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Planning Statement (Including Flood Risk)
Proposed Residential Gypsy/Traveller Site on Land at
Bleu Raye Farm, Millgate, Whaplode, PE12 6RY

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TABLE OF CONTENTS

1.	INTRODUCTION	1
2.	APPLICATION SITE AND SURROUNDINGS.....	2
3.	PLANNING POLICY.....	3
4.	DESIGN AND ACCESS	6
5.	FLOOD RISK ASSESSMENT	11
6.	CONCLUSIONS.....	13

1. INTRODUCTION

- 1.1. This Planning Statement has been prepared by Robert Doughty Consultancy Ltd on behalf of Mrs M A Compton to support a full planning application for a proposed residential gypsy/traveller site on land at Bleu Raye Farm, Millgate, Whaplode.
- 1.2. The application site is allocated as a 'Proposed Residential Gypsy/Traveller Site' in the South East Lincolnshire Local Plan 2019 (SELLP) to provide accommodation for four households (eight caravans).
- 1.3. A Flood Risk Assessment has also been prepared as part of this statement and this demonstrates that the development will be safe from flooding.
- 1.4. The planning application is also accompanied by a site plan showing the location of the proposed access, an indicative layout for the caravans and foul drainage details.
- 1.5. The site benefits from extensive existing landscaping which save for access arrangements will be retained.
- 1.6. The proposal accords with adopted policies in the South East Lincolnshire Local Plan and is acceptable in all other respects.

2. APPLICATION SITE AND SURROUNDINGS

- 2.1. The application site measures 1.1 ha and forms part of a larger former agricultural field off Millgate, Whaplode.
- 2.2. Whaplode village lies some 3km to the north and Whaplode St Catherine lies approximately 3.2km to the east.
- 2.3. The east, south and west boundaries are defined by mature planting, providing effective screening with no views into the application site. The northern boundary of the site is presently open as it forms part of a larger field which is under the client's ownership.
- 2.4. There is a dwelling to the east of the main body of the application site and north of the access track application site, and agricultural land to the north, south and west.
- 2.5. The character of the area is predominantly rural with isolated dwellings and farms punctuated by villages and hamlets.

3. PLANNING POLICY

THE DEVELOPMENT PLAN

South East Lincolnshire Local Plan

- 3.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that, "If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."
- 3.2. The development plan for the purposes of this application is the South East Lincolnshire Local Plan (the 'Local Plan') 2019. Those policies considered relevant for the proposal are set out below.
- 3.3. Policy 2: Development Management, sets out the criteria in respect of the sustainable considerations for development and these include the impact on the amenity of the area, access and vehicle generation levels, impact on neighbouring land uses and Flood Risk.
- 3.4. Policy 4: Approach to Flood Risk, outlines proposals within an area of risk at flooding will be permitted where a sequential test is passed and a site-specific flood risk assessment demonstrates the development will be safe from flooding. The application site is allocated in the Local Plan for its proposed use and is therefore considered to be in a sequentially preferable location.
- 3.5. Policy 20: Accommodation for Gypsies, Travellers and Travelling Showpeople, confirms the Council's commitment to providing sufficient accommodation for travellers and the application site is allocated in the Local Plan to provide such accommodation.

NATIONAL PLANNING POLICY FRAMEWORK

- 3.6. The National Planning Policy Framework (the "NPPF") sets out Central Government's planning policies for England and how these are expected to be applied.
- 3.7. Paragraph 8 of the NPPF confirms the commitment to sustainable development based on three dimensions:

"a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth,

innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."

This is followed by a commitment to a presumption in favour of sustainable development and at paragraph 11,

"For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

3.8. Paragraph 38 confirms this to be the case stating decision makers at every level should seek to approve applications for sustainable development wherever possible.

3.9. Paragraph 47 states that planning law requires application should be determined in accordance with the development plan.

3.10. Paragraph 61 states:

"the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers".

