

Sustainable development panel

Date: Tuesday, 13 June 2023

Time: 16:00

Venue: Mancroft room, City Hall, St Peters Street, Norwich, NR2 1NH

Committee members:

Councillors:

Carrington
Champion
Driver
Giles
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Agenda

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1 Appointment of chair

To elect a chair for the ensuing civic year

2 Appointment of Vice Chair

To elect a vice chair for the ensuing civic year.

3 Apologies

To receive apologies for absence

4 Declarations of interest

(Please note that it is the responsibility of individual members to declare an interest prior to the item if they arrive late for the meeting)

5 Minutes

5 - 10

To approve the accuracy of the minutes of the meeting held on 28 February 2023

6 Greater Norwich Local Plan: Proposed examination submission on the requirement for Gypsy and Traveller pitches and allocation of sites for Gypsy and Traveller pitches

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Purpose - To consider the report regarding submissions to the Greater Norwich Local Plan (GNLP) examination in respect of:
(1) the need for additional Gypsy and Traveller pitches to 2038; and,
(2) proposed modifications to the plan, including the identification (allocation) of sites for Gypsy and Traveller pitches, to ensure those needs can be met.

Date of publication: **Monday, 05 June 2023**



Sustainable Development Panel

16:00 to 17:50

28 February 2023

Present: Councillors Stonard (chair) Hampton (vice chair), Carlo, Grahame, Kendrick (substitute for Councillor Giles), Oliver and Osborn

Apologies: Councillors Giles, Lubbock and Padda

1. Declarations of Interest

None.

2. Minutes

RESOLVED to approve the accuracy of the minutes of the meeting held on 10 January 2023.

3. Levelling-up and Regeneration Bill – Reforms to National Planning Policy Consultation

The senior planner (report author) introduced the report and, as members' views were being sought on the proposed consultation responses to the government's proposals to reform national planning policy, focused on the Appendix 1, Council's Response to the Consultation. The National Planning Policy Framework (NPPF), National Development Management Policies and abolition of duty to cooperate and its replacement with "alignment policy" would be subject to further consultation at a later date when further details were available.

During consideration of Appendix 1, the senior planner, together with the planning policy team leader and planner, answered members' questions.

Reforming the 5-year housing land supply

The panel considered the draft council response in respect of this section. During discussion, members agreed that a buffer should not be included in the calculation of the 5-year housing land supply.

Members asked whether the changes proposed by the government would impact on the Greater Norwich Development Plan. The planning policy team leader referred members to paragraph 13 of the report which addressed this issue.

Boosting the Status of Neighbourhood Plans

The panel agreed that Neighbourhood Plans should be increased from two to five years and aligned with other local plans.

Planning for Housing

During discussion a member expressed concern about the methodology for the prediction of housing needs and provision, which tended to be housing for marketing. She considered that there needed to be more state aid to support social housing and a land value tax to prevent speculative development.

The chair suggested that the response should include the need for more state aid and that some members considered the introduction of a land value tax to prevent speculative development.

Introducing new flexibilities to meeting housing needs

The senior planner referred to the proposed responses to questions 11 and 12. Members agreed with these responses and that the government would need to provide clarity on evidence required to support a Local Plan.

It was noted that the council was not a city affected by urban uplift and members agreed that it was not appropriate to comment on questions 13 to 15.

Enabling communities with plans already in the system to benefit from changes

The panel was advised that the response to question 16 needed to be expanded to include a comment similar to that which Broadland District Council and South Norfolk Council had included in their response about Nutrient Neutrality. This should include a comment about how Nutrient Neutrality has caused disruption to house building and granting of planning permission for new developments. Time would need to be allowed for this recovered and transitional arrangements should suspend the 5-year housing land supply calculation for 3 years from 23 March 2022.

The council was not responding to question 17.

Taking account of permissions granted in the Housing Delivery Test

Members agreed that local authorities should not be penalised if developments were not built out.

In reply to a member's question, the senior planner explained the proposal to provide a 15 per cent contingency for under-delivery. The planner referred to the current 5-year land supply and said that it could not be certain that 100 per cent of the houses permitted would be delivered. The member considered 15 per cent contingency as excessive and considered that it should be reviewed every 10 years based on evidence.

The panel therefore supported that the response to question 19 be amended to include the need for review based on evidence and data in terms of the contingency percentage.

More homes for social rent / More older people's housing

The panel considered the responses to questions 22 and 23 together. The panel noted that it was important that tenure was based on up-to-date evidence in the local development plan. During discussion, members were advised that the housing need assessment had been conducted for the Greater Norwich Local Plan by consultants using an agreed methodology, and that this determined the requirement for affordable or social housing.

Members noted that the council did not agree to the proposal to amend the definition of affordable housing for rent and that affordable housing should be provided by registered providers or charities to ensure that it remained affordable in perpetuity (proposed response to question 26). A member pointed out that it should be easier for community groups to become registered providers. Discussion ensued in which it was suggested that there needed clarification on this to include charities. A member also suggested that cohousing units and housing co-operatives could provide accommodation at social rent and should be encouraged. The senior planner agreed to amend the wording to this response to reflect that the council considers that the process to become a registered provider and charity should be easier.

The panel considered the response to question 23 and that the provision of older people housing should be evidence based. It was noted that a target should not be set whilst younger people were unable to access housing.

More community-led developments

(Question 26 had been discussed above.)

The panel noted that the council was not responding to questions 27 and 28 as there were no exceptional sites within the city council area and was more relevant for rural areas.

The senior planner commented on the proposed responses to questions 30 and 31. There needed to be further guidance from the government as taking into account an applicant's history could result in local planning authority's losing control of planning as applications would end up being determined at appeal. Members approved the draft response to question 30 and considered that it was worth asking for further guidance.

More build out

The panel agreed with the proposed response to question 32. During discussion a members agreed that the government should provide more guidance and clarity on a national process and address the unintended consequences that might deter developers, such as not developing sites in certain areas because of the local planning process.

Beauty and ugliness

The panel considered the draft responses to questions 33 and 34. It was considered that “beauty and ugliness” were subjective and that the emphasis should be on place making, enhancing the environment, climate resilient, decarbonising and having connectivity and meaningful local community and stakeholder involvement. The senior planner said that a Mansard roof was not appropriate for many places in Norwich. Members also noted that the Lasdun Building, University of East Anglia (UEA) was considered to be “ugly” and Brutalist but was a listed building. The senior planner said that the UEA was a good example of a building that some may consider beautiful whilst others might consider it to be ugly.

Discussion ensued in which a member suggested that the idea of beauty must fit in with what already existed and went beyond subjectivity – it was what people were used to and bound the community together. The senior planner said that design codes could help define beauty in Norwich and provide guidance on how a new development would fit in with its surroundings. Discussion ensued, in which a member suggested that the government was putting aesthetic over all other considerations. Members considered that the government’s definition of “beauty” was not that of Roger Scruton’s *On Building Beauty* and meaningful placemaking.

Delivering biodiversity net gain and local nature recovery

The senior planner presented the draft response for question 37 pointing out that the use of artificial grass should be discouraged and that the focus should be on the planting of native species trees. A member suggested that the government should ban the use of artificial grass in gardens as most people were law abiding and it would have significant benefits to the environment. The senior planner said that the use of artificial grass in gardens would not be subject to planning permission. Major developments did not provide turf and therefore the prevention of using artificial grass could not be enforced through landscaping conditions. Members considered that the response should be strengthened to include boundary treatments as fencing panels and concrete posts did not allow wildlife such as hedgehogs access and that there needed to be a link between green spaces. Hedges were important for biodiversity and providing a food source. The provision of birdboxes were no use if there were no food nearby. Members also objected to the use of slate in gardens. The senior planner noted the members comments but pointed out a members suggestion that residents had access to green spaces might go beyond the context of the question.

Recognising the food production value of farmland

Members commented on the responses to questions 38 and 39 and considered that farmland should be protected unless “in exceptional circumstances” as the ability to produce food was really important. Discussion ensued on the need to protect farmland but also to provide energy through solar power or wind turbines and whether it was possible to achieve both. A member said that he could provide links to briefings on solar power and land use to the officers outside the meeting¹. There

¹ <https://www.carbonbrief.org/factcheck-is-solar-power-a-threat-to-uk-farmland/>

was potential to provide both large energy production and produce food. Members commented that solar power could be provided in hedgerows and other “unproductive” land and that there was an element of NIMBYism from residents objecting to the large-scale energy projects.

Climate change mitigation: exploring a form of carbon assessment

A member expressed her concern about recent development across the county that were dependent on new road creation. Communities should be sustainable and should be designed around public transport rather than roads and the private car. The senior planner said that the covering email would be amended to include comments on sustainable development and transport. It was noted that East Norwich was an example of sustainable development in an urban area with good cycle, pedestrian and public transport links.

The senior planner confirmed that emissions from demolition for development on brownfield sites would be added to the response to question 39.

Onshore wind and energy efficiency

The panel considered the draft response to questions 41 and 42. A member suggested that wind turbines of 30m in height could be used in an urban setting. During discussion a member said that electricity pylons were tolerated so did not understand why wind turbines were considered any different as there was a need for energy. Another member pointed out that pylons tended to be used in rural setting and that in built up areas there was less wind which would impact on the effectiveness of turbines. Members also considered that there could be noise from the turbines but did not have a specific view on this.

Climate adaptation and flood-risk management

The panel considered the response to question 40 and considered that it should include a cross reference to the stance of Natural England. Following discussion members noted areas were not self-sufficient and required water from other areas in the UK. Members also considered the need to raise the Future Homes Standard for new homes to be 100 per cent renewable energy rather than driving this agenda through local plans and subject to national and local politics. It was suggested that comments could be made in the covering email.

