

Greater Norwich Local Plan Examination

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Mike Burrell

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Greater Norwich Local Plan Partnership

9 August 2022

Dear Mr Burrell,

Greater Norwich Local Plan – Gypsy and Traveller site allocations

1. We are writing in response to your letter of 25 July setting out the position of the Greater Norwich Partnership in respect of Gypsy and Traveller site allocations.
2. The submitted Local Plan did not include site allocations for Gypsies and Travellers but the Partnership had recognised that this was something on which further work was required. In this regard, the GNDP Board meeting of 24 June 2021 heard that the examination could be very challenging without proposed allocations for Gypsy and Traveller sites.
3. Following the publication of our Matters, Issues and Questions in December, the Partnership informed us that it had undertaken further work, wished to consult on potential Gypsy and Traveller sites and sought our advice as how this should be undertaken. We responded on 19 January 2022.
4. The Partnership's hearing statement for Matter 6 Question 3 stated that the Partnership recognised that there was likely to be a need for pitch provision through allocations, having regard to Planning Policy for Traveller Sites 2015 (PPTS).
5. This was not discussed in detail at the hearing sessions, as the Partnership had already outlined the approach it intended to take.

6. We accepted that this approach, put forward by the Partnership and not us, would be an appropriate approach in order to achieve the plan's soundness. We outlined that we expected that we would resume the respective hearing session once the consultation process had been undertaken. We were assured on the process and timescale. We were assured again at our admin session on 6 July.
7. We are now one year on from the submission of the Plan.
8. The PPTS states that Local Plans should set out a supply of specific deliverable sites sufficient to provide 5 years worth of sites against their locally set targets, and identify a supply of specific deliverable sites, or broad locations for growth, for years 6 to 10 and where possible for years 11-15. According to your letter, the sites that you have identified would meet that requirement for the first 10 years of the plan period. You have told us that the sites that you had recommended to be proposed have been based upon a very thorough assessment of potential sites over the last year.
9. We do not wish to comment on the merits of individual sites but the information in the letter that the Costessey site might not be able to be delivered in the near future (to meet 5 year land supply) is at odds with the information given to us by the Partnership in its hearing statement (Matter 9, Issue 4 Q4) and with the written and verbal evidence submitted to the examination by the site promoter. It also conflicts with the signed Statement of Common Ground of 24 February between the four local authorities and Terra Strategic (D2.62).
10. The option of bringing forward a dedicated Development Plan Document to allocate sites for Gypsies and Travellers does not seem to be one that would necessarily lead to early delivery of sites given that it would not be likely to be submitted for examination until 2024.
11. This route may also reduce the scope for potential sites, as the Local Plan would have been adopted and the option for mixed uses as part of larger site allocations will have been closed off. In this regard, any subsequent DPD would need to be consistent with the adopted development plan as required by Regulation 8(4) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

12. Mindful of our obligations under the Public Sector Equality Duty in respect of the examination of the Plan, we are also not persuaded that there are good reasons to treat Gypsies and Travellers differently from the settled community in not allocating sites for housing for this group of people in the plan.
13. In any case, the letter states that the DPD approach has not been agreed by all the local authorities of the Partnership and refers to there being no unanimity within the Partnership on this issue.
14. In the light of the above, we are currently of the view that the best way forward to achieving a sound plan and to help ensure the allocation and subsequent delivery of sites to meet identified need for the 5 and 10 year period is through proposed modifications to the Greater Norwich Local Plan. In the hearing sessions, the Partnership sought to assure us that this was the appropriate approach and to date we have heard no reasonable planning or technical grounds to justify a departure from it.

We look forward to hearing from you.

Mike Worden and Thomas Hatfield

INSPECTORS