PLANNING POLICY FOR TRAVELLER SITES 2015

3.11. This document outlines the Government's planning policy for traveller sites.

3.12. Paragraph 4 states the Government's aims in respect of traveller sites:

"a. that local planning authorities should make their own assessment of need for the purposes of planning

b. to ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites

c. to encourage local planning authorities to plan for sites over a reasonable timescale

d. that plan-making and decision-taking should protect Green Belt from inappropriate development

e. to promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites

f. that plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective

g. for local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies

h. to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply

i. to reduce tensions between settled and traveller communities in plan-making and planning decisions

j. to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure

k. for local planning authorities to have due regard to the protection of local amenity and local environment".

4. DESIGN AND ACCESS

Use

- 4.1. The proposal is for the development of a piece of unused agricultural land which has been allocated for a gypsy and traveller site in the SELLP. The principle of the use is therefore consistent with the provisions of the development plan and in particular local plan policy 20.
- 4.2. The nearest dwelling to the application site is due north of the proposed access road leading into the site from Millgate. This detached dwelling has well landscaped boundaries to the application site and it is proposed to move the existing field entrance south, away from the boundary with the existing dwelling and add to the existing landscaping with further planting. The existing and relocated access is shown on the submitted drawings.
- 4.3. Once into the site proper, there is approximately 50m-60m between the main body of the application site and the adjacent dwelling to the east. It is considered that the distance between the proposal and the nearest dwelling, together with the low-density nature of the development will ensure that there is no detrimental impact arising from the development on the reasonable residential amenity of the occupants of the adjoining dwelling.
- 4.4. There are no businesses planned as part of this proposal but it should be anticipated that each plot could accommodate a business use or at the very least the parking of a commercial vehicle.

Amount

- 4.5. Local plan policy 20 provides for four households on the application site and this will comprise of a total of eight caravans.
- 4.6. Each plot covers an area of approximately 0.15 ha providing ample space for two caravans, parking, turning and amenity space. The proposed layout can be seen on the accompanying drawings and each plot, together with the boundaries of the site will be delineated with post and rail fencing.
- 4.7. The amount of development proposed is commensurate with the rural location and as set out in the local plan.

Scale

- 4.8. By their very nature, touring caravans represent a transient form of development with the only fixed development being the infrastructure that facilitates the use of the land for that purpose. Each plot will be fenced and will have access to foul water treatment in the form of a mini-treatment plant, a potable water supply and electricity. As the driveway into the site will not be an adoptable highway, refuse collection will be made available at the entrance to the site, close to the junction with Millgate.

Landscaping

- 4.9. As mentioned previously, the application site is well landscaped in terms of views into the site from Millgate to the east and Hurdletree Bank to the south. To the west there is a good sized block of landscaping which although beyond the applicants control, is now starting to self-seed into the application site and is becoming established.



Looking west at the rear boundary of the site and the self-set trees from the area of woodland beyond.



Looking east with the tall conifer hedge defining the southern boundary on the right of the picture and the nearest residential dwelling just visible in the centre of the photograph.



Looking south along Millgate from the existing entrance into the site.



Looking north east diagonally across the site towards Millgate.

Access

- 4.10. There is an existing entrance and track that services the site however, it is planned to centralise this along the site frontage which will have the advantage of moving it away from the neighbouring property.
- 4.11. Millgate at its southern end is a relatively quiet and straight rural road and there is good visibility on both directions.
- 4.12. Access to public transport is limited but this is also the position for most of the neighbouring rural settlements. Having regard to the nature of the proposal and the use of touring caravans, there is an expectation that the private car will be used as the principal mode of transport.

Heritage

- 4.13. A review of the Heritage Gateway and South Holland District Council's online mapping indicates that there are no designated or non-designated heritage assets near the site. In addition, there are no preserved trees affected by the proposal and we are not aware of any archaeological interest in the site.

5. FLOOD RISK ASSESSMENT

- 5.1. The application site lies within Flood Zones 1 and 2 and is identified as being at low to medium risk for tidal and fluvial flooding on the Environment Agency's flood mapping.
- 5.2. The proposal is classified as "highly vulnerable" in table 2 of the Planning Practice Guidance (PPG). As such, it is appropriate development in Flood Zones 1 and 2, as demonstrated in table 3 of the PPG subject to an exception test.
- 5.3. Diagram 3 of the PPG sets out when the Exception Test should be applied in the preparation of a Local Plan.

