brings to the county in relation to quality of life, health and wellbeing, economy, tourism and benefits to biodiversity; b) the pressure that development in Norfolk could place on these assets; and c) the importance of ecological connections between habitats Norfolk Planning Authorities will work together to complete and deliver the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy which will aid Local Plans in protecting and where appropriate enhancing the relevant assets.</p>	<p>Policy in the Local Plan relating to GI.</p> <p>Policy in the Local Plan relating to GI RAMS.</p>
<p>Agreement 29: It is agreed that: 1) It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. The Norfolk Minerals and Waste Local Plan will therefore enable Norfolk to continue to be self-sufficient in the production of sand and gravel, whilst making an important contribution to the national production of silica sand. 2) A steady and adequate supply of minerals to support sustainable economic growth will be planned for through allocating sufficient sites and/or areas in the Norfolk Minerals and Waste Local Plan to meet the forecast need for sand and gravel, carstone, and silica sand. 3) Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation. Resources of sand and gravel, carstone and silica sand within defined Mineral</p>	<p>The Local Plan refers to minerals and waste as required.</p>

Agreement	How the Local Plan addresses this
<p>Safeguarding Areas will be safeguarded from needless sterilisation by non-mineral development. Infrastructure for the handling, processing and transportation of minerals will also be safeguarded from incompatible development. Defined waste management facilities and water recycling centres will be safeguarded from incompatible development. 4) The Norfolk Minerals and Waste Local Plan policies will enable the re-use, recycling and recovery of waste in Norfolk to increase, thereby reducing the quantity and proportion of waste arising in Norfolk that requires disposal, in accordance with the Waste Hierarchy. 5) The Norfolk Minerals and Waste Local Plan will enable Norfolk to be net self-sufficient in waste management, where practicable and to enable sufficient waste management infrastructure to be provided in order for Norfolk to meet the existing and forecast amount of waste expected to arise over the Plan period. 6) The Norfolk Minerals and Waste Local Plan will direct new waste management facilities to be located in proximity to Norfolk's urban areas and main towns. Priority for the location of new waste management facilities will be given to the re-use of previously developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages. 7) The Norfolk Minerals and Waste Local Plan will contain policies to ensure that minerals development and waste management facilities will be located, designed and operated without unacceptable adverse impacts on the amenity of local communities, the natural, built and historic environment, the landscape and townscape of Norfolk.</p>	
<p>Agreement 30: In recognition of the benefits gained by co-ordinating and co-operating on strategic planning activities the Norfolk Planning Authorities agree to support the activities of the Norfolk Strategic Planning Member Forum and to continue to appropriately resource joint planning activity.</p>	<p>We continue to work together and jointly fund work as required.</p>
<p>Agreement 31: Norfolk Planning Authorities with support of the signatories of the document agree to maintain this statement of common ground.</p>	<p>Being reviewed at the time of writing.</p>

## Appendix 3: Assessment of Local Plan against Marine Plans

Policy code	Sector	East Inshore and Offshore Marine Plan policy wording	Relevance/how reflected in Local Plan for the Broads
E-AGG-3	Aggregates	Within defined areas of high potential aggregate resource, proposals should demonstrate in order of preference: that they will not, prevent aggregate extraction how, if there are adverse impacts on aggregate extraction, they will minimise these how, if the adverse impacts cannot be minimised, they will be mitigated the case for proceeding with the application if it is not possible to minimise or mitigate the adverse impacts.	Aggregate areas seem to be offshore. Not relevant to Local Plan.
E-AQ-1	Aggregates	Within sustainable aquaculture development sites (identified through research), proposals should demonstrate in order of preference: that they will avoid adverse impacts on future aquaculture development by altering the sea bed or water column in ways which would cause adverse impacts to aquaculture productivity or potential how, if there are adverse impacts on aquaculture development, they can be minimised how, if the adverse impacts cannot be minimised they will be mitigated the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts	Aquaculture seems to be more of an offshore issue. Not relevant to the Local Plan.
E-BIO-1	Environment (96)	Appropriate weight should be attached to biodiversity, reflecting the need to protect biodiversity as a whole, taking account of the best available evidence including on habitats and species that are protected or of conservation concern in the East marine plans and adjacent areas (marine, terrestrial).	Local Plan has policies relating to biodiversity. No obvious conflict.
E-BIO-2	Environment (96)	Where appropriate, proposals for development should incorporate features that enhance biodiversity and geological interests.	Local Plan seeks 20% net gain as well as biodiversity enhancements. No obvious conflict.