Barriers to Energy Efficiency

The panel considered the draft response to question 44 and discussed the balance of historic buildings and the importance of retrofitting buildings to decarbonise. Members considered that there were very few buildings that could not be retrofitted with some measures and that some weight could be given to heritage buildings in exceptional circumstances on a case-by-case basis. It was difficult to balance the need for energy efficient buildings and bespoke retrofitting of heritage assets, that people cherish and wish to preserve for future generations. Members noted that

<https://solarenergyuk.org/news/solar-energy-uk-statement-on-solar-farms-and-land-use/>

there were measures that could be used to retrofit properties in conservation areas, such as preserving the façade. Members agreed that significant weight should be made to energy efficient retrofitting of heritage assets and that it should be done in a fit and appropriate manner.

The panel then considered the definition of heritage assets and were advised that the definition was set out in the National Planning Policy Framework definition but included listed buildings, conservation areas, local listed buildings. Members noted that local councillors could call-in applications for retrofitting to the planning applications committee if they were concerned, for instance if timber windows were being replaced with PVC in a conservation area.

The panel noted that questions 45 to 48 referred to transitional arrangements and there was no need for discussion.

National Development Management Policies

Members noted that the introduction of National Development Management Policies was a major change and that there would be more information in due course.

A member suggested that the response to question 52 be amended to remove reference to “low carbon emissions”. Gas had lower carbon emissions than coal but should not be encouraged in favour of renewable energy. The senior planner agreed to make this amendment.

Enabling Levelling Up / Levelling up and boosting economic growth

The panel considered questions 53 to 56 and the draft responses. Members noted the reference to the Article 4 Direction required to manage the office accommodation conversions. Members also noted that such development could lead to unsustainable development. Members noted that East Norwich was an example of a new development within an easy walking distance from services and facilities, and bus services to the university etc. A member said that there needed to be funding to improve public transport and provide electric vehicles.

The panel noted that question 53 was included in the covering email.

Levelling up and boosting pride in places

Members noted that the council had no comments to make on questions 56 to 57.

RESOLVED to:

- (1) approve the response to the consultation, subject to amendment to reflect the comments of the panel;
- (2) note that officers will submit the amended response to the government by the end of the consultation period (2 March 2023);
- (3) ask that a copy of the consultation response is appended to the minutes of this meeting.

CHAIR



Committee name: Sustainable development panel

Committee date: 13/06/2023

Report title: **Greater Norwich Local Plan: Proposed examination submission on the requirement for Gypsy and Traveller pitches and allocation of sites for Gypsy and Traveller pitches**

Portfolio: Councillor Stonard, Leader of the Council and Cabinet member for inclusive and sustainable growth

Report from: Executive director of development and city services

Wards: All wards

OPEN PUBLIC ITEM

Purpose

To consider the report regarding submissions to the Greater Norwich Local Plan (GNLP) examination in respect of:

- (1) the need for additional Gypsy and Traveller pitches to 2038; and
- (2) proposed modifications to the plan, including the identification (allocation) of sites for Gypsy and Traveller pitches, to ensure those needs can be met.

Recommendations:

To note the content of the report and recommend that Cabinet agrees to submit to the Independent Inspectors of the Greater Norwich Local Plan that:

- (1) the Greater Norwich Local Plan should include a minimum requirement of 52 Gypsy and Traveller pitches to meet the full ethnic need for Gypsy and Traveller accommodation from 2022 to 2038.
- (2) in order to ensure the minimum requirement for Gypsy and Traveller pitches between 2022 and 2032 is met, that the Greater Norwich Local Plan should allocate 45 Gypsy and Traveller pitches comprising:
 - (a) 35 deliverable pitches from 2022 to 2027 through the allocation of the sites in Stratton Strawless, Carleton Rode, Foulsham, Wymondham and Cawston; and,

- (b) 10 developable pitches from 2028 to 2032 at Ketteringham Depot
- (3) the analysis of historic windfall demonstrates that at least a further 12 windfall pitches can reasonably be expected to meet unmet needs to 2038; and,
- (4) the proposed main and additional modifications to the plan set out in appendix 1 which provide the policy changes to enable recommendations 1 and 2 should be considered through the plan's examination.

It is further recommended that Cabinet agrees to:

- (5) Delegate authority to the Executive director of development and city services in consultation with the Portfolio holder for inclusive and sustainable growth to negotiate further modifications as may be necessary, which may include proposals to allocate one or more of the focused consultation sites, to ensure the Greater Norwich Local Plan is found sound through its examination.

Policy framework

The Council has five corporate aims, which are:

- People live independently and well in a diverse and safe city.
- Norwich is a sustainable and healthy city.
- Norwich has the infrastructure and housing it needs to be a successful city.
- The city has an inclusive economy in which residents have equal opportunity to flourish.
- Norwich City Council is in good shape to serve the city.

This report's content addresses the following corporate aims of: Norwich is a sustainable and healthy city; and Norwich having the infrastructure and housing it needs to be a successful city. The provision of gypsy and traveller accommodation through making site specific allocations will help ensure that this group's housing needs are addressed.

This report addresses the refine and deliver the strategic framework for city development priority in the Corporate Plan

This report helps to meet the following objective of the COVID-19 Recovery Plan:

Item 5: Housing, regeneration and development:

- Make progress on the Greater Norwich Local Plan to put in place a framework to guide development in the city and encourage it to be well designed and genuinely sustainable.
- Make the most of its own land holdings and financial capability to maximise rates of housing delivery through exemplary homes that meet the needs of the people of Norwich and develop a pipeline of sites that can be delivered over the medium to long-term.

Report summary

1. This report covers two main issues. Firstly that, based on local evidence, 52 Gypsy and Traveller pitches are required to be provided through the Greater Norwich Local Plan (GNLP) to meet need between 2022 and 2038.
2. Secondly, taking account of recent consultation, it is proposed that 7 sites are allocated through the GNLP to provide a total of 45 Gypsy and Traveller pitches between 2022 and 2032 and that development on sites not specifically identified (windfall sites) can be relied upon to meet the identified shortfall in pitches to 2038.

Background

3. The GNLP was submitted in 2021 and is currently at examination. The great majority of the issues have been examined, including the most recent hearings on nutrient neutrality and the housing trajectory which were held in March 2023.
4. When submitting the plan for examination, the Greater Norwich councils agreed to “commit to proactively identify and bring forward sufficient Gypsy and Traveller sites to meet identified needs”. As a result, the Partnership reviewed its approach to Gypsy and Traveller site provision. This included an update to the needs assessment work. In June 2022 consultants RRR completed a new Gypsy and Traveller Accommodation Assessment (GTAA) on the Partnership’s behalf (document [B8.3](#) for the plan’s examination). This supersedes the previous study.
5. As it is necessary to include allocations for Gypsy and Traveller accommodation in the GNLP and no potential sites had emerged through the earlier plan-making process, following approval by cabinets (including by [Norwich city council cabinet](#) on 18 January, a consultation on potential sites was held between January and March 2023. Further detail on the consultation is included at paragraphs 3.10 to 3.15.

Current positions/findings

6. The number of pitches required and the proposed approach to providing those Gypsy and Traveller pitches recommended in this cabinet paper will be considered through the plan’s examination, most likely at GNLP hearings sessions in late July. Hearings would most likely focus on the proposed main modifications to the submitted plan which are included in appendix 1 of this paper. The proposed main modifications would make changes to “Policy 5: Homes” in the plan’s strategy which would serve three purposes:
 - Firstly, they would provide protection in planning policy terms to the existing stock of Gypsy and Traveller pitches so that a shortage is not inadvertently created by future planning applications that seek the redevelopment of sites for other uses.
 - Secondly, they would outline how the plan will meet the evidenced needs for Gypsy and Traveller accommodation from 2022 to 2038 through a mixture of site allocations and windfall sites.

- Thirdly, they would provide the criteria-based policy for the granting of new pitches which will apply both to new sites and the expansion of existing sites. This will assist both allocated and windfall sites to come forward.
7. The modifications would also add site allocation policies in the Sites Plan for the sites identified in strategic policy 5.
 8. A topic paper addendum for Policy 5: Homes ([H3.1](#)), an updated Sustainability Appraisal ([H4.2](#)) and an update to the Habitats Regulations Assessment ([H5.2](#)) have been produced. These provide background for cabinet decisions and will inform the local plan examination.
 9. It is expected that the consultation on all of the plan's main modifications will take place in September/October 2023 and the GNLP will be adopted in early 2024.

Identifying the number of pitches required

10. Paragraph 10 of Planning policy for traveller sites (PPTS 2015) states:

“Local planning authorities should, in producing their Local Plan:

- a) identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets*
- b) identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15.”*

11. The GTAA of June 2022 identified that 52 Gypsy and Traveller pitches should be provided through the GNLP to meet ethnic need between 2022 and 2038 (see the topic paper section 2 for further information). The study also identified a figure of 30 pitches which is limited to meeting the needs of those Gypsies and Travellers who have not ceased to travel, using a methodology known as the PPTS definition (see the topic paper section 3, [H3.1](#)).
12. A recent Court of Appeal judgement in the “Lisa Smith case” concluded that any PPTS definition that excludes some Gypsies and Travellers is discriminatory. This is backed up by a recent local plan examination outcome in Central Lincolnshire, appeal findings, the legal view from our King's Counsel and the view of our consultants. Consequently, meeting the ethnic need is the only approach which is likely to be found sound.
13. Taking account of paragraph 10 of the PPTS set out above and the local circumstances identified in the GTAA, the 52 pitches should be provided as follows:
 - A minimum of **30** deliverable pitches from 2022 to 2027 (the 5-year land supply) on allocated sites,
 - **10** deliverable or developable pitches on allocated sites or broad locations for growth from 2028 to 2032 and
 - **12 pitches** for the remainder of the plan period to 2038 provided for on allocated sites or broad locations for growth, or through a windfall allowance.

