Greater Norwich Local Plan Hearing Statement Matter 17 – Gypsy and Traveller allocations and supply



Greater Norwich Local Plan Hearing Statement – Matter 17 Gypsy and Travellers allocations and supply (July 2023)

Introduction

This hearing statement has been produced by Broadland District Council, Norwich City Council and South Norfolk Council, working with Norfolk County Council as the Greater Norwich Development Partnership (GNDP).

The document library for the Greater Norwich Local Plan (GNLP) examination and further information can be found on the GNLP examination website:

www.gnlp.org.uk

The councils have responded to each question directly in the body of the hearing statement. Proposed new site allocation supporting text and policies for discussion at the examination hearings and subsequent inclusion in the main and additional modifications to the plan are in Appendix A to this document.



Issue 1: Site allocations

Site: Land north of Shortthorn Road, Stratton Strawless (Ref GNLP5019) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

- Yes, the allocation of GNLP5019 is justified and evidenced. Assessment and consultation details are provided in the Site Assessment information (<u>H2</u>), Sustainability Appraisal (SA) (<u>H4</u>), and the Summary of Consultation (section <u>H6</u>, see documents H6.1 and H6.2).
- 2. Pages 20-22 of <u>H2.1</u> give the Partnership's assessment of the site. Following the Focussed Consultation that closed in March there were no substantive updates, and the Partnership still considers that this assessment justifies allocation of the site. The response to question 2 below provides more detail.
- 3. Pages 55-59 of <u>H4.2</u> explain the SA findings pre-mitigation for GNLP5019. The policy for this site is appraised at pages 134-135. The SA identifies positive or neutral outcomes for most issues. It also shows that limited access to services, including to health care facilities, and impacts on natural resources, are issues for the site.

Question 2

Have any constraints to development been properly assessed and, where necessary, is it likely that appropriate mitigation can be achieved?

Response to question 2

- Yes, constraints have been assessed and factored into the site selection process, and where it is possible mitigation is included. Page 20 of <u>H2.1</u> identifies two amber constraints. These relate to 'Accessibility to Services' and 'Biodiversity and Geodiversity'.
- 5. The issue of 'Accessibility to Services' is a consequence of the site's rural location and its geographical distance to facilities. It is not a constraint that can be mitigated, but which must be weighed against the otherwise generally positive constraints and impacts analysis for the site. Overall, GNLP5019 remains amongst the most

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favourable of the sites available and has the advantage of being an extension to an already established site.

6. The 'Biodiversity and Geodiversity' constraint is addressed by the policy requirement for an ecological assessment at the planning application stage in case of the presence of protected species like bats, reptiles, and breeding birds.

Question 3

Is the site available, and is the assumed number of pitches robust?

Response to question 3

 Yes, a planning application for the 8 additional pitches is pending determination (20222073). Although not approved, the submitted layout plan shows how the road, 8 areas of hard standing, and dayroom buildings can be constructed whilst retaining existing trees.

Question 4

Is the site likely to come forward in the timescales envisaged?

Response to question 4

 Yes, Table 9 of the topic paper <u>H3.1</u> explains that a planning application has already been submitted for GNLP5019 and this is further supported by the Joint Delivery Statement <u>H7.5</u> provided by the owners. Consequently, the trajectory forecasts 4 pitches in 2024/25 from the existing permission (<u>20211657</u>) and 4 pitches in 2025/26 from application 20222073.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

9. Yes, the policy sets three criteria which are justified and effective. Criterion 1 requires the existing vehicular access to Shortthorn Road to be used. Criterion 2 requires an ecological assessment which must cover on-site trees and protected species like bats, reptiles and breeding birds. The third criterion ensures that the site will be retained for Gypsy and Traveller use and cannot become a general-purpose residential caravan site or holiday lets.

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Site: Romany Meadow, The Turnpike, Carleton Rode (Ref GNLP5020) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

- Yes, the allocation of GNLP5020 is justified and evidenced. Assessment and consultation details are provided in the Site Assessment information (<u>H2</u>), SA (<u>H4</u>), and Summary of Consultation (section <u>H6</u>, see documents H6.1 and H6.2).
- 11. Pages 23-25 of <u>H2.1</u> give the Partnership's assessment of the site which following the Focussed Consultation that closed in March still justifies allocation of the site. The response to question 2 below provides more detail. The only point of clarification made subsequent to the consultation was for the policy to require the use of septic tanks because of the absence of mains sewerage in the vicinity (see <u>H3.3</u>).
- 12. Pages 60-65 of <u>H4.2</u> explain the SA findings pre-mitigation for GNLP5020, and the policy for this site is appraised at pages 135-136. The SA identifies positive or neutral outcomes for most issues. It also shows that limited access to services, including health care facilities, as well as impacts on natural resources, are issues for the site.

Question 2

Have any constraints to development been properly assessed and, where necessary, is it likely that appropriate mitigation can be achieved?

Response to question 2

- 13. Yes, constraints have been assessed and factored into the site selection process, and where it is possible to, mitigation is included. Page 23 of <u>H2.1</u> shows there to be six amber constraints, related to 'Accessibility to Services', 'Contamination and Ground Stability', 'Flood Risk', 'Significant Landscapes', 'Biodiversity and Geodiversity', and the 'Historic Environment'.
- 14. The issue of 'Accessibility to Services' is a consequence of the site's rural location and its geographical distance to facilities. It is not a constraint that can be mitigated. However, this must be weighed against the positive constraints and impacts analysis for some issues related to the site and the ability to mitigate other issues through policy. GNLP5020 remains amongst the most favourable of the sites, in particular because it is available and has the advantage of being an extension to an already established site.
- 15. The other amber constraints of 'Contamination and Ground Stability', 'Flood Risk', 'Significant Landscapes', 'Biodiversity and Geodiversity', and the 'Historic Environment' will be dealt with at the planning application stage. This has been addressed through the site allocation policy for GNLP5020 containing the requirement for assessments of

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surface water flood and ecological impacts, landscaping to preserve the landscape and setting of nearby listed buildings, and measures to protect groundwater supplies.

