

Gypsy and Traveller Site Assessment Information – New Sites June 2023

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Introduction

1. This document provides site assessment information for three additional sites recently submitted for consideration for allocation for Gypsy and Traveller accommodation through the Greater Norwich Local Plan (GNLP). These sites were submitted through the Gypsy and Travellers Sites Focussed Consultation which was held from 30th January to 20th March 2023.
2. The document provides an analysis of site constraints and impacts and makes recommendations for the potential allocation of the sites in the GNLP. Comments are welcomed on this document.
3. Consultees can also comment on the Gypsy and Traveller Sites Additional Focussed Consultation – New Sites June 2023, the Sustainability Appraisal and the Habitats Regulation Assessment which are also available from the [GNLP](#) website. Information on responding to the consultation is in the first of these three documents.
4. The comments received through this consultation will assist in deciding whether to recommend a site or sites from the consultation for further consideration for allocation through the GNLP examination hearings.

Background

5. The GNLP was submitted for independent examination in July 2021.
6. During the examination the two inspectors appointed on behalf of the Secretary of State made it clear that they expected to include specific site allocations for Gypsies and Travellers in the plan in accordance with national policy in paragraph 68 of the National Planning Policy Framework NPPF.
7. The cabinets of the three constituent Greater Norwich local planning authorities at Broadland, Norwich and South Norfolk, are considering reports on Gypsy and Traveller accommodation between 12th and 14th June 2023.
8. These reports, if approved, will propose that the GNLP examination considers that 52 new pitches are required to meet Gypsy and Traveller needs from 2022 to 2038. The reports will also propose that seven sites are allocated through the GNLP to provide a total of 45 Gypsy and Traveller pitches and that development on sites not specifically identified (windfall sites) can be relied upon to meet the identified shortfall in pitches to 2038.
9. If approved, the reports will also delegate authority to senior officers and elected members to recommend that the examination should consider allocation of one or more of the sites covered in this consultation.

Methodology

10. Landowners have provided a “redline” outline plan for each of the proposed sites and a judgement has been made about how many pitches could be accommodated. As a guideline, to avoid the risk of pitches being too small, around 300 square metres is required per pitch. This accords with design guidance that suggests 320 square metres per pitch is needed to also provide space for an amenity block (with a kitchen, bathroom and living room) and touring caravan space for up to 2 caravans and 2 vehicles.¹ However, needs do vary with family unit size, so a range of pitch sizes should be provided where possible.
11. The Norfolk-wide Housing and Economic Land Availability Assessment (HELAA) methodology 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. The assessment of access to services takes account of the requirements for Gypsy and Traveller sites in more rural locations.
12. The proposed Gypsy and Traveller sites have been compared against the 14 suitability criteria in the HELAA methodology to assess if they are reasonable for development. The purpose of this is to screen out sites with no development potential; and, for the remaining sites, to identify issues that may need to be addressed to allow development to be progressed.
13. A ‘red’, ‘amber’ or ‘green’ rating is given for each site for each criterion, accompanied by a commentary and a conclusion. The ratings are informed by information from a broad range of professionals and are based on the following:
 - Green – no identified constraints,
 - Amber – constraints identified are either not significant enough to prevent development and/or could be mitigated,
 - Red – Significant constraints which cannot be mitigated.
14. An ‘Availability and Achievability’ section identifies when sites could be delivered, either within the current 5-year time period to March 2027 or, due to site specific issues, to a longer timeframe to March 2032. This approach is in line with national policy.
15. Following the site assessment, the sites are classified into two categories: below:
 - One site is a favoured option recommended for allocation pending the consultation comments received. Analysis shows that this site has limited constraints which can be overcome and provides potential for allocation

¹ [https://www.leeds.gov.uk/docs/Gypsy and Traveller Site Design Guide.pdf](https://www.leeds.gov.uk/docs/Gypsy%20and%20Traveller%20Site%20Design%20Guide.pdf)
[designinggypsiesites.pdf](https://www.leeds.gov.uk/docs/Gypsy%20and%20Traveller%20Site%20Design%20Guide.pdf) ([publishing.service.gov.uk](https://www.publishing.service.gov.uk))

- Two sites have been rejected as unreasonable alternatives due to site constraints.