14. The 52-pitch figure takes account of permissions granted since the April 2022 baseline of the GTAA.

Identifying the Sites: Consultation

15. The January to March 2023 [consultation](#) identified ten favoured sites, a reasonable alternative (the Ketteringham Depot) and three sites which were considered unreasonable. This classification was based on [Site Assessment](#) information which was available both to assist consultation feedback and for comment. Draft site allocation policies were available for the [favoured sites](#) and the [reasonable alternative](#) site.
16. Appendix 2 is a summary table from the consultation which sets out the number of responses received on a site-by-site basis. A Summary of Consultation for the Gypsy and Traveller Sites Focused Consultation ([H6.1](#)) provides further detail.
17. Two sites which generated very significant numbers of consultation responses from the public were GNLP5014 North Burlingham junction (almost 300 objections plus a petition signed by 219 people) and GNLP5009 at Hockering Lane, Bawburgh (over 130 objections).
18. A response from National Highways identified that the land at North Burlingham which was consulted on as a broad location for a site for 15 pitches will not be available. This is because it has recently been identified by National Highways as a site for environmental mitigation for the A47 dualling project including attenuation ponds. This site is therefore not deliverable so GNLP5014 is not recommended for inclusion in the plan.
19. Site GNLP5009 at Hockering Lane, Bawburgh and site GNLP5021 at Holt Road, Horsford are no longer available for consideration as the landowners have decided to withdraw the sites from the local plan process following the consultation. Consequently, sites GNLP5009 and 5021 are not recommended for inclusion in the plan.
20. Feedback from key organisations such as Anglian Water, Historic England, the Environment Agency and Natural England did not identify significant technical issues for any other sites.

Additional Focused Consultation

21. Three new/expanded sites were submitted through the consultation early in 2023. To ensure that these sites can be properly examined, a further focused consultation is currently taking place on these sites. The bullet points below identify the sites and provide a summary of initial site assessment outcomes. Further detail on the site assessment is in the topic paper, table 6 (see link under Background Documents below) and will be in the consultation documents:
- GNLP 5025, Woodyard, Reepham Road, Foulsham for 3 additional pitches beyond the 2 already occupied. This site is not recommended for inclusion in the plan through the consultation. This is because it is located

on an acute bend, so allowing more pitches would lead to an increase in vehicle movements using a difficult access.

- GNLP5026 Land off Peddlars Turnpike, Guestwick Green for a new site of 3 pitches. The site is not proposed for allocation for highway safety reasons and because it relies on a remote surrounding highway network which has limited capacity.
- GNLP5027 Land off Brick Kiln Lane, Hevingham for 5 additional pitches beyond the 1 already occupied. The initial assessment indicates it is suitable for development.

22. The outcome of this further public consultation work will be known in advance of the examination hearing sessions scheduled for late July 2023.

Proposed action

23. It is recommended that 47 pitches be provided to meet needs and to provide a small buffer through:

- a. The allocation of 6 deliverable sites to provide a minimum of 35 pitches to meet need between 2022 and 2027 (the 5-year land supply). These are:

Reference	Sites	Pitches
GNLP5019	Land north of Shortthorn Road, Stratton Strawless	4
GNLP5020	Romany Meadow, The Turnpike, Carleton Rode	6
GNLP5024	Land off Upgate Street, Carleton Rode	4
GNLP5022	Land at the Oaks, Reepham Road, Foulsham	5
GNLP5028 A and B	Land at Strayground Lane, Wymondham	12
GNLP5004	Land off Buxton Road, Eastgate, Cawston	4
Total Pitches		35

- i. The first four of the sites at Stratton Strawless, Carleton Rode (two sites) and Foulsham are considered to be deliverable within 5 years as they provide existing Gypsy and Traveller accommodation and have been proposed for expansion and delivery by their owners. The consultation has not identified any reasons for the sites being undeliverable.
- ii. The site at Cawston and the site at Wymondham are not currently used for Gypsy and Traveller accommodation. The site at Cawston is being promoted for this use by its landowner. The sites consulted on at Strayground Lane, GNLP5005 and GNLP5023, have been combined into one site. The purpose of this is to ensure that development on Strayground Lane cannot take place until after the waste recycling centre has closed. Part A of Site GNLP5028 is owned by Norfolk County Council and is currently in use as a recycling centre. Allocation of Part B of the site is supported by its private landowner. Recent work has identified that the site is now likely to be deliverable in the next 5 years. While the

consultation has not identified any reasons this site being undeliverable, there remains a concern over highways access and vehicle movements along Strayground Lane. As well as the narrowness of Whartons Lane and Strayground Lane, which would require improvements to passing bays, a concern is the visibility splay at the junction of London Road (B1172). Nevertheless, the site is considered deliverable.

- b. The allocation of the developable site at Ketteringham Depot for 10 pitches to meet the need from 2028 to 2032. The site is owned by South Norfolk Council. As access to services is somewhat limited, this site was consulted on as a reasonable alternative. However, its brownfield nature and size mean that it could benefit from funding from Homes England and delivery by a registered housing provider. Together with the sites above, this would provide a range of sites including both smaller and largely privately owned sites along with a larger publicly owned site.
 - c. The use of a windfall allowance to provide 12 pitches to meet remaining need to the end of the plan period. The windfall assumption used is that 12 pitches will be provided between 2028 and 2038 due to the positive approach to windfall in existing development management policies and in GNLP Policy 5. This is based on the record of 4 pitches per year having been delivered between 2009 and 2022, with an average of 2 pitches per year from 2017 to 2022 (see appendix 3 to this report and the topic paper [H3.1](#) section 4 for further details). These figures have been discounted to 1.25 per year to provide a strong likelihood of them being delivered after sites allocated in the 5-year land supply are built out.
24. In addition to the above recommended approach, the outcome of the additional focused consultation could indicate that an additional site or sites are suitable as allocations. In such circumstances, consideration may be given to their allocation at the examination. An additional allocation or allocations could help ensure a 5-year land supply and/or ensure that identified needs can be met with less reliance or without relying on windfall development.
25. If consultation findings on the three recently proposed sites at the end of June indicate that one or more of these sites are suitable, then it may be prudent to recommend to the examination that an additional site or sites are allocated to provide assurance that there will be enough pitches to meet overall need. Such a recommendation could be negotiated in accordance with the delegated authority sought in this report.

Next Steps

26. If cabinets approve the recommendations set out in this report, the final hearings on the GNLP should take place in late July. Consultation on the plan's main modifications should then be in September/October 2023, with plan adoption in early 2024.
27. This means that Greater Norwich would have an up-to-date local plan with a clear and sustainable strategy and site allocations that would promote investment in

our economy and the provision of the homes, jobs and infrastructure we need. By confirming our ongoing commitment to plan-led joint working, it would also assist Greater Norwich in accessing national funding streams, especially for infrastructure and regeneration programmes.

28. Importantly, proposed revisions to the National Planning Policy Framework, if enacted as recently stated by government, should mean that for 5 years after adoption of the plan, there would be no need to annually demonstrate a five-year land supply for Greater Norwich. This would significantly reduce the pressure to grant permissions for non-allocated housing sites and further increase the benefits of having an adopted plan.

Consultation

29. The portfolio holder for Sustainable and inclusive growth has been consulted and is supportive of the proposed approach. It was agreed under delegated authority with the Executive Director for Development and City Services for the consultation to begin in advance of this report being heard by cabinet.

Implications

Financial and resources

30. Any decision to reduce or increase resources or alternatively increase income must be made within the context of the council's stated priorities, as set out in its Corporate Plan 2022-26 and budget.
31. Progressing the GNLP through its examination is being met within the existing resources of the GNLP team and the annual budget committed to it by each of the partner authorities. Should the GNLP not be able to progress to adoption then it is likely that very significant costs would be borne by the Council in preparing a replacement plan.

Legal

32. The preparation and content of a local plan needs to accord with a range of legal and regulatory provisions. Project assurance, including taking relevant legal advice, has been undertaken as part of the plan making and examination process.

Statutory considerations

Consideration	Details of any implications and proposed measures to address:
Equality and diversity	The content of the report concerns Gypsies and Travellers. Gypsies and Travellers are a racial group as defined in Equality Act 2010. They are therefore protected, amongst other things from direct and indirect discrimination. An equalities impact assessment was completed to support the submission of the plan. This assessment recognised that there were identified additional accommodation needs and that such accommodation should be provided. At the point at which the previous assessment was completed no sites had been made available to meet those needs. This situation is now materially different for the reasons set out in this report.
Health, social and economic impact	This report does not have any direct implications for the council's health, social and economic considerations, but the subsequent delivery of gypsy and traveller accommodation will have positive health and social impacts for the gypsy and traveller community in Greater Norwich.
Crime and disorder	This report does not have any direct implications for the council's crime and disorder considerations.
Children and adults safeguarding	This report does not have any direct implications for the council's Safeguarding Policy statement.
Environmental impact	A Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA), and a Habitat Regulations Assessment has been prepared to support the GNLP. The SA has explicitly considered the sites proposed for allocation within this report.

Risk management

Risk	Consequence	Controls required
No risks have been identified other than those specified elsewhere in this report.		