Question 3

Is the site available, and is the assumed number of pitches robust?

Response to question 3

16. Yes, Joint Delivery Statement <u>H7.1</u> explains the landowner's commitment to expanding the Romany Meadows site and confirms it is available. GNLP5020 measures 5,400 sqm, which equates to 900 sqm per pitch. This is an ample amount of space and factors in areas required for landscaping and where stationing of buildings and caravans should be avoided due to the presence of a surface water flow path.

Question 4

Is the site likely to come forward in the timescales envisaged?

Response to question 4

17. Yes, Table 9 of the topic paper <u>H3.1</u> explains that the landowner estimates building will start in the next 1 to 2 years and all 6 pitches would be likely to be complete by March 2027. Consequently, the trajectory forecasts 3 pitches in 2025/26 and 3 further pitches in 2026/27.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

18. Yes, the policy sets six criteria which are justified and effective. The first requires the existing vehicular access from The Turnpike to be used. Criteria 2-5 are in response to the amber constraints identified in the Site Assessment (H2.1, page 23) and highlighted in paragraph 15 above. The sixth criterion ensures the site is retained for Gypsy and Traveller use and cannot become a general-purpose residential caravan site or holiday lets.





Site: Land off Upgate Street, Carleton Rode (GNLP5024) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

- Yes, the allocation of GNLP5024 is justified and evidenced. Assessment and consultation details are provided in the Site Assessment information (<u>H2</u>), SA (<u>H4</u>) and the Summary of Consultation (section <u>H6</u>, see documents H6.1 and H6.2).
- 20. Pages 38-39 of <u>H2.1</u> give the Partnership's assessment of the site. Following the Focussed Consultation that closed in March, this assessment still justifies allocation of the site. Two points of clarification made following the consultation were over the policy requirement for septic tanks because of the absence of mains sewerage in the vicinity of GNLP5024 (see <u>H3.3</u>) and the need for an archaeological assessment to be done. The response to question 2 below provides more details.
- 21. Pages 81-86 of <u>H4.2</u> explain the SA findings pre-mitigation for GNLP5024, and the policy for this site is appraised at pages 135-136. The SA identifies positive or neutral outcomes for most issues. It also shows that limited access to services, including to health care facilities, and impacts on natural resources, are issues for the site.

Question 2

Have any constraints to development been properly assessed and, where necessary, is it likely that appropriate mitigation can be achieved?

Response to question 2

- 22. Yes, constraints have been assessed and factored into the site selection process, and where it is possible to, mitigation is included in policy requirements. Page 38 of <u>H2.1</u> shows there to be 5 amber constraints related to 'Site Access', 'Accessibility to Services', 'Contamination and Ground Stability', 'Biodiversity and Geodiversity', and the 'Historic Environment'.
- 23. Due to the rural location of site GNLP5024 and its geographical distance to facilities, the constraint over accessibility to services cannot be mitigated. However, this must be weighed against the positive constraints and impacts analysis for a number of issues related to the site and the ability to mitigate other issues through policy requirements. The site remains amongst the most favourable of the sites available and has the advantage of being an extension to an already established site.



- 24. The amber constraint over vehicular access can be dealt with by the submission of a safety assessment at the planning application stage. Other requirements in the GNLP5024 allocation policy will deal with the constraints for 'Contamination and Ground Stability', and 'Biodiversity and Geodiversity'. These are for an ecological assessment with the planning application to ascertain the likely presence of protected species on the site and for the development to utilise measures to protect groundwater supplies. An archaeological assessment is required by the policy because of the proximity of the Bunn's Bank linear earthwork to the site.
- 25. Since the additional pitches are set to be within the curtilage of the existing site, which is already bounded by established trees and hedgerows and will minimise impacts on the setting of nearby heritage assets, it is not necessary to include a policy requirement to address the amber constraint for the 'Historic Environment'.

Question 3

Is the site available, and is the assumed number of pitches robust?

Response to question 3

26. Yes, Joint Delivery Statement <u>H7.2</u> explains the landowner's commitment to expanding the Upgate Street site and confirms it is available. GNLP5024 measures 6,200 sqm, which gives ample space for expansion, and allows 1,033 sqm per pitch.

Question 4

Is the site likely to come forward in the timescales envisaged?

Response to question 4

27. Yes, Table 9 of the topic paper <u>H3.1</u> explains that the landowner expects to complete the 4 additional pitches over the next 1 to 4 years. Consequently, the trajectory forecasts the delivery of 2 pitches in 2024/25 and 2 further pitches in 2025/26.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

28. Yes, the policy sets five criteria which are justified and effective. The first criterion requires use of the existing vehicular access to Upgate Street. Criteria 2 and 3 are in response to the amber constraints identified in the Assessment Information (H2.1, page 38), requiring an ecological assessment and the protection of groundwater supplies. The fourth criterion covers the requirement for an archaeological assessment to be done and the fifth ensures that the site is retained for Gypsy and Traveller use and cannot become a general-purpose residential caravan site or holiday lets.

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Site: Land at the Oaks, Reepham Road, Foulsham (GNLP5022) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

- 29. Yes, the allocation of GNLP5022 is justified and evidenced. Assessment and consultation details are provided in the Site Assessment information (<u>H2</u>), SA (<u>H4</u>) and the Summary of Consultation (section <u>H6</u>, see documents H6.1 and H6.2).
- 30. Pages 30-31 of <u>H2.1</u> give the Partnership's assessment of the site. Following the Focussed Consultation that closed in March there were no substantive updates and the Partnership still considers that this assessment justifies allocation of the site. The response to question 2 below provides more detail.
- 31. Pages 71-75 of <u>H4.2</u> explain the sustainability appraisal findings pre-mitigation for GNLP5022, and the policy for this site is appraised at pages 136-137. The SA identifies positive or neutral outcomes for most issues. It also shows that limited access to services, including to health care facilities, as well as impact on natural resources, are issues for the site.