Sustainability Appraisal Report

16. The Sustainability Appraisal Report of the Gypsy and Travellers sites is another background document which provides additional assessment of the new site and site policy including those considered unsuitable. It covers the sustainability performance of each site. The appraisal feeds into the assessment of sites and provides recommendations for mitigation measures which have been incorporated into the Site Policies document as appropriate.

The Habitat Regulation Assessment (HRA)

17. The Habitats Regulation Assessment (HRA) assesses a wide range of potential impacts on nature conservation sites of international importance, including any in-combination impacts with other development in the area.
18. It concludes that no allocations will be close enough to a European site to have any construction related impacts such as land-take or disturbance from construction activities. It also concludes that as there will be no allocations within 1.5 kilometres of a European site, there would also be no direct recreational impacts. While site GNLP5027 is just over 1km from Buxton Heath which is a component of Norfolk Valley Fens Special Area of Conservation (SAC), the walking route to the SAC is around 2.3km one-way. Therefore, there would be no direct recreational impacts.
19. The HRA also concludes that the tariff payment of £185.93 per Gypsy and Traveller Pitch (and for other types of home) which has been set which will be sufficient to ascertain no adverse effect upon the integrity of any European site from the in-combination effects of residential developments across the plan area and beyond.
20. Subject to satisfactory policy modification of the GNLP with respect to Nutrient Neutrality, the HRA concludes that the proposed allocations for Gypsy and Traveller sites will have no adverse effect upon the integrity of any European site acting alone, in combination with other development in the GNLP or any other plan or project.

Favoured Site

Parish: Hevingham Suitability Assessment

Site reference: GNL5027	Site area: 0.75 ha
LOCATION: Land off Brick Kiln Road	PROPOSED DEVELOPMENT: To extend by 5 additional pitches to provide 6 pitches in total.
District: Broadland	

CONSTRAINTS ANALYSIS

Site Access	Amber
Accessibility to Services	Amber
Utilities Capacity	Green
Utilities Infrastructure	Amber
Contamination and Ground Stability	Green
Flood Risk	Amber
Market Attractiveness	Green

IMPACTS ANALYSIS

Significant Landscapes	Amber
Sensitive Townscapes	Green
Biodiversity and Geodiversity	Amber
Historic Environment	Green
Open Space and GI	Green
Transport and Roads	Green
Compatibility with neighbouring uses	Amber

SITE SUITABILITY CONCLUSIONS

21. This is a 0.75 ha predominantly greenfield site off Brick Kiln Road in Hevingham. In 2014 planning permission was granted near the southern end of this site for a pitch which is known as 'Twelve Oaks'. This permission included a concrete hardstanding for a mobile caravan, a utility block, associated parking, a touring caravan and three cars, along with the erection of two sheds (Reference 20131495).
22. The proposal is to expand the permitted site to accommodate 5 further permanent residential Gypsy and Traveller pitches, so there would be a total of 6 pitches.
23. The site benefits from an established access off Brick Kiln Road which serves the existing pitch. The removal of vegetation may be required to improve the visibility splay to serve the additional pitches.

