

2<sup>nd</sup> September 2022

By email

Dear Inspectors,

### **Greater Norwich Local Plan – Gypsy and Traveller site allocations**

Further to your letter of 9<sup>th</sup> August, I am writing to explain the Partnership's proposed route forward on the above issue.

There were differing views within the Partnership as to whether site allocations should be included within the emerging local plan. In essence, the different views stemmed from a difference of opinion as to the robustness of the site search which has been undertaken and whether the site selection process allowed for adequately informed public consultation.

However, following discussions, the Partnership has now agreed a process which it considers will enable these concerns to be addressed. The process will allow sites which have the clear endorsement of the partner authorities to be advanced by way of proposed Main Modifications, subject to you being satisfied that their inclusion would be sound.

This approach is in accordance with paragraphs 9.1 – 9.4 of the Procedure Guide for Local Plan Examinations (available [here](#)) and would involve a partial pause in the examination of Gypsy and Traveller matters. This would allow the local authorities to do further work to identify sites to meet identified needs in the autumn. The detailed scope for such work is set out in appendix A.

Following the completion of this additional technical work, the local authorities propose publishing a potentially increased range of sites for public consultation. This consultation would be equivalent to that which would be conducted under regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. It would include all Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) work necessary to support potential allocations. The absence of this consultation having been undertaken to date is a key concern of the Members of the Partner authorities.

The outcome of the consultation would then be reported back to the local authorities to allow the decisions to be taken about which of the sites that have been consulted on will be identified as proposed site for inclusion within the plan by way of modifications.

Following the completion of this process, the examination of proposals for Gypsy and Traveller site provision could recommence. Our suggested detailed timetable for this work is set out in appendix B.

Whilst this increases the time to adoption of the plan from that which would be delivered if the Partnership reverted to its previous approach, the overall impact on timetable is minimal. This is due to it allowing work on other housing sites and

nutrient neutrality issues to continue to be examined whilst the technical work on Gypsy and Traveller sites is being done. The extent of SA and HRA work that needs to be done on the Gypsy and Traveller sites is considered likely to be much less, so the gap between examination sessions and main modifications consultation is reduced accordingly.

Following the resolutions the councils made to submit the plan and give the appointed Inspectors the authority to make modifications necessary to ensure the plan can be found sound, the Partnership is aware that it needs your consent to proceed in the manner that is proposed.

We hope this response provides a clear explanation of the issues which have been raised by the initially proposed approach. We also hope that it provides a clear solution to those issues and one which has a very limited impact on the examination timetable.

The Partnership hopes that you will see the merit of its proposed way forward and that you can approve it as being appropriate so that we can swiftly proceed in the manner proposed. If you require any further information, please do not hesitate to contact us.

Regards,

Mike Burrell,

Greater Norwich Planning Policy Team Manager.

# Appendix A - Brief for Gypsy and Traveller Site Identification and Assessment

## Introduction

1. This paper provides an overview of the detailed and urgent work that Partnership propose to undertake to identify Gypsy and Traveller sites for inclusion in the Greater Norwich Local Plan (GNLP).
2. The paper covers identifying sites for assessment and the criteria against which sites will be assessed.
3. Appendix B provides a potential timetable setting out key milestones and timings for the work and decision-making stages on Gypsy and Traveller site identification. It also provides a potential timetable for the proposed process for completing GNLP work on nutrient neutrality and the housing trajectory to enable main modifications on the remainder of the plan to be consulted on.
4. If the scope and timescales for the work are acceptable to the Inspectors, the Partnership will provide sufficient resources to ensure the timetable is met.
5. The Greater Norwich Gypsy and Traveller Accommodation Assessment Report (GTAA) produced by RRR Consultancy was published in June 2022 (examination document [B8.3](#)). It provides up to date evidence on the needs to be addressed. It is not proposed to update this evidence.

## Identifying Sites for Assessment

6. Officers will seek to identify a greater range of possible sites for allocation than have previously been identified, including sites which can be brought forward within the next 5 years. A further aim is to identify a sufficient range of sites to allow for choice and a geographical spread over the area.
7. The proposed process includes reassessing the potential of all sites previously considered and the following work to identify further sites:
  - a) engagement with the local Gypsy and Traveller community through RRR Consultancy Ltd who worked closely with the community in preparing the recent GTAA to identify any possible new sites the community are aware of and where existing sites may have the possibility of expansion;
  - b) engagement with housing authorities and registered providers to revisit any sites they may have an interest in and understand their appetite for acquiring further sites to enable provision;
  - c) working with One Public Estate to identify whether any sites currently in public ownership may be available for development and suitable for allocation;
  - d) systematic reconsideration of proposed new allocations in the plan to consider whether they have the potential to provide further sites;

e) direct engagement with other landowners and the development industry to identify additional sites that may have only recently become available.

