

# **Topic Paper – Provisions for gypsies, travellers and travelling showpeople in the South East**

## **Lincolnshire Local Plan 2011-2036: Publication**

### **Version (March 2017)**

## **1 National policy**

1.1 Government policy concerning the provision of accommodation for gypsies, travellers and travelling showpeople is set out in *Planning policy for traveller sites (August 2015)*. This document is intended to be read in conjunction with the *National Planning Policy Framework*, and identifies that Local Plans should:

- be based upon robust evidence of the likely permanent and transit accommodation needs of gypsies, travellers and travelling showpeople within the area, over the lifespan of the Plan;
- set pitch targets for gypsies and travellers, and plot targets for travelling showpeople to address these needs;
- identify a supply of specific deliverable sites sufficient to provide five years' worth of sites against locally set targets. To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a reasonable prospect that development will be delivered on the site within five years. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years;
- identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15. To be considered developable, sites should be in a suitable location for traveller site development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged;
- set out criteria to guide land supply allocations, where there is an identified need; and
- include criteria-based policies to provide a basis for decisions, where there is no identified need.

## **2 Evidence on accommodation needs**

2.1 The Boston and South Holland Gypsy and Traveller Accommodation Assessment (November 2016) (GTAA) identifies that, during the Plan period, there will be a need for the provision of:

- one pitch in Boston Borough for a gypsy and traveller household – this need stems from a household that is currently ‘doubled up’ on a pitch on the Redstone Traveller Site in Boston, and is expected to arise between 2016 and 2021;
- one plot in South Holland for a travelling showperson’s household – this need stems from a teenage child, currently living with parents, who will need a plot of their own between 2016 and 2021; and
- four pitches in South Holland for gypsy and traveller households – this need stems from new household formation, and is expected to arise between 2016 and 2021 (one pitch), between 2021 and 2026 (one pitch), between 2026 and 2031 (one pitch), and between 2031 and 2036 (one pitch).

2.2 However, the GTAA acknowledges that there were a number of gypsy, traveller and travelling showperson’s households within South East Lincolnshire who were not interviewed – either they declined to be interviewed or were not on site at the time of the fieldwork. Thus, the GTAA identifies that there may be ‘unknown needs’, over and above those set out in paragraph 2.1.

### **3 Setting targets**

3.1 If the Local Plan is to accord with Government guidance in *Planning policy for traveller sites*, it must “set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit accommodation needs of travellers in their area.” It is considered that the evidence from the GTAA provides sufficient information on which to base targets.

3.2 However, it is not considered necessary for the need identified in Boston Borough to be reflected in these targets, because there are two vacant pitches on the Redstone Traveller Site and thus the needs of the ‘doubled up’ household are currently catered for, i.e. they could immediately move onto a pitch of their own, if they wished.

3.3 Thus, targets were set out as shown in the table below.

	1.4.11 to 31.3.16	1.4.16 to 31.3.21	1.4.21 to 31.3.26	1.4.26 to 31.3.31	1.4.31 to 31.3.36
Residential pitches for gypsies and travellers (Boston Borough)	0	0	0	0	0
Residential pitches for gypsies and travellers (South Holland District)	0	1	1	1	1
Residential plots for travelling showpeople (Boston Borough)	0	0	0	0	0
Residential plots for travelling showpeople (South Holland District)	0	1	0	0	0
Transit pitches (Boston Borough)	0	0	0	0	0
Transit pitches (South Holland District)	0	0	0	0	0

#### 4 How many sites does the Local Plan need to identify?

4.1 If the Local Plan is to accord with Government guidance in *Planning policy for traveller sites*, it must identify specific deliverable/developable sites to accommodate needs arising between 1<sup>st</sup> April 2016 and 31<sup>st</sup> March 2026. The guidance also suggests that sites should be identified, where possible, to meet needs arising between 1<sup>st</sup> April 2026 and 31<sup>st</sup> March 2031. This translates into a requirement to identify land for at least:

- 1 residential plot for a travelling showperson's household in South Holland District; and
- 2 residential pitches for gypsies and traveller households in South Holland District.

4.2 However, it is considered to be desirable for the Plan to go further and to identify specific deliverable/developable sites to accommodate all the known needs.