Other options considered

33. Cabinet may resolve not to agree to make submissions to the GNLP examination in line with the recommendations or may decide to amend the content of the proposed submissions prior to agreeing that they can be submitted.
34. Resolving not to make submissions to the GNLP examination would mean that no provision for Gypsy and Traveller accommodation needs is made within the plan. Failing to provide adequate provision for Gypsy and Traveller sites can be expected to carry with it a material risk that the examination will find that the plan is not sound. As such, the course of action is not recommended.
35. Similar risk may be attached to any decision to amend the proposed submissions, although the level of risk would directly relate to how the submission are amended and therefore cannot be predicted in advance.

Reasons for the decision/recommendation

36. For the reasons set out in this report, it is considered appropriate to make submissions in line with the recommendations set out above. This will help ensure that the GNLP meets its legislative, regulatory and policy requirements and can be found Sound by the appointed Independent Inspectors through its Examination in Public.

Background papers:

1. Topic Paper Policy 5 Homes: Addendum on Gypsy and Traveller Sites ([H3.1](#))
2. Summary of Consultation for the Gypsy and Traveller Sites Focused Consultation ([H6.1](#))

Appendices: Appendix 1 Proposed modifications

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If you would like this agenda in an alternative format, such as a larger or smaller font, audio or Braille, or in a different language, please contact the committee officer above.

Appendix 1 Proposed policy modifications

Proposed Main Modifications to Policy 5: Homes – Please note that the content of modified policy 5 will be dependent on the June consultation.

Gypsies and Travellers, Travelling Show People and Residential Caravans

Development Planning applications that result in the loss of authorised pitches or plots will not be permitted unless:

- alternative replacement pitches or plots are being provided elsewhere; or
- evidence demonstrates that the pitches or plots are no longer needed.

The need for Gypsy 52 pitches for Gypsies and Traveller sites Travellers will be provided for by:

- allocations in the Sites Plan for a minimum of 30 deliverable pitches (the 5-year land supply) from 2022 to 2027;

<u>Sites</u>	<u>Pitches</u>
<u>Land north of Shortthorn Road, Stratton Strawless</u>	<u>4</u>
<u>Romany Meadow, The Turnpike, Carleton Rode</u>	<u>6</u>
<u>Land off Upgate Street, Carleton Rode</u>	<u>4</u>
<u>Land at the Oaks, Reepham Road, Foulsham</u>	<u>5</u>
<u>Land at Strayground Lane, Wymondham</u>	<u>12</u>
<u>Land off Buxton Road, Eastgate, Cawston</u>	<u>4</u>
<u>Total Pitches</u>	<u>35</u>

- an allocation for approximately 10 developable pitches at Ketteringham Depot during the period 2028 to 2032; and,
- 12 pitches through windfall during the remainder of the plan period to 2038.

Planning applications for new pitches or plots to accommodate Gypsies and Travellers, Travelling Show People sites, and for residential caravans will be acceptable where can come forward at any time in the plan period. Such proposals can be within our outside settlement boundaries and will be permitted where the site:

- ~~have safe and sustainable access to schools and facilities;~~
- have meets an evidenced need
- is within easy travelling distance of schools, services and shops, preferably by foot, cycle or public transport;
- has suitable vehicular access;
- provides for ancillary uses and appropriate landscaping;

- ~~are~~ is of a scale which is in keeping with its surroundings, ~~including small-scale extensions to existing sites;~~ and,
- for Travelling Show People, sites provide necessary storage for equipment.

For transit pitches providing temporary accommodation the following additional criteria apply:

- the site is conveniently accessible to the main 'A' and 'B' class road network; and,
- an agreement is in place for the satisfactory site management, including the maximum period and frequency of stay.

Proposed additional and main modifications to the Sites Plan (since all of the text below is proposed as additional or main modifications, no underlines are used):

Stratton Strawless – Policy GNLP5019 Woodland Stable, Shortthorn Road

1. This is a privately owned greenfield site which will extend a well-established privately owned Gypsy and Traveller site known as Woodland Stable located on Shortthorn Road in Stratton Strawless. The allocation of GNLP5019 will result in an expansion from the existing 9 pitches to 17 pitches in total.
2. Prior to development an ecological assessment is required due to the surrounding trees and the potential habitat for protected species.
3. The land shown as GNLP5019 already has planning permission for 4 pitches (20211657). This allocation therefore adds 4 pitches to the number already consented at Woodland Stable.

Policy GNLP5019

Woodland Stable, Shortthorn Road, Stratton Strawless (0.33 ha) is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 8 additional residential Gypsy and Traveller pitches.

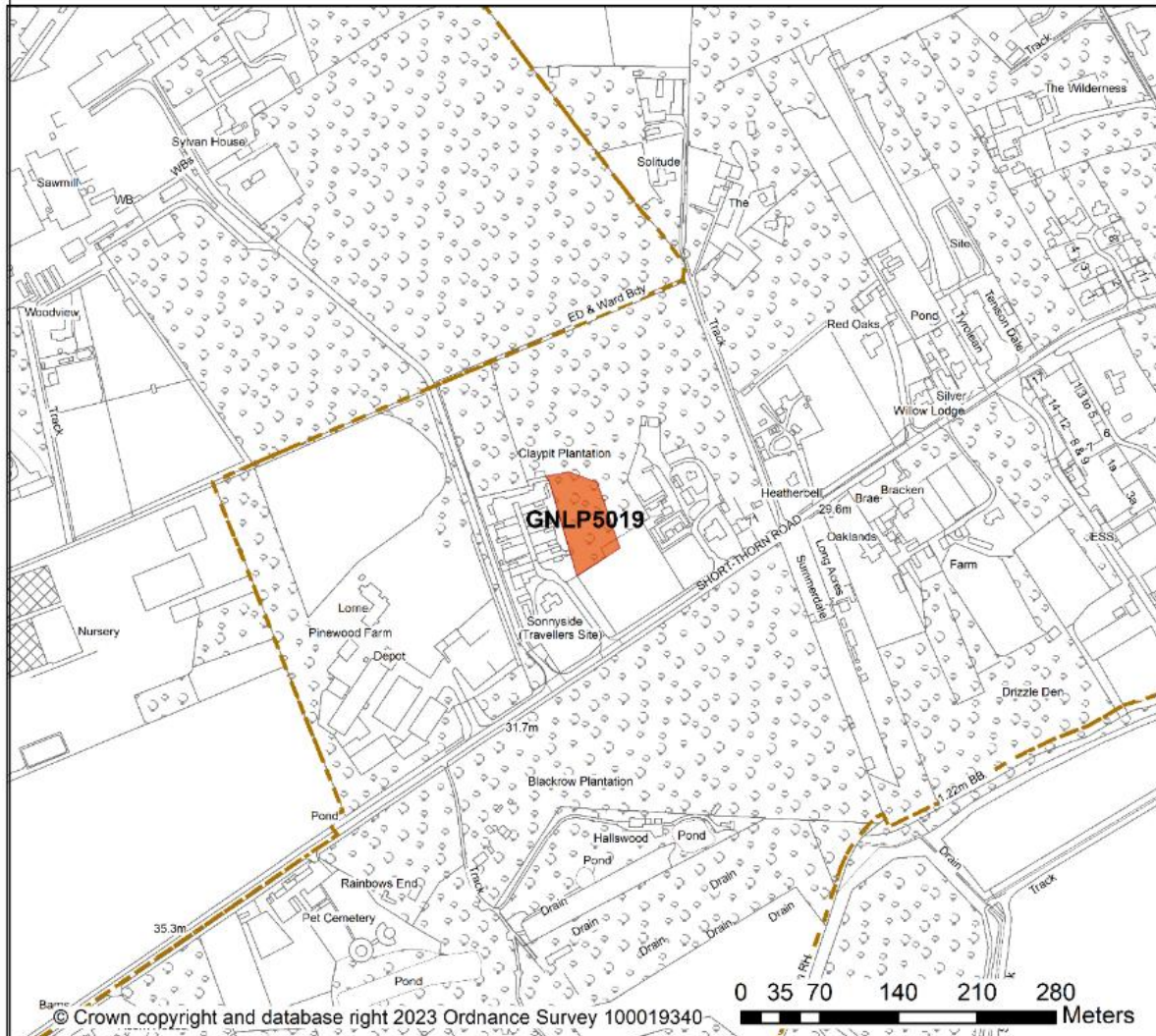
The development will address the following site-specific matters:



1. Access should be via the existing access off Shortthorn Road that serves the Woodland Stables site.
2. An ecological assessment and arboricultural survey must be carried to identify impacts on protected species; and, to retain as many existing trees on site as possible or to replant where removal is deemed necessary.
3. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

STRATTON STRAWLESS

GREATER NORWICH LOCAL PLAN GYPSY AND TRAVELLER SITES

Site Reference: GNL5019
 Location: Land at Woodland Stable, Shortthorn Road, Stratton Strawless
 Description: 8 additional residential pitches for Gypsies and Travellers
 Site Area: 0.33 ha



 Gypsy and Traveller Site
 Parish Boundary

Scale at A4:
1:5,000



Date: 28/04/2023

Carleton Rode – Policy GNLP5020 Romany Meadow, The Turnpike

4. This is a privately owned greenfield site which will extend a well-established Gypsy and Traveller site known as Romany Meadow on The Turnpike, Carleton Rode. The allocation of GNLP5020 will result in an expansion from the existing 6 pitches to 12 pitches in total.
5. Site specific issues will impact on the design of the development. A surface water flow path that crosses the southern part of the site is likely to limit where caravans and other structures can be located, and additional landscaping is required at the boundaries of the site to protect views of nearby listed buildings. An ecological assessment is also required due to the proximity of nearby mature trees and hedgerows.

