



Policy LP56 Gypsy and Traveller Allocations Evidence Report

**Proposed Submission
April 2016**

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1 Introduction and Policy Context

Introduction

- 1.1 A joint Local Plan for the Central Lincolnshire area is being produced which will set the framework for how development will be considered across the districts of the City of Lincoln, North Kesteven and West Lindsey to 2036.
- 1.2 This Evidence Report (which is one of a collection) provides background information and justification for policy LP56, which relates to the allocation of sites for Gypsy and Travellers.

National policy

- 1.3 In March 2012 Government adopted the 'Planning policy for traveller sites' (PPTS) which set out national policy for planning for traveller sites. This policy was superseded on 31 August 2015 by the publication of a revised policy document of the same title and in most respects the same content.
- 1.4 The National Planning Policy Framework (NPPF) (March 2012) is also relevant and states that Local Plans should identify and meet objectively assessed housing needs (paras 14 and 17); be based on adequate, up-to-date and relevant evidence (para 158); and that local planning authorities should have a clear understanding of housing needs in their area and address the needs for all types of housing (para 159).
- 1.5 The National Planning Practice Guidance (NPPG) was introduced in 2014 which offers 'live' government guidance: at the time of writing this report, the NPPG did not feature any guidance on Gypsy and Travellers and Travelling Showpeople.
- 1.6 The PPTS consists of policies on using evidence, plan making and decision taking. The following paragraphs and policies in particular relate to allocating sites for travellers:
 - Paragraph 4 - Government's aims in respect of traveller sites are... to ensure that local planning authorities ... develop fair and effective strategies to meet need through the identification of land for sites; to encourage local planning authorities to plan for sites over a reasonable timescale; ... to promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites; to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply...
 - Policy B (para 10) - Local planning authorities should, in producing their Local Plan:
 - a) identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets
 - b) identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15
 - c) consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites...
 - Policy B (para 11) - Criteria should be set to guide land supply allocations where there is identified need.
 - Policy D (para 15) - If there is a lack of affordable land to meet local traveller needs, local planning authorities in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable traveller sites. This may include using

a rural exception site policy for traveller sites that should also be used to manage applications.

- Policy F (para 18) - Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents.

1.7 The above national policy has been taken into account in preparing the Local Plan, and policy LP56 in particular.

2 Central Lincolnshire Context in Relation to Policy LP56

2.1 The Central Lincolnshire Gypsy and Traveller Accommodation Assessment 2013 identified:

- An annual need of 3.6 new permanent Gypsy and Traveller pitches from 2013 to 2033 (72 total over this period) to meet needs arising from overcrowding and from newly forming families on authorised sites;
- the need for four Emergency Stopping Places; and
- the need for one additional plot for Travelling Showpeople.

2.2 In accordance with Policy B of the national planning policy for traveller sites, the Central Lincolnshire Local Plan should identify sites for 32 pitches¹ (the need identified for the first 10 years) and broad locations for a further 19 pitches² (the need identified for years 11-15).

2.3 Key issues facing the Central Lincolnshire authorities, as identified in the Central Lincolnshire Gypsy and Traveller Accommodation Assessment, include:

- a preference for small, family sized sites;
- the population size and demographics of Gypsy and Travellers can change rapidly;
- the health status of Gypsy and Travellers is much poorer than the general population;
- poor school attendance exacerbated by lack of support means that Gypsy and Traveller children were constantly underachieving compared with national education standards;
- Government has acknowledged that increased site provision is the most effective means of dealing with unauthorised developments and encampments;
- The total Gypsy and Traveller population living in the UK is unknown (with estimates ranging from 90,000 and 120,000 in 1994 to 300,000 in 2006). There are uncertainties partly because of the number of different definitions that exist, but mainly because of an almost total lack of information about the numbers of Gypsy and Travellers now living in bricks and mortar accommodation.

2.4 The Central Lincolnshire Authorities respond to these issues in a variety of ways, including:

- The Central Lincolnshire Traveller Initiative, a charity organisation funding by Lincolnshire County Council, which provides access to a range of courses with the aim of delivering communication, education, information and other benefits to Gypsy and Travellers;
- liaising with neighbouring local authorities to ensure a coordinated approach to Gypsy and Traveller issues;

¹ Central Lincolnshire Gypsy and Traveller Accommodation Assessment 2013

² Central Lincolnshire Gypsy and Traveller Accommodation Assessment 2013

- monitoring the reasons for unauthorised caravan days³: between 2008 and 2013, over 70% of unauthorised caravan days were due to families transiting through the area, 8.5% were due to families wanting to stay in the area and 4.9% were visiting relatives; and
- Setting out policy and allocating sites through the Central Lincolnshire Local Plan.

