



# NORWICH City Council

**Committee name:** Cabinet

**Committee date:** 18/01/2023

**Report title:** Greater Norwich Local Plan (GNLP), consideration of consultation regarding possible gypsy and traveller sites for inclusion within the plan.

**Portfolio:** Councillor Stonard, Cabinet member for inclusive and sustainable growth

**Report from:** Executive director of development and city services

**Wards:** All wards

## OPEN PUBLIC ITEM

### Purpose

To seek Cabinet approval to undertake a focused public consultation on the allocation of Gypsy and Traveller sites in the Greater Norwich Local Plan (GNLP).

### Recommendation:

It is recommended that Cabinet:

- 1) Approves the focused consultation on the Greater Norwich Local Plan proposed allocations for Gypsy and Traveller sites; and
- 2) Delegates authority to the Executive director of development and city services, in consultation with the Cabinet member for inclusive and sustainable growth, to agree consultation documentation and materials prior to the public consultation.

### Policy framework

The council has five corporate priorities, 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 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.

## Introduction

1. Members will recall that Cabinet in July 2022 gave approval for a focussed consultation to take place on the Greater Norwich Local Plan (GNLP) proposed Gypsy and Traveller sites due to take place in summer 2022. This consultation did not take place as it was not agreed by South Norfolk Council, as noted at paragraph 24 below. That [report](#) set out the background to the consultation including the fact that the GNLP Inspectors indicated that they would require Gypsy and Traveller accommodation needs to be addressed through the allocation of sites.
2. We now need to reconsider the provision of gypsy and traveller sites as part of the local plan examination process. Over recent months there has been engagement with the Gypsy and Traveller community, additional sites have been identified, and need has increased, as set out below.
3. The purpose of this report is to seek Cabinet approval to undertake a focused public consultation on the allocation of Gypsy and Traveller sites in the GNLP. The consultation includes 10 favoured sites, a reasonable alternative site, proposed changes for the submitted contingency site and 3 unreasonable sites. All the sites are located outside the city council's administrative area but the city council part owns the proposed contingency site at Costessey. The consultation also provides the opportunity for people to put forward additional sites for Gypsy and Traveller accommodation.
4. The consultation is scheduled to take place from 30<sup>th</sup> January to 13<sup>th</sup> March 2023 with the opportunity for Cabinet to agree the final sites in early June prior to final site information and representations being sent to the inspectors later in June. The GNLP examination hearings sessions on Gypsies and Travellers sites are expected to take place in late July.
5. It is anticipated that the inspectors will subsequently include Gypsy and Traveller sites in their main modifications to the GNLP. The main modifications are expected to be consulted on in early Autumn 2023 allowing the inspectors to produce their report on the plan before the end of 2023 and adoption to take place early in 2024.
6. For consultation to take place on the proposals there needs to be unanimity on the contents of the consultation document. South Norfolk District Council considered a similar paper to this at their meeting on 9<sup>th</sup> January and resolved to approve it "subject to the reference to the contingency site, for Gypsy and Traveller pitches, at Costessey being deleted". Broadland District Council are due to consider the matter on 10<sup>th</sup> January. Should Broadland resolve to accept the change from South Norfolk the City will need to do likewise to allow the consultation to proceed to the timetable. A verbal update on this matter will be given at the meeting.

## Summary

7. In resolving to submit the GNLP for independent examination in July 2021 the Council agreed to *“proactively identify and bring forward sufficient Gypsy and Traveller sites to meet identified needs in accordance with the criteria-based policies of the current and emerging Development Plans”*.
8. During the GNLP hearing sessions in February/March 2022 it was made clear that Gypsy and Traveller accommodation needs must be addressed through site allocations in the plan. This is in accordance with the expectations set out in paragraph 68 of the National Planning Policy Framework ([NPPF](#)) and allied guidance specifically for Gypsies and Travellers in Planning Policy for Travellers Sites ([PPTS](#)) (2015).
9. No potential Gypsy and Traveller sites were submitted to the GNLP for consideration prior to its submission for independent examination. Subsequently, officers have undertaken an extensive process of proactive engagement and site assessment to identify suitable allocation sites.
10. This report seeks Cabinet agreement to undertake a Focused Consultation on the sites which have been identified from this work. Furthermore, to ensure that the best and most appropriate sites are chosen, the consultation gives landowners a further chance to submit land for inclusion in the GNLP, but this will be strictly limited to the promotion of Gypsy and Traveller sites.
11. Following the close of the consultation the GNLP team will process and analyse the responses received and finalise the favoured site allocations for consideration at Cabinets in June. The finalised sites information and representations will be provided to the inspectors and published. The sites will then be subject to additional hearing sessions in late July, with the outcome being the subject of main modifications to the plan.
12. The main modifications are expected to be consulted on in Autumn 2023 with adoption planned for early 2024.

## **Background**

13. Policy regarding the provision of Gypsy and Traveller sites is set out in the NPPF. Paragraph 68 states that local plans should include specific deliverable sites for years 1 to 5 of the plan period and developable sites for years 6-10 and where possible years 11-15. Allied guidance to the NPPF specifically for Gypsies and Travellers is in the Planning Policy for Traveller sites (PPTS, 2015). [This](#) makes the same point at paragraph 10 about local plans having *‘specific deliverable sites sufficient to provide 5 years-worth of sites against their locally set targets... [and] specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15’*.
14. The PPTS also contains a definition of Gypsies and Travellers for planning purposes which focuses on people who continue to lead a nomadic lifestyle. This is known as the PPTS need, as opposed to the full need, which is referred to as the ethnic need.

