

## INTRO

We are pleased, on behalf of the residents of Marton, to have the opportunity to comment on Matter 16 of the Central Lincolnshire Plan, that relating to Gypsy and Traveller Allocations.

We are pleased also to note, by the nature of the questions raised by the Inspectors, that they have grasped the fundamental issues associated with the rational and successful implementation of this aspect of the plan as regards the establishment of a traveller site in Marton.

Accordingly we have been able to structure this statement around the questions with, I hope, a minimum of repetition.

Before dealing with the matter with reference to the Inspector's questions I would just like to make 3 short points:

Firstly, this statement is in support of an objection to the location of Marton as a possible traveller site. Objections were raised in May this year by about 150 residents of Marton, a village of about 250 houses. Only one comment in favour of the proposed site was supplied.

Secondly, we consider that the council has been very poor in engaging in consultation with the village. The impression given, at a meeting by invitation of the parish council, was that the most important issue to the councillors was that the local plan would be turned down. Suitability of the proposed Marton site was not an issue for discussion. The feasibility of a traveller site in Marton was considered about 6 years ago and rejected because the village is too small and lacks infrastructure and service. Nothing has changed.

Thirdly, a large proportion of the residents of the Residents of the village are elderly or vulnerable. Many are afraid to put their heads above the parapet in such issues, but for those who did do they found themselves confronted with a complex website inviting them to read a 168 page document with no reference to the relevant points. This is very poor.

## QUESTION 1

The residents are not able to comment on whether the need for 72 pitches is justified but a number of our objections noted that the existing allocation is not fully utilised. There appear to be vacancies in sites including Summergang's Lane, Drinsey Nook, Saxilby and between Laughterton and Blyton. Can the council comment on this? The recycling waste site on Summergang's Lane has been relocated recently. Does this open up the possibility of a brownfield site development almost adjacent to an existing site?

Have the council taken on board the change in Traveller definition circa 2015? This may mean that the need for sites is reduced.

## QUESTION 2

Moving on to question 2 “has an appropriate selection of sites been assessed?” again, this is a matter for the council, but it seems logical to start by drawing a distinction between zones in Lincolnshire considered appropriate for traveller sites and, by definition, those considered inappropriate: i.e. everywhere else. The guidance document includes the map reproduced in the Appendix as Figure 1. The zones encompass land within 2.5 km of major centres. Marton is not in, or even close to any of the identified zones. We will enlarge on this under Question 8.

The truth of the matter, as it results in the possible selection of Marton, is best gleaned by a paraphrase of the words of the county councillor Jeff Sumner at a public meeting in Marton: “we need somewhere so that the Lincolnshire plan can go through; this is somewhere”. A cynic might conclude that the issue has best dealt with by finding a remote location, thereby minimising the objections of more substantial communities. It might also be read as a policy of “out-of-sight, out-of-mind”. We will come back to this under Question 8.

Is it the only parcel of land put forward by a landowner? Can this be a sufficient reason to classify a site as appropriate?

## QUESTION 4

Regarding the first half Question 4, our understanding of national policy is that, firstly, the assessment of need is based on council assessment, not a government requirement. Our comment on this was placed under Question 1. Secondly, the items we consider relevant under national policy are: early and effective engagement with communities, the use of greenfield/agricultural land, and whether rural exceptions apply.

Picking up on the first of these “early and effective engagement with communities”, the Marton villagers consider that there has been no proactive engagement. Marton has a large population of elderly people and also a large population of people with learning difficulties whose views have not been sought. Can the council comment on its engagement with the traveller community and recording its views on the proposed site? There seems not to have been any relevant comment on the Local Plan.

Regarding the second half of the question, the residents of Marton have identified, in our objections, a number of reasons against the selection of Marton specific to the proposed site itself. Various Council, Government and Housing consultancy documentations are relevant (see Appendix).

GTAA 2013 describes getting large accommodation units on and off site. The access road which is shared with the settled community is single track as shown in Figure 2 of the Appendix. The road is less than 3 m wide at the entrance to the site (as compared to the building regulations of 3.7m). The verge of a much loved and pretty lane, used heavily by locals and by tourists for views of the Trent and access to footpaths and a village conservation area, would be wrecked by large touring caravans moving on and off the site. There would be implications for visual privacy and on protecting local amenity. Marton is a quiet, rural village.