3 Local Plan Policy: Preliminary Draft

- 3.1 The Preliminary Draft version of the Local Plan (published for consultation in October – November 2014) did not include a policy on site allocations for Gypsy and Traveller pitches (in the same way it did not include site allocations for other land use matters).
- 3.2 However, Policy LP8 Meeting Accommodation Needs of the Preliminary Draft included a section on Gypsy and Traveller issues which confirmed what the overall need was, explained that sites would be allocated at future stages, and included criteria for delivering pitches (allocated and non-allocated).
- 3.3 Comments received in relation to the Gypsy and Travellers section of policy LP8 during the Preliminary Draft consultation included: support for provision of Traveller pitches; that it is important that Traveller sites include a good level of amenity for occupiers; that the policy should confirm that the need for pitches will be kept under review; that criteria ‘a’ to ‘e’ are detailed development control criteria which should be distinctly separate; and that it is important that provision for all groups, especially Gypsies and Travellers, is spread equally across the Central Lincolnshire area to ensure parity.
- 3.4 It should also be noted that Policy LP26, Sustainable Urban Extensions, of the Preliminary Draft Local Plan stated:
“... each new urban extension proposal must... set aside an area of land which is suitable for the provision of gypsy and traveller pitches, with the size of the site informed by an assessment of local need and agreed through negotiation, unless it would be demonstrably inappropriate to do so ...”.
- 3.5 The consultation response to the Sustainable Urban Extension policy is discussed in the Evidence Report for policy LP28.

4 Local Plan Policy: Further Draft

- 4.1 In response to the issues raised in relation to policy LP8 at the Preliminary Draft stage (as summarised at 3.3 above), in formulating the Further Draft version of the Local Plan criteria a to e were removed from the Meeting Accommodation Needs policy and, with revisions, inserted into a new policy, LP56 Gypsy and Traveller Allocations. The comment about equal distribution was not taken forward in policy LP56 as accommodation distribution across the Central Lincolnshire area is addressed in policies LP2, The Spatial Strategy and Settlement Hierarchy, and LP3, Level and Distribution of Growth and the development of particular types of accommodation (including Gypsy and Traveller accommodation) may not be equal across all three local authority areas due to differing need, markets, land availability and sustainability considerations.

³ Calculated by multiplying the number of caravans on an unauthorised encampment by the number of days that the encampment lasts to give a rough indication of comparative demand in each area of Central Lincolnshire.

- 4.2 The approach used to identify sites for Gypsy and Traveller pitches for inclusion in the Further Draft Local Plan was as follows:
- The ‘call for sites’ for all forms of development in October 2014 (as part of the Preliminary Draft Local Plan consultation) explicitly sought submissions from landowners and others for Gypsy and Traveller sites. An extremely limited response was received, and insufficient to meet need identified.
 - Land which was put forward for residential or other development during the October 2015 call for sites, but which was subsequently not proposed as an allocation for such uses, were considered by officers as to their suitability for allocation as a Gypsy and Traveller site and, where appropriate, such land owners were contacted to see if they would be interested in their land being allocated for Gypsy and Traveller purposes. This only yielded three positive responses.
 - The owners of existing Gypsy and Traveller sites (where contactable) were asked whether they would consider any extensions to their existing site/s.
 - Each property team of the four authorities comprising Central Lincolnshire were asked whether any suitable council-owned land may be suitable for allocation. This again only had limited success.
 - Tolerated sites within each local authority area were considered.
- 4.3 In undertaking the above work, it was identified that many of the existing sites are either not suitable for extension, or are privately owned and therefore opportunities for extension are limited. A number of the main sites are also large and do not lend themselves to the preference for small, family sized sites.
- 4.4 Following the work to identify sites for Gypsy and Travellers outlined above, policy LP56 ‘Gypsy and Traveller Allocations’, as introduced to the Further Draft Local Plan, set out the sites that were considered to be the most suitable of the very limited number of identified options. As explained at 4.1 above, the policy also established a set of criteria largely drawn from the criteria as set out in LP8 of the Preliminary Draft Local Plan for the consideration of Gypsy and Traveller proposals on the allocated sites, within Sustainable Urban Extensions, and on non-allocated sites.
- 4.5 It should also be noted that Policy LP28, Sustainable Urban Extensions of the Further Draft Local Plan was revised from the Preliminary Draft version (formerly policy LP26):
- “... each new urban extension proposal must... set aside an area of land which is suitable for the provision of gypsy and traveller pitches unless it would be demonstrably inappropriate to do so. The size of the site shall be agreed through negotiation, though is likely to be of a size sufficient to accommodate 5 pitches. Such set aside land should be on-site unless the developer can demonstrate exceptional circumstances which necessitate provision on an alternative site or the payment of a financial contribution to the council to enable the need for pitches to be met elsewhere. Such set aside land should be provided to the local planning authority at nil cost and be secured through an appropriate legal agreement.”*