#### 5 Identifying sites

5.1 As with sites for 'bricks and mortar' homes, any assessment of potential gypsy, traveller and travelling showpeople's sites will need to consider availability, achievability and suitability. Suitability was assessed against the criteria of policy 17 of the South East Lincolnshire Local Plan 2011-2036 Draft

for Public Consultation (January 2016), which identified that gypsy/traveller/travelling showperson's sites for permanent residential use should:

- i. provide occupants with an acceptable standard of amenity;
- ii. not be located adjacent to uses likely to endanger the health of occupants;
- iii. be adequately provided with appropriate infrastructure such as electricity, drinking-water, waste-water treatment and recycling/waste management;
- iv. respect the scale of the nearest settled community;
- v. not have a significant adverse effect on the amenities of existing local residents or adjoining land users;
- vi. not place undue pressure on local infrastructure;
- vii. be successfully assimilated into both their immediate environs and the wider landscape;
- viii. not affect heritage assets or areas of importance to nature conservation;
- ix. not prejudice highway safety or give rise to problems of parking or highway access;
- x. provide occupants with access to education, health care and recreational facilities, shops and employment within reasonable travelling distances, preferably by walking, cycling or public transport;
- xi. be suitable (or capable of being made suitable) for mixed residential and business use; and
- xii. not be located within Flood Zone 3a or 3b, or be located within Flood Zone 2 only if the Sequential and Exception Tests have been passed.

**5.2 Travelling showpeople** - With respect to meeting the need for one residential plot for a travelling showperson's household in South Holland District, it is considered that there is only one reasonable option. The GTAA identifies that this need arises at The Stables, Baulkins Drove, Sutton St James, where a teenaged child who is currently living with their parents is expected to need a plot of their own between 2016 and 2021. It is expected that the child will wish to continue to live on the site, and would simply need their own plot within it. A map showing the location and extent of this site, and an assessment of its merits is set out in Appendix 1. This assessment identifies that the site is available and achievable and that (although it does not meet flood risk requirements) it is suitable – it is therefore classified as 'deliverable'. The Local Plan therefore allocates The Stables, Baulkins Drove, Sutton St James as a 'Proposed Residential Travelling Showperson's Site' to provide accommodation for one additional household.

**5.3 Gypsy and traveller sites** – With respect to meeting the need for four residential pitches for gypsy and traveller households in South Holland, three potential sites have been put forward: Drain Bank North, Spalding; Roper's

Gate, Gedney; and Bleu Raye Farm, Whaplode Fen. Maps showing the locations and extents of these sites, and assessments of their merits are set out in Appendix 1. These assessments conclude that two are 'undevelopable' (one cannot be considered available, and neither offers a suitable location for development on the basis of their flood risk). However, the assessment of Bleu Raye Farm, Whaplode Fen identifies that this site is available, achievable and suitable, and it is therefore classified as 'deliverable'. The Local Plan therefore allocates Bleu Raye Farm, Whaplode Fen as a 'Proposed Residential Gypsy/Traveller Site' to provide accommodation for four households.

- 5.4 **'Unknown need'** – Paragraph 2.2 of this paper identified that a number of gypsy, traveller and travelling showperson's households within South East Lincolnshire were not interviewed by the GTAA consultants, and that consequently there may be 'unknown needs'. A letter has been received from such a household, providing evidence that they are 'gypsies or travellers' as defined in Annex 1 to *Planning policy for traveller sites (August 2015)*, and requesting that provision should be made in the Local Plan to provide for their housing needs. This household currently lives on a gypsy and traveller transit site within the Plan area, and has acquired land at the corner of Cranesgate North and Hurdletree Bank, Whaplode St Catherines which they wish to develop as a gypsy/traveller site for their own use, i.e. for one pitch. A map showing the location and extent of this site, and an assessment of its merits is set out in Appendix 1. This assessment identifies that the site is available and achievable, but that it does not offer a suitable location for development on the basis that it may be filled or contaminated ground. The assessment therefore classifies it as 'undevelopable', and the Local Plan does not allocate this site as a 'Proposed Residential Gypsy/Traveller Site'.

## 6 Policy

- 6.1 Further 'unknown needs' are likely to arise during the Plan period. In accordance with the requirements of *Planning policy for traveller sites (August 2015)*, the Local Plan will need to include a criteria-based policy to provide a basis for making a decision on planning applications.
- 6.2 The policy is worded as set out below.