Policy GNLP5020

Land off the B1113 (0.54 ha) at Romany Meadow, The Turnpike, Carleton Rode is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 6 additional residential Gypsy and Traveller pitches.

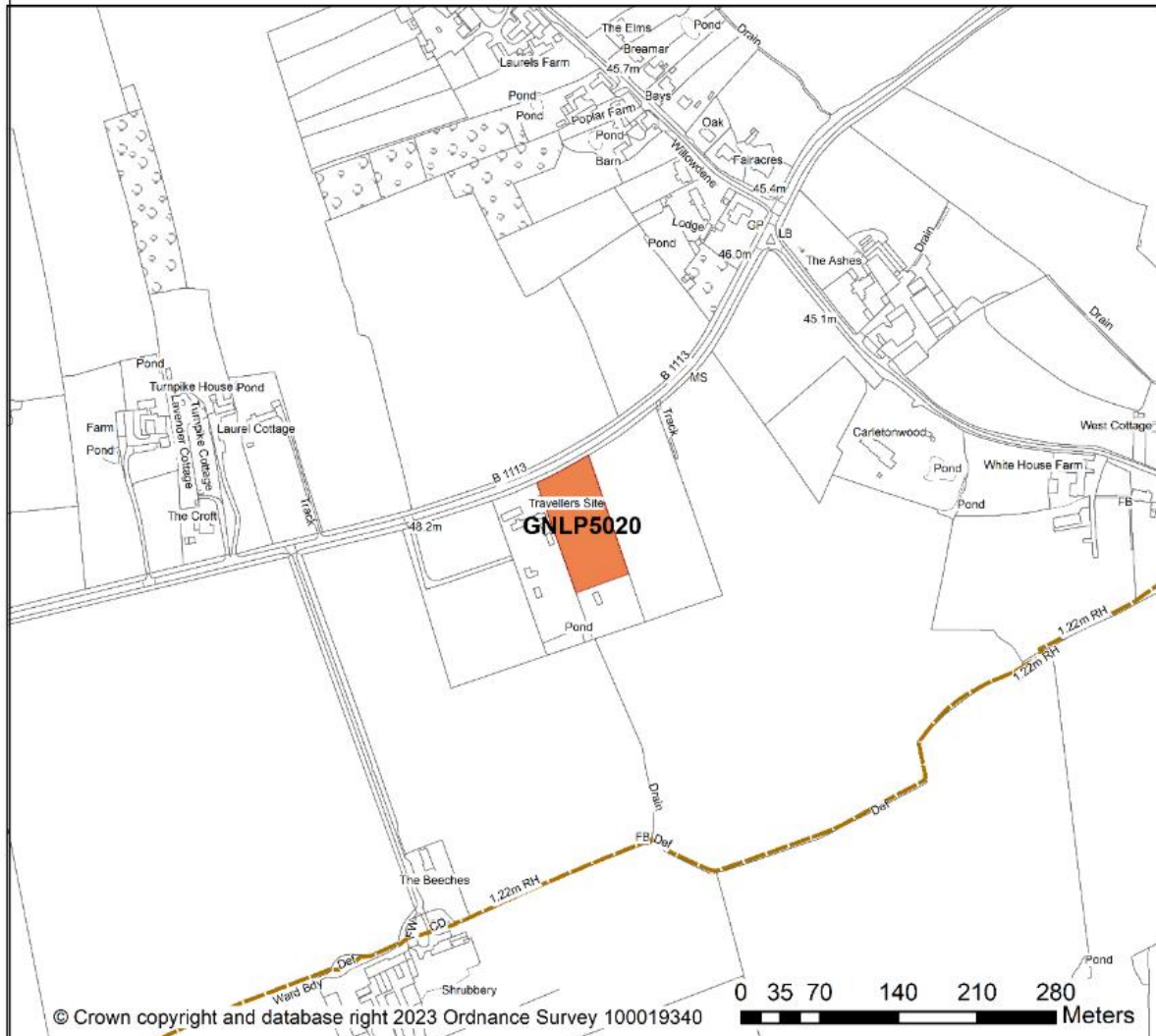
The development will address the following site-specific matters:

1. Access should be via the existing access off The Turnpike that serves the Romany Meadow site.
2. A surface water flood risk assessment must be carried out with caravans and other structures positioned away from areas at surface water flood risk.
3. An ecological assessment must be carried out and any identified impacts on protected species and nearby sites mitigated.
4. Landscaping and tree planting will be required to preserve the landscape character of the surrounding area and to protect views of nearby listed buildings.
5. Pollution mitigation measures are required as the site is within the catchment of groundwater source protection zone (III).
6. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.



CARLETON RODE

GREATER NORWICH LOCAL PLAN GYPSY AND TRAVELLER SITES

Site Reference: GNL5020
 Location: Land at Romany Meadow, The Turnpike, Carleton Rode
 Description: 6 additional residential pitches for Gypsies and Travellers
 Site Area: 0.54 ha



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 Gypsy and Traveller Site
 Parish Boundary

Scale at A4:
1:5,000



Date: 28/04/2023

Carleton Rode – Policy GNLP5024 Upgate Street

6. This is an existing privately owned Gypsy and Traveller site located on Upgate Street, Carleton Rode. The allocation of GNLP5024 will result in an expansion from the existing 2 pitches to 6 pitches in total.
7. Further development of the site will require investigation of highway safety, including of vehicle speeds along Upgate Street, with widening of the visibility splay at the site entrance as appropriate. An ecological assessment prior to development is required due to the presence of a veteran tree on the northern boundary of the site and because New Buckenham Common is approximately 250 metres to the south-west.

Policy GNLP5024

Upgate Street, Carleton Rode (0.62 ha) is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 4 additional residential Gypsy and Traveller pitches.

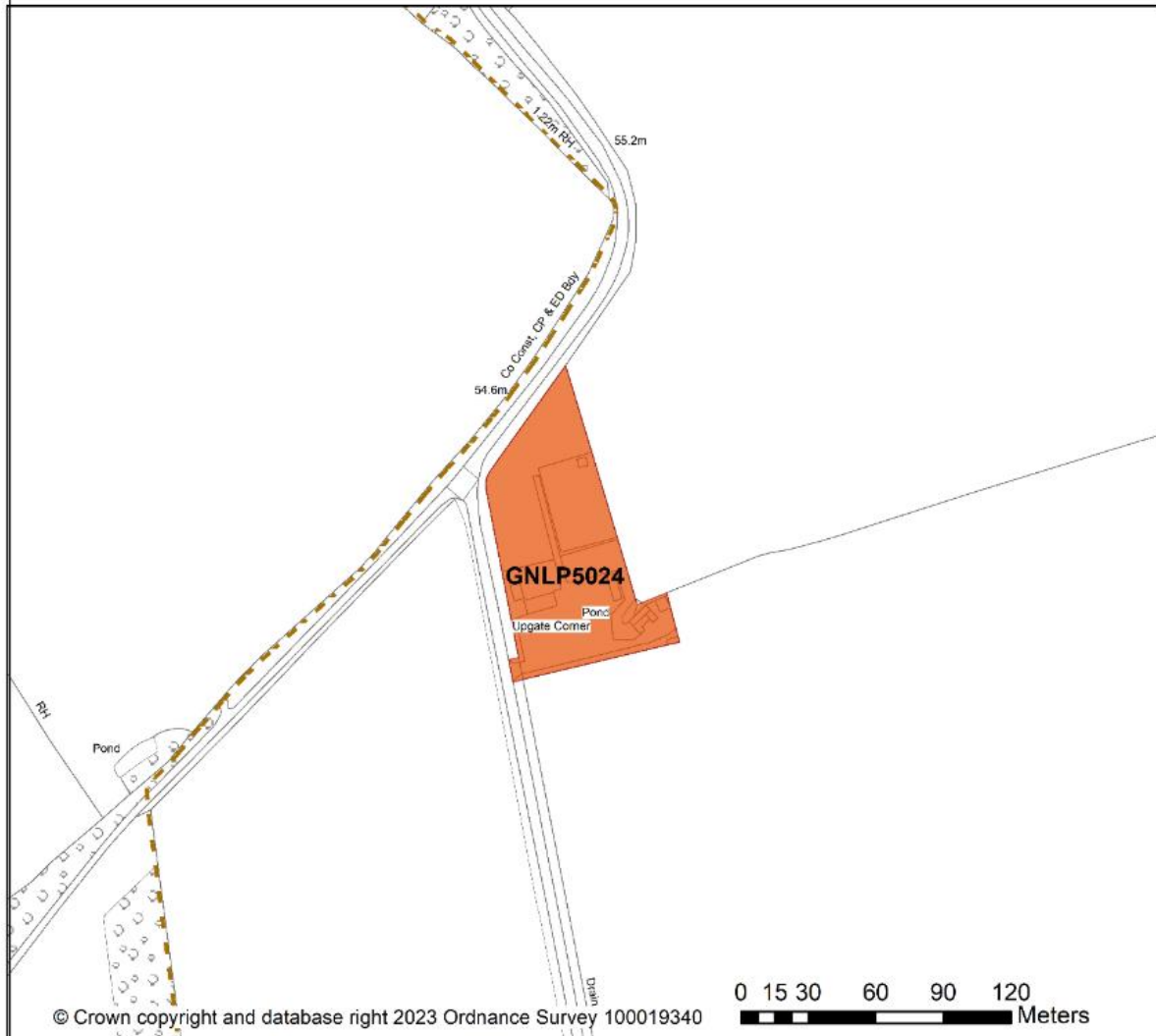
The development will address the following site-specific matters:



1. Access should be via the existing access off Upgate Street. A highway safety assessment is required, and an appropriate visibility splay must be achieved.
2. An ecological assessment must be carried out and any identified impacts on protected species and nearby sites mitigated.
3. Pollution mitigation measures are required as the site is within the catchment of groundwater source protection zone (III).
4. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

CARLETON RODE

GREATER NORWICH LOCAL PLAN GYPSY AND TRAVELLER SITES

Site Reference: GNLP5024
Location: Land at Upgate Street, Carleton Rode
Description: 4 additional residential pitches for Gypsies and Travellers
Site Area: 0.62 ha



-  Gypsy and Traveller Site
-  Parish Boundary

Scale at A4:
1:2,500



Date: 28/04/2023

Foulsham – Policy GNLP5022 The Oaks, Land off Reepham Road

8. This site allocation would extend a well-established privately owned Gypsy and Traveller site by 5 further pitches. The site is located off the Reepham Road, approximately 2 kilometres from the edge of the village of Foulsham which has a limited range of services and facilities including Foulsham Primary School.
9. Further development of the site will require investigations into highway safety, including vehicle speeds along Reepham Road, with widening of the visibility splay at the site entrance if required.
10. The Bacton to Kings Lynn gas pipeline crosses from east to west below the site at its mid-point. This will require further investigation, engagement with the Health & Safety Executive (HSE), National Gas Transmission and National Grid and consequent consideration of site design. A surface water flow path that crosses the southern portion of the site is also likely to limit where caravans and other structures can be located.
11. An ecological assessment is needed due to the presence of several County Wildlife Sites within 2.5 kilometres.
12. The allocation of GNLP5022 will result in its expansion from the existing 2 pitches to 7 pitches in total.

Policy GNLP5022

The Oaks off Reepham Road, is allocated for a residential Gypsy and Traveller site (3.1 ha). The site will accommodate approximately 5 additional residential Gypsy and Traveller pitches.

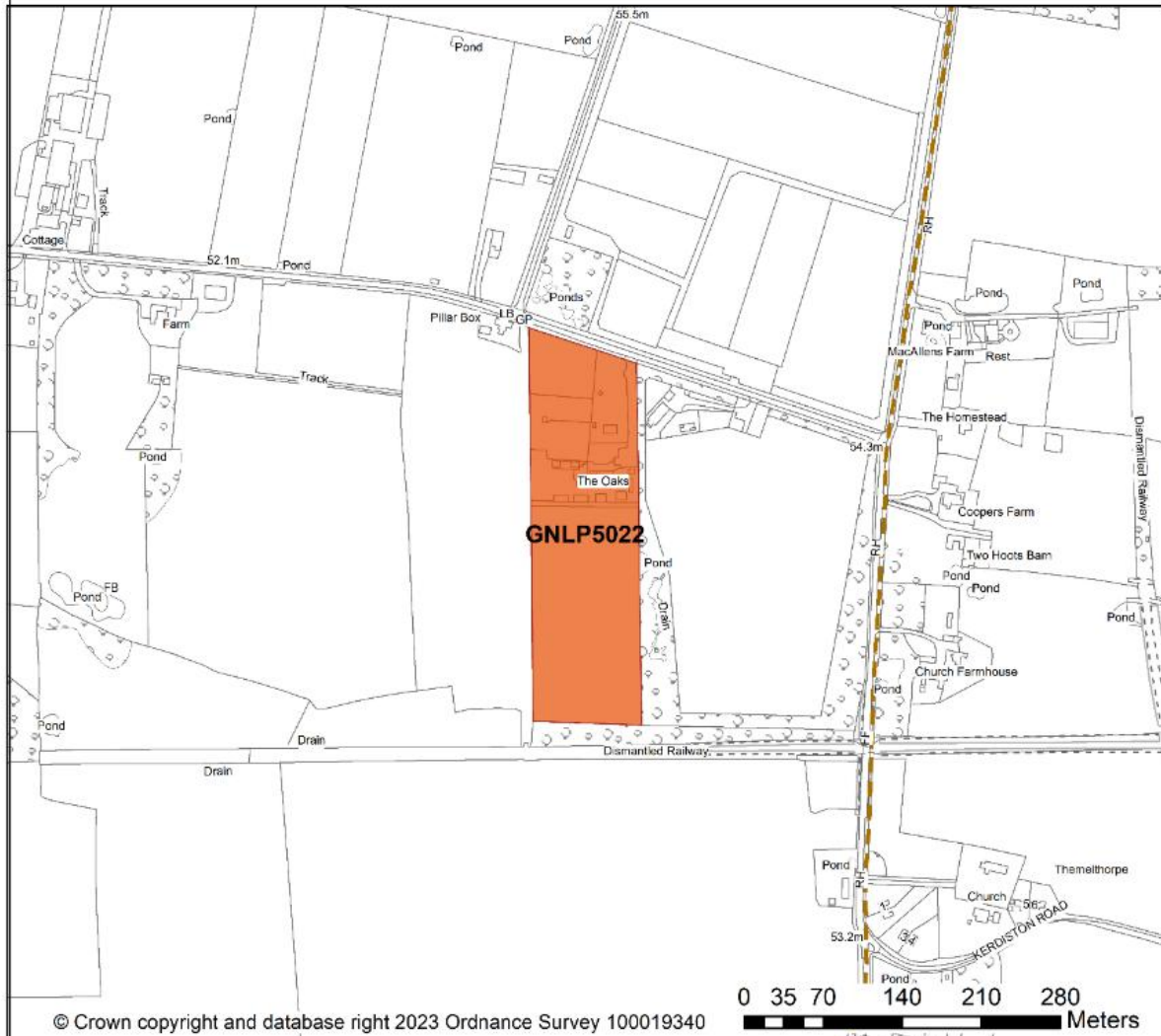
The development will address the following site-specific matters:

1. Access will be via the existing access on Reepham Road. A highway safety assessment is required, and an appropriate visibility splay must be achieved.
2. A surface water flood risk assessment must be carried out with caravans and other structures positioned away from areas at surface water flood risk.
3. An ecological assessment must be carried out and any identified impacts on protected species and nearby sites mitigated.
4. Landscaping and tree planting will be required to preserve the landscape character of the surrounding area and to protect views of nearby listed buildings.
5. Development will be designed to avoid impacts to and from the underground gas pipeline.
6. Pollution mitigation measures are required as the site is within the catchment of groundwater source protection zone (III).
7. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

FOULSHAM

GREATER NORWICH LOCAL PLAN GYPSY AND TRAVELLER SITES

Site Reference: GNLP5022
 Location: Land at The Oaks, Foulsham
 Description: 5 additional residential pitches for Gypsies and Travellers
 Site Area: 3.1 ha



- Gypsy and Traveller Site
- Parish Boundary

Scale at A4:
1:5,000



Date: 28/04/2023

Wymondham – Policy GNLP5028 A and B Land at Strayground Lane

13. This site consists of a privately owned piece of land that has been put forward by the owner (part A) and a publicly owned brownfield site that is expected to become vacant due to the decision to relocate Wymondham Recycling Centre (part B).
14. The site is located towards the southern end of Strayground Lane, Wymondham. Strayground Lane is a quiet road that connects to the built edge of the town to the north via Whartons Lane.
15. The Bays River Meadow North County Wildlife Site is adjacent to, and partly overlaps the site on its west, and an established paving business is also adjacent to the site. There are mineral extraction activities on the land to the north-east and east. The Norwich to Cambridge railway line is to the south.
16. The redevelopment of this site will require local highways improvements, consideration of noise and dust from neighbouring activities, investigation of possible land contamination from previous uses, pollution control measures for the groundwater source protection zone and conducting an ecological assessment prior to development due to the neighbouring County Wildlife Site. Assessments will be required prior to development and mitigation put in place.

Policy GNLP5028 A and B

Land at Strayground Lane, Wymondham (1.1 ha for part A and 0.07 ha for part B) is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 12 residential Gypsy and Traveller pitches.

The development will address the following site-specific matters:

1. Access will be via Strayground Lane. For part A, either the existing access point at the north-east corner of the site or a new access on the eastern boundary will be used. If a new access is provided any loss of trees or hedgerows will be compensated for by new planting within the site. Part B of the site will use the existing vehicular access for the recycling centre.
2. Highway improvements will be required to the passing bays along Strayground Lane and an adequate visibility splay is required at the junction of Whartons Lane with London Road (the B1172).
3. On part A of the site, as the land adjacent to the south-west is in Flood Zones 2 and 3, caravans and other structures shall also be positioned away from this area.
4. A contaminated land assessment is required, and any mitigation must be completed prior to development.
5. Landscape screening will be required at the site boundaries to protect residential amenity and landscape character.
6. An ecological assessment must be carried out and any identified impacts on nearby sites mitigated to protect the adjacent County Wildlife Site and to support priority habitat within the site boundary.
7. Pollution mitigation measures are required because the site is within the catchment of groundwater source protection zone (III).
8. Due to the proximity to the River Bays, an access shall be provided for the maintenance of the river and development must not compromise the river defences.
9. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