Question 2

Have any constraints to development been properly assessed and, where necessary, is it likely that appropriate mitigation can be achieved?

Response to question 2

- 32. Yes, constraints have been assessed and factored into the site selection process, and where it is possible to, mitigation is included in the site allocation policy. Page 30 of <u>H2.1</u> shows there to be eight amber constraints, which relate to 'Site Access', 'Accessibility to Services', 'Utilities Infrastructure', 'Contamination and Ground Stability', 'Flood Risk', 'Significant Landscapes', 'Biodiversity and Geodiversity' and 'Transport and Roads'.
- 33. The constraint over accessibility to services cannot be mitigated. This is due to the rural location of site GNLP5024 and its geographical distance to facilities. However, this must be weighed against the positive constraints and impacts analysis for a number of issues related to the site and the ability to mitigate other issues through policy. The site remains amongst the most favourable of the sites available and has the advantage of being an extension to an already established site.
- 34. The amber constraint over the vehicular access can be dealt with by the submission of a safety assessment at the planning application stage. Other constraints identified in

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the Site Assessment are addressed through allocation policy requirements that will also be determined in detail at the planning application stage. These will ensure caravans and built structures are away from areas of surface water flood risk, that the presence of protected species onsite is investigated, that landscaping is added to avoid adverse impacts on the setting of nearby listed buildings, and development avoids the route of an underground pipeline that crosses the site.

Question 3

Is the site available, and is the assumed number of pitches robust?

Response to question 3

35. Yes, Joint Delivery Statement <u>H7.4</u> explains the landowner's commitment to expanding The Oaks site and confirms it is available. GNLP5022 measures 31,000 sqm, which equals 4,428 sqm per pitch, and gives assurance that ample space for expansion exists even when constraints like surface water flood risk, landscaping, and the route of the underground pipeline are deducted.

Question 4

Is the site likely to come forward in the timescales envisaged?

Response to question 4

36. Yes, Table 9 of the topic paper <u>H3.1</u> explains that the landowner is working with a planning agent to prepare a planning application. They expect to complete 1 pitch in 2023/24 and 4 further pitches in 2024/25. Consequently, these forecasts are included in the trajectory.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

37. Yes, the policy sets seven criteria which are justified and effective. The first criterion is to require use of the existing vehicular access to the Reepham Road. Criteria 2, 3, 4, 5 and 6 are in response to the amber constraints identified in the Assessment Information (<u>H2.1</u>, page 30) and highlighted in paragraph 34 above. The seventh criterion ensures the site is retained in Gypsy and Traveller use and cannot become a general-purpose residential caravan site or holiday lets.



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Site: Land at Strayground Lane, Wymondham (Ref GNLP5028 A & B) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

- 38. Yes, the allocation of GNLP5028 A and B (formerly sites GNLP5005 and GNLP5023) is justified and evidenced. Assessment and consultation details are provided in the Site Assessment information (<u>H2</u>), SA (<u>H4</u>), and the Summary of Consultation (section <u>H6</u>, see documents H6.1 and H6.2).
- 39. Originally the sites were referred to as GNLP5005 and GNLP5023, but as of May 2023 when the topic paper <u>H3.1</u> was published they have been re-referenced as GNLP5028 A and B. Combining and re-referencing the sites is the result of a judgement about highway access constraints, because doing so ensures development of the Gypsy and Traveller pitches cannot take place until after the volume of traffic along Strayground Lane has been reduced by the closure of the waste recycling centre. From a highways perspective this is required due to the narrowness of Whartons Lane and Strayground Lane, and a concern over the visibility splay at the junction of Whartons Lane with the B1172 London Road.
- 40. Pages 9-21 of <u>H2.1</u> give the Partnership's assessment of site GNLP5005, or as it is now referenced GNLP5028 B. Following the Focussed Consultation that closed in March there were no substantive updates and the Partnership still considers that this assessment justifies allocation of the site.
- 41. Pages 34-35 of <u>H2.1</u> give the Partnership's assessment of site GNLP5023, or as it is now referenced GNLP5028 A. This assessment still justifies the site, but following the Focussed Consultation that closed in March there are some points of clarification which are referred to in the May 2023 Site Assessment Information Update (<u>H3.3</u>) and that have been added to the policy requirements. These relate to protecting the nearby County Wildlife Site, landscape screening, providing access to the river for maintainance, and that development must not compromise the nearby river defences.
- 42. The June 2023 update to the Sustainability Appraisal (<u>H4.2</u>) followed the decision to combine the two Strayground Lane sites and references them as GNLP5028 A and B. Pages 104-109 of <u>H4.2</u> explains the SA findings pre-mitigation for GNLP5028 A and B, and the latest policy is appraised at pages 140-142. The SA identifies positive or neutral outcomes for most issues. It also states that limited access to health care facilities and education are an issue for the site as are air quality, natural resources and water.

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Question 2

Have any constraints to development been properly assessed and, where necessary, is it likely that appropriate mitigation can be achieved?

Response to question 2

- 43. Yes, the constraints of GNLP5005 and GNLP5023 have been assessed and factored into the site selection process. These constraints were considered when originally drafting policies for them as GNLP5005 and GNLP5023, and the constraints have been reconsidered following their merger as GNLP5028 parts A and B. Pages 9 and 34 of <u>H2.1</u> show that the Strayground Lane sites have 7 amber constraints. These are related to 'Site Access', 'Accessibility to Services', 'Utilities Capacity', 'Utilities Infrastructure', 'Contamination and Ground Stability', 'Biodiversity and Geodiversity' and 'Compatibility with neighbouring uses'.
- 44. Notwithstanding a remaining objection from the highways authority, the amber constraint over site access has been addressed by combining the two pieces of land at Strayground Lane together as one allocation and by the criteria written into the policy text. Combining and re-referencing the sites as GNLP5028 A and B means that development cannot happen until traffic volumes are reduced by the closure of the waste recycling centre. Specific requirements that must be addressed at the planning application stage to address highways access are in policy criteria 1 and 2.
- 45. Although the Strayground Lane sites had an amber rating for accessibility to services, paragraph 105, page 35 of the Site Assessment Information (H2.1) is relevant. It says: "There are no footpaths on Strayground Lane, but as it is a quiet road, pedestrians and cyclists would be able to use this route. There is a local shop approximately 700 metres away and Browick Road Primary School is approximately 1 kilometre away." This factor is especially relevant because it makes Strayground Lane the most sustainably located site in terms of access to services of all the locations promoted for Gypsy and Traveller pitches through the local plan process.
- 46. Other constraints identified in the Site Assessment are addressed through site allocation policy requirements that can be determined in detail at the planning application stage. These will ensure caravans and built structures are away from areas of flood risk and that the scheme would not compromise the nearby river defences, with space being provided for an access to the river to allow for maintenance. The policy also requires a contamination investigation, landscape screening at the site's boundaries to protect residential amenity, a study on the presence of protected species and the protection of groundwater supplies.