24. The site is slightly disconnected from the local services. However, Hevingham Primary School is approximately 15 minutes walking distance along Brick Kiln Road and there is also a bus stop, a pub and a village hall nearby. As this is a relatively small development proposal it is unlikely to lead to a significant increase in traffic on local roads or in unsustainable travel patterns.
25. The national grid gas pipeline from Bacton to Roudham Heath runs diagonally east to west across the northern edge of the site. The site is at low risk of flooding from rivers so is within Flood Zone 1. There is a surface water flow path of medium (1 in 100 year) to low (1 in 1,000 year) probability risk which crosses the north of the site, extending to approximately 50 metres into the site. A large percentage of the site remains unaffected by surface water flood risk including the access from Brick Kiln Road. Whilst further investigation of these issues will be necessary, locating development away from the very northern part of the site will address these constraints.
26. The site is within the catchment of a groundwater Source Protection Zone (Zone III). As such, pollution mitigation measures for water quality protection will be required, but this does not rule out development potential.
27. There are no other known constraints relating to other utilities capacity, contamination or ground stability.
28. Market attractiveness is evidenced by the landowner promoting the site.
29. GNLP5027 is on grade 3 (lesser quality) agricultural land, so development would not result in a loss of high-quality agricultural land. There would also be no loss of open space resulting from development and the site is not situated on a strategic green infrastructure corridor.
30. There are no statutorily designated environmental sites which would be immediately affected by the development of site GNLP5027. However, Hevingham Park Ancient Woodland & County Wildlife Site (CWS) and Dark Plantation CWS are located within 1 kilometre of the site. In addition, the Heathland Pits, a candidate geodiversity site, is located 660 metres to the north of the site. Further to the north is the Norfolk Valley Fens Special Area of Conservation which is 1,000 metres away.
31. The site consists of grassland with mature trees and hedgerows bordering and within it. Therefore, it has the potential to support priority habitats and protected species such as bats, reptiles and breeding birds. As a result, a preliminary ecological appraisal would be required.
32. Further planting to boundaries could be required to mitigate impacts on landscape character and neighbouring properties.
33. Given the scale of the proposal, GNLP5027 presents no substantive concerns in relation to heritage constraints, listed buildings or scheduled ancient monuments. The nearest grade II listed building are:

- Pound Farmhouse and Garden which is 1,900 metres to the west,
 - Avenue Farmhouse and Barn which is 989 metres to the northeast, and
 - Park Farmhouse and Barn which is 1,728 metres to the southwest of the site.
34. As with many locations in Greater Norwich, mitigation of the impacts on nutrient levels in river catchments will be required.
35. In conclusion, the site is suitable for expansion to 6 pitches subject to detailed consideration of the impact of the gas pipeline, flood risk, design layout, landscaping, pollution mitigation measures and an ecological survey.

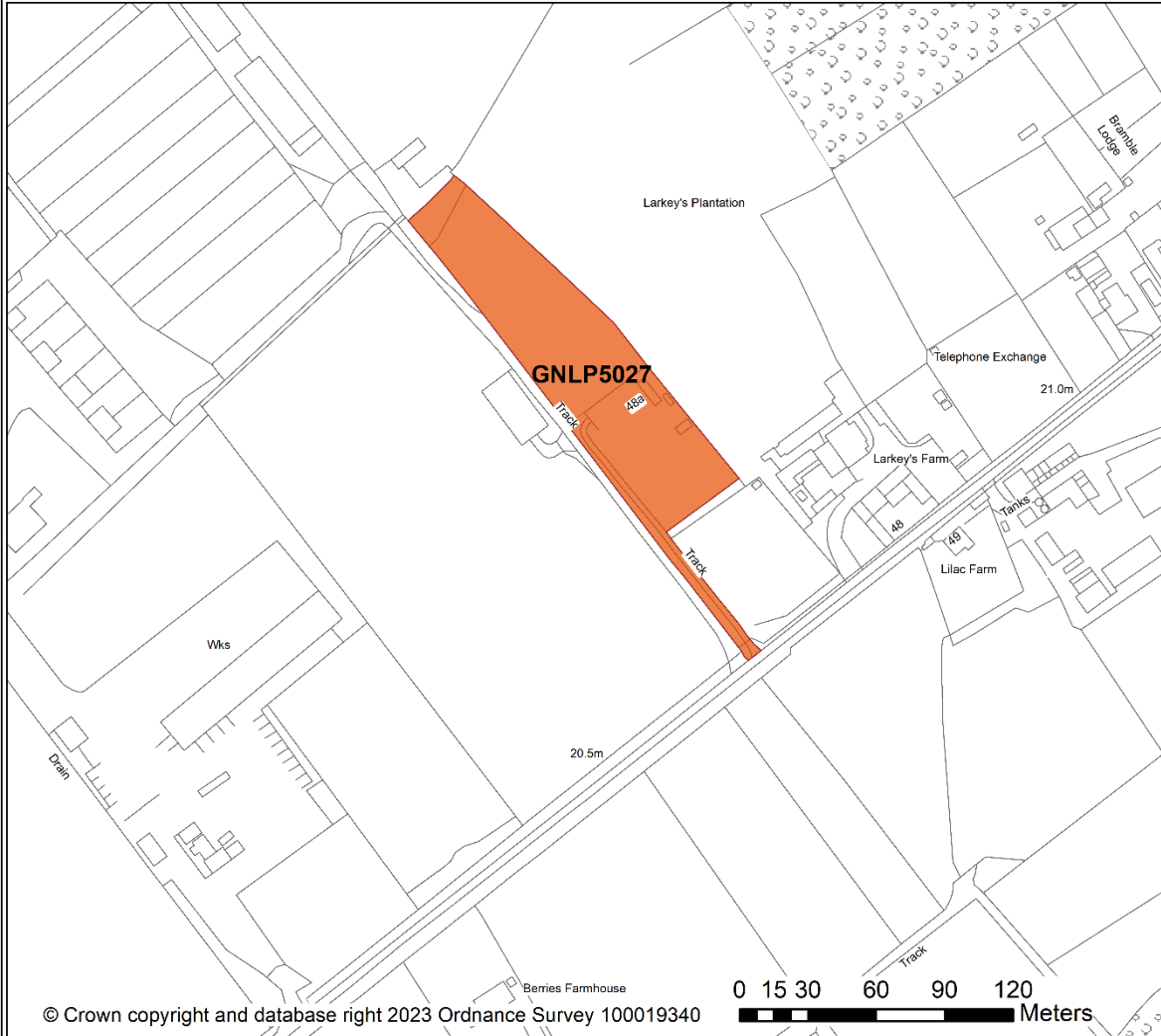
Availability and Achievability Conclusions