## **Assessment Criteria**

8. The Norfolk-wide Housing and Economic Land Availability Assessment (HELAA) has been the starting point for assessing all development proposals in the GNLP. This has been adapted to include criteria specific to the needs of Gypsy and Traveller communities including access, landscaping, acoustic screening and proximity to the main road network. Sites will be assessed based on a Red/Amber/Green rating, supported by accompanying commentary. The criteria are:

### **Assessment Criteria for Gypsy and Traveller Sites**

#### **Access to the Site**

The site should have suitable access allowing for the manoeuvring of trailers and caravans.

#### **Accessibility to Local Services and Facilities**

The site should be within easy travelling distance of schools, services and shops, preferably by foot, cycle or public transport.

#### **Accessibility to Roads**

The site should have good access to the main 'A' and 'B' class road network.

#### **Biodiversity, Geodiversity and Open Space**

The site should minimise adverse impact on locally, nationally and internationally designated sites and defined green spaces.

#### **Contamination and Ground Stability**

The site should be reasonably level and have no constraints from activities such as historic mineral working, landfill, quarrying or tunnelling that cannot be mitigated.

#### **Flood Risk**

The site should be substantially in Flood Zone 1. Any parts of the site susceptible to flood risk (including surface water flood risk) should be minimal and should not be required for the standing of caravans, dayrooms, or utility blocks.

#### **Landscapes, Townscape and Heritage Assets**

The position of the site should minimise any adverse impact on protected and sensitive landscapes, townscapes and heritage assets.

#### **Market Attractiveness**

- There should be a willing landowner prepared to bring forward the site;
- The site should be an attractive location for the travelling community to live in;
- The site should contribute to an overall mix of sites across Greater Norwich that offers choice.

**Scale and Neighbouring Communities**

The scale of the site should be in keeping with its surroundings and should minimise the impact on neighbouring communities, providing at least 1 pitch and up to approximately 15 pitches. It should also be large enough to allow for on-site landscaping and screening (such as acoustic fencing if required), pitches, ancillary buildings and open space to be provided.

**Utilities**

Connections to the electricity and water supply should be available and there should be no impact from utilities infrastructure passing through the site which cannot be mitigated.

## Appendix B - Greater Norwich Local Plan key milestones

Note that the timetable is provisional subject to agreement with Inspectors and proposes some specific dates in order to achieve deadlines.

Greater Norwich local elections: pre-election period end March to 4 May 2023

FOCUSSED CONSULTATION ON SITES FOR GYPSY AND TRAVELLER ACCOMMODATION		GNLP MAIN MODIFICATIONS CONSULTATION (EXCLUDING GYPSY AND TRAVELLER SITES)	
Tasks	Dates	Tasks	Dates
Identify and map sites for consideration	By mid Oct. 22	Additional hearings – Matter 15 Housing and Nutrient Neutrality	
SA and HRA of sites	Mid – end Oct. 22	<i>Provide to Inspectors and publish all details for Matter 15 and Nutrient Neutrality hearings</i>	w/c 12/09/22
Internal consultees' review of sites (Highways, Education, LLFA, DM)	Mid – end Oct. 22	<i>MIQs received from Inspectors and published</i>	w/c 26/09/22
Complete and document site assessments and policies including internal review	Early – mid Nov.	<i>MIQs responses submitted/published (Partnership's and others')</i>	w/c 10/10/22
SA and HRA of policies	Mid Nov. – early Dec.	Hearing sessions – Matter 15 and Nutrient Neutrality	w/c 17/10 or 31/10
Review Equality Impact Assessment	Mid Nov. – early Dec.	Inspectors and partnership finalise main modifications and policy map changes etc. for consultation	End Nov.
Cabinet approval to consult Broadland Cabinet – 10/01 South Norfolk Cabinet – 09/01 Norwich Cabinet – 18/01 (Committee papers mid-December)	By 18/01/23	SA and HRA of main modifications	By early Jan. 23

Prepare consultation system	End Nov. – mid Jan 23	Prepare consultation system	End Nov. – mid Jan 23
		<i>Main modifications consultation</i>	<i>30/01 – 13/03/23</i>
<i>Focussed consultation on Gypsy and Traveller sites and associated evidence</i>	<i>30/01 – 13/03/23</i>	Complete processing of representations and pass to Inspectors.	By end-March 23
Complete processing of consultation responses	By early-April		
Analyse responses and finalise proposed sites – post-consultation review of representations including SA and HRA	By early May		
Cabinets agree final sites (Committee papers mid-May)	By early June (dates tbc)		
Provide finalised sites information and representations to Inspectors and publish	By 16 June		
MIQs received from Inspectors	26 June		
MIQ responses submitted/published (Partnership's and others')	5 July		
Inspectors' hearing session - Matter 6, Issue 3 – Gypsy and Traveller accommodation	w/c 10 July		
Post-hearing agree main modifications on Gypsy and Traveller accommodation	By 21 July		
<b>Main modifications consultation on Gypsy and Traveller sites</b>	<b>July - September</b>		
Finalise processing of representations and send to Inspectors	Mid – end Sept.		
<b>Inspectors' report (tbc) – October – December 23</b>			
<b>Adoption (tbc) – early 2024</b>			