15. While the PPTS does not require allocations to meet the needs of Gypsies and Travellers who have ceased to travel, a recent Court of Appeal decision (dated 31<sup>st</sup> October 2022) has found that this distinction can discriminate against ethnic Gypsies and Travellers, in particular the disabled and elderly who are unable to travel.
16. The councils must decide how many Gypsy and Traveller pitches are required ('the need') by gathering evidence, which is then tested as part of the independent examination of the plan. Evidence has been produced by RRR Consultancy on behalf of the councils and is available online as [B8.3](#). This most recent Gypsy and Traveller Accommodation Assessment (GTAA) identifies a potential need in the Greater Norwich area for 50 residential pitches to meet the total ethnic need. Since the evidence was completed, the additional capacity to be provided through refurbishment work at the existing site at Swanton Road site in Norwich has been reduced by 3 pitches. As a result of this reduced commitment, 53 additional pitches are likely to be needed over the plan period although not all of these will require allocations to be made.
17. In order to provide some flexibility and choice and to minimise the risks of non-delivery and any implications of the Court of Appeal decision, favoured sites should be identified for consultation which are capable of delivering at least the minimum number of pitches required to meet the ethnic definition in the earlier years of the plan. A criteria-based policy set out within Policy 5 of the plan provides the potential for further windfall sites to come forward in suitable locations which could meet needs in the later years of the plan. These windfall pitches also provide additional flexibility.
18. No sites for Gypsies and Travellers were submitted for allocation through the GNLP plan-making process between 2016 and its submission in July 2021. Therefore, the GNLP as submitted does not contain any Gypsy and Traveller site allocations.
19. In considering the submission of the GNLP back in July 2021 the Council resolved specifically to *"commit to proactively identify and bring forward sufficient Gypsy and Travellers sites to meet identified needs in accordance with the criteria-based policies of the current and emerging Development Plans"*. The purpose of this was to allow the Gypsy and Traveller accommodation issue to be addressed through the examination hearings without adding undue additional delay to plan adoption.
20. The GNLP was submitted for examination by inspectors on 30<sup>th</sup> July 2021. Their role is to undertake an independent assessment of the overall "soundness" of the plan and to verify that it satisfies the relevant statutory and regulatory requirements for its preparation. As part of the submission of the plan, the councils formally requested that the appointed inspectors recommend such modifications to the plan as may be necessary to ensure legal compliance and soundness in accordance with Section 20 (7C) of the Planning and Compulsory Purchase Act 2004 (as amended).

21. Public hearings took place in February and March 2022, with further sessions on the outstanding issues of nutrient neutrality and the housing trajectory to be reconvened in late March 2023 and on Gypsies and Travellers in late July 2023.

## **Examination process January 2022 to present**

22. The partnership wrote to the inspectors on 4<sup>th</sup> January 2022 ([D5.4](#)) in relation to the Part 1 Matters Issues and Questions to seek advice on how to progress the issue of Gypsies and Travellers through the examination. The inspectors responded on 19<sup>th</sup> January 2022 ([D5.4A](#)) with the view that any sites identified would need to be subject to dedicated public consultation and examination, with any modifications necessary for soundness to be incorporated into any main modifications. This view was offered without prejudice to discussions to take place during the hearing sessions.
23. During the GNLP hearing sessions in February/March 2022 the inspectors indicated that they would require Gypsy and Traveller accommodation needs to be addressed through site allocations in the plan in accordance with the expectations set out in paragraph 68 of the NPPF.
24. Following the hearing sessions officers from the GNLP team undertook further work to identify Gypsy and Traveller allocations. A report was written for consideration by Cabinets in July 2022 which identified three potential sites for consultation at Wymondham Recycling Centre, the Costessey Contingency Site and Cawston. Consultation was anticipated to take place from 25<sup>th</sup> July to 7<sup>th</sup> September 2022. As noted above the city council's cabinet supported undertaking the consultation at its meeting on 6<sup>th</sup> July. South Norfolk did not do so at its meeting on 11<sup>th</sup> July and as a result Broadland did not take the matter to their Cabinet meeting. Since decisions on the GNLP must be unanimous this meant the focused consultation on Gypsy and Traveller sites could not take place as anticipated. South Norfolk's concerns centred around the nature of the consultation and specific issues in relation to the proposed Costessey site.
25. Since July a number of letters have been exchanged between the partnership and the inspectors regarding the issue of Gypsy and Traveller sites to establish the most appropriate way forward. These can be found in section [D5.4](#) of the GNLP website

### **The current position**

26. The inspectors' most recent letter ([D5.4G](#)) provides the timetable for the rest of the examination as referenced in this report, making it clear that strict adherence to this timetable is critical to the timing of the modification stage and the adoption date of the plan. It also requested a response on whether the partnership will update its evidence on Gypsy and Traveller needs in the light of the Court of Appeal decision.
27. The partnership's response (document [D5.4H](#)) stated that the assessment of Traveller site needs would be reviewed in the light of the legal decision through an addendum to current evidence which would make clear how the needs of those who have ceased to travel for reasons of age or infirmity are to be dealt with. It explained that the addendum would be provided by the

consultancy which produced the Greater Norwich Gypsy and Traveller Accommodation Assessment by early December.

28. The response also stated that legal advice has been commissioned on this issue.

29. Officers have undertaken a process of extensive proactive engagement and site assessment to identify suitable allocation sites over recent months. This includes:

- Officers have contacted local agents and development promoters asking them to bring forward any options where there are willing landowners. Agents Brown & Co have been commissioned to contact landowners on behalf of the Partnership.
- All GNLP new and carried forward residential, employment and mixed use allocations have been reviewed to see if any of them have potential to accommodate Gypsy and Traveller pitches.
- A review of publicly owned land options has been done.
- The Norfolk and Suffolk Gypsy, Roma and Traveller Service has been commissioned to engage with the Gypsy and Traveller community on the partnership's behalf.