36. Subject to the caveats identified above, site GNLP5027 is considered suitable for allocation. The site is in private ownership and the landowner is willing to make the site available for an additional 5 pitches for Gypsies and Travellers. Therefore, there is no reason why development with appropriate mitigation could not come forward quickly, with 4 to 5 years considered ample time to market the land, gain planning permission and to develop the site.

HEVINGHAM

GREATER NORWICH LOCAL PLAN GYPSY AND TRAVELLER SITES

Site Reference: GNLP5027
Location: Land Adjacent to Larkeys Farm, Brick Kiln Road, Hevingham
Description: 5 additional residential pitches for Gypsies and Travellers
Site Area: 0.75 ha




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0 15 30 60 90 120 Meters

Scale at A4:
1:2,500

N

 Gypsy and Traveller Site



Date: 28/04/2023

Unreasonable Alternatives - Not Favoured for Allocation

Parish: Foulsham Suitability Assessment

Site reference: GNLP5025	Site area: 0.48 ha
LOCATION: Land off Brandhip and Reepham Road,	PROPOSED DEVELOPMENT: To provide 2 additional pitches, extending the existing 2 pitches currently permitted to 4 in total.
District: Broadland	

CONSTRAINTS ANALYSIS

Site Access	Red
Accessibility to Services	Amber
Utilities Capacity	Green
Utilities Infrastructure	Amber
Contamination and Ground Stability	Green
Flood Risk	Green
Market Attractiveness	Green

IMPACTS ANALYSIS

Significant Landscapes	Amber
Sensitive Townscapes	Amber
Biodiversity and Geodiversity	Amber
Historic Environment	Amber
Open Space and GI	Green
Transport and Roads	Red
Compatibility with neighbouring uses	Amber

SITE SUITABILITY CONCLUSIONS

37. This is a 0.48 ha site off Reepham Road to the east of Foulsham. The proposal is to add 2 further pitches within the curtilage of the existing site to create 4 residential Gypsy and Traveller pitches in total.

38. In terms of access, GNLP5025 is located at a bend on the Reepham Road, which is a 'C' class rural road with a 60 MPH speed limit. The alignment of the Reepham Road, the position of the access, and the visibility for vehicles using the access would present highway safety concerns if GNLP5025 were further developed.

39. GNLP5025 is less than 1 kilometre from the village of Foulsham, which has a limited range of services and facilities which includes a school. The location is

disadvantaged though by the absence of a footpath along the Reepham Road to reach the village.