**Between 2011 and 2036 evidence suggests that, in South East Lincolnshire, there will be a need for the provision of:**

- **4 new permanent residential pitches for gypsies and travellers; and**
- **1 new permanent residential plot for travelling showpeople.**

**This need will be met through the development of the sites identified on the Policies Map.**

**Additional needs which may arise during the Local Plan period will be met through the determination of planning applications on other, unallocated sites.**

**Planning permission will be granted for proposals on allocated and unallocated sites provided that they:**

- 1. provide occupants with an acceptable standard of amenity;**
- 2. are not located adjacent to uses likely to endanger the health of occupants, such as a refuse tip, water recycling centre or contaminated land;**
- 3. will be adequately provided with appropriate infrastructure such as electricity, drinking-water, waste-water treatment and recycling/waste management;**
- 4. respect the scale of the nearest settled community;**
- 5. will not have a significant adverse on the amenities of existing local residents or adjoining land users;**
- 6. will not place undue pressure on local infrastructure;**
- 7. will be successfully assimilated into both their immediate environs and the wider landscape;**
- 8. will not adversely affect heritage assets or areas of importance to nature conservation; and**
- 9. will not prejudice highway safety or give rise to problems of parking or highway access.**

**Planning permission will be granted for:**

**A. sites for permanent residential use if they:**

- i. provide occupants with access to education, health care and recreational facilities, shops and employment within reasonable travelling distances, preferably by walking, cycling or public transport;**
- ii. are suitable (or capable of being made suitable) for mixed residential and business use; and**
- iii. are not located within Flood Zone 3a or 3b; or**
- iv. are located within Flood Zone 2 and the Sequential and Exception Tests have been passed; and**

**B. sites for transit or stopping place use if they:**

- i. are not located within Flood Zone 3b; or**
- ii. are located within Flood Zone 3a and the Sequential and Exception Tests have been passed.**

## Appendix 1 – Assessment of potential sites

<b>Site address –</b>	<b>The Stables, Baulkins Drove, Sutton St James</b>
<b>Site area -</b>	0.23 hectares
<b>Current use -</b>	Currently used as a residential gypsy caravan site for one family/two caravans (planning permission H20-0287-06)
<b>Potential use -</b>	One additional travelling showperson’s plot. [The GTAA identifies the family as travelling showpeople, rather than gypsies.]

**AVAILABILITY** The site is available now. It is understood to be in the ownership of the family from which the need arises, and there are no known legal or ownership problems.

**ACHIEVABILITY** The site is achievable – there is a reasonable prospect that development would be delivered on the site within five years. Existing hardstandings could accommodate an additional plot. There are expected to be no unusual opening-up costs, and it is understood that existing water and electricity supply and sewage disposal arrangements (septic tank) are adequate to accommodate another household.