30. All the sites identified have been assessed in a standardised manner. It is important to have clear criteria to assess all the Gypsy and Traveller sites, to apply the methodology consistently and to include the findings in public consultation. This process ensures that sites are selected or ruled out on their planning merits and that unsuitable sites are ruled out at an early stage. The assessment criteria were provided to the inspectors as part of the letter dated 2 September ([D5.4D](#)). They are based on the Housing and Economic Land Availability Assessment (HELAA) criteria that the partnership used to assess all potential development sites with adjustments for specific issues that Gypsy and Traveller sites raise such as the manoeuvring of trailers and caravans and the vulnerability of people living in caravans during flood events.

### **Proposed action**

31. It is proposed to undertake public consultation on potential Gypsy and Traveller sites for allocation in the GNLP between 30<sup>th</sup> January and 13<sup>th</sup> March 2023. It is crucial that the consultation takes place between these dates so that it is closed prior to the pre-election period for the local elections in May.

32. As set out above, the evidenced requirement is for 53 pitches to meet total need under the ethnic definition of Gypsies and Travellers. Sites in the planning applications pipeline have been taken account of in the evidenced need.

33. In line with the national policy requirements identified in paragraph 12 above, a minimum of 31 pitches would need to be provided through site allocations within the initial 5-year period from April 2022 to March 2027. Ten pitches would need to be provided as either site allocations or by the



identification of broad locations for sites between April 2027 and March 2032. Greater flexibility is possible over provision for the remaining years of the plan to 2038, and windfall could play a role here.

34. Work on the evidence of need to reflect the implications of the Court of Appeal decision is ongoing but the current advice is that the need should be derived from the ethnic population rather than the PPTS. The very recent appeal court decision suggests that providing sufficient pitches to meet ethnic need will de-risk the examination and reduce the potential for legal challenge. Legal advice has confirmed that this is the case.

35. As a result of the above, the intention is to consult on 10 favoured sites along with a reasonable alternative site and the potential opportunity provided by a proposed change to the submitted housing contingency site as follows (see Appendix A for further details):

<b>Table 1: Favoured Sites</b>			
Reference	Address	Pitches	Pitches Delivered years 1 to 5
GNLP5004	Land off Buxton Road, Eastgate, Cawston	4	4
GNLP5005	Land at Strayground Lane, Wymondham Recycling Centre	2	0
GNLP5009	Land off Hockering Lane, Bawburgh	6	6
GNLP5014	A47 North Burlingham Junction	15	15
GNLP5019	Land north of Shortthorn Road, Stratton Strawless	4	4
GNLP5020	Romany Meadow, The Turnpike, Carleton Rode	6	6
GNLP5021	Land at the Old Produce Shop, Holt Road, Horsford	6	6
GNLP5022	Land at the Oaks, south-east of Letter Box Cottage, Reepham Road, Foulsham	5	5
GNLP5023	Land off Strayground Lane, Wymondham	10	0
GNLP5024	Land off Upgate Street, Carleton Rode	4	4
Total		62	50

<b>Table 2: Reasonable Alternative</b>			
Reference	Address	Pitches	Pitches Delivered years 1 to 5
GNLP5013	Land at Ketteringham Depot	10	0
Total		10	0

<b>Table 3: Proposed change to Contingency Site</b>			
Reference	Address	Pitches	Pitches Delivered years 1 to 5
GNLP5007R	Land off Bawburgh Lane, north of New Road and east of the A47 (Costessey contingency site)	18	0
Total		18	0

36. The 10 favoured sites provide the opportunity to deliver up to 62 pitches against the overall ethnic need of 53 pitches. This provides flexibility should sites drop out and/or choice if some favoured sites are found to be unsuitable through the consultation.
37. Current expectations, as set out in the tables above, are that 50 of these pitches could be delivered in years 1 to 5 and 12 could be delivered in years 6 to 10. This would more than meet the NPPF requirements (31 pitches in years 1 to 5 and 10 in years 6 to 10). The consultation will provide further evidence on deliverability.
38. Ketteringham Depot is recommended as a reasonable alternative. It is not part of the favoured approach due to concerns over accessibility and integration with neighbouring uses, though potential remains.
39. The Costessey Contingency Site is in a highly accessible location and continues to provide an excellent opportunity if the wider contingency housing site comes forward.
40. Windfall delivered through policy 5 plus the Costessey Contingency Site could meet needs later in the plan period or could provide a buffer against non-delivery to help ensure the 53-pitch need will be met. It is anticipated that this would also meet NPPF requirements.
41. Three sites, two in Denton and one on London Road, Wymondham, were proposed through the South Norfolk Village Clusters Plan. These have been assessed as unreasonable for the reasons set out in Appendix A which provides a summary of key considerations in relation to all sites. Consultation respondents will be able to comment on the non-inclusion of these sites.