40. There are no known constraints relating to other utilities capacity, contamination, or ground stability. The site is at low risk of flooding so is within flood zone 1 and is not affected by surface water flooding. The site is within the catchment of a groundwater Source Protection Zone (Zone III). As such, pollution mitigation measures for water quality protection would be required if the site were further developed.
41. There are no statutory designated environmental sites which would be immediately affected by the development of site GNLP5025 as Foxley Meadow Ancient Woodland is located 2,000 metres southwest of the site so any significant effect on it is unlikely. Non-statutory sites nearby would also not be significantly affected by the proposed development. These are:
 - Moat Meadow and Bates Moor County Wildlife Site is adjacent to the site's western boundary and
 - West Field Meadow and land north of Twyford Hall County Wildlife Sites are 1,500 metres to the southeast.
42. In addition, Barney Brickyard, a County Geodiversity Site, is 860 m northeast of the site. The site consists of improved grassland and is unlikely to support priority habitats. However, boundary trees and hedgerows have the potential to support protected species such as bats and breeding birds. As it is also located within a great crested newt 'amber zone' and therefore has the potential to impact on Great Crested Newts, therefore a preliminary ecological appraisal would be required prior to any further development.
43. GNLP5025 is on grade 3 (lesser quality) agricultural land, so development would not result in a loss of high-quality agricultural land. There would also not be a loss of open space resulting from development and the site is not situated on a strategic green infrastructure corridor.
44. Market attractiveness is evidenced by the landowner promoting the site.
45. GNLP5025 presents no substantive concerns in relation to heritage constraints, given the scale of the proposal and as the site is 1 km outside of Foulsham Conservation Area where the majority of grade two listed buildings are located. However, the nearest grade two listed buildings are as follows:
 - the Old Hall Farm boundary wall is 250 metres to the west,
 - the Old Hall Farmhouse is 300 metres to the west,
 - Manor Farmhouse is 760 metres to the east.The site is also 100 meters to the east of a medieval moat. Consequently, an archaeological investigation would be necessary as well as landscaping to provide adequate screening and mitigate any visual impacts on landscape character if the site were further developed.
46. The site is surrounded by agricultural land being located 1 km outside of Foulsham, and is bounded by a mature hedge. Therefore, there are no potential

concerns over possible visual impacts on landscape character given the scale of the proposal.

47. As with many locations in Greater Norwich, mitigation of the impacts on nutrient levels in river catchments would be required.

48. Overall, the main constraint relating to GNLP5025 is the highway safety concern associated with the site access being on a bend on the Reepham Road..