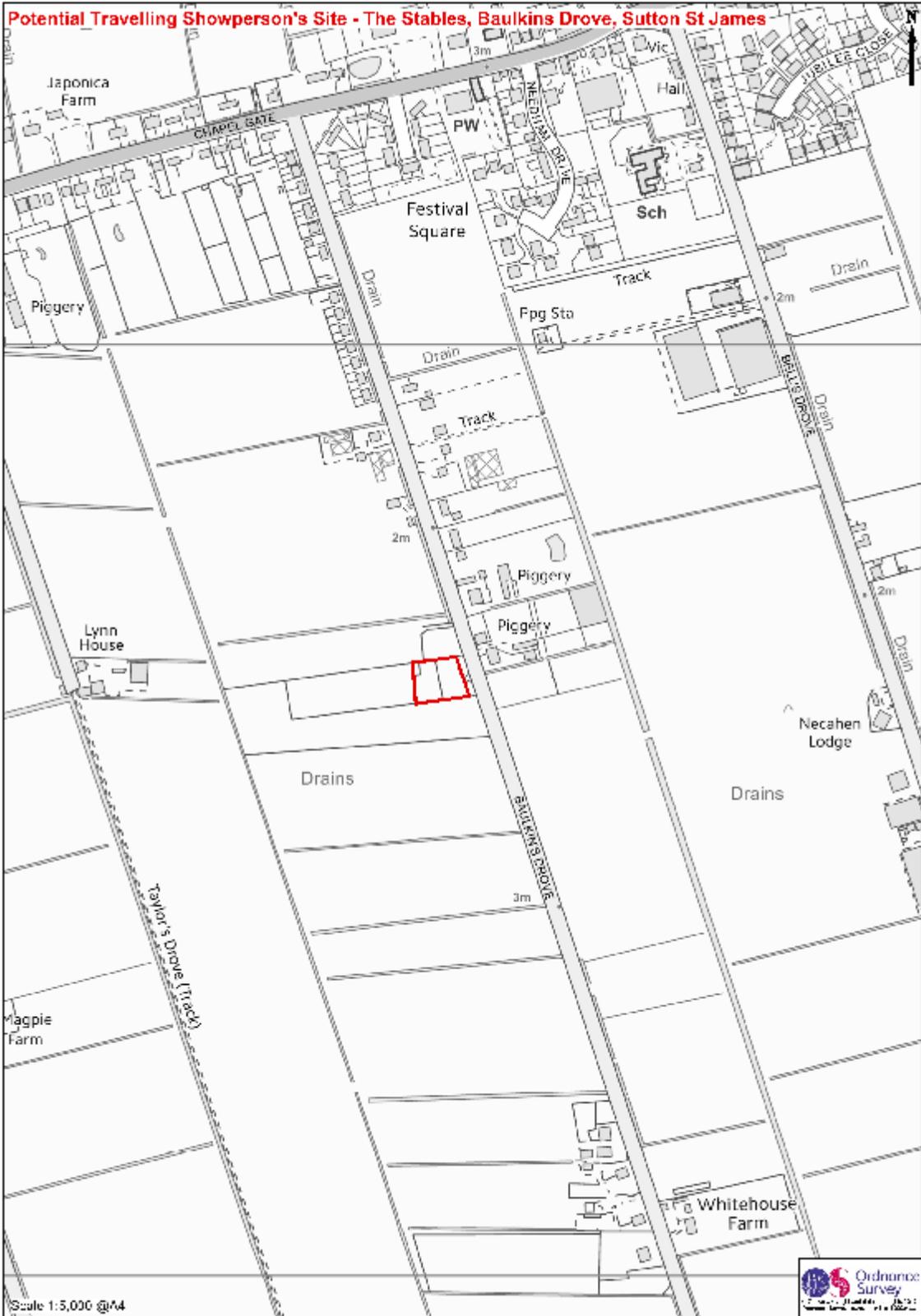
### **SUITABILITY**

- i. It is considered that the site would provide occupants with an acceptable standard of amenity – it is not close to any potential ‘bad neighbour’ uses;
- ii. The site is not located adjacent to any uses likely to endanger the health of occupants;
- iii. It is understood that all necessary on-site infrastructure is available and capable of accommodating a second household;
- iv. The scale of the resulting site would not conflict with that of the nearest settled community (Sutton St James);
- v. There are several nearby residential properties, but the site is well-kept and is surrounded by a tall, evergreen hedge. It is not considered that the addition of a second household would have a significant adverse effect on the amenities of existing local residents or adjoining land users;
- vi. It is not considered that the addition of a second household would place undue pressure on local infrastructure;
- vii. The site is surrounded by a tall, evergreen hedge and is well assimilated into its immediate environs and the wider

- landscape. The addition of a second household is considered highly unlikely to change this;
- viii. The addition of a second household would not affect heritage assets or areas of importance to nature conservation;
  - ix. The Highway Authority indicates that the intensification of the site to two households would not have any materially harmful impact upon the capacity or safety of Baulkin's Drove;
  - x. Many facilities are available in Sutton St James (within 1 kilometre) of the site, and a wider range of facilities is available in Long Sutton (some 6.5 kilometres away);
  - xi. It is considered that the site is potentially suitable for mixed residential and business use; and
  - xii. The site is located within Flood Zone 3a (Residual Flood Hazard (2115) = 'no hazard' and Residual Flood Depth (2115) = 'no depth'). *In this respect, the site does not accord with the provisions of policy 17 of the South East Lincolnshire Local Plan 2011-2036 Draft for Public Consultation (January 2016). However it is considered that, given that the need is specific to this site, it would be inappropriate to seek alternative sites that are potentially sequentially preferable in flood risk terms, because such sites would not meet the identified need.*

The site is suitable – it offers a suitable location for development now.

**CONCLUSIONS    THE SITE IS DELIVERABLE**



<b>Site address –</b>	<b>Drain Bank North, Spalding</b>
<b>Site area -</b>	0.86 hectares
<b>Current use -</b>	Agriculture
<b>Potential use -</b>	Gypsy/traveller site to accommodate four households/eight caravans

**AVAILABILITY** The site is not available. The owner has not confirmed that it would be released for development should it be allocated.

**ACHIEVABILITY** The site is achievable – there is a reasonable prospect that development would be delivered on the site within five years. The site is greenfield, so there will be costs to bring it into use (e.g. creation of hardstandings and internal roads, installation of septic tanks, etc.). However, it is understood that water and electricity supplies are adequate to accommodate four households, and opening up and infrastructure costs are not expected to threaten viability.