Policy code	Sector	East Inshore and Offshore Marine Plan policy wording	Relevance/how reflected in Local Plan for the Broads
E-CAB-1	Subsea Cables (196)	Preference should be given to proposals for cable installation where the method of installation is burial. Where burial is not achievable, decisions should take account of protection measures for the cable that may be proposed by the applicant.	Not relevant to Local Plan.
E-CC-1	Climate Change (56)	Proposals should take account of how they may be impacted upon by, and respond to, climate change over their lifetime and how they may impact upon any climate change adaptation measures elsewhere during their lifetime Where detrimental impacts on climate change adaptation measures are identified, evidence should be provided as to how the proposal will reduce such impacts.	The Local Plan has policies relating to climate change. No obvious conflict.
E-CC-2	Climate Change (56)	Proposals for development should minimise emissions of greenhouse gases as far as is appropriate. Mitigation measures will also be encouraged where emissions remain following minimising steps. Consideration should also be given to emissions from other activities or users affected by the proposal.	The Local Plan has policies relating to climate change. No obvious conflict.
E-CCS-2	Carbon Capture and Storage (51)	Carbon Capture and Storage proposals should demonstrate that consideration has been given to the re-use of existing oil and gas infrastructure rather than the installation of new infrastructure (either in depleted fields or in active fields via enhanced hydrocarbon recovery).	Not specifically covered in the Local Plan. Local Plan has general policies that would guide development proposals. No obvious conflict.
E-DD-1	Dredging and Disposal	Proposals within or adjacent to licensed dredging and disposal areas should demonstrate, in order of preference: that they will not adversely impact dredging and disposal activities how, if there are adverse impacts on dredging and disposal, they will minimise these how, if the adverse impacts cannot be minimised they will be mitigated the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts	The Broads Authority undertakes dredging. Local Plan has general policies that would guide development proposals. No obvious conflict.
E-EC-1	Economic (86)	Proposals that provide economic productivity benefits which are additional to Gross Value Added currently generated by existing activities should be supported.	The Local Plan has economy policies. No obvious conflict.

Policy code	Sector	East Inshore and Offshore Marine Plan policy wording	Relevance/how reflected in Local Plan for the Broads
E-EC-2	Economic (86)	Proposals that provide additional employment benefits should be supported, particularly where these benefits have the potential to meet employment needs in localities close to the marine plan areas.	The Local Plan has economy policies. No obvious conflict.
E-EC-3	Economic (86)	Proposals that will help the East marine plan areas to contribute to offshore wind energy generation should be supported.	Local Plan has policies for onshore wind. Local Plan has general policies that would guide on shore development proposals. No obvious conflict.
E-ECO-1	Environment (96)	Cumulative impacts affecting the ecosystem of the East marine plans and adjacent areas (marine, terrestrial) should be addressed in decision-making and plan implementation.	Local Plan has general policies that would guide development proposals. No obvious conflict.
E-FISH-1	Fisheries (111)	Within areas of fishing activity, proposals should demonstrate in order of preference: that they will not prevent fishing activities on, or access to, fishing grounds how, if there are adverse impacts on the ability to undertake fishing activities or access to fishing grounds, they will minimise them how, if the adverse impacts cannot be minimised, they will be mitigated the case for proceeding with their proposal if it is not possible to minimise or mitigate the adverse impacts	Seems to refer mainly to fishing activities offshore. Not relevant to Local Plan.
E-FISH-2	Fisheries (111)	Proposals should demonstrate, in order of preference: that they will not have an adverse impact upon spawning and nursery areas and any associated habitat how, if there are adverse impacts upon the spawning and nursery areas and any associated habitat, they will minimise them how, if the adverse impacts cannot be minimised they will be mitigated the case for proceeding with their proposals if it is not possible to minimise or mitigate the adverse impacts	Spawning and nursery areas seem to be offshore. Not relevant to Local Plan.
E-GOV-1	Governance (126)	Appropriate provision should be made for infrastructure on land which supports activities in the marine area and vice versa.	Local Plan has general policies that would guide development proposals. No obvious conflict.