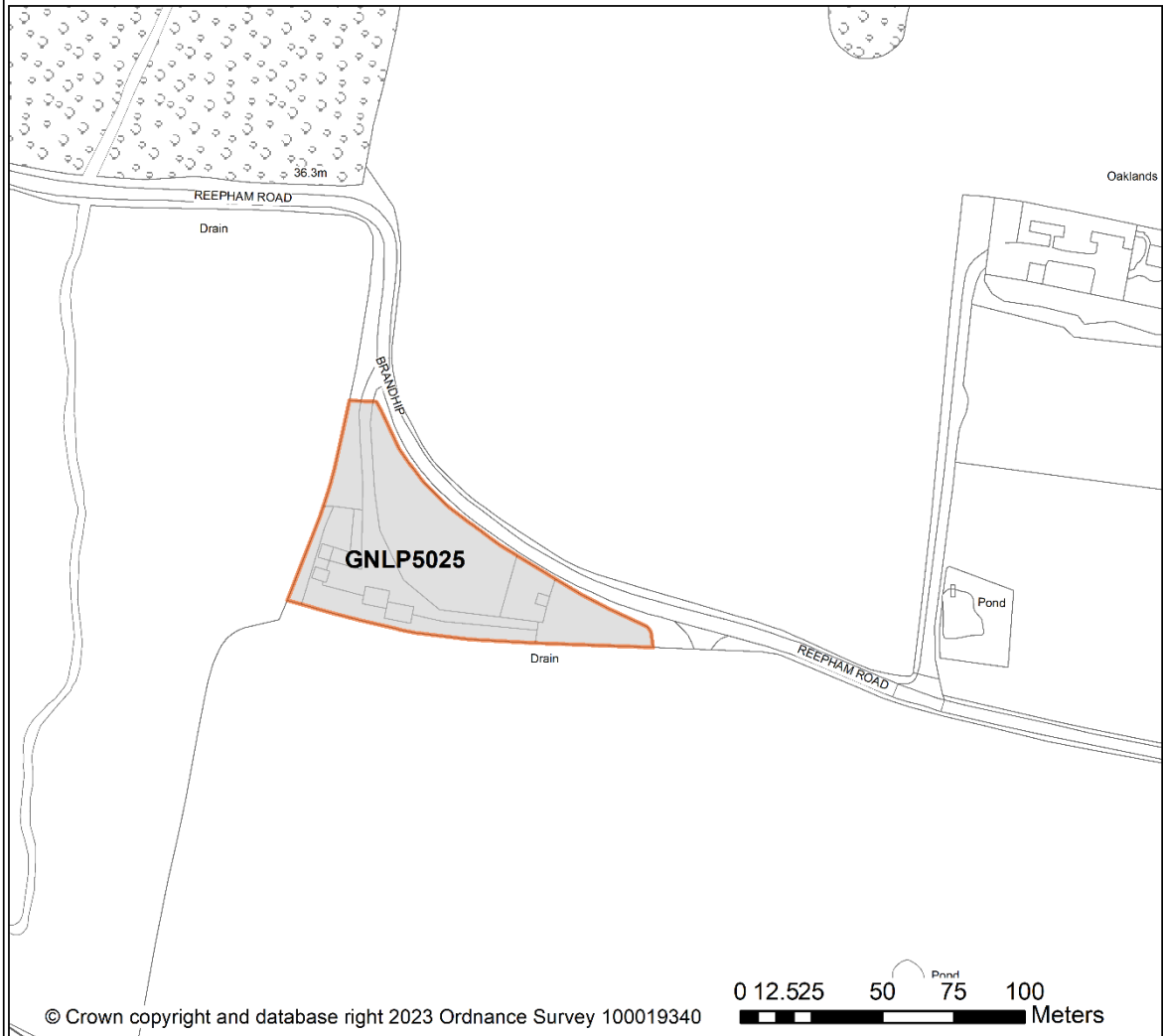
Availability and Achievability Conclusions



49. GNLP5025 was promoted by the landowners during the Gypsy and Traveller Focussed Consultation that ran between 30th January and 20th March 2023. Whilst the site is being made available for development by the landowners, the initial highways assessment raises safety concerns. Since further development would lead to more vehicle movements using an access that is located on a bend in the Reepham Road, GNLP5025 is not considered suitable for allocation.

FOULSHAM

GREATER NORWICH LOCAL PLAN GYPSY AND TRAVELLER SITES

Site Reference: GNL5025
Location: Woodyard, Reepham Road, Foulsham
Description: Unreasonable Alternative Site
Site Area: 0.47 ha



-  Gypsy and Traveller Site (Unreasonable Alternative)
-  Settlement Boundary

Scale at A4:
1:2,000



Date: 28/04/2023

Parish: Guestwick Suitability Assessment

Site reference: GNLP5026	Site area: 1.17 ha
LOCATION: Land off Peddlars Turnpike, Guestwick Green	PROPOSED DEVELOPMENT: A permanent residential Gypsy and Travellers site for 3 pitches
District: Broadland	

CONSTRAINTS ANALYSIS

Site Access	Red
Accessibility to Services	Red
Utilities Capacity	Amber
Utilities Infrastructure	Amber
Contamination and Ground Stability	Green
Flood Risk	Amber
Market Attractiveness	Green

IMPACTS ANALYSIS

Significant Landscapes	Green
Sensitive Townscapes	Green
Biodiversity and Geodiversity	Amber
Historic Environment	Green
Open Space and GI	Amber
Transport and Roads	Red
Compatibility with neighbouring uses	Amber

50. This is a 1.17 ha greenfield site off Peddlars Turnpike Road, Guestwick Green, to the south of Guestwick. The proposal is for 3 residential caravan pitches to include a static caravan, a touring caravan and an amenity block for Gypsies and Travellers.