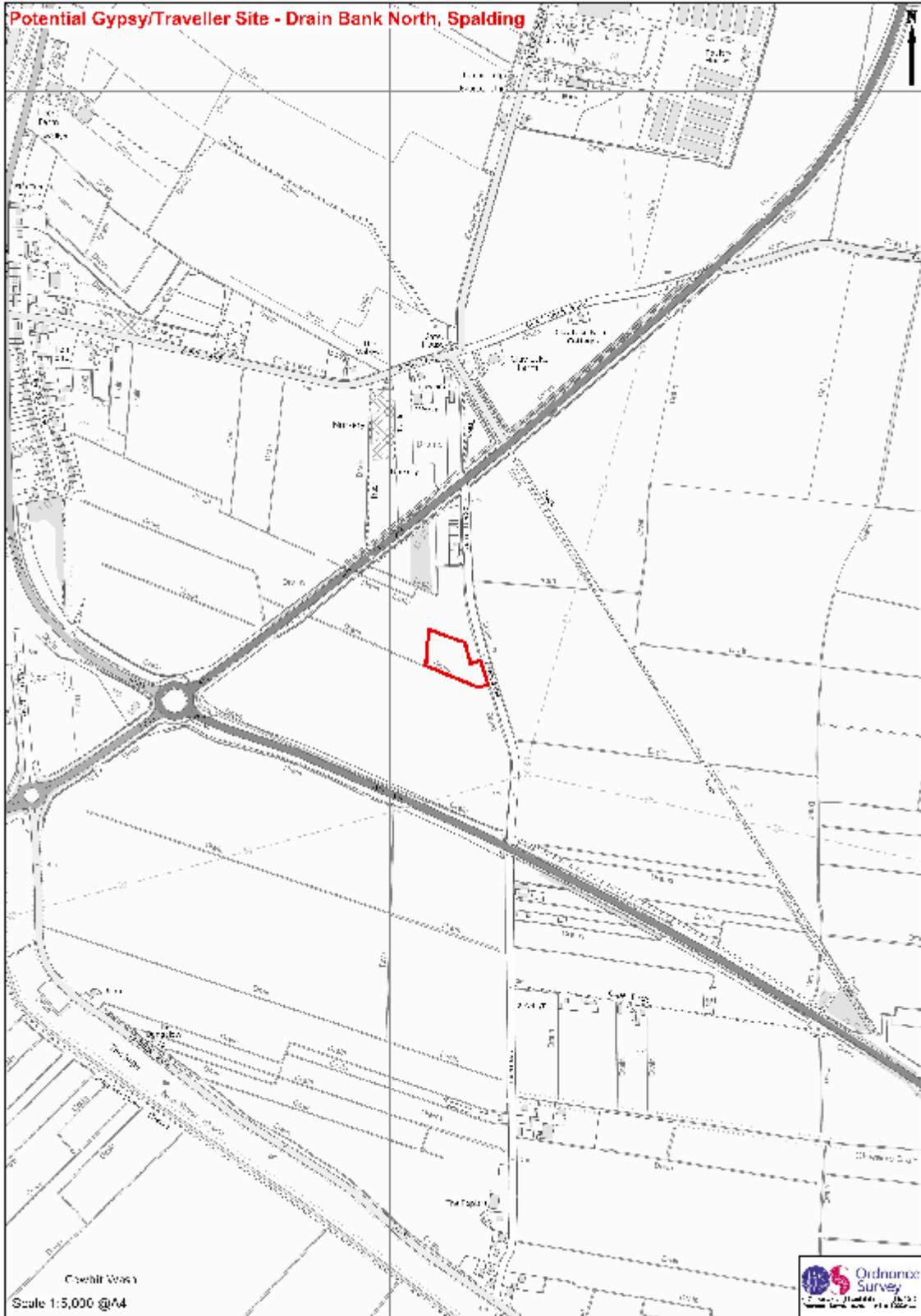
**SUITABILITY**

- i. It is considered that the site would provide occupants with an acceptable standard of amenity – it is not close to any potential ‘bad neighbour’ uses (the A16 is more than 225m distant and, although there is the potential for land to the south to be used as pitches for Spalding Rugby Club, it is not considered that this would be an incompatible use);
- ii. The site is not located adjacent to any uses likely to endanger the health of occupants;
- iii. It is understood that all necessary on-site infrastructure is available and capable of accommodating four households;
- iv. The scale of the resulting site would not conflict with that of the nearest settled community (Spalding). [The proposed site adjoins two existing gypsy/traveller sites which accommodate 12 households. If this additional land is allocated for development it would result in a gypsy/traveller site with a total area of 3.7 hectares, which would accommodate a total of 16 households];
- v. The site is predominantly surrounded by agricultural land, with existing gypsy/traveller pitches to the north. Taken together with the existing site, the allocation of this land would result in a gypsy/traveller site with a total area of 3.7 hectares and which would accommodate a total of 16 households. Nonetheless, with landscaping, it is considered that this site could be developed without any additional