42. The existing Gypsy and Traveller Transit site at Long Lane, Bawburgh is to be retained in its current use and improved with new investment. Consequently, it does not form part of this consultation on permanent Gypsy and Traveller sites.
43. Appendix B to this report is a map showing the distribution of the favoured, reasonable alternative, contingency and unreasonable sites.
44. The Site Policies document in Appendix C of this report will be the main consultation document.
45. Detailed site appraisals in the Site Assessment Information document which is in Appendix D of this report will be available to assist consultation responses. The legally required Sustainability Appraisal and Habitat Regulations Assessments on the environmental impacts of proposed site allocations are in Appendices E and F of this report. Consultation respondents will also be able to comment on these supporting evidence documents.
46. In the interests of efficiency and continuing the successful approach taken at previous GNLP consultations, responses will be encouraged online, although written responses will also be accepted either by post or via email.
47. Publicity relating to the consultation will be undertaken in line with the Communications Protocol agreed by the Greater Norwich Development Partnership (GNDP) Board in 2017 (updated 2019). Cllr Shaun Vincent as chair of the GNDP will be the nominated spokesperson for all media. All media responses will be co-ordinated by the Broadland and South Norfolk Joint Marketing and Communications team as communications lead for the project, in liaison with other partners.
48. The GNLP has been prepared with regard to the Public Sector Equality Duty as defined by the Equality Act 2010 and this consultation represents a further positive step in meeting the Public Sector Equality Duty. Gypsies and Travellers are a key ethnic minority in the area and making specific site allocations in the plan to meet ethnic need, potentially in tandem with other sources of delivery, would give added assurance that their housing needs are being addressed in line with current requirements.
49. Following the close of the consultation on 13<sup>th</sup> March the GNLP team will process and analyse the responses received and finalise the preferred site allocations for consideration at Cabinets in June. The new council administrations formed after the May elections will need to take the decision on submitting the Gypsy and Traveller sites into the GNLP process. If this is agreed the finalised sites information and representations will be provided to the inspectors for their consideration. Hearing sessions and possible modifications to the plan will follow.
50. The main modifications are expected to be consulted on in Autumn 2023 allowing the Inspectors to produce their report on the plan before the end of 2023 and adoption to take place early in 2024.

## Written statement

51. A [written statement](#) from the Secretary of State Michael Gove was published on 6<sup>th</sup> December 2022. A supporting letter was also sent to local planning authorities. The written statement sets out further changes to the planning system alongside the Levelling Up and Regeneration Bill which aim to “*place local communities at the heart of the planning system*”. It contains a number of commitments to consultation and a small number of clear policy statements.
52. For the Greater Norwich authorities, the main impact is likely to be on how 5-year land supply will be calculated in the future. A key statement is that “*We will end the obligation on local authorities to maintain a rolling five-year supply of land for housing where their plans are up-to-date*”. This means that progressing the GNLP to adoption will result in 5-year land supply requirements not applying in the area for an as yet undefined period.
53. Other measures to “*give local communities a greater say in what is built in their neighbourhood*” remain to be clarified through consultation. In general, future changes to calculating housing numbers are most likely to impact on heavily constrained local planning authorities, for example those with green belts, which are at earlier stages of plan-making. As Greater Norwich has a submitted plan, these changes are less likely to have an impact on its examination.

## Consultation papers

54. The documents to support the GNLP Gypsy and Traveller Focused Consultation are the:
- Site Policies document (the main consultation document -see Appendix C linked below)
  - Site Assessment Information document (Appendix D linked below).
  - Sustainability Appraisal of the Greater Norwich Local Plan Gypsy and Traveller Sites and Policies by Lepus Consulting (Appendix E linked below)
  - Habitats Regulations Assessment of published Proposed Submission Greater Norwich Local Plan – Gypsy and Traveller Sites Addendum by The Landscape Partnership (Appendix F linked below).
  - A review of new and carried forward residential, employment and mixed-use allocations which concludes that none of the allocations in the GNLP have the potential to accommodate pitches for Gypsies and Travellers (see Appendix G linked below).
55. Other documents that are part of the GNLP’s examination evidence library which relate to Gypsies and Travellers are:
- [B8.1](#) Caravans and Houseboats Study, October 2017, RRR Consultancy Ltd
  - [B8.2](#) Gypsy and Travellers Addendum, January 2021, RRR Consultancy Ltd
  - [B8.3](#) Greater Norwich Gypsy & Traveller Accommodation Assessment Draft Report, June 2022, RRR Consultancy Ltd

- [D3.6](#) Topic Paper - Policy 5 Homes, September 2021
- [D3.7](#) Topic Paper - Policy 5 Homes - Appendices A to D, September 2021
- [D5.4](#) Inspectors' Matters Issues and Questions (Part 1) - GNLP letter on Matter 6 (Homes) Issue 3: Gypsies and Travellers, Travelling Showpeople and Residential Caravans, 4th January 2022
- [D5.4A](#) Inspectors' response letter regarding sites for Gypsies and Travellers, 19<sup>th</sup> January 2022
- [D5.4B](#) A letter from the partnership explaining the position following the July Cabinet, 26<sup>th</sup> July 2022.
- [D5.4C](#) The inspectors' response to the partnership letter of 26<sup>th</sup> July, 9<sup>th</sup> August 2022.
- [D5.4D](#) A letter from the partnership in response to the inspectors' letter of 9<sup>th</sup> August, 2<sup>nd</sup> September 2022.
- [D5.4E](#) The inspectors' response to the partnership letter of 2<sup>nd</sup> September, 14<sup>th</sup> October 2022.
- [D5.4F](#) A letter from the partnership in response to the inspectors' letter of 14<sup>th</sup> October, 17<sup>th</sup> October 2022.
- [D5.4G](#) a letter from the inspectors sent on 11<sup>th</sup> November.
- [D5.4H](#) partnership response to the above letter.

## **Consultation**

56. Should the recommendation be approved by all three Council's full public consultation will be undertaken on the sites proposed.

## **Implications**

### **Financial and resources**

57. 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.
58. There are no proposals in this report that would reduce or increase resources. The focused consultation will be undertaken within the current GNLP officer resource and covered by the existing GNLP budget.

## **Legal**

59. The consultation is required to ensure a sound plan and consequently relates to the regulatory framework associated with plan making. Statutory requirements for Sustainability Appraisal and Habitats Regulations Assessment are also part of this focused consultation.