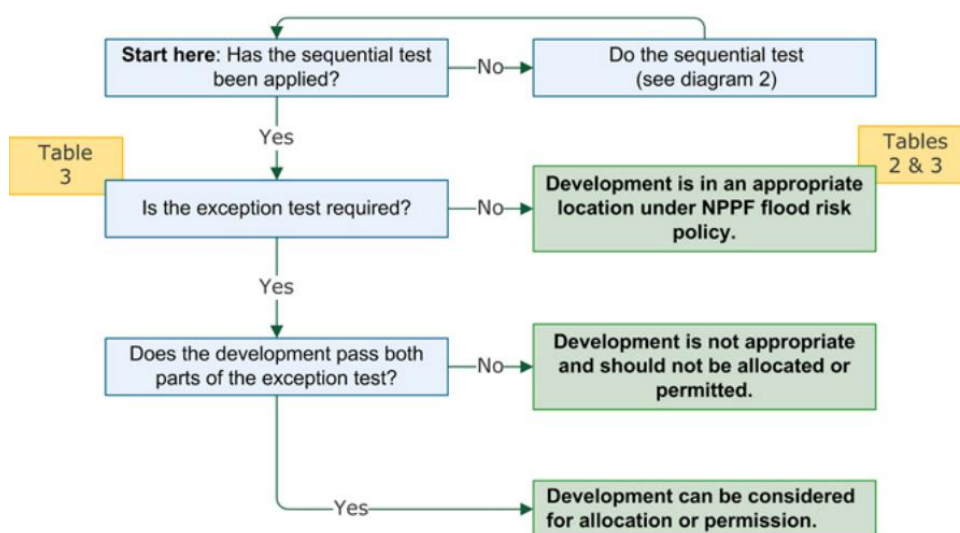


Diagram 3 of the PPG.

- 5.4. The application site has been allocated in the Local Plan as a proposed traveller and gypsy site. As the proposal has been allocated in the Local Plan, in accordance with diagram 3 of the PPG, it is deemed to have passed the Exception Test.
- 5.5. The PPG indicates that site-specific flood risk assessments should always be proportionate to the degree of flood risk and make use of information available. The flood risk assessment should also be appropriate to the scale, nature and location of the development.
- 5.6. The South East Lincolnshire Strategic Flood Risk Assessment (March 2017), indicates that the application site is shown to have no hazard rating on both the South Holland District present day and 2115 flood maps.

- 5.7. There are no other nearby sources of flooding with the Little Holland Drain being approximately 1.3km to the south. This is a South Holland Internal Drainage Board drain, the levels of which are artificially managed along with the rest of the Board's system.
- 5.8. The application site is allocated in the Local Plan for a travellers and gypsy site and the South East Lincolnshire Strategic Flood Risk Assessment demonstrates the site to have no hazard rating in both the present day and up to 2115. The proposal is, therefore, safe from flooding and will not lead to an increase in surface water flooding to neighbouring land uses or users.

6. CONCLUSIONS

- 6.1. The proposal is for a proposed traveller's site accommodating 4 households and 8 caravans on land at Bleu Raye Farm, Whaplode.
- 6.2. During the preparation of the recently adopted local plan, an extensive search for suitable sites was undertaken as part of the Topic Paper on the provision of suitable sites for gypsies, travellers and travelling showpeople. This application site, together with one at The Stables, Baulkins Drove, Sutton St James (one additional household for showpeople) were subsequently allocated as part of the South East Lincolnshire Local Plan.
- 6.3. The application responds to an identified need as set out in Policy 20 in the Local Plan.
- 6.4. This Planning Statement demonstrates that the site will have little or no impact on the character of the area and that having regard to existing and proposed landscaping, the proposal for eight caravans and associated infrastructure will have a light touch on the landscape.
- 6.5. The Flood Risk Assessment demonstrates that the site will be safe from flooding.
- 6.6. In exercising the planning balance, the proposal accords with adopted local plan policy and is acceptable in all other respects.

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