Further Draft Consultation

- 4.6 Numerous comments were received in relation to policy LP56 during the consultation on the Further Draft Local Plan: the majority of these were in objection to the proposed allocations. The key issues raised included:
- Objections to all proposed site allocations
 - Very small number of supporting representations, mostly giving high level support
 - Mixed views on whether Sustainable Urban Extensions should provide Gypsy and Traveller provision
 - Common objections to the proposed site allocations included:
 - Lack of facilities nearby

- Impact on landscape character
- Road safety and access
- Flooding
- Integration to the community
- Limited school places
- Privacy and amenity of existing and future residents
- Questions over site capacity
- Imbalanced distribution of sites across the Central Lincolnshire area
- Objection on the grounds that the proposed site allocations do not meet the criteria set out in the policy
- No existing infrastructure on site

4.7 It became apparent during the October- November 2015 Further Draft consultation that the six sites put forward in the emerging Local Plan were an area of considerable public concern, generating the highest level of representations. The site in Greetwell (CL1388) and the two sites in Marton (CL1335 and CL1337) were particularly objected to.

5 Local Plan Policy: Proposed Submission

5.1 Further detailed consideration of the proposed site allocations took place over the winter 2015/16, assisted by views made during the Further Draft consultation in October to November 2015. A specific agenda item on this matter was also considered at the Central Lincolnshire Joint Strategic Planning Committee at its meeting on 18 January 2016⁴.

5.2 The Proposed-Submission version of policy LP56 has been significantly changed from the Further Draft version of the policy. The changes follow careful consideration of the representations received, further technical site appraisal work of the sites proposed, an Integrated Impact Assessment (IIA, incorporating Sustainability Appraisal) appraisal of reasonable sites, as well as attempts to find any other suitable sites (though this proved unfruitful).

5.3 The policy was therefore amended from the Further Draft to the Proposed Submission as follows:

- The following proposed allocations were removed:
 - CL1388: Land off A158, North Greetwell
 - CL4440: Summergangs Lane, Gainsborough
 - CL1335: Land off A156, Marton
 - CL4205: Washingborough Road, Lincoln (1)
- The following sites have been retained:
 - CL4675: Washingborough Road, Lincoln (2) (capacity 5)
 - CL1337: Trent Port Road, Marton (capacity 3-6)
- The following site has been added (because it recently received consent):
 - CL4738: Westrum Lane, near Brigg (capacity 6)
- The requirement for SUEs to contribute towards pitch provision is strengthened in existing policy LP28 (to 5- 10 pitches per SUE, rather than the previous 5 pitches per SUE). See the separate evidence report for LP28 for more details on this aspect.

⁴ CLJSPC 18 January 2016 agenda and minutes
<https://nkdc.moderngov.co.uk/ieListDocuments.aspx?MId=6227&x=1>

