

RECORD OF OFFICER / MATERIAL DECISION

Local Government (Executive Arrangements) (Meetings and Access to Information) (England)
Regulations 2012.

Decision Date – 10 July 2023

Decision Maker: Executive Director of Development and City Services

Decision status: Is Key decision?: No

Is subject to call in?: No

Decision details:

In line with recommendation 5 of the [June Cabinet report](#) on the Greater Norwich Local Plan (GNLP) which delegated authority to agree further proposed modifications to the GNLP, this officer decision approves limited amendments to the proposed modifications covering Gypsy and Traveller sites, by inclusion of a site at Hevingham. See attached report.

Publication date: 9 August 2023

Date of decision: 10 July 2023

Report

1. This report summarises the recent 'Additional focussed consultation – new sites June 2023' which took place following the June Cabinet report referred to above. It then sets out the reasons for the need to include the site in Hevingham in the GNLP.

Consultation responses to the Gypsy and Traveller Sites Additional Focussed Consultation - New Sites – 5th June to 3rd July 2023

2. As reported to councillors at the June 2023 cabinet meetings, an additional public consultation has been held on three recently submitted sites. This began on 5th June and finished on 3rd July. The following sites were consulted on:
 - GNLP5025, Woodyard, Reepham Road, Foulsham
 - GNLP5026, Land off Peddlars Turnpike, Guestwick Green
 - GNLP5027, Land off Brick Kiln Road, Hevingham
3. As part of the consultation, the Partnership published a Site Assessment Information document ([H2.2](#)). This gave the Partnership's findings on the suitability of each of the sites for development, and respondents were asked whether they supported or objected.
4. There were 21 comments on the 3 site proposals. These 21 comments were received from 16 respondents because of those who commented on more than 1 site.
5. As is shown in the table below, most comments supported the consultation in that sites at Foulsham and Guestwick were not favoured by the GNLP for allocation, though there was some opposition to the favoured allocation at Hevingham. The site promoters for Foulsham and Guestwick argued in favour of allocating their sites.

Table A: Comments in Support or Objection

GNLP5025, Woodyard, Reepham Road, Foulsham	6 comments agreed with the Partnership’s assessment that GNLP5025 in Foulsham should not be allocated, and 1 comment from the site promoters argued for its allocation.
GNLP5026, Land off Peddlars Turnpike, Guestwick Green	7 comments agreed with the Partnership’s assessment that GNLP5026 in Guestwick should not be allocated, and 1 comment from the site promoters argued for its allocation.
GNLP5027, Land off Brick Kiln Road, Hevingham	3 comments disagreed with the Partnership’s assessment that GNLP5027 in Hevingham is suitable for allocation and 2 comments supported the allocation. The comment arguing for the allocation came from the site promoters and the other supporting comment came from Historic England which agreed with the assessment of there being no heritage assets near to the site. 1 comment was received from Avison Young on behalf of National Gas requesting that the policy wording of GNLP5027 reflects the presence of a high-pressure gas pipeline.

6. Neither the Environment Agency nor National Highways had comments to make on the sites.
7. A full summary of the consultation and GNLP responses to these comments is available on the [GNLP website](#). The following table provides an overview explaining what respondents said in reply to the consultation documents the Partnership published.

Table B: Overview of Comments Received

<p>GNLP5025, Woodyard, Reepham Road, Foulsham</p> <p>The Woodyard, Foulsham, site (GNLP5025) was assessed by the Partnership as being unsuitable for inclusion in the plan. This was mainly due to the highway safety concern associated with the vehicular access being on an acute bend of the Reepham Road. Comments received also mentioned the dangerous bend, as well as the lack of space within the site for more pitches, and possible harm to an oak tree within the site.</p> <p>Foulsham Parish Council also objected to GNLP5025, saying that in its view and in the opinion of residents that approached the parish council, reasons for objection were highway safety, environmental pollution, waste disposal and threat to flora and fauna. The parish council also stated that there is already a disproportionate number of Gypsy and Traveller sites in the area and that it was inappropriate to consider further pitches until planning breaches on existing sites had been addressed.</p> <p>Speaking in favour of its allocation, the promoters of GNLP5025 said that the Highways Authority had not previously objected to the access into the site. The current occupants have 4 vehicles whereas 7 vehicles were referred to when planning permission on the site was first considered in 2009. Furthermore, the promoters would install improvements to make the access safer if such measures were required.</p>

GNLP5026, Land off Peddlars Turnpike, Guestwick Green

The Peddlars Turnpike, Guestwick, site (GNLP5026) was assessed by the Partnership as unsuitable for inclusion in the plan due to its remote location and poor access. Comments received also mentioned the location and access, as well as the environmental harm that would be caused by development and that there are already other Gypsy and Traveller sites nearby. Historic England also commented, noting the proximity of listed farmhouses to the north and south of GNLP5026.