- significant adverse effect on the amenities of existing local residents or adjoining land users;
- vi. It is not considered that the development of this site would place undue pressure on local infrastructure;
  - vii. The site is currently visually exposed and, as a consequence, its development would not immediately be assimilated into the wider landscape. However, it is considered that appropriate boundary treatment/landscaping could address this issue in time;
  - viii. The site's development would not affect heritage assets or areas of importance to nature conservation;
  - ix. The Highway Authority indicates that the site's development would be acceptable, provided it shared the access that has already been provided into the existing gypsy/traveller site. Any new access would require further highway improvement works to Drain Bank North;
  - x. Services and facilities are available in Spalding (i.e. within 3 kilometres) of the site;
  - xi. It is considered that the site is potentially suitable for mixed residential and business use; and
  - xii. The site is located with Flood Zone 3a (Residual Flood Hazard (2115) = 'danger for some' and Residual Flood Depth (2115) = '0.25m to 0.5m'). *In this respect, the site does not accord with the provisions of policy 17 of the South East Lincolnshire Local Plan 2011-2036 Draft for Public Consultation (January 2016).*

The site is not suitable – it does not offer a suitable location for development, on the basis of its flood risk.

## **CONCLUSIONS    THE SITE IS UNDEVELOPABLE**



<b>Site address –</b>	<b>Roper’s Gate, Gedney</b>
<b>Site area -</b>	0.71 hectares
<b>Current use -</b>	Grass paddocks containing stable buildings (located to the south of existing and permitted gypsy/traveller pitches)
<b>Potential use -</b>	Gypsy/traveller site to accommodate a total of ten households/twenty caravan. [The site’s owners envisage that the majority of the pitches provided would be occupied by family members, and that only three would be available to meet more general local need. Nonetheless, this would be sufficient potentially to meet needs up to 31 <sup>st</sup> March 2031.]

**AVAILABILITY** The site is available now. There are no known legal or ownership problems. The site’s owners indicate that, if the site is allocated for development, the new pitches would be available for occupation within two years.

**ACHIEVABILITY** The site is achievable – there is a reasonable prospect that development would be delivered on the site within five years. The site is greenfield, so there will be costs to bring it into use (e.g. creation of a new vehicular access and hardstandings, installation of septic tanks, etc.). However, it is understood that water and electricity supplies are adequate to accommodate ten households, and opening up and infrastructure costs are not expected to threaten viability.