- 5.4 Details of the sustainability appraisal of the candidate sites can be found in the IIA report, and are not repeated here (though such an appraisal has assisted in making final decisions on the site allocations).
- 5.5 Appendix 1 of this Evidence Report sets out more detailed information and conclusions as to why the sites named above have or have not been taken forward (excluding CL4738, which has consent and therefore automatically is allocated).
- 5.6 In terms of the criteria elements of the policy, criteria 'e' of Policy LP56 has also been amended to read "*should be adequately served, or capable of being adequately serviced...*", and the latter part of the criteria about undue pressure on infrastructure removed.
- 5.7 In addition to the above changes, the supporting text to the policy now incorporates the text in relation to the Gypsy and Traveller pitch needs identified in the 2013 assessment that was previously featured in policy LP10 of the Further Draft (Meeting Accommodation Needs). This text has been relocated from LP10 as it was considered more logical and the previous wording within policy LP10 did not make any policy provision in respect of Gypsy and Travellers.
- 5.8 In terms of the identified need for four Emergency Stopping Places, these Places are to be identified outside the Local Plan process, as the nature of such sites are temporary (and usually without any hard buildings provided) and are subject to changes in location as new Stopping Places are found or arise. Identification in a twenty-year Local Plan would therefore be inappropriate and it is not common practice to do so.
- 5.9 In terms of the identified need for one additional plot for Travelling Showpeople, no sites have been put forward and we are not aware of a particular demand in any particular part of Central Lincolnshire. As such, as and when an applicant for such uses comes forward, the generic policies in the plan should prove sufficient to deal with this matter. We contacted The Showmen's Guild of Great Britain in January 2016 to confirm whether they were content with this approach, however we did not receive a response to our email communication.

6 Alternative Reasonable Options

- 6.1 The following alternative options have been considered for this policy. (Option 4 is the preferred policy approach which has been included in the Proposed Submission Local Plan.)
- 6.2 **Option 1:** allocate various sites to contribute to meeting Gypsy and Traveller needs and require a small contribution (5 pitches) from Sustainable Urban Extensions. Whilst this was the preferred policy approach at the Further Draft stage, it has not been taken forward in the Proposed Submission Local Plan because insufficient suitable and deliverable sites were identified.
- 6.3 **Option 2:** do not allocate sites to meet the needs of Gypsy and Travellers in the Local Plan and instead allocate sites through a separate development plan document (DPD) following adoption of the Local Plan. This option has been rejected because national planning policy clearly sets out planning authorities' responsibilities with regard to identifying Gypsy and Traveller needs and meeting these needs. Furthermore, paragraph 153 of the NPPF states that any additional development plan documents should only be used where clearly

justified. A recent inspector's interim examination findings on a Local Plan⁵ recommended that the Plan be withdrawn or face being found unsound because (amongst other reasons) it did not meet the development requirements for Gypsy and Travellers in accordance with the PPTS, nor did it clearly justify why Gypsy and Traveller provision should be set out in an additional plan at a later date.

- 6.4 **Option 3:** allocate more sites to meet Gypsy and Traveller needs and require less / no contribution from sustainable urban extensions. This option has been discounted because there were not enough suitable sites put forward for Gypsy and Traveller development to meet the need identified in the GTANA.
- 6.5 **Option 4 (preferred approach):** require a greater contribution (i.e. greater than 5 pitches) from sustainable urban extensions and allocate fewer other, individual sites. This option was discounted at the Further Draft stage, as the preference was for clearly identified sites to be allocated where possible. However, identification of sufficient, deliverable and justifiable sites was not possible, so this option is taken forward in the Proposed Submission Local Plan.

7 Conclusion

- 7.1 This Evidence Report demonstrates the rationale for the proposed policy as contained in the April 2016 Proposed Submission Local Plan. We hope this helps demonstrate how we have responded to comments received during both the Preliminary and Further Draft consultations, as well as how the latest evidence and national guidance has been taken into account.

⁵ Maldon District Council

http://www.maldon.gov.uk/info/856/local_development_plan/83/maldon_district_local_development_plan_ldp/10

Appendix 1 – Detailed appraisal of the candidate Gypsy and Traveller Sites

The following pages feature an appraisal of the candidate sites, which broadly follows the same framework for appraising housing allocations (see Evidence Report on Residential Allocations).

This appraisal should also be read in conjunction with the formal sustainability appraisal of each site.

Please note that site CL4738 (Westrum Lane, Brigg) has not been considered in the appraisal of candidate sites as this site already has planning permission.

The Site Assessment Scoping criteria used in the appraisal is set out below.

