

17th October 2022

By email

Dear Inspectors,

Greater Norwich Local Plan – Gypsy and Traveller site allocations

Thank you for your letter of 12th October in response to our letter of 2nd September setting out a suggested way forward in relation to the Greater Norwich Local Plan (GNLP).

The Partnership is disappointed with your response to our suggestion of a partial pause to consider Gypsy and Traveller issues whilst continuing with examination of remaining parts of the plan.

In paragraph 3 you point out that the Partnership has been undertaking work to find Gypsy and Traveller sites for a year now and you have previously been assured that the process undertaken had been thorough. This is indeed the case, but notwithstanding the thoroughness of the work conducted, the outcome was the identification of possible sites that proved unacceptable to at least one of the Partnership's constituent councils. As the Partnership only functions on the basis of unanimity this creates a significant issue.

The timescale for this work was set out in our letter of 2nd September and is below:

FOCUSSED CONSULTATION ON SITES FOR GYPSY AND TRAVELLER ACCOMMODATION	
Tasks	Dates
Identify and map sites for consideration	By mid Oct. 22
SA and HRA of sites	Mid – end Oct. 22
Internal consultees' review of sites (Highways, Education, LLFA, DM)	Mid – end Oct. 22
Complete and document site assessments and policies including internal review	Early – mid Nov.
SA and HRA of policies	Mid Nov. – early Dec.
Review Equality Impact Assessment	Mid Nov. – early Dec.
Cabinet approval to consult Broadland Cabinet – 10/01 South Norfolk Cabinet – 09/01 Norwich Cabinet – 18/01 (Committee papers mid Dec.)	By 18/01/23
Prepare consultation system	End Nov. – mid Jan 23
<i>Focussed consultation on Gypsy and Traveller sites and associated evidence</i>	<i>30/01 – 13/03/23</i>
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 2023

We have been making good progress on this work in the weeks since we sent you the letter. However, we are not currently in a position to expedite this. The local councils all have elections in May 2023 and we believe the councils are not capable of formally agreeing a range of sites for Gypsies and Travellers for potential inclusion in the Local Plan until after these elections.

In paragraph 4 you set out your concern that our proposals “might actually cause confusion for members of the public and could restrict the potential of some allocated sites to be considered in whole or part as a Gypsy and Traveller site”. We understand this concern, but consider these risks to be overstated, capable of being managed and to be of a lesser order than the risks of not proceeding as we have suggested.

The issue needs to be put in some context. The GNLP is a strategic long-term plan which plans for the delivery of at least 40,500 homes over a 20-year period with the scope to deliver around 50,000 homes. It aims to deliver 33,000 new jobs over the same period, again with scope for many more, and brings forward allocations of 360 hectares of land for employment purposes. The evidence base of the GNLP, which is still to be examined, suggests the requirement to identify allocations or broad locations for 21 pitches for the next 10 years. It is highly likely that only a fraction of housing sites will be affected by the issues that you raise.

You also comment that in your “opinion, it would also not shorten the examination of the Plan as a whole or hasten the date by which the Plan could be adopted.” Respectfully we do not agree with this. In our letter of 2nd September, we set out a timetable for adoption with a pause for Gypsy and Traveller work only. This timetable showed adoption in early 2024.

As we cannot get the Gypsy and Traveller sites to you until June next year, we do not think it will be possible to examine the Gypsy and Traveller sites, the housing trajectory and nutrient neutrality issues prior to the summer break which we understand you require. However, we think that it may be possible to examine Gypsy and Traveller sites alone. This makes a considerable difference to when the plan could finally be adopted and of course seeks to minimise the risk of the evidence base becoming out of date or needing to re-examine matters that have already been considered.

A timetable that we consider would result from your preferred route, total suspension of the plan, is below:

Greater Norwich local plan timetable: with total suspension

Tasks	Dates
Focussed consultation on sites for Gypsy and Traveller accommodation	
Identify and map sites for consideration	By mid Oct. 22
SA and HRA of sites	Mid – end Oct. 22
Internal consultees’ review of sites (Highways, Education, LLFA, DM)	Mid – end Oct. 22

Complete and document site assessments and policies including internal review	Early – mid Nov.
SA and HRA of policies	Mid Nov. – early Dec.
Review Equality Impact Assessment	Mid Nov. – early Dec.
Cabinet approval to consult Broadland Cabinet – 10/01 South Norfolk Cabinet – 09/01 Norwich Cabinet – 18/01 (Committee papers mid Dec.)	By 18/01/23
Prepare consultation system	End Nov. – mid Jan. 23
<i>Focussed consultation on Gypsy and Traveller sites and associated evidence</i>	30 Jan. – 13 March 23
Complete processing of consultation responses	By early April 23
Analyse responses and finalise proposed sites – post-consultation review of representations including SA and HRA	By early May 23
Cabinets agree final sites (Committee papers mid-May)	By mid June 23
Hearings – Matter 6, Issue 3, Gypsy and Traveller accommodation; Nutrient Neutrality; Matter 15 – Housing	
Provide finalised G&T sites information and representations to Inspectors and info for Nutrient Neutrality and Matter 15 – Housing	Early September 23
MIQs received from Inspectors	Mid – end September 23
MIQ responses submitted/published (Partnership’s and others’)	End Sept. – early Oct. 23
Hearing sessions (Matter 6, Issue 3; Matter 15; Nutrient Neutrality)	Mid – end October 23
Main modifications	
Post-hearings finalise main modifications	By mid-December 23
Main modifications consultation	January – March 24
Finalise processing of representations and send to Inspectors	Mid-end March 24
Inspectors’ report (tbc) – March – May 24	
Adoption (tbc) – Spring/summer 2024	

As you will see this suggests that the earliest possible adoption will be Spring/Summer 2024. The Partnership considers this unnecessary and should be avoided if at all possible.

We respectfully request that further consideration is given to this issue and to whether a quicker timetable can be found. Even if you are not prepared to consider two separate main modification consultations, it would be very helpful if you could proceed with hearings on outstanding matters that are not directly affected by the issue of Gypsy and Traveller sites, possibly providing some interim note of findings following them to allow all outstanding matters requiring examination to be completed prior to summer next year.

Yours sincerely,

Mike Burrell

Greater Norwich Planning Policy Manager