With the lack of local sites of employment in the area, it is natural to assume that some form of industry would take place on the traveller site itself. Any mixed use on this site would be inappropriate in Martin particularly as it adjoins housing and the village cemetery where burials and quiet mourning takes place. The noise from such a site may be distressing.

Trent Port Road, through which the site is accessed, is subject to flooding during periods of heavy rain as shown in Figures 3 and 4 of the Appendix. The wash from heavy vehicles reaches front doors requiring sand-bags protection. In fact the whole area is riddled with flood zones.

Water and sewerage services are already compromised at the end of Trent Port Road. The main drains cannot cope with existing demand. The houses built in 2006 are not on the mains system, but instead pay for a separate system of holding tanks. The three properties at the bottom of the road experience low water pressure. A spur onto the proposed site would not improve matters.

There is no mains electricity or sewerage on the proposed site and no mains gas in the village. Many villagers experience poor or non-existent mobile phone signals.

The land within which pitches would be allocated is large. GTAA 2013 states that it should not dominate the local community. We'll refer to this again under Question 6.

The Ark housing consultancy survey of traveller respondents' shows that traveller communities do not want to be sited too closely to a settled community. The clear majority would prefer to be 250m or more away. Over 40% would prefer 1km or more. This, it is supposed, reflects noise and privacy issues. The rights of the settled community are addressed in "Central Lincolnshire Gypsy and Traveller Accommodation Assessment" (2013), where it is stated that the site should respect the scale of and not dominate the nearest settled community. The position of the proposed Marton site with respect to the settled community is shown, in Figure 5 of the Appendix, to be adjacent, in fact right next to existing housing and in the heart of the village community. This is in contrast to the Gainsborough, Lincoln and Beckingham sites (shown in the Appendix as Figures 6, 7 and 8). It may not be a formal requirement but I would like to draw attention to the fact that the Marton site would not have direct access to a main road. Access to the main road is via the residential Trent Port Road. How will residents at the far end of Trent Port road pass traveller vehicles coming in the opposite direction? This would not be ideal for either community. This is also in contrast with the other established sites. Many existing residents might stop using the lane and thus lose their local amenity.

## QUESTION 5

Question 5 covers two related and fundamentally important success criteria. We are trusting, of course, that the council has a duty to work towards a successful outcome. That being so the council must have a rational expectation that the site will be prepared to the necessary standard and once occupied, it will be managed such that the relationship between the traveller and settled community is harmonious. As the site is to be privately developed and managed the key relationship will be between the council and the landowner. We are concerned that a poor working relationship between the council and the landowner would prevent actions taking place to deal with any failure in community relations.

The go-ahead for a permanent legal site will depend on a successful planning application. As planning for houses has previously been refused twice for this site it must be considered likely that a traveller site application may also not make it through the planning stage. I would like to mention two issues. Firstly, whilst the proposed site itself is not in a flood risk zone, much of Trent Port Road is. A significant area of hard-standing for a permanent traveller site is likely to result in water run-off and make the flooding of Trent Port Road more extreme. We strongly believe that the landowner would not invest in dealing with any flooding/drainage issues and, experience suggests, would resist any enforcement notices from the authorities. In the event of the ownership of the land changing hands dealing appropriately with drainage would be difficult and costly.

Secondly, the site is of potential archaeological interest. The route of the Roman road that crossed the Trent at Marton lies close to the proposed site. There are remains of a Roman fort and villa and small settlements all along the bank and ridge nearby. Any planning application on this land leads to the requirement for an archaeological survey. The cost of this, we presume, would be borne by the landowner. The risk of this proving a terminal stumbling block should not be ignored. What is the point of Marton being identified on a council plan, when the site is highly likely never to receive the necessary planning permission?

We'll return to the issue of the likelihood of the potential take-up of pitches by travellers looking for relatively long-term residency under Question 7, but we find it difficult to believe that there would be any commercial viability in developing the plot and, therefore in spending money on the planning application and the provision of services necessary to conform to needs.

Of concern to the settled community is the issue of site management, maybe better stated as the expectation of a lack of any site management. We assume that the landowner would be the person responsible for maintaining a harmonious relationship between the communities. Can the council comment on this?

