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Re: Planning Application 3PL/2015/1258/F for a permanent gypsy/traveller site adjacent to the old workhouse paddocks

Bawdeswell Parish Council objects strongly to the proposal in planning application 3PL/2015/1258/F for a permanent gypsy/traveller site on agricultural land outside of the Bawdeswell settlement boundary adjacent to the Old Workhouse Paddocks on the following grounds:

The extant Breckland Core Strategy and Policy CP2 (paragraphs 3.19 and 3.20) states clearly that the geographic location for new permanent traveller sites should be along the A11 corridor with Thetford and Attleborough (relatively large urban settlements) as the preferred areas. The Study commissioned by Breckland in 2013 to ascertain the need for further traveller sites also highlighted the A47 and Swaffham areas as the preferred areas by the travellers themselves. The proposed site near Bawdeswell does not conform to these policies and conclusions.

The extant Breckland Local Development Framework, as well as the new draft Local Plan (PD 09) also stipulates that traveller sites should be situated on well-located sites within the settlement boundaries of settlements designated Local Service Centres (LSCs) or larger. Bawdeswell is currently not designated as a Local Service Centre, and the closest LSC is Swanton Morley, some 5 miles away from the proposed site. The preliminary designation of Bawdeswell as a possible LSC within the current draft of the new Local Plan is strongly opposed by Bawdeswell Parish Council and many local residents on the grounds that the settlement does not have the requisite or adequate infrastructure and services such as shops, employment, public transport, educational places and, most important, easy access to medical facilities.

The Department for Communities and Local Government (DCLG) paper "Planning policy for traveller sites" (August 2015) at paragraph 25 states "Local planning authorities should very strictly limit new traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan." There is already one such site on Reepham Road and the PC considers that agreeing a second site would not be in accordance with the DCLG guidance of a strict limit.

The PC notes that Breckland's policy for Traveller sites (CP2) which might provide an exception to CP14 states (para 3.21) that assessment of sites (other than those identified in the LDF) will "be based on there being a clear need and the proposal representing the most sustainable and practical option. Such proposals will, however, be considered with reference to criteria (b) to (d) of Policy CP2 and guidance set out in ODPM Circular 01/2006." The ODPM circular is now replaced by the DCLG paper referred to above. Criteria (b) to (d) are:

- b. The site will be within reasonable distances to facilities and supporting services;
- c. The site will be properly serviced; and
- d. The site will not have an adverse visual impact on the character and appearance of the surrounding landscape.

In selecting a sustainable location, preference will be given to previously-developed land or a vacant and derelict site in need of renewal."

The PC does not believe that a clear need has been identified nor that such a need exists in the locality. At the Parish Council meeting held on 4th April (attended by over 100 residents) where the application was discussed; only one resident supported the application.

Bawdeswell is a small village which lacks supporting services such as medical facilities and employment opportunities and therefore the PC considers that criterion (b) is not met.

In considering criterion (c) "Proper servicing of a permanent site will include safe highway access, to facilitate safe movement and services within the site, sewerage, water, electricity and structural landscaping." (LDF para 3.20). The site access, albeit on a short straight stretch, would be on to a busy and dangerous main road (the B1145 Bawdeswell – Reepham Road). Earlier planning approval for the development of Woofful Farm Barns, which would share the same access track, will increase the traffic flow to and from Reepham Road, and this application, which includes space for 6 car and 6 goods vehicles will seriously and significantly exacerbate the problem. As the application is to accommodate both cars and goods vehicles this means that it is an application for "mixed use" (Policy F of the DCLG paper). The DCLG paper states that "Local planning authorities should not permit mixed use on rural exception sites." (para 20). On this basis also, the PC considers that the application should be refused.

There is no mains foul sewage to the site, which would have to rely on a septic tank. The PC notes that, in its response to Breckland's recent Issues and Options consultation, The Environment Agency suggested looking at the ability to connect to the public foul sewer to prevent the proliferation of individual / private forms of water treatment. On both these grounds, the PC considers that criterion (c) is not met.

The draft Local Plan (PD09) also states that approval for permanent traveller sites will only be granted where there is a perceived need. However, the 2013 Study commissioned by Breckland referred to the likelihood that the need in the District might be met if existing temporary permissions were regularised, and this is reflected in para 5.20 of the Preferred Directions within the draft Local Plan which also concludes that there should be an assessment as to whether temporary sites themselves are appropriate locations for permanent development. There is, therefore, no conclusion that a permanent site of this size and nature is needed. PD09 also requires that the application be “supported by local communities” which it clearly is not.

As to the proposed site itself, Breckland extant policy (CP2) seeks to give preference to previously developed or vacant derelict land. However, an earlier application (3PL/2014/1193/F) stated that this land had been used by the then owners for grazing horses, sheep and poultry and the application envisaged increasing the livestock on the site, thus confirming that the land cannot be considered as derelict. There are currently stables on the site; hence the land is clearly not a brownfield site and has clearly been used for agriculture. Moreover, a previous application for a non-residential building on the site was also turned down.

The draft Local Plan (PD09) specifically refers to there being “no significant adverse impacts on the safe and efficient operation of the highway network”. When one considers that the recent planning approval for the conversion of the Woofful Farm Barn to a residence, which will increase traffic on this shared access track, the six traveller pitches proposed, opening via a very narrow, shared access track on to a major and dangerous Reephams Road, cannot be considered safe. Bawdeswell Parish Council therefore strongly supports and endorses the views of Highways on this application. There is no realistic scope to widen the access track.

In the Local Plan consultation document, in the discussion accompanying PD09, there is reference to the changed National Policy in relation to travellers who have ceased to travel. This proposal for static caravans suggests it is not for those actively travelling, and the application should therefore be dealt with as if it were by members of the settled population. This is, in effect, a proposal for permanent residences with static homes; it should therefore be treated as such.

In summary, Bawdeswell Parish Council is firmly of the opinion that the planning application should be refused on the grounds there is no definitive need for such a site in the proposed location which is agricultural land in open countryside, outside of the settlement boundary of a small rural community which lacks the key facilities and support services necessary. The site is not in any of the Breckland preferred locations, and the extra vehicular traffic involved with the application would pose serious and dangerous highways issues (the Parish Council understands that Norfolk County Council Highways have already raised an objection). The proposal is

therefore in conflict with: the current Breckland Core Strategy, in particular Policy CP2; the new draft Local Plan, in particular PD09; and the current PPTS.

The Parish Council would also like to comment that the statutory notice requirement was not met until Friday 1st April when the required on-site notice advertising the planning application was finally positioned.