Criteria	Red	Amber	Green
Flood Risk – Fluvial and Tidal	50% or more in Flood Zone 3	Less than 50% in Flood Zone 3 and/or any of the site in Flood Zone 2	Site in Flood Zone 1 / not in flood zones 2 or 3
GP Surgery	Nearest GP Surgery is farther than 800m from any part of the site	Nearest GP Surgery is within 800m of any part of the site	Nearest GP Surgery is within 400m of any part of the site
Primary School	Nearest Primary School is farther than 800m from any part of the site	Nearest Primary School is within 800m of any part of the site	Nearest Primary School is within 400m of any part of the site
Secondary School	Nearest Secondary School is farther than farther than 1600m from any part of the site	Nearest Secondary School is within 1600m of any part of the site	Nearest Secondary School is within 800m of any part of the site
Bus Stop	Nearest bus stop is farther than 800m from any part of the site	Nearest bus stop is within 800m of part of the site	Nearest bus stop is within 400m of part of the site
Protected Local Green Space	Site is within of an area of Local Green Space	Part of the site is in an area of Local Green Space	Site is not within, or does not intersect with a Local Green Space
Green Wedge	Site, or part of the site, is within a Green Wedge	Site is immediately adjacent to a Green Wedge	Site is not within or adjacent to a Green Wedge
Area of Outstanding Natural Beauty or an Area of Great Landscape Value	Site, or part of the site, is within the AONB or an AGLV	Site is adjacent to the AONB or an AGLV (within 200m)	Site is not next to the AONB or an AGLV
Conservation Area	Site, or part of the site, is within a Conservation Area	Conservation Area within 200m of the site	No Conservation Area within 200m of the site
Scheduled Ancient Monument	Site includes a Scheduled Ancient Monument	Scheduled Ancient Monument within 200m of the site	No Scheduled Ancient Monuments within 200m of the site
Historic Parks and Gardens	Site, or part of the site, is within a Historic Parks and Garden	Historic Parks and Garden within 200m of the site	No Historic Parks and Garden within 200m of the site
Grade I or II* Listed Buildings	Site includes one or more Grade I or II* Listed Buildings	One or more Grade I or II* Listed Buildings within 200m of the site	No Grade I or II* Listed Buildings within 200m of the site
Grade II Listed Buildings	Site includes one or more Grade II Listed Buildings	One or more Grade II Listed Buildings within 200m of the site	No Grade II Listed Buildings within 200m of the site
Public rights of way	Public right of way traversing site	Within 200m of a public right of way	No public rights of way within 200m of site
Tree	TPOs on site that would	TPOs on or immediately	No TPOs on or immediately

Criteria	Red	Amber	Green
Protection Order	likely need to be removed for development (e.g. a number of TPOs across a site or around all sides, or group TPO across site)	adjacent to the site that can likely be retained as part of a development scheme (e.g. in all likelihood development could occur with trees retained as part of a landscaping scheme – such as one or two trees on the site or some at the edge of the site)	adjacent to the site
Nationally Important Wildlife Site	Site, or part of the site, is within a nationally or internationally protected wildlife site	The site is within 500m of a nationally or internationally protected wildlife site	No nationally or internationally protected wildlife sites are within 500m of the site
Locally Important Wildlife Site	Site, or part of the site, is within a locally important wildlife site	The site is within 500m of a locally important wildlife site	No locally important wildlife sites are within 500m of the site
Ancient Woodland	Site, or part of the site, is in an ancient woodland	The site is within 500m of an ancient woodland	There is no ancient woodland within 500m of the site
Contaminated Land	Site is within an area of potential contamination due to previous uses. Further investigation may be required	Part of the site is within / site is immediately adjacent to an area of potential contamination due to previous uses. Further investigation may be required	No history of uses that could result in contamination on or adjacent to the site
Regionally Important Geological Site	Site within a Regionally Important Geological Site	Site abuts a Regionally Important Geological Site	No Regionally Important Geological Site within or adjacent to the site
Agricultural Land	50% or more of the site is within Grade 1 and 2 Land and is predominantly undeveloped	Less than 50% of the site is within Grade 1 and 2 land and/or within Grade 3 land and is predominantly undeveloped	Site is grade 4 or lower or is previously developed
Surface Water Flood Risk	More than 50% at high risk of surface water flooding	Less than 50% of the site at high risk and/or any of the site at medium risk of surface water flooding	Site at low or very low risk of surface water flooding
Train Station	Nearest train station is farther than 1600m from any part of the site	Nearest train station is within 1600m of part of the site	Nearest train station is within 800m of part of the site