Arguing in favour of allocating GNLP5026, the promoters stated that access arrangements are safe with suitable visibility splays, that there are no recorded traffic accidents in this location, and that in comparison to other favoured sites GNLP5026 is no less remote from the services and facilities in the nearest settlement. The promoters also stated that allocating GNLP5026 would improve their personal circumstances as they are suffering distress from living in bricks and mortar accommodation, that living onsite would allow them to better care for their horses, and that allocating GNLP5026 would free-up the council home that the promoters are currently living in for another family.

GNLP5027, Land off Brick Kiln Road, Hevingham

The Brick Kiln Road, Hevingham site (GNLP5027) was assessed as suitable for inclusion in the plan. The Partnership's conclusion was that GNLP5027 was that, although it is slightly disconnected from local services, it is not affected by any major constraints. It also concluded that mitigation existed for the great majority of the 'amber' constraints identified through the assessment process. Support for this assessment came from the site promoters, and from Historic England which concurred with the assessment that no nearby listed buildings or other heritage assets would be adversely affected.

Objections to the allocation of GNLP5027 came from Hevingham Parish Council, the nearby Cobbleacre fishing lakes and holiday park, and members of the public. Reasons raised were the deficient road network, the rural location outside the settlement limit defined in planning policy, adverse environmental impacts, the disproportionate size of Gypsy and Traveller sites to the local community, and past breaches of planning conditions.

The comment from Avison Young on behalf of National Gas pointed out the route of a high-pressure gas pipeline and that the policy for GNLP5027 should include wording to the effect that the presence of this pipeline is responded to through good design. Officers have considered this comment and concluded that the proposed policy wording already achieves the effect National Gas propose.

8. The Partnership has assessed all the comments received and has concluded that the issues raised do not present new or different information to amend the conclusions in the Site Assessment Information for GNLP5025, GNLP5026, and GNLP5027. As such the Site Assessment Information document ([H2.2](#)) as published by the Partnership in June is still considered to be a robust, objective, and consistent evidence base.

Recommendation on the Inclusion of site GNLP5027, Land Adjacent to Larkeys Farm, Brick Kiln Road, Hevingham

9. As stated in the report to cabinets in June, allocating one or more of the recently consulted on sites GNLP5025, GNLP5026, and GNLP5027 strengthens the ability to help ensure the GNLP is found to be "sound" by the inspectors. This is because a main issue at the hearing session

on 25th July was whether the GNLP can deliver enough pitches by March 2027 to satisfy the assessed need. The Partnership's evidence says 30 pitches are needed by March 2027.

10. Including 5 pitches from GNLP2027 at Hevingham would bolster the supply to 40 pitches by March 2027, giving a buffer of 10 pitches. Having this buffer is important in case objectors to the GNLP cast doubt about whether certain sites can deliver quickly enough. A buffer is also important in that having a land supply above the minimum 5-year requirement will help to persuade the inspectors that the proposed approach to Gypsy and Traveller accommodation is sound. If all the sites the councils are proposing are included in the plan, there will be a 6.7-year land supply. This will strongly support delivery of need and greatly assist soundness.
11. Of primary concern is whether officers can successfully argue that 10 pitches on site GNLP5028 B at Strayground Lane, Wymondham, are deliverable. The difficulty here relates to an objection from the Highways Authority which has concerns over the narrowness of Strayground Lane and about the visibility splay at the junction of London Road (B1172). There has also been local opposition to GNLP5004R at Eastgate, Cawston.
12. It is therefore prudent that GNLP2027 at Hevingham is proposed for inclusion in the plan, as it would greatly assist in ensuring evidenced needs are met.