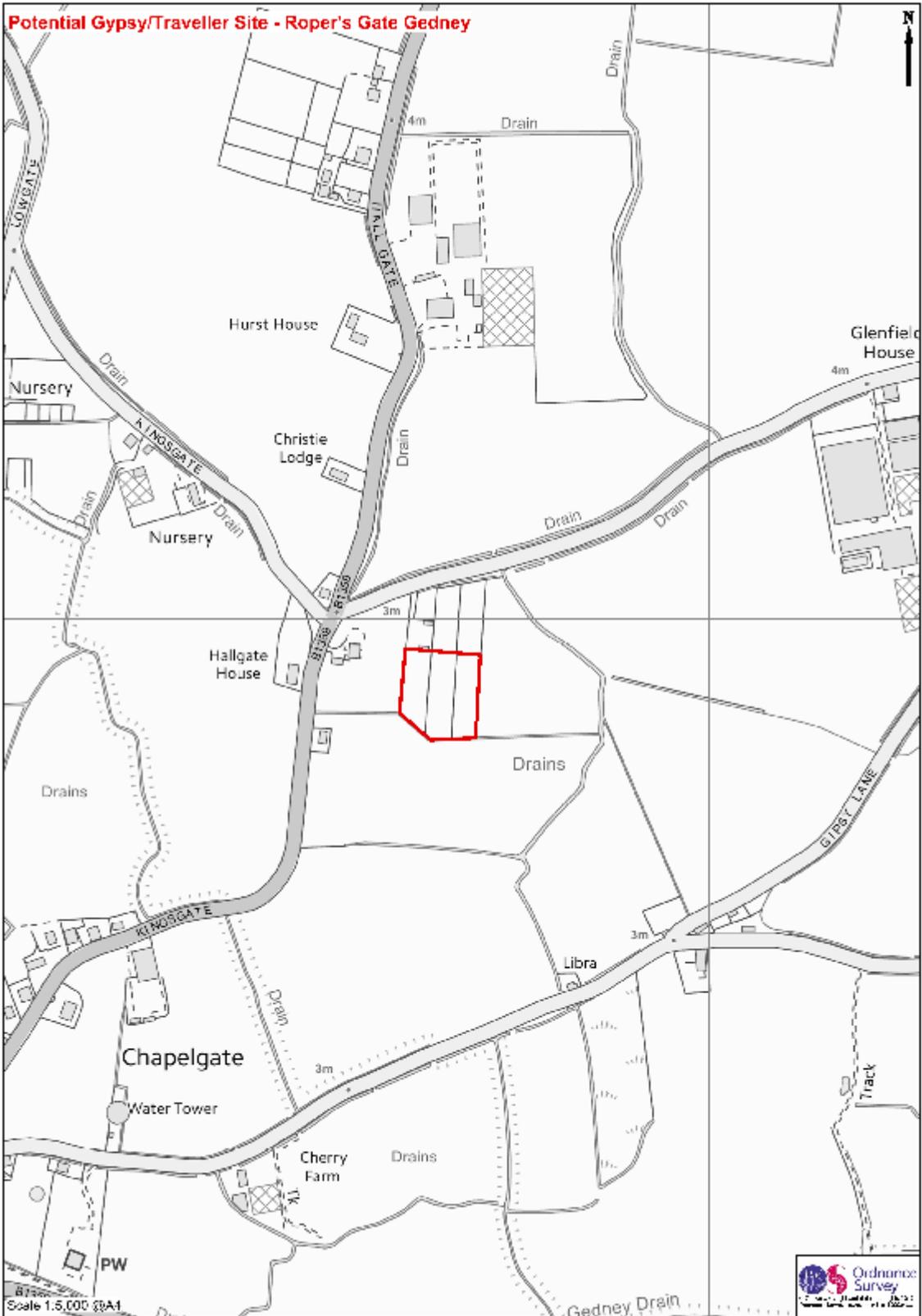
**SUITABILITY**

- i. It is considered that the site would provide occupants with an acceptable standard of amenity – it is not close to any potential ‘bad neighbour’ uses;
- ii. The site is not located adjacent to any uses likely to endanger the health of occupants;
- iii. It is understood that all necessary on-site infrastructure is available and capable of accommodating an additional ten households;
- iv. The scale of the resulting site would not conflict with that of the nearest settled community (Gedney Black Lion End). [The proposed site adjoins an existing gypsy/traveller site which accommodates 2 households, and a permitted site (reference H06-0558-15) which can accommodate 4 households. If this additional land is allocated for development it would result in a gypsy/traveller site with a total area of 1.22 hectares, which would accommodate a total of 16 households];

- v. The site is well-kept, but lacks landscaping (its boundary is defined by fencing). It is predominantly surrounded by agricultural land, although there are five dwellings within 200m. Taken together with existing planning permissions, the allocation of this land would result in a gypsy/traveller site with a total area of 1.22 hectares and which would accommodate a total of 16 households. Nonetheless, with a sensitive layout and landscaping, it is considered that this site could be developed without a significant adverse effect on the amenities of existing local residents or adjoining land users;
- vi. It is not considered that the development of this site would place undue pressure on local infrastructure;
- vii. The site is currently visually exposed and, as a consequence, its development would not immediately be assimilated into the wider landscape. However, it is considered that appropriate boundary treatment/landscaping could address this issue in time;
- viii. The site's development would not affect heritage assets or areas of importance to nature conservation;
- ix. The Highway Authority indicates that, subject to the vehicle access crossings of the frontage drain being made-up to the appropriate standard, the site's development should be possible without any materially harmful impact;
- x. A relatively limited range of facilities are available within 1 kilometre (in Gedney Black Lion End), and occupants would need to travel approximately 6 kilometres to Holbeach to access a fuller range of services;
- xi. It is considered that the site is potentially suitable for mixed residential and business use; and
- xii. The site is located within Flood Zone 3a (Residual Flood Hazard (2115) = 'danger for most' and Residual Flood Depth (2115) = '0.5m to 1.0m'). *In this respect, the site does not accord with the provisions of policy 17 of the South East Lincolnshire Local Plan 2011-2036 Draft for Public Consultation (January 2016).*

The site is not suitable – it does not offer a suitable location for development, on the basis of its flood risk.

## **CONCLUSIONS    THE SITE IS UNDEVELOPABLE**



<b>Site address –</b>	<b>Bleu Raye Farm, Whaplode Fen</b>
<b>Site area -</b>	0.92 hectares
<b>Current use -</b>	Grassland
<b>Potential use -</b>	Gypsy/traveller site to accommodate four households/eight caravans

**AVAILABILITY** The site is available now. The site’s owner indicates that they will offer the land for sale with immediate effect if it is allocated. There are no known legal or ownership problems.

**ACHIEVABILITY** The site is achievable – there is a reasonable prospect that development would be delivered on the site within five years. The site is greenfield, so there will be costs to bring it into use (e.g. creation of a new vehicular access and hardstandings, installation of septic tanks, etc.). However, it is understood that water and electricity supplies are adequate to accommodate four households, and opening up and infrastructure costs are not expected to threaten viability.

