

Greater Norwich Partnership letter to the Inspectors on Gypsy and Traveller Accommodation in the Greater Norwich Local Plan

25th July 2022

By Email

Dear Inspectors,

We discussed the draft timetable for a focussed consultation on Greater Norwich Local Plan (GNLP) Gypsy and Traveller site allocations at our administration meeting on 6th July 2022. This consultation was anticipated to take place from 25th July to September 7th 2022.

Unfortunately, the Partnership does not find itself in a unanimous position in regard to the proposed consultation on Gypsy and Traveller Site Allocations.

Norwich City Council cabinet supported undertaking the consultation at its meeting on July 6th.

South Norfolk did not do so at its meeting on July 11th. As a result, Broadland District Council did not take the matter to their cabinet meeting.

Since decisions on the GNLP must be unanimous, this means that a focussed consultation on Gypsy and Traveller sites cannot take place as anticipated above.

South Norfolk Council's position

South Norfolk's cabinet recommended that the GNLP should not include site allocations for Gypsies and Travellers, but that a separate and dedicated plan should be produced which allocates such sites. The aim of this is to allow sites to be subject to wider consultation and scrutiny, including allowing more sites to be submitted for consideration through a dedicated plan.

This conclusion was based largely on concerns over the potential for delivery of the Costessey contingency site. This submitted GNLP contingency housing site was to be proposed through the focussed consultation to include a Gypsy and Traveller site to provide 18 pitches. This would have constituted the great majority of the 5-year land supply total of 10 pitches between April 2022 and March 2027 and the 8 pitches over years 6 to 10 from April 2027 to March 2032 identified as the need through the updated Gypsy and Traveller Accommodation Assessment (GTAA document [B8.3](#)).

A significant number of concerns were expressed at the South Norfolk cabinet that the Gypsy and Traveller element of the site might not be able to be delivered in the near future to meet 5-year land supply needs due to the need for supporting infrastructure, particularly to access the site. It was felt to be particularly unacceptable to make the proposal for 18 pitches wholly conditional on an additional 800 homes being allocated from the contingency site.

South Norfolk members also consider that a complete dependency on the Gypsy and Traveller consultation for about 20 pitches had somehow developed upon the otherwise acceptability of the rest of the plan for 50,000 homes and 30,000 jobs and to them this approach was unreasonable.

Work done to date

As you are aware, no sites for Gypsy and Traveller accommodation were submitted through the formal plan-making process, but the Partnership has continued to make progress since submission of the GNLP. An example of this is the completion of the above-mentioned updated GTAA. This shows a supply of 129 permanent pitches across Greater Norwich, and importantly that the stock of pitches has continued to expand and receive investment.

Since the GNLP was submitted in July 2021, planning permission has been granted for 4 additional pitches, and over the period April 2017 to March 2022 a total of 7 pitches were completed on windfall sites. Public sector investment in Gypsy and Traveller accommodation also continues, as is demonstrated by the improvements being made to the Swanton Road site in Norwich which is anticipated to grow to 34 pitches. Here 13 new pitches have been substantially completed and the outcome of a £690,000 bid to the Government's Traveller Site Fund to remodel the existing pitches is anticipated in late September.

Future options

As an alternative to the allocation of sites for Gypsies and Travellers within the GNLP, it is possible that a main modification to policy 5 could provide a policy commitment to meeting the Gypsy and Traveller pitch need with allocations subsequently made through a dedicated Gypsy and Traveller Site Allocation Development Plan Document (GTSA DPD). However, it should be noted that there is no formal agreement from each of the Local Authorities to participate in the production of such a document, nor to making the main modification as described below.

This approach would allow a new call for sites to be undertaken. This would include proactive work with the Gypsy and Traveller community, other landowners and a further review of publicly owned sites to provide greater certainty that the needs identified in the Greater Norwich GTAA ([B8.3](#)) can be met, particularly in the first 5 years. The resulting allocations would provide for further pitch delivery in addition to those from recently permitted and potential future windfall sites.

A call for sites could progress in October 2022 if the conclusion of a September Gypsy and Traveller Accommodation hearing is that production of a separate DPD is appropriate. The proposed modification to GNLP policy 5 for publication in the main modifications consultation in November would follow commencement of the call for sites. Thus, a main modification to policy 5 could reference commencement of the GTSA DPD (assuming agreement is reached within the Partnership to produce it) and commit the Partnership to tightly defined timescales for plan production as set out in this possible additional policy and text:

The councils have commenced a Gypsy and Traveller Site Allocation Development Plan Document (GTSA DPD). This will identify a supply of specific, deliverable sites to meet the identified needs for Gypsies and Travellers. The GTSA DPD will be submitted within 12 months of the adoption of this plan.

If this approach is taken forward, the following revised supporting text to policy 5 would then replace paragraph 279 of the submitted GNLP ([A1](#)).

In June 2022, a new Gypsy and Traveller Accommodation Assessment (GTAA) found that 29 pitches are required in Greater Norwich over the period April 2022 to March 2038 for Gypsies and Travellers that meet the Planning Policy for Traveller Sites (PPTS) planning definition. This is in addition to sites already planned for, such as the expansion of the Swanton Road site in Norwich.

To address the findings of the GTAA, the Greater Norwich authorities are committed to producing a Gypsy and Traveller Development Plan Document (GTSA DPD) to allocate specific sites to fulfil the obligations set by the PPTS. In the meantime, the authorities are working with the Gypsy and Traveller community to identify new sites or existing sites that can be expanded so that pitches can also be brought forward as planning applications.

For households of Gypsy and Traveller heritage that do not meet the PPTS planning definition because they have ceased to travel, the GTAA identified a need for 21 pitches up to March 2038. Planning applications for Gypsy and Traveller pitches, including for applicants whose circumstances mean they have ceased to travel, will be considered against the criteria in Policy 5. The criteria in policy 5 will also apply when considering planning applications for Gypsy and Traveller transit sites, plots for Travelling Show People, and sites for other residential caravans.

The proposed approach would allow the GNLP, an important joint plan including very significant homes and jobs delivery which will contribute to sustainable growth in one of the fastest growing sub-regions nationally, to be adopted early in 2023.

At the same time, the Gypsy and Traveller Site Allocation Development Plan Document **may** allow provision for the accommodation needs of the Gypsy and Traveller community to be met by ensuring that sufficient sites and pitches can be considered in greater detail and then allocated to closely defined timescales.

As stated already, with no unanimity in the partnership Councils we find ourselves in a difficult situation and we would welcome your earliest response on this important issue.

Regards,

Mike Burrell,

Greater Norwich Planning Policy Team Manager.