Question 3

Is the site available, and is the assumed number of pitches robust?



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Response to question 3

- 47. Yes, the Partnership has agreed Joint Delivery Statements with the respective landowners. Joint Delivery Statement <u>H7.6</u> has been agreed with the owner of the larger Part A area of land and <u>H7.7</u> does the same for Part B, which is currently the waste recycling centre.
- 48. The Partnership is also confident that 12 pitches can be provided from GNLP5028 A and B, though the density of development would be different across the two pieces of land. This is because Part A is a much larger undeveloped piece of land, whereas Part B is smaller and is already entirely covered by hardstanding.
- 49. Part A measures 11,000 sqm, which equals 1,100 sqm per pitch, and this is ample even after deducting space for protecting and enhancing the ecological and landscape qualities of the land. By contrast, Part B measures 700 sqm, which equals 350 sqm per pitch. This affords adequate space for two pitches which would reuse the hardstanding that already covers the site.

Question 4

Is the site likely to come forward in the timescales envisaged?

Response to question 4

50. Yes, Table 9 of the topic paper <u>H3.1</u> explains the timeline for developing GNLP5028 A and B. The landowner of Part A is actively promoting the site, has prepared a transport statement in support of its allocation in the GNLP, and as per Joint Delivery Statement <u>H7.6</u> forecasts the delivery of 5 pitches in 2025/26 and 5 in 2026/27. For Part B of the site, the landowner has also agreed a Joint Delivery Statement (<u>H7.7</u>), and subject to the waste recycling centre being relocated within the anticipated timeframe, forecasts the delivery of 2 pitches in 2026/27.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

51. Yes, the policy sets nine criteria which are justified and effective. Criteria 1 and 2 are to address site access constraints and to require highway improvements to the passing bays along Strayground Lane and an adequate visibility splay at the junction of Whartons Lane with London Road (the B1172). Criteria 3, 4, 5, 6, 7, and 8 are in response to the amber constraints identified in the Assessment Information (H2.1, pages 9 and 34) and in paragraph 46 above. The ninth criterion ensures the site will be





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retained for Gypsy and Traveller use and cannot become a general-purpose residential caravan site or holiday lets.



Site: Land off Buxton Road, Eastgate, Cawston (Ref GNLP5004R) Are the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

- 52. Yes, the allocation of GNLP5004R is justified and evidenced. Assessment and consultation details are provided in the Site Assessment information (<u>H2</u>), SA (<u>H4</u>) and the Summary of Consultation (section <u>H6</u>, see documents H6.1 and H6.2).
- 53. Pages 5-7 of <u>H2.1</u> give the Partnership's assessment of the site and following the Focussed Consultation that closed in March, this assessment still justifies the allocation of the site, subject to issues summarised in <u>H3.3</u>. The public consultation showed that an error had been made in how the site boundary had been drawn. Consequently, as a factual correction, the site is re-referenced as GNLP5004R with the eastern boundary corrected and the site area has been recalculated from 0.12 ha to 0.09 ha. A further point of clarification is that the requirement to undertake an archaeological assessment will incorporate a field evaluation as well as a desktop study.
- 54. Pages 28-32 of <u>H4.2</u> explain the SA findings pre-mitigation for GNLP5004R, and the policy for this site is appraised at pages 132-133. The SA identifies positive or neutral outcomes for most issues. It also shows that limited access to services, including to health care facilities, and impacts on natural resources, are issues for the site.

Question 2

Have any constraints to development been properly assessed and, where necessary, is it likely that appropriate mitigation can be achieved?

Response to question 2

- 55. Yes, constraints have been assessed and factored into the site selection process, and where it is possible to, mitigation is included in the site allocation policy. Page 5 of <u>H2.1</u> shows there to be seven amber constraints, which are related to 'Site Access', 'Accessibility to Services', 'Contamination and Ground Stability', 'Significant Landscapes', 'Biodiversity and Geodiversity', 'Historic Environment' and 'Compatibility with neighbouring uses'.
- 56. The constraint over accessibility to services cannot be mitigated. This is due to the rural location of the site and its geographical distance to facilities. However, this must be weighed against the positive constraints and impacts analysis for several issues related to the site and the ability to mitigate other issues through policy. The site is amongst the most favourable of the sites available.
- 57. The amber constraint over the vehicular access has been addressed by a policy criterion that allows the removal of trees or hedgerow to create a suitable visibility splay

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at the site entrance, provided that any losses are compensated for by new planting within the development.

58. Other constraints identified from the Site Assessment have been addressed through site allocation policy requirements that will be determined in detail at the planning application stage. These will ensure there is landscape screening to maintain the residential amenity of adjoining properties, an archaeological assessment due to the possible proximity of Roman settlement in the area, and measures to protect groundwater supplies.

Question 3

Is the site available, and is the assumed number of pitches robust?