51. The land is currently grassland.

52. The site has two established access points, one of which is close to a bend on the road.

53. Peddlars Turnpike Road is an unclassified single-carriage country lane, there are no pavements. The local highway network is of an unsuitable standard, with no options for walking or cycling off carriageway to access local facilities. The site is disconnected from services and facilities. The nearest school is in Foulsham which is 3.4 km away. Therefore, this location is considered unsustainable for development.

54. There are no known constraints relating to other utilities capacity, contamination or ground stability. The site is at low risk of flooding so is within flood zone 1 and is not immediately affected by surface water flooding. However, Peddlars Turnpike on the eastern boundary of the site is affected by patches at risk of surface water flooding. The site is within the catchment of a groundwater Source Protection Zone (Zone III). As such, pollution mitigation measures for water quality protection will be required, but this does not rule out development potential.
55. Market attractiveness is evidenced by the landowner promoting the site.
56. GNLP5026 is on grade 3 (lesser quality) agricultural land, so development would not result in a loss of high-quality agricultural land. There would also not be a loss of open space resulting from development and the site is not situated on a strategic green infrastructure corridor.
57. There are no statutory designated environmental sites immediately affecting site GNLP5026 or within a 10km radius. Non-designated environmental sites in the vicinity include:
- Bates Moor Meadow County Wildlife Site 1,800 metres to the east,
 - land adjacent to the disused railway County Wildlife Site is 2,000 meters to the southeast,
 - Marriott's Way County Wildlife site is 1,800 meters to the southeast.
58. The site consists of grassland with mature trees and hedgerows both within and bordering the site. It therefore has the potential to support priority habitats as well as protected species such as bats, reptiles and breeding birds. In addition, the site is located within a great crested newt 'amber zone' and therefore has the potential to impact on their habitat. Consequently,
- a preliminary ecological appraisal would be required if the site were developed.
59. GNLP5026 presents no substantive concerns in relation to heritage constraints as the nearest grade II listed building is Station Farmhouse 600m north of the site. Outside a 5 km radius, there are four other listed buildings located to the north of the site:
- Church Farmhouse (grade II),
 - the Manse (grade II),
 - Church of St Peter (grade I),
 - The Congregational Chapel (grade II).
60. However, as the site is bounded by mature hedgerows, this would mitigate any potential visual impacts on landscape character and listed buildings. As hedgerows are integral to maintaining the rural character of the area, any trees or hedgerow lost to form the access or visibility splay would need to be compensated for with new planting within the development.
61. As with many locations in Greater Norwich, mitigation of the impacts on nutrient levels in river catchments will be required.