<b>Policy code</b>	<b>Sector</b>	<b>East Inshore and Offshore Marine Plan policy wording</b>	<b>Relevance/how reflected in Local Plan for the Broads</b>
E-GOV-2	Governance (126)	Opportunities for co-existence should be maximised wherever possible.	Local Plan has general policies that would guide development proposals. No obvious conflict.
E-GOV-3	Governance (126)	Proposals should demonstrate in order of preference: a) that they will avoid displacement of other existing or authorised (but yet to be implemented) activities b) how, if there are adverse impacts resulting in displacement by the proposal, they will minimise them c) how, if the adverse impacts resulting in displacement by the proposal, cannot be minimised, they will be mitigated against or d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts of displacement	Local Plan has general policies that would guide development proposals. No obvious conflict.
E-MPA-1	Environment (96)	Any impacts on the overall Marine Protected Area network must be taken account of in strategic level measures and assessments, with due regard given to any current agreed advice on an ecologically coherent network.	The Local Plan seeks to protect protected sites. No obvious conflict.
E-OG-1	Oil and Gas	Proposals within areas with existing oil and gas production should not be authorised except where compatibility with oil and gas production and infrastructure can be satisfactorily demonstrated.	Oil and gas infrastructure seem to be offshore. Not relevant to Local Plan. Local Plan has general policies that would guide on shore development proposals. No obvious conflict.
E-OG-2	Oil and Gas	Proposals for new oil and gas activity should be supported over proposals for other development.	Oil and gas infrastructure seem to be offshore. Not relevant to Local Plan. Local Plan has general policies that would guide on shore development proposals. No obvious conflict.

Policy code	Sector	East Inshore and Offshore Marine Plan policy wording	Relevance/how reflected in Local Plan for the Broads
E-PS-2	Ports and Shipping	Proposals that require static sea surface infrastructure that encroaches upon important navigation routes should not be authorised unless there are exceptional circumstances. Proposals should: be compatible with the need to maintain space for safe navigation, avoiding adverse economic impact, anticipate and provide for future safe navigational requirements where evidence and/or stakeholder input allows and account for impacts upon navigation in-combination with other existing and proposed activities	Sea surface infrastructure seems to be offshore. Not relevant to Local Plan.
E-PS-3	Ports and Shipping	Proposals should demonstrate, in order of preference: that they will not interfere with current activity and future opportunity for expansion of ports and harbours how, if the proposal may interfere with current activity and future opportunities for expansion, they will minimise this how, if the interference cannot be minimised, it will be mitigated the case for proceeding if it is not possible to minimise or mitigate the interference	Local Plan has general policies that would guide development proposals. No obvious conflict.
E-SOC-1	Social and Cultural	Proposals that provide health and social well-being benefits including through maintaining, or enhancing, access to the coast and marine area should be supported.	Local Plan has policies relating to health and wellbeing. No obvious conflict.
E-SOC-2	Social and Cultural	Proposals that may affect heritage assets should demonstrate, in order of preference: a) that they will not compromise or harm elements which contribute to the significance of the heritage asset b) how, if there is compromise or harm to a heritage asset, this will be minimised c) how, where compromise or harm to a heritage asset cannot be minimised it will be mitigated against or d) the public benefits for proceeding with the proposal if it is not possible to minimise or mitigate compromise or harm to the heritage asset	Local Plan has policies relating to the historic environment/heritage assets. No obvious conflict.



Policy code	Sector	East Inshore and Offshore Marine Plan policy wording	Relevance/how reflected in Local Plan for the Broads
E-SOC-3	Social and Cultural	Proposals that may affect the terrestrial and marine character of an area should demonstrate, in order of preference: a) that they will not adversely impact the terrestrial and marine character of an area b) how, if there are adverse impacts on the terrestrial and marine character of an area, they will minimise them c) how, where these adverse impacts on the terrestrial and marine character of an area cannot be minimised they will be mitigated against d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts	Local Plan has policies relating to landscape character. No obvious conflict.
E-TIDE-1	Offshore Wind Renewable Energy Infrastructure	In defined areas of identified tidal stream resource, proposals should demonstrate, in order of preference: a) that they will not compromise potential future development of a tidal stream project b) how, if there are any adverse impacts on potential tidal stream deployment, they will minimise them c) how, if the adverse impacts cannot be minimised, they will be mitigated d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts	This analysis identified areas of tidal stream resource off the coast of Norfolk and to the north of the Humber Estuary so does not affect the Local Plan.
E-TR-1	Tourism and recreation	Proposals for development should demonstrate that during construction and operation, in order of preference: they will not adversely impact tourism and recreation activities how, if there are adverse impacts on tourism and recreation activities, they will minimise them how, if the adverse impacts cannot be minimised, they will be mitigated the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts	Local Plan has policies relating to protecting amenity. No obvious conflict.
E-TR-2	Tourism and recreation	Proposals that require static objects in the East marine plan areas, should demonstrate, in order of preference: that they will not adversely impact on recreational boating routes how, if there are adverse impacts on recreational boating routes, they will minimise them how, if the adverse impacts cannot be minimised, they will be mitigated the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts	Local Plan has policies that protect navigation. No obvious conflict.