WYMONDHAM

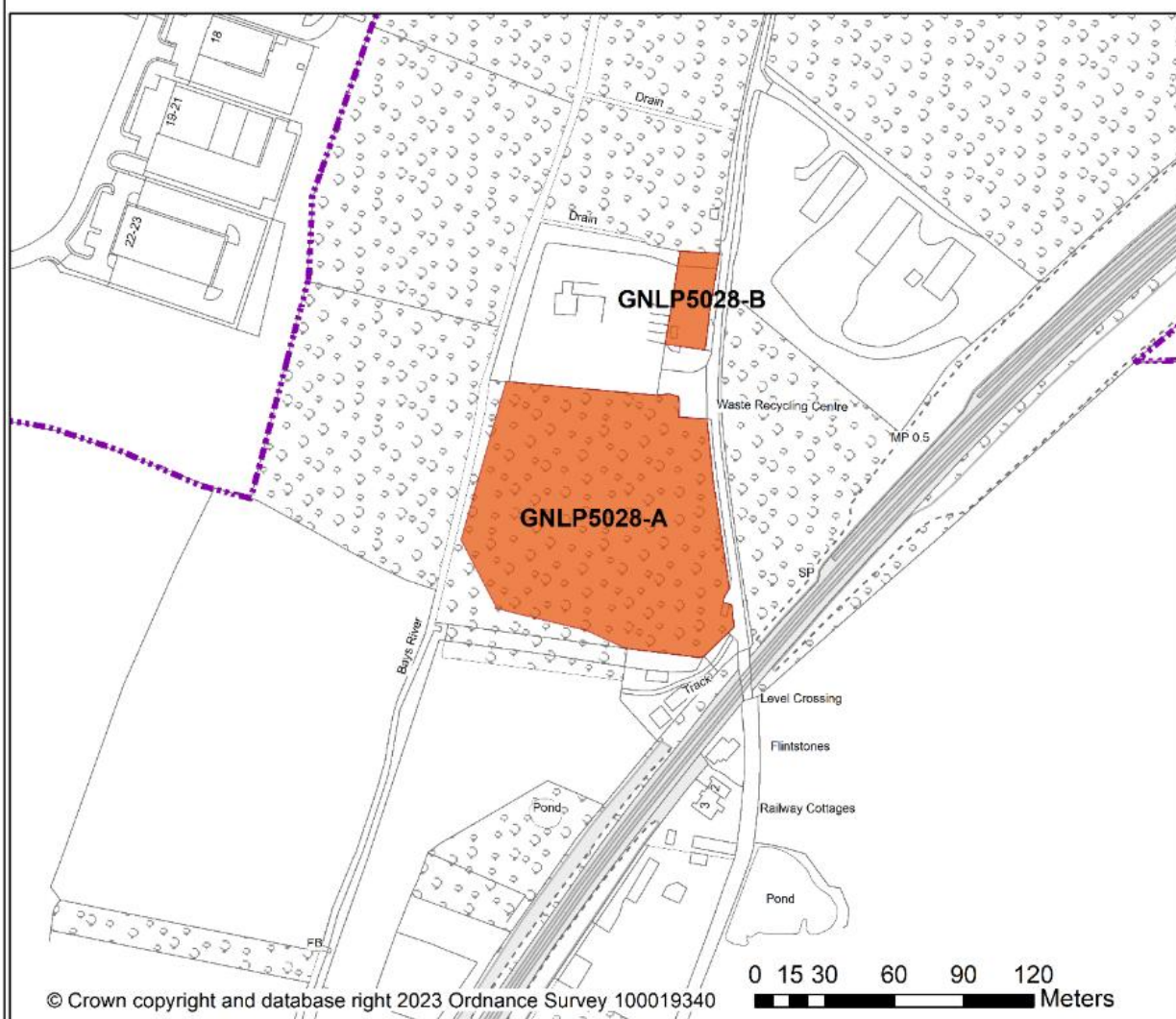
GREATER NORWICH LOCAL PLAN GYPSY AND TRAVELLER SITES



Site Reference: GNLP5028 - A & B

Location: Site at Strayground Lane, Wymondham

Description: 12 residential pitches for Gypsies and Travellers

Site Areas: Part A: 1.1 ha
Part B: 0.07ha



-  Gypsy and Traveller Site
-  Settlement Boundary

Scale at A4:
1:2,500



Date: 23/05/2023

Cawston – Policy GNLP5004R Land off Buxton Road, Eastgate

17. This privately owned greenfield site is located on the Buxton Road in the hamlet of Eastgate to the south-east of Cawston.
18. Additional landscaping is required as part of the design and layout of the scheme to enhance screening and to maintain the residential amenity of adjoining properties. An archaeological assessment is also required prior to development due to the site being close to an area of Roman settlement.

Policy GNLP5004R

Land off Buxton Road, Eastgate, Cawston (0.09 ha) is allocated for a permanent residential Gypsy and Travellers site. The site will accommodate approximately 4 residential Gypsy and Traveller pitches.

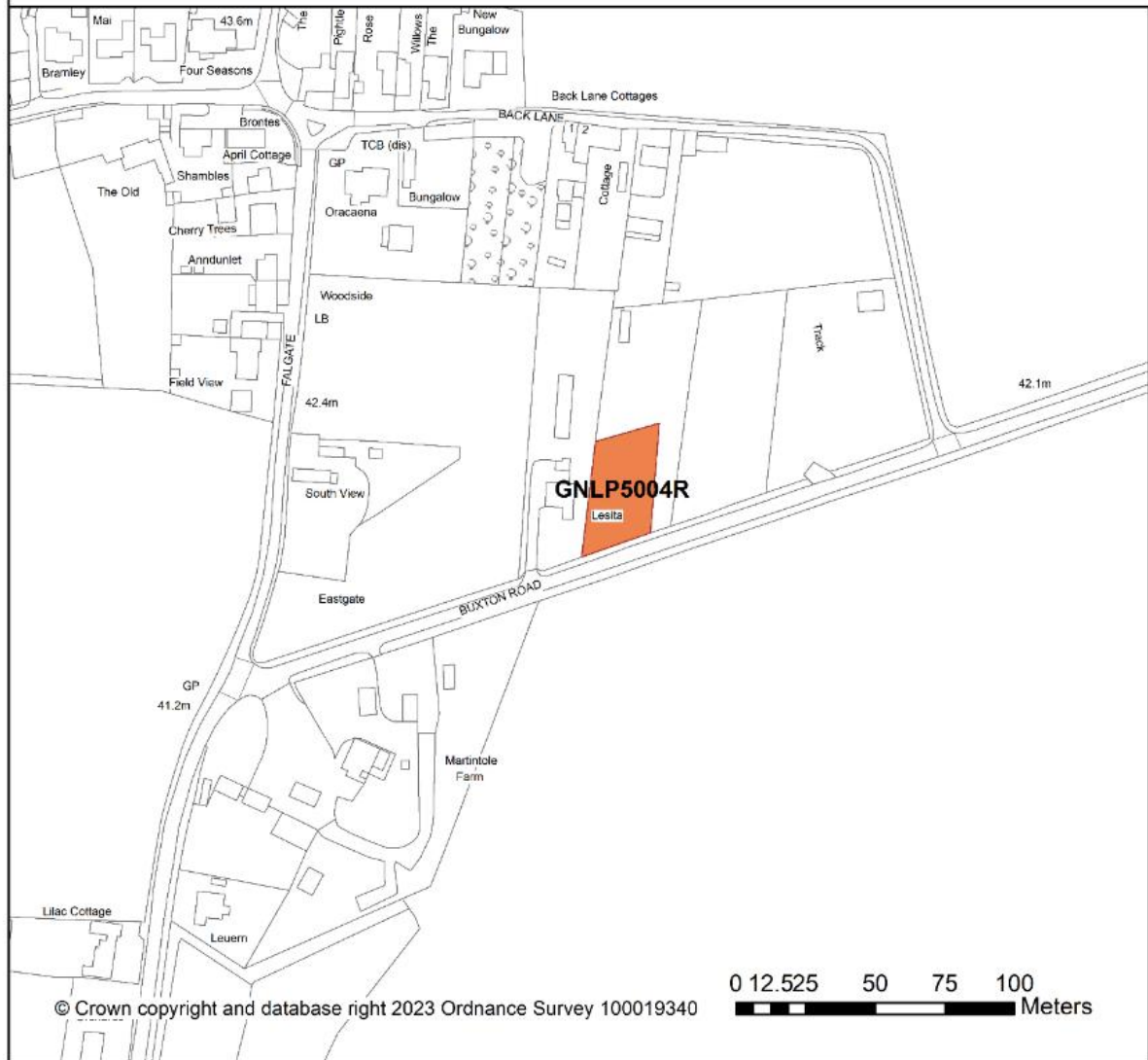
The development will address the following site-specific matters:


1. Access will be via Buxton Road. Any trees or hedgerow lost to form the access or visibility splay must be compensated for with new planting within the development.
2. Landscaping will be provided to enhance screening and to maintain the residential amenity of adjoining properties.
3. An archaeological assessment incorporating a field evaluation will be required prior to development.
4. Pollution mitigation measures are required as the site is within the catchment of groundwater source protection zone (III).
5. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

CAWSTON

GREATER NORWICH LOCAL PLAN GYPSY AND TRAVELLER SITES

Site Reference: GNLP5004R
Location: Land off Buxton Road, Eastgate, Cawston
Description: 4 residential pitches for Gypsies and Travellers
Site Area: 0.09 ha



 Gypsy and Traveller Site

Scale at A4:
1:2,000



Date: 02/05/2023

Ketteringham – Policy GNLP5013 Ketteringham Depot land east of Station Lane

19. This site is on publicly owned land located west of Station Lane, Ketteringham. It is currently used as a depot which is expected to be relocated.
20. This site is separated from the nearest services and facilities which are in Hethersett, but nevertheless this site is considered suitable for allocation.
21. Assessments will be required prior to development and mitigations put in place. These are an assessment of possible land contamination from previous uses, an ecological survey for the potential for hibernating bats in the existing buildings and an investigation of potential noise and dust from neighbouring depot and waste processing businesses nearby.