Response to question 3

- 59. Yes, Joint Delivery Statement $\underline{H7.3}$ explains the landowner's commitment to making the site available for sale as a Gypsy and Traveller site.
- 60. GNLP5004R measures 900 sqm, which equals 225 sqm per pitch. Although this is the smallest average pitch size amongst the allocations, achieving 4 pitches at the site is considered to be a robust assumption. The site's rectangular shape, flat topography, and few constraints that reduce the developable area give the opportunity to segment the site into four, with a single access and turning space serving all four pitches. A site of 4 pitches is also more likely to be occupied by a single extended family who may prefer a scheme layout with some shared facilities or communal open space.

Question 4

Is the site likely to come forward in the timescales envisaged?

Response to question 4

61. Yes, Table 9 of the topic paper <u>H3.1</u> explains that a Joint Delivery Statement has been agreed with the landowner. Using the Joint Delivery Statement, the trajectory forecasts 4 pitches in 2026/27. This is based on the landowner taking until 2024/25 to dispose of the site and the new pitches taking another 1-2 years to be developed.

Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

62. Yes, five criteria have been set in the policy and these are justified and effective. The first criterion is to ensure the existing field access is upgraded with an acceptable visibility splay. Criteria 2, 3, and 4 are in response to the amber constraints identified in

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the Assessment Information ($\underline{H2.1}$, page 5) and highlighted in paragraph 58 above. The fifth criteria is to ensure the site is retained for Gypsy and Traveller uses, and cannot become a general-purpose residential caravan site or holiday lets.



If proposed for allocation by the Partnership following the additional focussed consultation (June-July 2023):

Site: Brick Kiln Road Hevingham (Ref GNLP5027) Is the proposed site allocations listed below soundly based? In particular:

Question 1

Is the allocation justified and is it supported by the evidence?

Response to question 1

- 63. Yes, the allocation of GNLP5027 is justified and evidenced. Assessment and consultation details are provided in the Site Assessment information (<u>H2</u>), SA (<u>H4</u>) and Summary of Consultation (section <u>H6</u>, see documents H6.1 and H6.2).
- 64. Pages 5-7 of <u>H2.2</u> give the Partnership's assessment of the site, which was subject to a public consultation that closed on 3rd July. The Partnership has considered and responded to the representations, but none of the issues raised were substantive enough in relation to issues and constraints at the site to amend the site assessment conclusions that it is suitable for allocation (section <u>H6</u>, see document <u>H6.3</u>). Consequently, the Partnership still considers that this assessment represents a justification for the allocation of the site.
- 65. Pages 98 to 103 of <u>H4.2</u> explain the SA findings pre-mitigation for GNLP5004R, and the policy for this site is appraised on page 139. The SA identifies positive or neutral outcomes for most issues. It also shows that limited access to services, including to health care facilities, and impacts on natural resources and water, are issues for the site.

Question 2

Have any constraints to development been properly assessed and, where necessary, is it likely that appropriate mitigation can be achieved?

Response to question 2

66. Yes, constraints have been assessed and factored into the site selection process, and where it is possible, to mitigation included in the proposed site allocation policy. Page 5 of <u>H2.2</u> shows there to be seven amber constraints, which are related to 'Site Access', 'Accessibility to Services', 'Utilities Infrastructure', 'Flood Risk', 'Significant Landscapes', 'Biodiversity and Geodiversity', and 'Compatibility with neighbouring uses'. Mitigation for these issues is in the proposed site allocation policy for GNLP5027 (appendix A below, page 35), which has recently been consulted upon.

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- 67. The constraint over accessibility to services cannot be mitigated. This is due to the rural location of the site and its geographical distance to facilities. However, this must be weighed against the positive constraints and impacts analysis for a number of issues related to the site and the ability to mitigate other issues through policy. The site is amongst the most favourable of the sites available and has the advantage of being an extension to an already established site.
- 68. The amber constraint over the vehicular access has been addressed through the policy as it allows the removal of trees or hedgerow to create a suitable visibility splay at the site entrance, provided that any losses are compensated for by new planting within the development.
- 69. Other constraints identified from the assessment have been addressed through site allocation policy requirements and will be determined in detail at the planning application stage. These will ensure caravans and built structures are away from areas of flood risk, development avoids the route of a nearby underground pipeline, landscape screening is provided to maintain the residential amenity of adjoining properties, there are measures to protect groundwater supplies and an ecological assessment is undertaken in case of the presence of protected species like bats, reptiles, and breeding birds.

Question 3

Is the site available, and is the assumed number of pitches robust?

Response to question 3

- 70. Yes, Joint Delivery Statement <u>H7.9</u> explains the landowner's commitment to providing 5 more pitches during 2025/26. GNLP5027 is not included in the trajectory in <u>H3.2</u> as drafted at the time of writing. Since this site is now proposed as part of the main modifications to the sites plan, it has been added to the 5-year supply from April 2022 to March 2027 which increases from 35 to 40 pitches (see the response to issue 2, question 1 below for further details).
- 71. The Brick Kiln Road site measures 7,500 sqm, which equals 1,250 sqm per pitch, and gives assurance that ample space for the proposed expansion exists even when constraints like surface water flood risk, landscaping, and the route of the underground pipeline are deducted.

Question 4

Is the site likely to come forward in the timescales envisaged?

Response to question 4

72. Yes, there is every likelihood that 5 additional pitches can be built by 2025/26, as Joint Delivery Statement <u>H7.9</u> explains.



Question 5

Are the detailed policy requirements that would apply to the allocation justified and effective?

Response to question 5

73. Yes, seven criteria are in the site allocation policy and these are considered to be justified and effective. The first criterion is to use the existing vehicular access to Brick Kiln Road. Criteria 2, 3, 4, 5 and 6 are in response to the amber constraints identified in the Assessment Information (<u>H2.2</u>, page 5) and summarised in paragraph 69 above. The seventh criterion is to ensure the site is retained for Gypsy and Traveller use and cannot become a general-purpose residential caravan site or holiday lets.



Issue 2: Supply of pitches over the plan period

Question 1

Will there be at least a 5-year supply of deliverable pitches on adoption of the plan?