## Statutory considerations

Consideration	Details of any implications and proposed measures to address:
Equality and diversity	The GNLP has been prepared with regard to the Public Sector Equality Duty, as defined by the Equality Act 2010. This consultation represents a positive step in meeting the Public Sector Equality duty. The recent court decision on meeting needs should be taken into account in decision making.
Health, social and economic impact	The report has no direct health, social and economic impacts but will have positive impacts in the longer term by enabling the allocation of accommodation for Gypsies and Travellers to meet need.
Crime and disorder	The report does not have any direct implications for the council's crime and disorder considerations and therefore no measures are proposed.
Children and adults safeguarding	There are no implications with regards to safeguarding and therefore no measures proposed.
Environmental impact	A Sustainability Appraisal and Habitat Regulations Assessment have been undertaken alongside the site assessment process to ensure that the environmental impacts of proposed site allocations are fully understood.

## Risk management

Risk	Consequence	Controls required
Failure to consult on, and enable the allocation of, sufficient sites for Gypsy and Traveller accommodation carries a significant risk that the GNLP will be found unsound.	Delays to the examination process and potentially leading to the plan being found unsound, and the possibility of a public sector equality duty challenge.	Identification of sites will assist in ensuring the soundness of the GNLP to support future housing delivery

## Other options considered

60. If a focused consultation is not undertaken on potential allocation sites for Gypsies and Travellers it will prevent the inspectors from undertaking a subsequent consultation on the modifications. Such modifications are very likely to be necessary for the soundness of the GNLP. Therefore, choosing not to agree to undertake the proposed consultation carries a strong likelihood of the GNLP being found unsound. Officers do not consider that

there is evidence to justify this option as reasonable and therefore consider there are no other options to present.

### **Reasons for the decision/recommendation**

61. It is recommended that Cabinet gives approval for the Gypsy and Traveller Focused Consultation to go ahead as it forms an important part in the examination of the GNLP. Allocating sites for Gypsies and Travellers through the main modifications to the GNLP is needed both to address identified accommodation needs and to support a sound plan.

### **Appendices:**

Appendix A (attached): Summary of key considerations in relation to the sites

Appendix B (attached): Distribution Map of the favoured, reasonable alternative, contingency and unreasonable sites

Appendix C: [Site Policies document \(the main consultation document\)](#)

Appendix D: [Site Assessment Information document](#)

Appendix E: [Sustainability Appraisal of the Greater Norwich Local Plan Gypsy and Traveller Sites and Policies by Lepus Consulting](#)

Appendix F: [Habitats Regulations Assessment of published Proposed Submission Greater Norwich Local Plan – Gypsy and Traveller Sites Addendum by The Landscape Partnership](#)

Appendix G: [A review of new and carried forward residential, employment and mixed-use allocations which concludes that none of the allocations in the GNLP have the potential to accommodate pitches for Gypsies and Travellers](#)

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## **Appendix A: Summary of key considerations in relation to the sites**

### **Introduction**

15 potential sites for Gypsy and Traveller accommodation have been assessed in detail. Three of these were promoted through the public consultation for the South Norfolk Village Clusters Housing Allocations Plan (VCHAP), with the remainder resulting from proactive engagement over recent months as set out in this report.

The sites have been categorised into four tables in this appendix as follows:

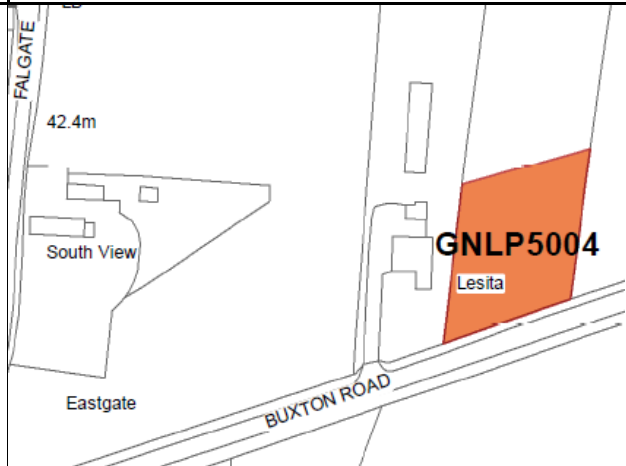

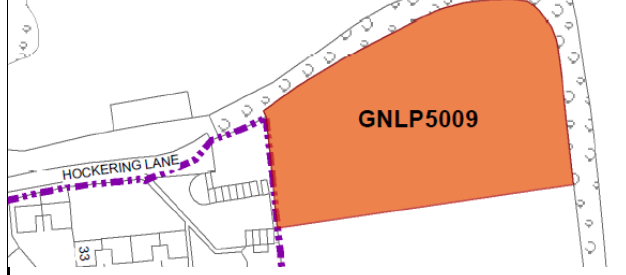
- Table 1: Favoured Sites
- Table 2: Reasonable Alternative
- Table 3: Proposed change to Contingency Site
- Table 4: Unreasonable Sites