**SUITABILITY**

- i. It is considered that the site would provide occupants with an acceptable standard of amenity – it is not close to any potential ‘bad neighbour’ uses;
- ii. The site is not located adjacent to any uses likely to endanger the health of occupants;
- iii. It is understood that all necessary on-site infrastructure is available and capable of accommodating four households;
- iv. The scale of the resulting site would not conflict with that of the nearest settled community (Whaplode St Catherines);
- v. The site is predominantly surrounded by farmland/grassland and, although there are nearby dwellings, the only existing dwelling that directly adjoins the site is the home of the site owner. It is considered that the site could be developed as a gypsy/traveller site for four households without it having a significant adverse effect on the amenities of existing local residents or adjoining land users;
- vi. It is not considered that the development of a site for four households would place undue pressure on local infrastructure;
- vii. The site is screened from view from the south, west and east by trees and hedging. From the north, only partial and distant views are available. It is considered that the site is capable of being successfully assimilated into its immediate environs and the wider landscape;

- viii. The development of the site would not affect areas of importance to nature conservation. The site is located just over 1 kilometre from a Scheduled Ancient Monument, but it is not considered that its development would adversely affect this heritage asset;
- ix. The Highway Authority indicates that the development of the site to accommodate four gypsy/traveller households should be possible without creating any materially harmful impact upon the local highway network;
- x. Many facilities are available in Whaplode, just over 3 kilometres from the site. A fuller range of facilities are available in Holbeach, approximately 5 kilometres from the site;
- xi. It is considered that the site is potentially suitable for mixed residential and business use; and
- xii. The site is located partly within Flood Zone 1 and partly within Flood Zone 2 (no hazard and no depth).

The site is suitable – it offers a suitable location for development now.

**CONCLUSIONS    THE SITE IS DELIVERABLE**



<b>Site address –</b>	<b>Cranesgate North/Hurdletree Bank, Whaplode St Catherines</b>
<b>Site area -</b>	0.47 hectares
<b>Current use -</b>	Predominantly grassed, with a hardstanding and one small out-building towards its north-east corner
<b>Potential use -</b>	Gypsy/traveller site to accommodate one household/two caravans

**AVAILABILITY** The site is available now. It is understood to be in the ownership of the family from which the need arises, and there are no known legal or ownership problems.

**ACHIEVABILITY** The site is achievable – there is a reasonable prospect that development would be delivered on the site within five years. There are expected to be no unusual opening-up costs, and it is understood that water and electricity supplies and sewage disposal arrangements (septic tank) are adequate to accommodate a household.

**SUITABILITY**

- i. It is considered that the site would provide occupants with an acceptable standard of amenity – it is not close to any potential ‘bad neighbour’ uses;
- ii. The site is identified as possible filled or contaminated ground, i.e. there is potential that past uses of the site may endanger the health of occupants;
- iii. It is understood that all necessary on-site infrastructure is available and capable of accommodating a single household;
- iv. The scale of the resulting site would not conflict with that of the nearest settled community (Whaplode St Catherines);
- v. The site is predominantly surrounded by farmland, although it adjoins the garden to a single dwelling to the south, and there are other dwellings to its north-west and east (which do not directly adjoin it). However, the site is large in size, and nearby dwellings themselves have sizeable curtilages. Furthermore, the site is surrounded by a recently-planted evergreen hedge which will, in due course, screen it from view. It is considered that the site could be developed as a gypsy/traveller site for one household without it having a significant adverse effect on the amenities of existing local residents or adjoining land users;
- vi. It is not considered that the development of a gypsy/traveller site for one household would place undue pressure on local infrastructure;

- vii. The site does not have an isolated or open countryside character, as it is located at the end of a ribbon of existing dwellings. It is well-kept, and is surrounded by a post and rail fence and a recently-planted evergreen hedge that will screen it from view in due course. It is considered that the site will be successfully assimilated into its immediate environs and the wider landscape;
- viii. The site's development would not affect heritage assets or areas of importance to nature conservation;
- ix. The Highway Authority indicates that the development of the site for a single pitch should be possible without creating any materially harmful impact upon the local highway network;
- x. Occupants of the site would probably need to travel to Holbeach (4 kilometres distant) to access services and facilities, as other closer settlements offer few services;
- xi. It is considered that the site is potentially suitable for mixed residential and business use; and
- xii. The site is located within Flood Zone 1 (no hazard and no depth).

The site is not suitable – it does not offer a suitable location for development, on the basis that it may be filled or contaminated ground.

**CONCLUSIONS    THE SITE IS UNDEVELOPABLE**