Over recent years there have been several well documented incidents that have required police intervention at this site. In a telling statement to the Gainsborough Standard, from the landowner after fire crews were called out to a fire on his land in 2011, he was quoted as saying "This is the ninth attack we've suffered in six years. All of them arsons. I'd say we've had about £1 million worth of damage over the years ... Enough is enough, I'm sick of this". History suggests that, if issues arose between the communities, that he could not be relied upon to sort out problems. Failing this, what? There is no local police station. The local Marton residents are largely elderly or vulnerable and easily intimidated. What would the authorities do if serious community problems occurred? We are concerned that they would be reluctant to engage with the landowner. It is of immense importance to the residents of Martin that the council comment on this.

Have the safety needs of the travellers regarding been considered as regards their relationship with the landowner?

On a bureaucratic note, a resident traveller would be a council tax payer and registered with the council. Could they, or would they check who was occupying the pitches or is that the responsibility of the landowner? Would they be obliged to take any interest if the site grew beyond the defined number of pitches, and I'll refer to this under Question 6, and if so, what would they actually do?

## QUESTION 6

The first point to make is that the consultation process has been made difficult by the lack of clarity on boundaries. We have made our best guess. Is the process only opaque to us or is the question of boundaries equally vague to the council? It seems that the landowner has identified various new development uses for his land apart from traveller allocation without obvious geographical boundaries.

Figure 5 of the Appendix shows our assumption of the site identified for the pitches. This is already quite sizeable as a proportion of the village. If the site goes ahead it is possible to foresee future growth of the site into the surrounding land either legally or illegally (and who would enforce action against an illegal site that developed incrementally from a legal one?).

The GTAA 2013 document states that a traveller site should not dominate the local community. This is not the case with Marton where the site would indeed dominate. Expansion would be hard to control due to the nature of the land around the site. If run up to the physical boundaries the land would be greater than that of the settled community.

It is no exaggeration to state that the character of Marton would be permanently changed as a consequence of a significant traveller site.

## QUESTION 8

Referring back to Figure 1 in the Appendix we can consider why the areas not encompassed by the circles are not considered as appropriate for traveller sites. The reasons are covered by the reference documents, and the specific situation of Marton makes one of the strongest arguments in support of our objection.

The rationale for a zone to be classified as a recommended location is that the traveller communities should have access to services, e.g. supermarkets, schools and medical services. Marton is not in or close to any of the identified zones. Why? Apart from a small, oversubscribed primary school it has no full-time services or shops with basic groceries. The nearest supermarket, for example, is an 8 km drive away, and the nearest basic groceries shop is nearly 4 km away. The nearest secondary schools are 12 and 20 km away. Village children have to apply for a school bus pass, a lengthy process and dependant on free spaces. There is Primary healthcare available in Marton twice a week for an hour each time. The closest full time service is 5 km away with no bus service. The general bus service passing through Marton is poor and stops before the end of the school/working day. There are no nearby centres of employment and Marton is isolated from neighbouring villages due to lack of pavements. JK Builders have applied to build 58 new homes placing greater demands on the limited services.

A traveller site in Marton would thus be unlikely to be of interest to those wishing to settle, especially the elderly and those with school age children. The likely appeal of a site in Marton can be judged with reference to the site near Beckingham (having very similar distance from services). According to GTAA 2013 it was decided that this site would not be expanded due to dissatisfaction of

the residents with the distance from services. With the exception of the primary school and two hours of GP service a site in Marton is no better positioned for access to services. What real traveller needs would a Marton site satisfy?

We could take a parochial view. So what if the needs of the traveller community are not well served in Marton? No-one is making them come here. It's just the council ticking boxes before moving on to the next task. The concern is that if the site does not attract those for whom the council is obliged to find appropriate sites, then the probability is high that it becomes attractive to those who do not look to be tied into council supplied services and have little need for establishing harmonious relationships with the settled community. This brings us back to the aforementioned management issues.

### CLOSING STATEMENT

The intent of the council in this matter, as it potentially affects Marton, fails to meet its own guidelines for the provision of traveller sites. It is also, we strongly believe, not going to be delivered in a way that could be judged a success by any criterion. This would be a poor and unjust outcome for travellers and village residents alike.

It should go without saying that in the important process of local planning that the council has a responsibility to act in an ethical manner and not treat their duty as a box-ticking exercise. The ethics of responsibility holds that what will not work cannot be moral.

It should also be obvious to all concerned in today's discussions that the inevitable poor execution of this part of the local plan could have detrimental, potentially severe effects on the residents of Marton beyond the lifetimes of the current settled community.

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