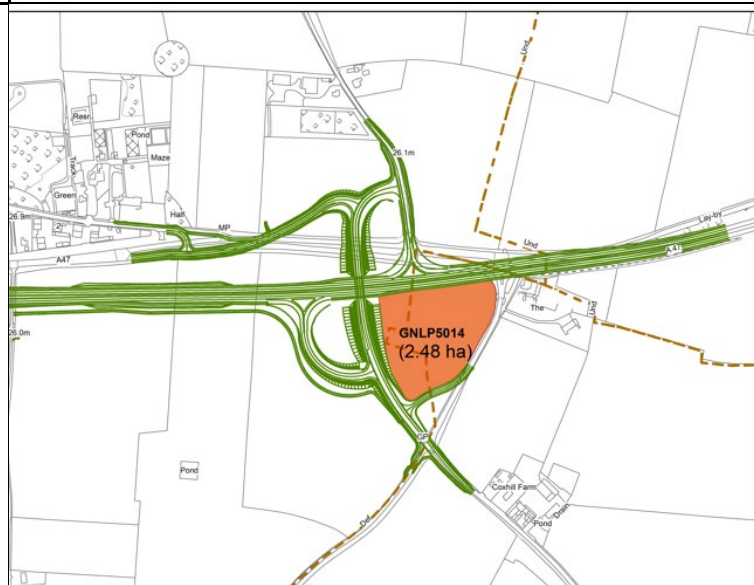
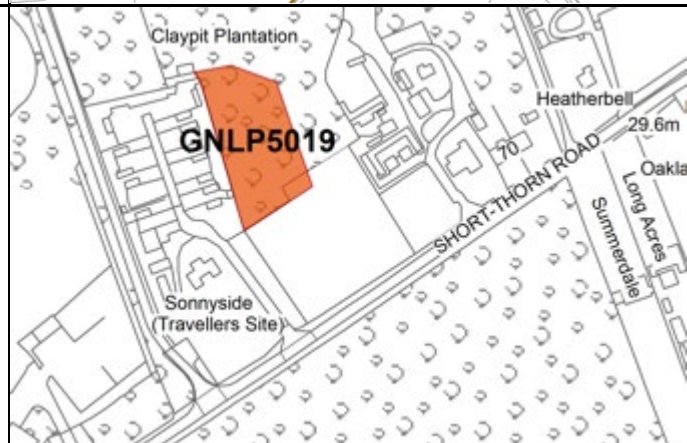

Brief details are given for each site, along with a summary of deliverability conclusions. This assessment is based on and supported by the Site Assessment Information document (see Appendix D below).

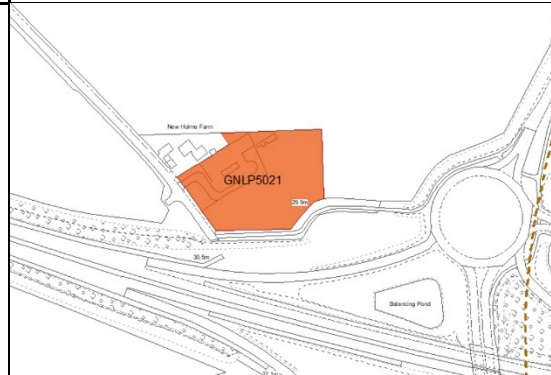
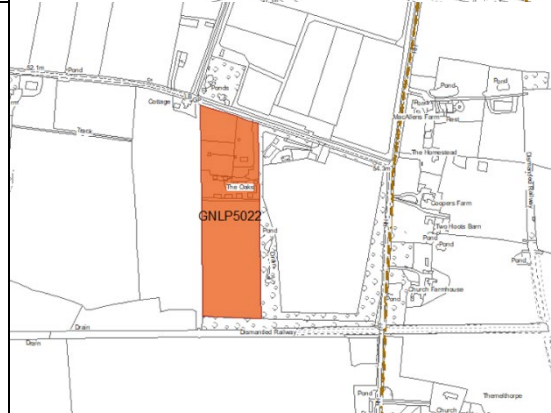
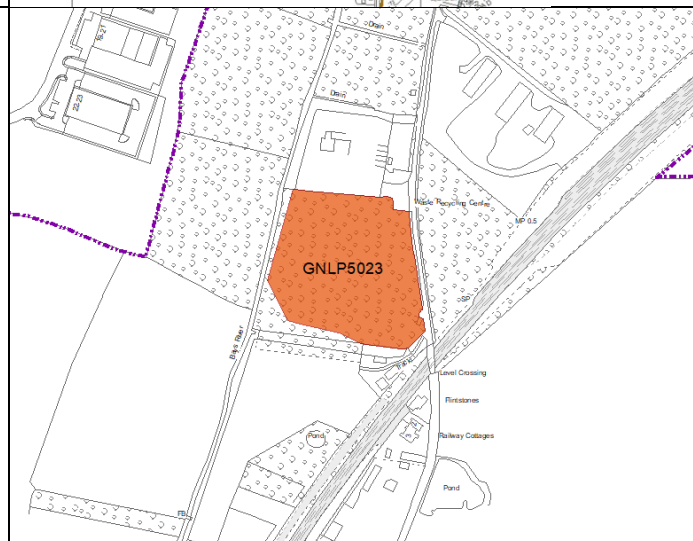




**Table 1: Favoured Sites**

Site Reference	Site Address	Estimate of Pitches	Timeframe for Delivery	Opportunities and Constraints	Site Maps
GNLP5004	Land off Buxton Road, Eastgate, Cawston BROADLAND	4	3-5 years	The private landowner has sold land for a Gypsy and Traveller site in the past and is content to promote this site for Gypsies and Travellers, having previously had an appeal for a residential property on the site refused. The site is somewhat remote from services and facilities, but development could take place here within 3-5 years.	
GNLP5005	Land at Strayground Lane, Wymondham Recycling Centre SOUTH NORFOLK	2	6-10 years	Norfolk County Council intend to relocate the recycling centre and are willing to sell it as a Gypsy and Traveller site. However, the site will not be available prior to 2027. Development would be subject to investigations about possible contamination.	
GNLP5009	Land off Hockering Lane, Bawburgh SOUTH NORFOLK	6	3-5 years	The private landowner has sold land for a Gypsy and Traveller site in the past and is content to promote this site for Gypsies and Travellers. There is a Cadent gas pipeline that runs north to south through the western part of the site and this is likely to dictate that the majority of pitches would be positioned towards the middle or eastern part of the site. Other considerations are the possible landscape impacts on the River Yare, and, to a lesser extent, nearby heritage assets and the Bawburgh Conservation Area. Nevertheless, there is development potential here and a scheme could come forward in 3-5 years.	