Answer to Question 1

- 74. Yes, as shown in tables 1 and 2 of appendix A to this document, there is calculated to be a 6.7-year supply for the period April 2022 to March 2027. This is based on a need for 30 pitches set against a supply of 40 pitches. The requirement for 30 pitches is derived from the GTAA (<u>B8.3</u>) but has been updated to May 2023 by taking account of recent changes in the existing stock and pipeline of pitches. These details are fully explained in paragraph 2.4 of the topic paper (<u>H3.1</u>).
- 75. The sites that comprise the supply of 40 pitches are listed below in table 1 of appendix A of this document. It is forecast that these sites can be built out by March 2027, and in support of this the various landowners and promoters have provided Joint Delivery Statements. These statements are available in section <u>H7</u>.

Question 2

Will there be a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and years 11-15 of the plan?

Answer to Question 2

- 76. The trajectory (<u>H3.2</u>) shows the land at Ketteringham Depot (GNLP5013) as providing 10 pitches during the period April 2027 to March 2032, which will meet the identified need over that period. For details about the time periods for when pitches are required see Table 2 of the topic paper (<u>H3.1</u>) or Table 5.11 of the GTAA (<u>B8.3</u>).
- 77. Between April 2033 to March 2037, which is equivalent to years 11 to 15 of the plan, the trajectory shows a reliance on windfall planning permissions providing a supply of 12 pitches. The Partnership considers this to be a reliable estimate of future windfall and in combination with site allocations will ensure the need is met for 52 pitches over the plan period with a buffer.

Question 3

Is there compelling evidence that windfall pitches will provide a reliable source of supply

Answer to Question 3

78. Yes, the Partnership is applying a reliable allowance for windfall, which totals 12 pitches, and is shown as a row highlighted blue in the trajectory (<u>H3.2</u>).





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- 79. Paragraphs 4.1 to 4.5 on pages 8 and 9 of topic Paper <u>H3.1</u> explain why an allowance of 12 windfall pitches over 10 years at a rate of 1.25 per year is a reliable projection. This is a discounted windfall allowance that is below the long-term yearly average of 4 pitches per year since 2009/10, and fewer than the recent five-year average of 2 pitches per year.
- 80. Not only is the windfall rate of 12 pitches both modest and reliable, it is also not factored into the trajectory (<u>H3.2</u>) until 2028/29 onwards. The estimated rate from that point onwards is 1 to 2 pitches a year. This means that the Partnership is seeking to meet its 5-year accommodation needs of 30 pitches between April 2022 and March 2027 without relying on windfall permissions.



Appendix A Proposed Main Modifications to the GNLP Sites Plan

Main modifications are required to the GNLP Sites Plan to allocate deliverable and developable Gypsy and Traveller sites. 8 sites in total are proposed for allocation at Carleton Rode (2 sites), Cawston, Foulsham, Hevingham, Ketteringham, Stratton Strawless and Wymondham.

Table 1 below lists the sites and table 2 provides the calculation of the 5-year land supply.

Table 1 Proposed Specific Site Allocations for Inclusion in the Sites Plan
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		Site			
Place Name	Address	Reference	Pitches		
Sites to deliver from 2022 to 2027					
Carleton Rode	Romany Meadow, The Turnpike	GNLP5020	6		
Carleton Rode	Upgate Street	GNLP5024	4		
Cawston	Land off Buxton Road, Eastgate	GNLP5004R	4		
Foulsham	Land off Reepham Road, The Oaks	GNLP5022	5		
Hevingham	Land off Brick Kiln Road	GNLP5027	5		
Stratton					
Strawless	Woodland Stable, Shortthorn Road	GNLP5019	4		
	Land at Strayground Lane,	GNLP5028			
Wymondham	Wymondham	Parts A and B	12		
5-year total 40 = 6.7-year land supply (against the 30-pitch requirement)					
Sites to deliver 2028 to 2032					
	Ketteringham Depot land east of				
Ketteringham	Station Lane	GNLP5013	10		

Table 2 – Calculation of the 5-year land supply

Row ID	Greater Norwich Gypsy and Traveller Land Supply 1 April 2022 to 31 March 2027		
а	Total requirement 1 April 2022 to 31 March 2038 from GTAA 2022	52	
b	Annual Requirement from GTAA 2022 (a/16 years)	3.3	
С	Number of Pitches Required 1 April 2022 to 31 March 2027 from GTAA 2022	30	
d	Supply of Pitches Projected from Allocations 1 April 2022 to 31 March 2027	40	
е	Supply of Pitches Projected from Windfall 1 April 2022 to 31 March 2027	0	
f	Revised Annual Requirement (c/5 years)	6.00	

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g	Supply of Pitches (d+e)	40
h	Shortfall/Surplus of Supply (d-c)	10
i	Supply in Years (g/f)	6.7

The text and policies which are proposed to be consulted on as main modifications and subsequently to be added as a separate section at the end of the GNLP Sites Plan are below:



Gypsy and Traveller Site Allocations

Carleton Rode – Policy GNLP5020 Romany Meadow, The Turnpike

- 1. This is a privately owned greenfield site which will extend a well-established Gypsy and Traveller site known as Romany Meadow on The Turnpike, Carleton Rode. The allocation of GNLP5020 will result in an expansion from the existing 6 pitches to 12 pitches in total.
- 2. Site specific issues will impact on the design of the development. A surface water flow path that crosses the southern part of the site is likely to limit where caravans and other structures can be located, and additional landscaping is required at the boundaries of the site to protect views of nearby listed buildings. An ecological assessment is also required due to the proximity of nearby mature trees and hedgerows.





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Policy GNLP5020

Land off the B1113 (0.54 ha) at Romany Meadow, The Turnpike, Carleton Rode is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 6 additional residential Gypsy and Traveller pitches.

The development will address the following site-specific matters:

- 1. Access should be via the existing access off The Turnpike that serves the Romany Meadow site.
- 2. A surface water flood risk assessment must be carried out with caravans and other structures positioned away from areas at surface water flood risk.
- 3. An ecological assessment must be carried out and any identified impacts on protected species and nearby sites mitigated.
- 4. Landscaping and tree planting will be required to preserve the landscape character of the surrounding area and to protect views of nearby listed buildings.
- 5. Pollution mitigation measures are required as the site is within the catchment of groundwater source protection zone (III).
- 6. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.