Site Reference	CL1335 (Reasonable alternative)	CL1337 (Preferred allocation)	CL1388 (Reasonable alternative)	CL4205 (Reasonable alternative)	CL4440 (Reasonable alternative)	CL4675 (Preferred allocation)
Address and Local Authority	East of High Street, Marton, Gainsborough, Lincolnshire DN21 5AL West Lindsey	Land off Trent Port Road, Marton West Lindsey	The Paddock, Wragby Road, Lincoln LN2 4RA West Lindsey	Land to the North of Washingborough Cemetery City of Lincoln	Land to the south of Summergangs Lane, Gainsborough West Lindsey	Washingborough Road, Lincoln (2) City of Lincoln
Site size	4.8	1.9	0.4	4.2	1.8	0.9
Greenfield or Brownfield	Greenfield	Greenfield	Greenfield	Greenfield	Greenfield	Greenfield
Flood Risk	A	A	G	A	R	A
Health	R	R	R	R	R	R
Proximity to nearest Primary School	G	A	R	R	G	R
Proximity to nearest Secondary school	R	R	A	R	R	R
Distance to nearest bus stop	G	G	G	G	G	G
Protected Local Green Spaces	G	G	G	G	G	G
Green Wedge or Settlement Break	G	G	G	A	G	A
AONB or AGLV	G	G	G	G	G	G
Conservation Area	G	G	G	R	G	G
SAM	G	G	G	G	G	G
Historic Park & Garden	G	G	G	G	G	G
Listed Building Grade 1 and 2*	A	G	G	G	G	G
Listed Building Grade 2	A	A	G	G	G	G
Public Rights of Way (ROW)	R	A	A	G	G	G
TPO	G	G	G	G	G	G
Nationally	G	G	G	G	G	G

Important sites						
Locally Important wildlife site	G	A	G	R	A	R
Ancient woodland	G	G	G	G	G	G
Contaminated land	G	A	G	A	G	A
Regionally Important Geological Sites (RIGS)	G	G	G	G	G	G
Agricultural land classification	A	A	R	G	A	G
Settlement	Marion	Marion	North Greetwell	Lincoln	Gainsborough	Lincoln
Settlement Hierarchy 2015	Medium Villages	Medium Villages	Small Villages	Lincoln Urban Area	Main Towns	Lincoln Urban Area
Surface Water Flooding	A	G	G	A	A	A
Railway Station	R	R	R	A	G	A
Open Spaces	G	G	R	G	G	G
Air pollution	G	G	G	A	G	A
Shopping centre	R	R	R	G	A	A
Employment	R	R	R	G	A	G

Site conclusions

Site CL1335

Site CL1335 is a large site off of the A156 in Marton. The site is currently farmland with a topography characterised by changing gradients, including a more significant rise in levels as it slopes upwards towards the eastern boundary. The lower, road fronting section of the site falls within Flood Zone 3, however the rear section of the site is entirely outside of the flood zone. Marton as a whole has a limited range of facilities, though it does have a primary school.

The site mostly scored 'greens' in the site appraisal above, however it scored 'red' in relation to various factors including proximity to shopping centre, employment and secondary school. Consequently the site scored poorly in the Integrated Impact Assessment (IIA) in relation to transport and accessibility, with major negative effects expected. The only major positive effects predicted by the IIA analysis were in relation to biodiversity and green infrastructure because the site does not affect a local green space, there are no nationally or internationally protect wildlife sites within 500m of the site, and there are no locally important wildlife sites within 500m.

Overall, it is considered appropriate that one site in Marton is taken forward, and on balance, CL1337 appears more suitable as CL1335 appears to have greater constraints such as flooding, highway, and landscape character.

Site CL1337

Site CL1337, off Trent Port Road, has been used for holiday caravan provision previously, however it is not currently in use for this purpose. It is accessed via a broad road/track (presumed un-adopted highway), which leads down towards the River Trent. The total site size is around 1.9ha, and therefore there are different options for the exact position of any development. Marton as a whole has a limited range of facilities, though it does have a primary school.

The site mostly scored 'greens' in the site appraisal above, however it scored 'red' in relation to various factors including proximity to shopping centre, employment and secondary school. Consequently the site scored poorly in the Integrated Impact Assessment (IIA) in relation to transport and accessibility, with major negative effects expected. The IIA identified that this site has the potential for major positive effects in relation to biodiversity and green infrastructure because it does not affect a local green space and there are no nationally or internationally protect wildlife sites within 500m of the site, however the site is within 500m of a locally important wildlife site.