Site Reference	Site Address	Estimate of Pitches	Timeframe for Delivery	Opportunities and Constraints	Site Maps
GNLP5014	A47 North Burlingham Junction BROADLAND	15	3-5 years	The A47 improvements will sub-divide neighbouring land and reduce its agricultural potential. They will also create new vehicular accesses. Site GNLP5014 is a 2.48 ha broad location for development with the opportunity to provide 15 pitches on 1 ha of this land and landscaping to mitigate noise from the A47 and visual impacts on the surrounding landscape. While the site is somewhat remote from services and timescales are dependent on the trunk road scheme, delivery is anticipated in years 1 to 5.	
GNLP5019	Land at Shortthorn Road, Stratton Strawless BROADLAND	4	1-3 years	This site currently comprises 9 pitches and a community building. The proposal is to submit a revised scheme for 8 pitches on an area of land that has been granted permission for 4 pitches. The proposal would expand the site to a total of 17 pitches. While somewhat remote from services, this is an existing Gypsy and Traveller site which the owners would be likely to progress quickly.	
GNLP5020	Romany Meadow, The Turnpike, Carleton Rode SOUTH NORFOLK	6	1-3 years	This site currently comprises 6 pitches and the proposal is to expand on adjacent land to provide up to an additional 6 pitches. While somewhat remote from services, this is an existing Gypsy and Traveller site on which additional pitches could come forward quickly. If approved, the Romany Meadow site would grow to a total of 12 pitches.	

Site Reference	Site Address	Estimate of Pitches	Timeframe for Delivery	Opportunities and Constraints	Site Maps
GNLP5021	Land at the Old Produce Shop, Holt Road, Horsford BROADLAND	6	1-3 years	This site currently comprises 1 pitch and the proposal is to expand it by 6 pitches within the current curtilage of the site. The land was previously a shop selling fruit and vegetables but has been a private Gypsy and Traveller site for nearly 10 years. The owner would be likely to progress this proposal quickly and if approved the site would grow to a total of 7 pitches.	
GNLP5022	Land at the Oaks, south-east of Letter Box Cottage, Reepham Road, Foulsham BROADLAND	5	1-3 years	This site currently has 2 pitches and Broadland District Council is discussing regularising all the development on the site with the landowner. The landowner wants to expand the site by 5 pitches, bringing the total number of pitches to 7. Development would need to be in the northern part of the site, as a gas pipeline runs east to west below the central part of the site. While somewhat remote from services and located next to rural roads, this is an existing Gypsy and Traveller site on which additional pitches could come forward quickly over the next 1-3 years.	
GNLP5023	Land off Strayground Lane, Wymondham SOUTH NORFOLK	10	5-10 years	The private landowner has stated that the land is available immediately and is willing to sell it as a private or publicly funded Gypsy and Traveller site. Investigations for possible contamination and ground stability will be required as part of the land was previously used as a landfill site. 10 pitches is considered to be appropriate given the highway constraints posed by the narrowness of Strayground Lane and Whartons Lane and delivery would be likely to need to be delayed until after the waste and recycling centre has closed.	


Site Reference	Site Address	Estimate of Pitches	Timeframe for Delivery	Opportunities and Constraints	Site Maps
GNLP5024	Land off Upgate Street, Carleton Rode SOUTH NORFOLK	4	1-3 years	This site currently comprises 2 pitches and the proposal is to expand within the current curtilage of the site by 4 pitches to grow the site to a total of 6 pitches. While somewhat remote from services and located next to rural roads with a bend nearby which will require further investigation and potentially mitigation, this is an existing Gypsy and Traveller site on which additional pitches could come forward quickly.	 <p>The site map shows a plot of land highlighted in orange, labeled 'GNLP5024'. It is situated off 'Upgate Street' and adjacent to 'Carleton Rode'. The map includes a dashed line indicating a boundary or proposed expansion area, and a small inset map shows the location within a larger regional context.</p>