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Carleton Rode – Policy GNLP5024 Upgate Street

- 3. This is an existing privately owned Gypsy and Traveller site located on Upgate Street, Carleton Rode. The allocation of GNLP5024 will result in an expansion from the existing 2 pitches to 6 pitches in total.
- 4. Further development of the site will require investigation of highway safety, including of vehicle speeds along Upgate Street, with widening of the visibility splay at the site entrance as appropriate.
- 5. An ecological assessment prior to development is required due to the presence of a veteran tree on the northern boundary of the site and because New Buckenham Common is approximately 250 metres to the south-west.
- 6. A possible fragment of the scheduled monument Bunn's Bank linear earthwork is approximately 230 metres from the site. Therefore, an archaeological assessment is required prior to development.





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Policy GNLP5024

Upgate Street, Carleton Rode (0.62 ha) is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 4 additional residential Gypsy and Traveller pitches.

The development will address the following site-specific matters:

- 1. Access should be via the existing access off Upgate Street. A highway safety assessment is required, and an appropriate visibility splay must be achieved.
- 2. An ecological assessment must be carried out and any identified impacts on protected species and nearby sites mitigated.
- 3. Pollution mitigation measures are required as the site is within the catchment of groundwater source protection zone (III).
- 4. To protect the Bunn's Bank linear earthwork an archaeological assessment will be required prior to development.
- 5. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.







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Cawston – Policy GNLP5004R Land off Buxton Road, Eastgate

- 7. This privately owned greenfield site is located on the Buxton Road in the hamlet of Eastgate to the south-east of Cawston.
- 8. Additional landscaping is required as part of the design and layout of the scheme to enhance screening and to maintain the residential amenity of adjoining properties. An archaeological assessment is also required prior to development due to the site being close to an area of Roman settlement.

Policy GNLP5004R

Land off Buxton Road, Eastgate, Cawston (0.09 ha) is allocated for a permanent residential Gypsy and Travellers site. The site will accommodate approximately 4 residential Gypsy and Traveller pitches.

The development will address the following site-specific matters:

- 1. Access will be via Buxton Road. Any trees or hedgerow lost to form the access or visibility splay must be compensated for with new planting within the development.
- 2. Landscaping, including species appropriate to the local area, will be provided to enhance screening and to maintain the residential amenity of adjoining properties.
- 3. A desk based archaeological assessment and, if necessary, a programme of archaeological fieldwork, will be required prior to development.
- 4. Pollution mitigation measures are required as the site is within the catchment of groundwater source protection zone (III).
- 5. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.





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Greater Norwich Local Plan Hearing Statement – Matter 17 (July 2023)





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Foulsham – Policy GNLP5022 The Oaks, Land off Reepham Road

- 9. This site allocation would extend a well-established privately owned Gypsy and Traveller site by 5 further pitches. The site is located off the Reepham Road, approximately 2 kilometres from the edge of the village of Foulsham which has a limited range of services and facilities including Foulsham Primary School.
- 10. Further development of the site will require investigations into highway safety, including vehicle speeds along Reepham Road, with widening of the visibility splay at the site entrance if required.
- 11. The Bacton to Kings Lynn gas pipeline crosses from east to west below the site at its mid-point. This will require further investigation, engagement with the Health & Safety Executive (HSE), National Gas Transmission and National Grid and consequent consideration of site design. A surface water flow path that crosses the southern portion of the site is also likely to limit where caravans and other structures can be located.
- 12. An ecological assessment is needed due to the presence of several County Wildlife Sites within 2.5 kilometres.
- 13. The allocation of GNLP5022 will result in its expansion from the existing 2 pitches to 7 pitches in total.





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Policy GNLP5022

The Oaks off Reepham Road, is allocated for a residential Gypsy and Traveller site (3.1 ha). The site will accommodate approximately 5 additional residential Gypsy and Traveller pitches.

The development will address the following site-specific matters:

- 1. Access will be via the existing access on Reepham Road. A highway safety assessment is required, and an appropriate visibility splay must be achieved.
- 2. A surface water flood risk assessment must be carried out with caravans and other structures positioned away from areas at surface water flood risk.
- 3. An ecological assessment must be carried out and any identified impacts on protected species and nearby sites mitigated.
- 4. Landscaping and tree planting will be required to preserve the landscape character of the surrounding area and to protect views of nearby listed buildings.
- 5. Development will be designed to avoid impacts to and from the underground gas pipeline.
- 6. Pollution mitigation measures are required as the site is within the catchment of groundwater source protection zone (III).
- 7. The residential pitches shall not be occupied by any persons other than





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Policy GNLP5027 Land off Brick Kiln Road, Hevingham

- 14. This is an 0.75 ha greenfield site which will extend a well-established privately owned Gypsy and Traveller site located off Brick Kiln Road, Hevingham.
- 15. The site consists of grassland with mature trees and hedgerows bordering and within it. As such, it has the potential to support priority habitats as well as protected species such as bats, reptiles and breeding birds, so a preliminary ecological appraisal is required.
- 16. The land shown as GNLP5027 already has planning permission for one pitch reference (20131495). This allocation will result in its expansion from the existing pitch to six pitches in total. It therefore adds five pitches to the already established site.
- 17. The Bacton to Roudham Heath Lynn gas pipeline crosses from east to west across the far northern end of the site. This will require further investigation, engagement with the Health & Safety Executive (HSE), National Gas Transmission and National Grid and consequent consideration of site design. A surface water flow path that crosses the northern border of the site is also likely to limit where caravans and other structures can be located.
- 18. Additional landscaping is required as part of the design and layout of the scheme to enhance screening and to maintain the residential amenity of adjoining properties.





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Policy GNLP5027

Land off Brick Kiln Road, Hevingham (0.75 ha) is allocated for a permanent residential Gypsy and Travellers site. The site will accommodate approximately 5 additional residential Gypsy and Traveller pitches.

