

19th January 2022

Tom [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Email: tom@northnorfolk.gov.uk [REDACTED]

Dear Sir

Complaint of alleged contravention by North Norfolk District Council of Race Relations Act 1968

I refer to your further email communication of 21st December 2021, with my colleague Sandra King, concerning the above and note the contents therein.

I advise that I believe both I and Mrs King have previously responded in some detail to the substantive issue raised in your original correspondence with the Council regarding the occasional use of height restriction barriers at some of the District Council's public car parks and whether this constituted a contravention of the Race Relations Act through being discriminatory to the Gypsy and Traveller community.

In my correspondence to you of the 10th October 2021 I explained that, following a history over many years of unauthorised short-term encampments by the travelling community on District Council car parks, playing fields, common land and on highway verges, which often generated community tensions; North Norfolk District Council had provided two Temporary Stopping Place facilities in its area – at Cromer and Fakenham to meet the needs of the travelling community. These facilities were provided from 2010/11 since which time community tensions around visits to North Norfolk by the travelling community have been significantly reduced, such that their provision and operation is widely recognised as a success in community cohesion terms. There was one exception to this position, this being a large unauthorised encampment and anti-social behaviour by a group of Gypsies and Travellers visiting Cromer in August 2017; which was extensively reported in national media and subsequently involved Norfolk Constabulary undertaking a review of how visits to Norfolk by the Gypsy and Traveller community could be more positively managed – this involved the police advising that the District Council should look to install height barriers at some of its coastal car parks, which could be operated or closed at the request of police colleagues, to minimise future unauthorised encampments.

I therefore believe that the Council has responded to the substantive point raised in your original correspondence and strongly reject your contention that in installing height barriers for occasional use in the management of its public car parks the Council is discriminating against members of the Gypsy and Travelling community or is contravening the provisions of the Race Relations Act 1968.

Cont/.....

Cont/.....

Your subsequent email of 1st December 2021 raised wider issues as to the use of the District Council's car parks by the owners of motorhomes and camper vans – particularly that the Council does not permit overnight sleeping in vehicles on its public car parks on the grounds of local amenity and that there is a large number of authorised camping sites across the North Norfolk district where businesses have made investment in their tourism offering providing significant capacity and choice of sites – in terms of location, scale and levels of facilities, such that **it shouldn't be necessary for the owners of motorhomes and campervans to park overnight on public car parks**. I believe that Mrs King sought to respond to your further points in this respect in her email to you of the 20th December; but note that you have replied further on the 21st December 2021 such that I am now responding to the points raised in that email.

As advised above, I believe that I have fully outlined the Council's position with respect to your contention that the Council might have contravened provisions within the Race Relations Act 1968 as they relate to the Gypsy and Traveller community through detailing the provision the authority has made of Temporary Stopping Place facilities for the Gypsy and Traveller community in accordance with legislation in the 2004 Housing Act. I further confirm that the facilities provided have significantly reduced community tensions associated with unauthorised encampments in the District such that I do not propose commenting further in this regard. If you therefore remain unhappy with the position outlined with respect to this issue I advise that it will be necessary for you to refer your concerns to the Local Government and Social Care Ombudsman.

In terms of the subsequent issues you have raised regarding camping and caravan sites in North Norfolk and the rights of motorhome / campervan owners to park overnight on public car parks, I would comment further as follows as per the issues raised in your email dated 21st December 2021:-

I do not believe that in Mrs King seeking clarification from you over your request for the Council to provide you with website details of five camping sites 'authorised, approved and recommended' by the Council that there is, or was, any attempt on behalf of the Council to delay providing you with a detailed response. In my letter to you of the 10th October 2021 I advised that *"the district has a very large number of authorised camping sites, thereby catering for a very diverse range of preferences which the Council believes it is unfair to undermine given the investment made in facilities by these businesses"*. This is a position of fact, and not one of any sort of favouritism, patronage or, as you have implied, "corruption"; it **reflects a view of the Council that it shouldn't use tax-payers monies to operate facilities which would be in direct competition with private sector businesses, as would be the case if the authority allowed overnight camping on its car parks whilst** there was a large choice of camping sites available for people to stay on where the owners had invested in facilities with their own funds or at their own risk.

With respect to my use of the term 'authorised' – by this I meant that the sites either had formal planning consent or, in the case of Certified Locations and the 28-day planning rule, were able to operate under Permitted Development rights. Further, over the past two summer seasons a number of "pop-up" camping sites have operated in the district under COVID legislation during the peak summer weeks where landowners could make their land available for up to 56 days for camping purposes without the express need to obtain planning permission – effectively an extension of the 28-day rule referred to above. **The Council's Environmental Health Team then maintains a list or record of Camping Sites – as per the list provided to you by Mrs King on 20th December, such that as necessary these can be the subject of periodic inspection.**

Cont/.....

Cont/.....