Table 2: Reasonable Alternative


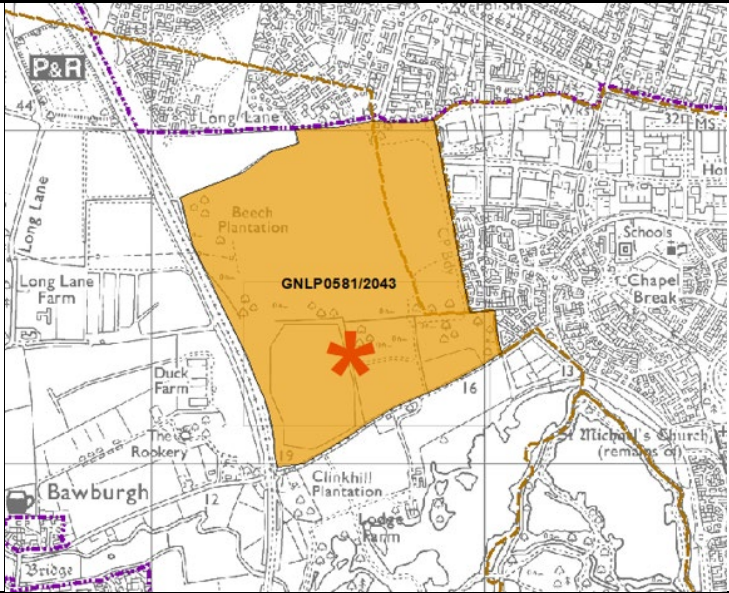
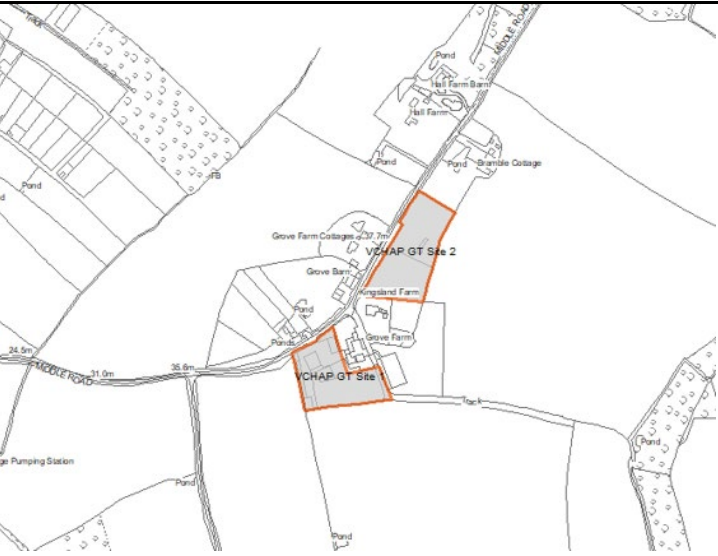
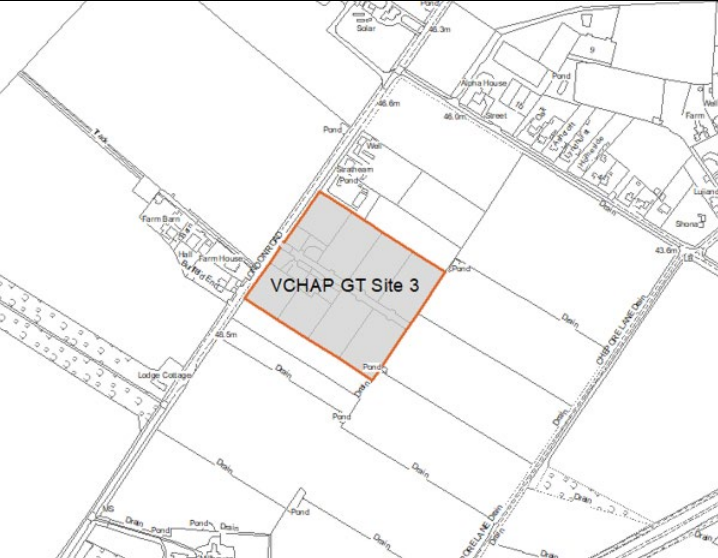
Site Reference	Site Address	Estimate of Pitches	Timeframe for Delivery	Opportunities and Constraints	Site Plan
GNLP5013	Land at Ketteringham Depot SOUTH NORFOLK	10	5-10 years	This 0.7 ha brownfield site is owned by South Norfolk District Council. It is currently used as a depot which is expected to be relocated and a Gypsy and Traveller site could be delivered over the next 5 to 10 year period. Site constraints include possible contamination, the compatibility of neighbouring uses and the distance to local services in Hethersett via a necessarily indirect route as it is not practicable to cross the A11 to the north of the site.	



Table 3: Proposed change to Contingency Site

Site Reference	Site Address	Estimate of Pitches	Timeframe for Delivery	Opportunities and Constraints	Site Plan
GNLP5007R	Land off Bawburgh Lane, north of New Road and east of the A47 (Costessey Contingency Site) SOUTH NORFOLK	18	4-6 years	<p>A large site in Costessey is identified as a contingency site for housing in the submitted GNLP. The role of the contingency site has been discussed at the examination. The inspectors' conclusions on this have not yet been released.</p> <p>Subject to agreement from the landowners, the southern portion of the site is identified as a potential broad contingency location for a Gypsy and Traveller site (denoted by a star on the map to the right). To ensure good planning, the need for a Gypsy and Traveller site at this broad location would need to be evidenced if and when the wider contingency site for housing is brought forward for development.</p>	 A detailed map of the site area in Costessey, South Norfolk. The map shows the proposed contingency site for housing, which is a large orange-shaded area labeled 'GNLP0581/2043'. A red star is marked on the southern portion of this site, indicating a potential broad contingency location for a Gypsy and Traveller site. The map also shows surrounding features such as Bawburgh Lane, New Road, the A47, and various local landmarks including Long Lane Farm, Duck Farm, The Rookery, Clinkhill Plantation, and Michael's Church (remains of). A 'P&R' (Park and Ride) area is also indicated near the top left of the site.

### Table 4: Unreasonable Sites

Site Reference	Site Address	Estimate of Pitches	Timeframe for Delivery	Opportunities and Constraints	Site Plan
VCHAP GT Site 1 VCHAP GT Site 2	Sites at Denton, Middle Road SOUTH NORFOLK	n/a	n/a	Planning constraints relate to the highway implications for Middle Road, the distance to facilities and the impact on the setting of adjacent listed buildings. These issues were cited in planning applications that were refused and appeals that were dismissed in 2004 and 2006 and continue to apply.	
VCHAP GT Site 3	Land off London Road, Sutton, Wymondham SOUTH NORFOLK	8	n/a	Planning constraints are accessibility to local services and facilities, as well as impacts on landscapes and heritage assets. These issues were tested at a dismissed appeal in 2021. The site is known as Hollyoaks and the planning reference is 20190330.	



Appendix B - Distribution Map of the favoured, reasonable alternative, contingency and unreasonable sites.