The development will address the following site-specific matters:

- 1. Access will be via Brick Kiln Road. Any trees or hedgerow lost to form the access or visibility splay must be compensated for with new planting within the development.
- 2. A surface water flood risk assessment must be carried out with caravans and other structures positioned away from areas at surface water flood risk.
- 3. Development will be designed to avoid impacts to and from the underground gas pipeline located just within the northern site boundary.
- 4. Additional landscaping will be provided to enhance screening and to maintain the residential amenity of adjoining properties.
- 5. Pollution mitigation measures are required as the site is within the catchment of groundwater source protection zone (III).
- 6. An ecological assessment must be carried out and any identified impacts on protected species and nearby sites mitigated.
- 7. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.





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HEVINGHAM

GREATER NORWICH LOCAL PLAN GYPSY AND TRAVELLER SITES

Site Reference: Location: Description: Site Area:

GNLP5027

Land Adjacent to Larkeys Farm, Brick Kiln Road, Hevingham 5 additional residential pitches for Gypsies and Travellers 0.75 ha









Ketteringham – Policy GNLP5013 Ketteringham Depot land east of Station Lane

- 19. This site is on publicly owned land located west of Station Lane, Ketteringham. It is currently used as a depot which is expected to be relocated.
- 20. This site is separated from the nearest services and facilities which are in Hethersett, but nevertheless this site is considered suitable for allocation.
- 21. Assessments will be required prior to development and mitigations put in place. These are an assessment of possible land contamination from previous uses, an ecological survey for the potential for hibernating bats in the existing buildings and an investigation of potential noise and dust from neighbouring depot and waste processing businesses nearby.

Policy GNLP5013

Land east of Station Lane, Ketteringham, (0.7 ha) is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 10 residential Gypsy and Traveller pitches.

The development will address the following site-specific matters:

- 1. Access should be via the existing access that currently serves the depot.
- 2. Investigation is required of the potential for the conversion of existing buildings, particularly at the frontage, as part of the redevelopment.
- 3. Noise and air quality investigations are required, and the layout and design of the site should include boundary treatments that protect residential amenity.
- 4. A contaminated land assessment is required, and any mitigation must be completed prior to development.
- 5. An ecological survey is required due to the potential presence of protected species such as bats or barn owls in the existing buildings.
- 6. Pollution mitigation measures are required as the site is within the catchment of groundwater source protection zone (III).
- 7. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.







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Stratton Strawless – Policy GNLP5019 Woodland Stable, Shortthorn Road

- 22. This is a privately owned greenfield site which will extend a well-established privately owned Gypsy and Traveller site known as Woodland Stable located on Shortthorn Road in Stratton Strawless. The allocation of GNLP5019 will result in an expansion from the existing 9 pitches to 17 pitches in total.
- 23. Prior to development an ecological assessment is required due to the surrounding trees and the potential habitat for protected species.
- 24. The land shown as GNLP5019 already has planning permission for 4 pitches (20211657). This allocation therefore adds 4 pitches to the number already consented at Woodland Stable.

Policy GNLP5019

Woodland Stable, Shortthorn Road, Stratton Strawless (0.33 ha) is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 8 additional residential Gypsy and Traveller pitches.

The development will address the following site-specific matters:

- 1. Access should be via the existing access off Shortthorn Road that serves the Woodland Stables site.
- 2. An ecological assessment and arboricultural survey must be carried to identify impacts on protected species; and, to retain as many existing trees on site as possible or to replant where removal is deemed necessary.
- 3. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.





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Wymondham – Policy GNLP5028 A and B Land at Strayground Lane

- 25. This site consists of a privately owned piece of land that has been put forward by the owner (part A) and a publicly owned brownfield site that is expected to become vacant due to the decision to relocate Wymondham Recycling Centre (part B).
- 26. The site is located towards the southern end of Strayground Lane, Wymondham. Strayground Lane is a quiet road that connects to the built edge of the town to the north via Whartons Lane.
- 27. The Bays River Meadow North County Wildlife Site is adjacent to, and partly overlaps the site on its west, and an established paving business is also adjacent to the site. There are mineral extraction activities on the land to the north-east and east. The Norwich to Cambridge railway line is to the south.
- 28. The redevelopment of this site will require local highways improvements, consideration of noise and dust from neighbouring activities, investigation of possible land contamination from previous uses, pollution control measures for the groundwater source protection zone and conducting an ecological assessment prior to development due to the neighbouring County Wildlife Site. Assessments will be required prior to development and mitigation put in place.

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Policy GNLP5028 A and B

Land at Strayground Lane, Wymondham (1.1 ha for part A and 0.07 ha for part B) is allocated for a residential Gypsy and Traveller site. The site will accommodate approximately 12 residential Gypsy and Traveller pitches.

The development will address the following site-specific matters:

- 1. Access will be via Strayground Lane. For part A, either the existing access point at the north-east corner of the site or a new access on the eastern boundary will be used. If a new access is provided any loss of trees or hedgerows will be compensated for by new planting within the site. Part B of the site will use the existing vehicular access for the recycling centre.
- 2. Highway improvements will be required to the passing bays along Strayground Lane and an adequate visibility splay is required at the junction of Whartons Lane with London Road (the B1172).
- 3. On part A of the site, as the land adjacent to the south-west is in Flood Zones 2 and 3, caravans and other structures shall also be positioned away from this area.
- 4. A contaminated land assessment is required, and any mitigation must be completed prior to development.
- 5. Landscape screening will be required at the site boundaries to protect residential amenity and landscape character.
- 6. An ecological assessment must be carried out and any identified impacts on nearby sites mitigated to protect the adjacent County Wildlife Site and to support priority habitat within the site boundary.
- 7. Pollution mitigation measures are required because the site is within the catchment of groundwater source protection zone (III).
- 8. Due to the proximity to the River Bays, an access shall be provided for the maintenance of the river and development must not compromise the river defences.
- 9. The residential pitches shall not be occupied by any persons other than Gypsies and Travellers and their families.



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