<b>Policy code</b>	<b>Sector</b>	<b>East Inshore and Offshore Marine Plan policy wording</b>	<b>Relevance/how reflected in Local Plan for the Broads</b>
E-TR-3	Tourism and recreation	Proposals that deliver tourism and/or recreation related benefits in communities adjacent to the East marine plan areas should be supported.	Local Plan has a section relating to tourism. No obvious conflict.
E-WIND-1	Offshore Wind Renewable Energy Infrastructure	Developments requiring authorisation, that are in or could affect sites held under a lease or an agreement for lease that has been granted by The Crown Estate for development of an Offshore Wind Farm, should not be authorised unless they can clearly demonstrate that they will not compromise the construction, operation, maintenance, or decommissioning of the Offshore Wind Farm the lease/agreement for lease has been surrendered back to The Crown Estate and not been re-tendered the lease/agreement for lease has been terminated by the Secretary of State in other exceptional circumstances	Local Plan has policies for onshore wind. Local Plan has general policies that would guide on shore development proposals. No obvious conflict.

## Appendix 4: East Suffolk Council Duty to Cooperate Letter May 2025



Natalie Beal

**Date:** 19<sup>th</sup> May 2025

By email only: [natalie.beal@broads-authority.gov.uk](mailto:natalie.beal@broads-authority.gov.uk)

**Please ask for:** Dickon Povey

**Direct dial:** 01502 523043

**Email:** [dickon.povey@eastsuffolk.gov.uk](mailto:dickon.povey@eastsuffolk.gov.uk)

Dear Natalie Beal,

### **The Local Plan for the Broads Review – Housing need**

This letter is provided to set out East Suffolk Council's position in relation to the Broads Authority's housing need in the context of the preparation of the Broads Local Plan.

By way of context, East Suffolk Council has two Local Plans – the Waveney Local Plan (March 2019) and the Suffolk Coastal Local Plan (September 2020). The Waveney Local Plan covers the former Waveney District, excluding the part within the Broads. The Broads Local Plan defers to/has regard to the open space, retail and affordable housing policies of the Waveney Local Plan for the parts of the Broads in East Suffolk. The Suffolk Coastal Local Plan covers the former Suffolk Coastal District, which the Broads does not overlap with. East Suffolk Council was formed in April 2019, comprising the former Council areas of Waveney District and Suffolk Coastal District.

We reviewed the Waveney Local Plan, under Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012, in March 2024 which concluded that an update was not required. Following the Government's introduction of the revised standard method in December 2024, and resulting increase in housing number for East Suffolk, an addendum to the Waveney Local Plan review assessment was produced in March 2025 which concludes that the plan does need to be updated. The assessment and addendum can be read here: [www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/](http://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/).

[The Council aims to act positively around having up to date plans in place. In the context of](#)

[recent reforms to the plan-making process, our March 2025 Local Development Scheme](#) envisages commencing formal stages of preparation of a new Local Plan for East Suffolk outside of the Broads from later in 2025. However, early preparations for commencing a review are set out to take place in the short term during 2025/26, including evidence scoping / gathering and early engagement. The next Local Plan is anticipated to be an East Suffolk Local Plan (i.e. covering the areas currently covered by the Waveney Local Plan and Suffolk Coastal Local Plan). This is set out in the Council's Local Development Scheme which is available here: [www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/statement-of-community-involvement-and-local-development-scheme/](http://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/statement-of-community-involvement-and-local-development-scheme/)

The five year housing land supply for the Waveney Local Plan area of East Suffolk is 3.33 years as at March 2025 following publication of the Interim Housing Position Statement which can be viewed here: <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/open-data/housing-land-supply/>. The Interim Housing Position Statement updated the land supply calculations set out in the latest Statement of Housing Land Supply (November 2024) which is available here: <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/open-data/housing-land-supply/>

A statement of Common Ground between the Broads Authority and the (then) Waveney District Council in relation to housing need and delivery was signed in January 2018. This letter does not replace that Statement of Common Ground, which relates to the current adopted 2019 Broads Local Plan and the current adopted 2019 Waveney Local Plan. This letter relates to the review of the Local Plan for the Broads which, at the time of writing, was approaching Regulation 19 consultation stage.