Overall, it is considered appropriate that one site in Marton is taken forward, and on balance, CL1337 appears suitable, whereas CL1335 appears to have greater constraints such as flooding, highway, and landscape character.

Site CL1388

The site is currently utilised as a paddock and is situated on the edge of the settlement adjacent to the A158 Wragby Road. As highlighted by the representations, highways safety is a key concern and it is situated on a "Red Route". There appear to be very limited options to provide safe site

access, and any options which might be feasible would be of such cost to be unviable. There is an acknowledged lack of local amenities in the surrounding area, and the impact on landscape and character on one of the busiest routes into the city is also a valid concern raised by representors.

The site mostly scored 'greens' in the site appraisal above, however it scored 'red' in relation to various factors including agricultural land classification and proximity to shopping centre and to employment. Consequently the site scored poorly in the Integrated Impact Assessment (IIA) in relation to land use and soils and transport and accessibility, with major negative effects expected for both of these objectives. The only major positive effects predicted by the IIA analysis were in relation to biodiversity and green infrastructure because the site does not affect a local green space, there are no nationally or internationally protect wildlife sites within 500m of the site, and there are no locally important wildlife sites within 500m.

Site CL4205

The site is located off Washingborough Road with access via a tarmacked road which leads to an existing Gypsy and Traveller site. The site is large enough to allow a number of options for the layout of the site which will allow the minimisation of the impact on the surrounding landscape whilst ensuring the privacy of the site residents is maintained. The site is within a Local Wildlife site as identified by the Greater Lincolnshire Nature Partnership. More generally, the site is entirely within Flood Zone 2 with medium flood risk, and therefore should be avoided for pitch provision. Possible previous uses may have contaminated parts of the site. Allocating a new site near an existing site is also not accepted best practice.

The site mostly scored 'greens' in the site appraisal above, however it scored 'red' in relation to various factors including proximity to secondary school, conservation area and locally important wildlife site. The IIA appraisal predicted major negative effects in relation to the built and historic environment because the site or part of the site is within a conservation area. The IIA did not anticipate any major positive effects for this site.

Site CL4440

The site is currently undeveloped grass and scrubland, situated towards the end of Summergangs Lane in Gainsborough. Opposite the site is an established Traveller site managed by Lincolnshire County Council. The site is entirely within Flood Zone 3 with high risk of flooding. If taken forward, a flood risk assessment will be necessary to establish if this risk can be mitigated, potentially either through defences or raising site levels, however for the form of development proposed this is highly unlikely to result in a positive outcome and is unlikely to be supported by the Environment Agency. Allocating a new site immediately adjacent to an existing site is also not accepted best practice.

The site mostly scored 'greens' in the site appraisal above, however it scored 'red' in relation to various factors including flood risk and proximity to secondary school. The IIA appraisal predicted major negative effects in relation to climate change adaptation and flooding because 50% or more of the site is in flood zone 3. The IIA identified potential for major positive effects in relation to the biodiversity and green infrastructure objective because the site does not affect a local green space and there are no nationally or internationally protect wildlife sites within 500m of the site, however the site is within 500m of a locally important wildlife site.

Site CL4675

The site is a square site adjacent to an existing Gypsy and Traveller site and a closed Gypsy and Travellers transit site. The site is grassed with some trees and is flat. The access to the site is a surfaced road. The north half of the site is within flood zone 2. The site is within a Local Wildlife site as

identified by the Greater Lincolnshire Nature Partnership. Allocating a new site immediately adjacent to an existing site is also not accepted best practice.

The site mostly scored 'greens' in the site appraisal above, however it scored 'red' in relation to various factors including proximity to secondary school and locally important wildlife sites. The IIA appraisal did not predict any major positive or negative effects in relation to this site.

While the site is far from ideal it is considered deliverable.

Overall conclusion

In light of the site appraisal above, the Integrated Impact Assessment, national policy and the other planning considerations set out in the main body of this Evidence Report, sites CL4738 (Westrum Lane, Brigg), CL4675 (Washingborough Road, Lincoln) and CL1337 (Trent Port Road, Marton) are the proposed Gypsy and Traveller allocations taken forward in policy LP56 of the Proposed Submission Central Lincolnshire Local Plan. In addition to these proposed allocations policy LP28, Sustainable Urban Extensions, proposes that a proportion of land on each SUE must be set aside for the provision of Gypsy and Traveller pitches.