Policy GNLP5013

Land east of Station Lane, Ketteringham, (0.7 ha) is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 10 residential Gypsy and Traveller pitches.

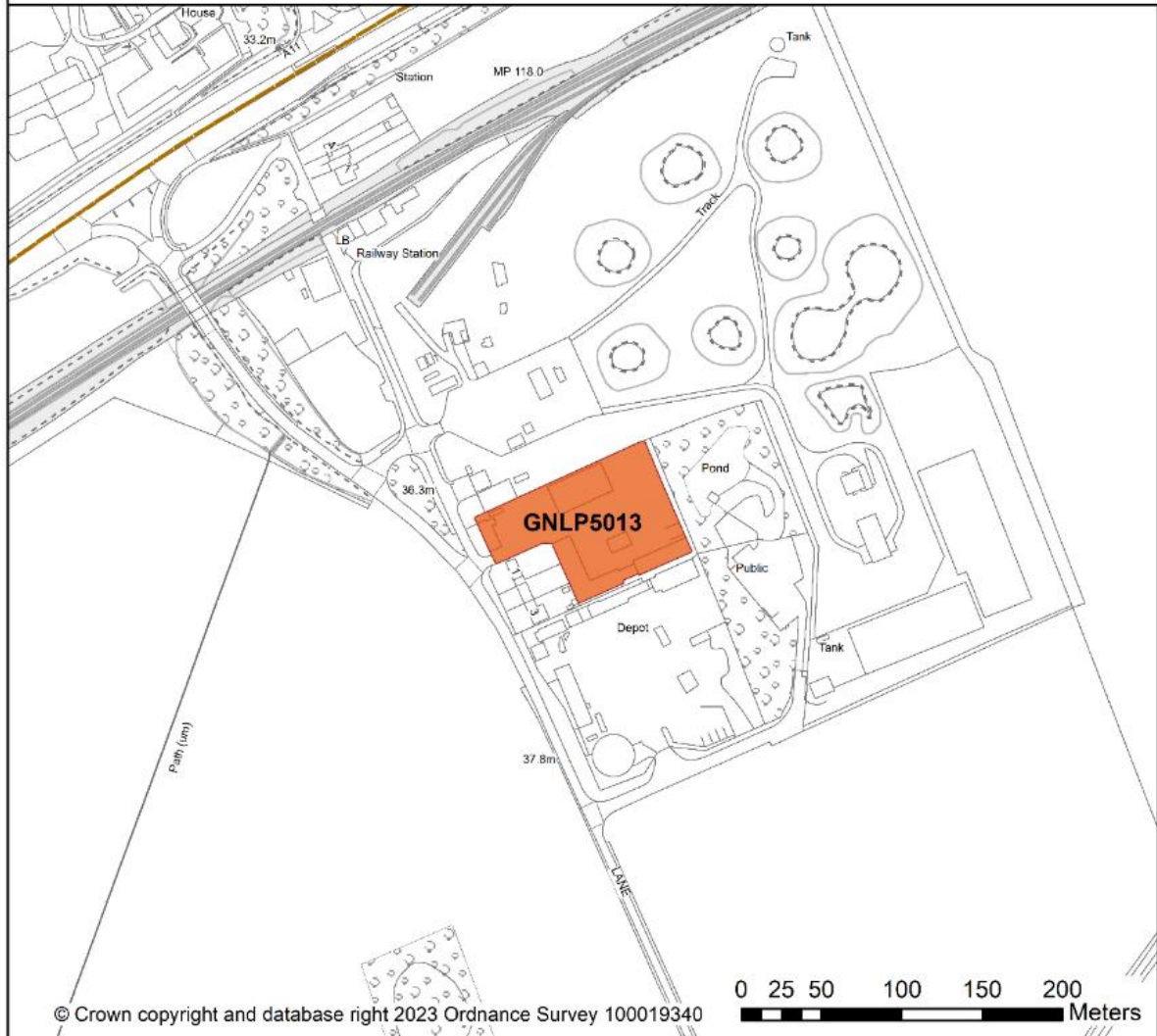
The development will address the following site-specific matters:



1. Access should be via the existing access that currently serves the depot.
2. Investigation is required of the potential for the conversion of existing buildings, particularly at the frontage, as part of the redevelopment.
3. Noise and air quality investigations are required, and the layout and design of the site should include boundary treatments that protect residential amenity.
4. A contaminated land assessment is required, and any mitigation must be completed prior to development.
5. An ecological survey is required due to the potential presence of protected species such as bats or barn owls in the existing buildings.
6. Pollution mitigation measures are required as the site is within the catchment of groundwater source protection zone (III).
7. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.

KETTERINGHAM

GREATER NORWICH LOCAL PLAN GYPSY AND TRAVELLER SITES

Site Reference: GNLP5013
Location: Land at Ketteringham Depot
Description: 10 residential pitches for Gypsies and Travellers
Site Area: 0.7 ha



 Gypsy and Traveller Site
 Parish Boundary

Scale at A4:
1:3,500



Date: 28/04/2023

Appendix 2 - List of Sites by number of responses

Site ref	Address	Support	Object	Comments	Total
Favoured Sites					
GNLP5014	A47 North Burlingham Junction	0	271	18	289
GNLP5009	Land off Hockering Lane, Bawburgh	0	124	8	132
GNLP5004	Land off Buxton Road, Eastgate, Cawston	0	21	3	24
GNLP5005	Land at Strayground Lane, Wymondham Recycling Centre	1	2	7	10
GNLP5022	Land at the Oaks, south-east of Letter Box Cottage, Reepham Road, Foulsham		6	3	9
GNLP5023	Land off Strayground Lane, Wymondham		3	6	9
GNLP5020	Romany Meadow, The Turnpike, Carleton Rode	3	1	4	8
GNLP5024	Land off Upgate Street, Carleton Rode	3	1	3	7
GNLP5021	Land at the Old Produce Shop, Holt Road, Horsford	0	2	4	6
GNLP5019	Land north of Shortthorn Road, Stratton Strawless	2	0	3	5
Reasonable Alternative Site					
GNLP5013	Land at Ketteringham Depot	0	0	3	3
Unreasonable Alternative Sites					
VCHAP GT Site 1 VCHAP GT Site 2	Sites at Middle Road, Denton,			1	1
VCHAP 3	Land off London Road, Sutton, Wymondham				
TOTAL		9	431	63	503

Appendix 3 Windfall Assumption

National policy on windfall

There is no reference in the PPTS 2015 to how windfall development should be considered for Gypsies and Travellers. In the absence of such specific guidance, regard has been had to paragraph 70 of the NPPF 2019 (paragraph 71 of the NPPF 2021). The NPPF states: *“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regards to strategic housing land availability assessment, historic windfall delivery rates and expected future trends.”*

Evidence on windfall

Using data on historic windfall completions from the Homes Topic Paper Appendix C (document [D3.7](#)) page 7 which has been updated to include 2020/21 and 2021/22 figures, the table below sets out Gypsy and Traveller pitch completions in Greater Norwich from 2009 to the baseline for the GTAA in April 2022.

Please note that the table only covers permanent residential pitches and does not include pitches granted on appeal. The latter is to ensure that the data only reflects sites likely to be considered acceptable by the authorities under their specific policies.

Monitoring Year	Pitches completed	Policy context
2009/10	8	Pitch numbers derived from RSS
2010/11	6	JCS adopted March 2011
2011/12	6	
2012/13	18	
2013/14	1	Amendments to JCS adopted January 2014
2014/15	0	Development Management policies adopted
2015/16	0	
2016/17	4	
2017/18	2	
2018/19	1	
2019/20	3	
2020/21	0	
2021/22	4	GTAA baseline April 2022
Total	53	
Overall annual average	4	
Final 5-year annual average	2	

The overall annual average number of completions from 2009/10 to 2022 was 4 pitches, while the 5-year average from 2017 to 2022 was 2 pitches per year. Delivery was particularly strong from 2009/10 to 2012/13. The pitches were delivered on a range of sites, including both small scale new sites and extensions to existing sites, along with new sites for up to 8 pitches.

Methodology

Although it is possible that some pitches will be delivered at the same time as allocated sites in the 5-year land supply are brought forward prior to 2028, the

assumption is that 12 pitches will be delivered from windfall from 2028 to 2038 at a rate of 1.25 pitches per year.

This is based firstly on the overall historic rate of delivery of 4 pitches per year as set out in the table above. More specifically, the 5-year average delivery of 2 pitches per years is used as this reflects more recent trends.

Taking a precautionary approach, the assumption is discounted to 1.25 pitches per year from 2028 to 2038 to provide 12 pitches in total. This provides a strong likelihood of pitches being delivered after sites allocated in the GNLP have been built out.

Conclusions on windfall

Pitch requirements in strategic plans along with criteria-based development management policies in each district have enabled windfall Gypsy and Traveller pitches and sites to be developed. It can be expected that sites will continue to come forward as promoted through the positive approach to windfall development in GNLP policy 5.

The data provides the compelling evidence required by the NPPF that, along with allocations in the GNLP, windfall will be a reliable source of supply to help to meet need late in the plan period from 2028. In particular, this will apply from 2032 onwards by which time sites allocated in the GNLP are likely to have been built out.

The windfall assumption included in this report and the proposed policy modification to provide 12 pitches from 2028 to 2038 are therefore justified based on the evidence in this appendix.