Based upon the evidence contained in the Broads Authority: Local Housing Needs Assessment Update (2025) we are comfortable with the 70 dwellings housing requirement proposed for the East Suffolk part of the Broads over the plan period 2021 to 2042, as identified in the Local Housing Needs Assessment 2025 Update for the Broads. We understand that this makes up part of the housing requirement for East Suffolk, and is not additional to it, although some of this need goes beyond the Waveney Local Plan period which ends in 2036. This is as set out on page 183 of the Broads Preferred Options Local Plan (February 2024) which states "For the avoidance of doubt, each element of the Broad's Objectively Assessed Need identified in the table above for each of the six districts also forms part of each district's objectively assessed need and is not additional to."

We are aware that the Broads Authority as a Local Planning Authority take decisions to permit housing development. Where these are in the East Suffolk part of the Broads, these will continue to count towards meeting the housing requirement in the Waveney / East Suffolk area, and permissions in the Broads will similarly continue to be accounted for in the Waveney / East Suffolk Housing Land Supply.

It is understood that the need of 70 dwellings is net of permissions in place prior to 1st April 2021. However, completions arising from permissions in place prior to 1<sup>st</sup> April 2021 will

nevertheless also make up part of meeting the housing requirement for Waveney / East Suffolk.

You have undertaken three 'call for sites' to help identify suitable sites for housing, including a call for sites undertaken during November / December 2024. It is understood that through the third 'call for sites' undertaken in December 2024 no sites suitable for development came forward in the East Suffolk area of The Broads and none are therefore proposed for allocation.

The Broads status is equivalent to a National Park, plus constraints such as sensitive landscapes and geography which is susceptible to flooding, act as constraints to the delivery of your housing requirement. We recognise that the vast majority of the East Suffolk area of The Broads is in Flood Zone 3, has landscape and heritage sensitivity or is unsuitable for allocations to accommodate 70 dwellings.

Your Preferred Options plan includes only one allocation for mixed use development that could include housing (the Utilities Site in Norwich), which will come forward later in the plan period.

We acknowledge that the 2024 National Planning Policy Framework states inter alia at para. 61: *"The overall aim should be to meet an area's identified housing need, including with an appropriate mix of housing types for the local community."* East Suffolk Council expects that all efforts are made to accommodate the Broads Authority's housing need in the Broads area. However, it is acknowledged that as housing completions and supply in the East Suffolk part of the Broads contribute towards meeting the housing requirement for East Suffolk (the Waveney Local Plan requirement), if the full residual need of 62 dwellings cannot be met through completions in the Broads, then housing completions in East Suffolk outside of the Broads would be needed to ensure that the East Suffolk requirement is met. It is expected that this will be more formally established as part of Duty to Co-operate discussions with East Suffolk Council to inform the preparation of the East Suffolk Local Plan.

You have confirmed that there will be one more year of monitoring housing permissions and completions in the Broads Authority area before the Local Plan is adopted, and that this is expected to slightly reduce the residual housing need number for the remainder of the plan period.

This letter represents the Council's position based on the current national and local planning policy context.

In summary:

- East Suffolk Council are comfortable with the 70 dwellings housing requirement proposed for the East Suffolk part of the Broads over the plan period 2021 to 2042. We understand that this makes up part of the housing requirement for East Suffolk, and is not additional to it, although some of this need goes beyond the Waveney Local Plan

period which ends in 2036.

- East Suffolk Council expects the Broads Authority will make all efforts to accommodate the Broads' housing needs, however it will meet any residual housing need for the East Suffolk part of the Broads that is not addressed within the Broads Authority Executive Area during the plan period, if needed.
- In our future Local Plan review, should it be evident that this residual need still exists in the East Suffolk part of the Broads, we may look to identify opportunities close to the Broads, taking account of the role of settlements in this part of East Suffolk in meeting local housing needs alongside constraints presented such as flood risk.

I trust the above is of assistance and we are committed to working with you in future under the Duty to Cooperate.

Yours sincerely,

**Ben Woolnough | Head of Planning, Building Control and Coastal  
Management**  
East Suffolk Council