As Mrs King has stated in her email of 20th December, **the District Council is unable to 'recommend' any particular camping site or establishment** and further to this I cannot see anywhere in my previous correspondence with you that I have used the term 'approved' or 'recommended'. The Council does not assist some commercial enterprises relative to others and certainly not on the basis of 'favours of some kind' as you have stated; as this would be wholly inappropriate. If you therefore have any evidence to support your contentions in this regard I would be grateful if you can provide this information to me such that I can investigate, or ask the police to investigate, as appropriate.

I accept your comment, and indeed your right, that you shouldn't be required to become a member of the Caravan and Motorhome Club or the Camping and Caravan Club to enjoy holidaying in North Norfolk and do not believe that I have made any such statement. I can also confirm that the District Council does not receive any "cut" from the membership fees of such organisations. What I did say was that *'the district had a very large number of authorised sites – including over 100 certified locations with just five pitches to large commercial sites with leisure facilities, bars and restaurants – therefore catering for a very diverse range of preferences'* such that it would be hoped that the needs of visitors with motorhomes and campervans could be met within the District without the need for people to "camp" overnight on public car parks. Whilst I accept that the majority of smaller certified sites might be associated with membership organisations, there is still a large number of sites open to non-members and the general public in both coastal and inland locations across the District which provide significant choice such that overnight stays on public car parks should not be necessary.

Public car parks provided and operated by the District Council are for the purpose of parking and not as places for overnight stays. They serve as important infrastructure in support of our local economy and seek to balance the needs of visitors and businesses alongside the amenity of local residents, as many such facilities are provided in or adjoining residential areas. It is for these reasons that the Council operates its public car parks with a series of by-laws as outlined in the adopted North Norfolk Car Park Order – as provided for your reference in the accompanying pdf file.

At some, but not all, public car parks public toilets are provided, but due to issues of vandalism and anti-social behaviour such facilities are closed at night. The Council's public toilets and car parks do not provide chemical toilet emptying, waste water disposal facilities or large scale bins for the depositing of domestic waste as are required to be provided at caravan and camping sites. Provision of such facilities would be costly to local Council Tax payers, particularly if there is no means by which to collect parking charges for overnight stays. **Our car parks are open for parking 24 hours a day for use by local residents without private parking and visitors staying in local hotels and guesthouses in our coastal and market towns,** but charges are only levied between 08:00 – 18:00 hours. Previously the Council did operate an evening charge but it was considered that this had a negative impact on the local evening economy such that the charges were dropped some years ago.

The Council's car park by-laws have never permitted overnight camping or sleeping in vehicles and this is not a position I see changing in the foreseeable future – not least because in recent years **an increasing number of our communities (local residents and town and parish councils) have expressed concerns over the number of motorhomes and campervans which are visiting the area** and not using authorised camping sites but are instead parking up overnight on car parks, laybys, beach access roads etc.

Cont/.....

Cont/.....

This situation has increased significantly over the past two years with the COVID pandemic – however, the District Council and our local communities are familiar with legislation which does not permit “wild” camping in the majority of England. Indeed, a number of motorhome websites and mobile apps clearly state this, for example:

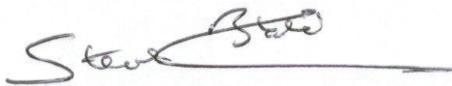
- [Can you park up your motorhome anywhere in the UK? \(motorhomeprotect.co.uk\)](http://motorhomeprotect.co.uk)
- [A Guide on Wild Camping for Motorhomes in the UK - Oaktree Motorhomes \(omcmotorhomes.co.uk\)](http://omcmotorhomes.co.uk)
- [Camping and motorhomes | Dartmoor](#)
- [Campervans and where to park : Lake District National Park;](#)

such that local communities in North Norfolk are expressing concerns to the District Council and local police colleagues that overnight “camping” or stays on public car parks and in locations in the open countryside should be enforced against, not least because **the indiscriminate parking of such vehicles in remote locations and visitor car parks undermines the character of the Norfolk Coast Area** of Outstanding Natural Beauty and The Broads National Park – i.e the very thing many visitors to the area seek from our beautiful coast and countryside.

This issue is therefore currently being considered by the District Council and partners including the Norfolk Coast Partnership, Broads Authority, the County Council in its capacity as Highway Authority and local police colleagues – such that we can extend a warm welcome to the owners of motorhomes and campervans by advising them of the large number of campsites which exist in the District.

I believe in the comments I have made above that I have clearly addressed the issues you have raised with the District Council regarding the welcome we are able to extend to the owners of motorhomes and campervans visiting the North Norfolk District, such that I advise that I now consider the matter closed and am unable to correspond with you further over this matter. If you continue to have concerns over the position I have outlined I advise that it will be necessary for you to refer your concerns to the Local Government and Social Care Ombudsman, whose details can be accessed via the following link - [Home - Local Government and Social Care Ombudsman](#).

Yours faithfully



**Steve Blatch - BA (Hons), DipTP, MRTPI, DMS
CHIEF EXECUTIVE**

Tel:- 01263 516232

Email:- Steve.Blatch@north-norfolk.gov.uk

Ref: Peil 05 01 22