62. Overall, the main constraints relating to GNLP5026 are its remote location and the access into the site.

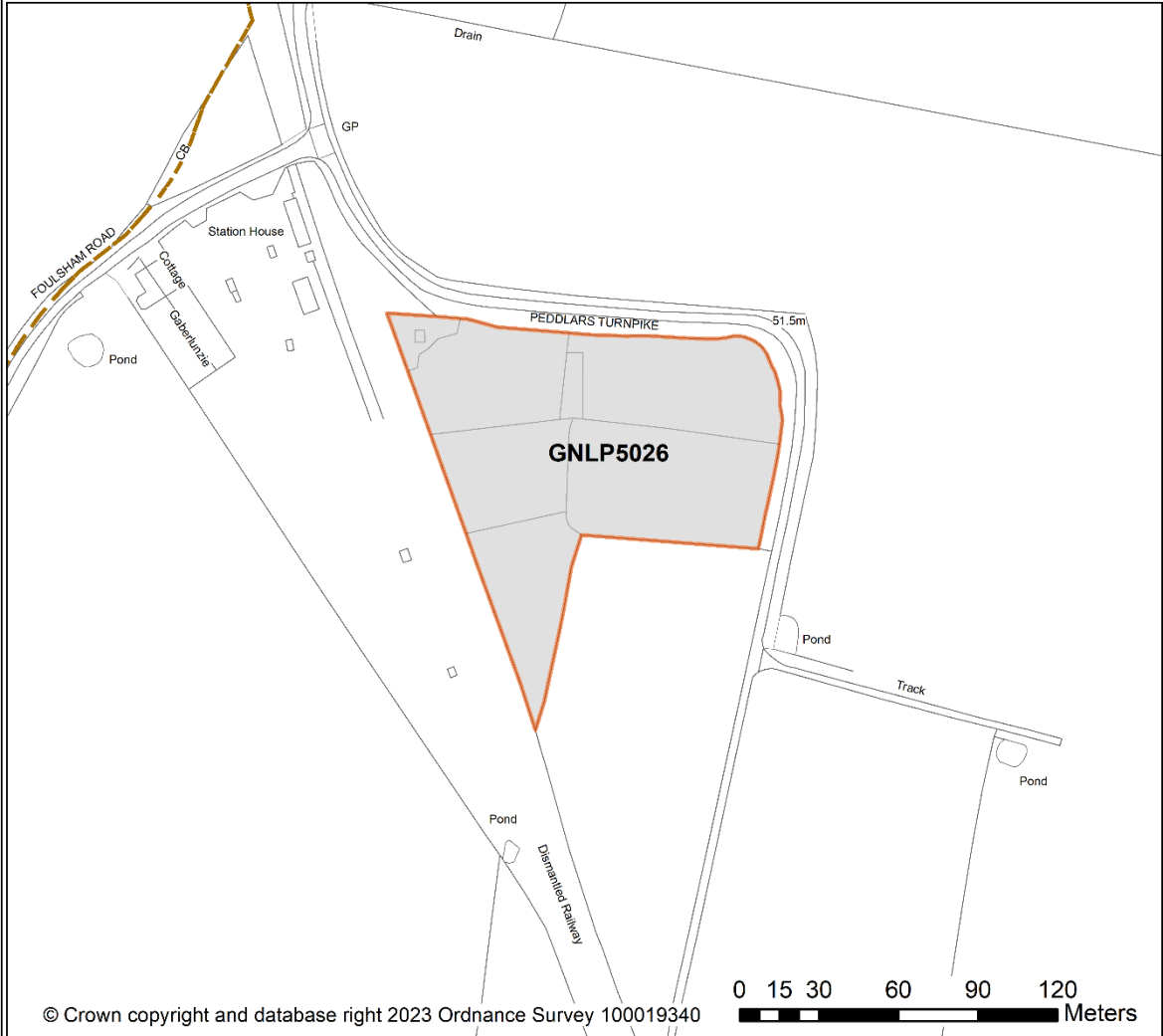
Availability and Achievability Conclusions

63. GNLP5026 was promoted by the landowners during the Gypsy and Traveller Focussed Consultation that ran between 30th January and 20th March 2023. Whilst the site is being made available for development by the landowners, the initial highways assessment raises significant concerns about the rurality of location and the highway safety of vehicular access at this point on Peddlars Turnpike. For these reasons, GNLP0525 is not considered suitable for allocation.

GUESTWICK

GREATER NORWICH LOCAL PLAN GYPSY AND TRAVELLER SITES

Site Reference: GNL5026
Location: Peddlars Turnpike, Guestwick
Description: Unreasonable Alternative Site
Site Area: 1.17 ha



 Gypsy and Traveller Site (Unreasonable Alternative)

Scale at A4:
1:2,150

N



Date: 28/04/2023

Conclusions

64. This assessment, which integrates SA and HRA findings, has considered three additional sites which were recently submitted to the GNLP. It has identified site GNLP50027 at Hevingham as a favoured site. Two sites, GNLP5025 at Foulsham and GNLP5026 at Guestwick, have been rejected as unreasonable alternatives due to site constraints.
65. Although the favoured site has some constraints, the limited scale of the development proposed and the specific nature of the constraints means that these can be overcome with appropriate mitigation measures which are set out in the proposed site policy.
66. Consultation feedback is welcomed as it will assist in deciding whether to recommend a site or sites from this consultation for further consideration for allocation through the GNLP examination hearings.