

## Appendix – Main Modifications

The modifications below are expressed in the conventional form of ~~strike through~~ for deletions and underlining for additions of text.

The page/policy/paragraph numbers in the second column below refer to the submission DPD, and do not take account of the deletion or addition of text.

Ref	Page/Policy/ Paragraph	Main Modification
MM1	Page 1 Paragraph 1.2	Alter wording and add text at end of paragraph to read: “1.2 Policies DS4 – Overall development needs and H3 – Gypsies and Travellers set out the need for new pitches by 2031/2032 to be at least 39 residential and 5 transit pitches. Policy H3 does not set out where the new pitches would be provided but sets out the criteria that will be used to identify potential locations for residential and permanent pitches through the Gypsy and Traveller Site Allocations Development Plan Document (DPD). It is through this DPD that land <u>is</u> identified and allocated for future traveller sites. <b><u>Policy H3 of the current adopted Borough Plan (2011-2031) is superseded entirely by the DPD and in the emerging Borough Plan Policy H3 will purely refer to the DPD for Policies relating to Gypsy, Travellers and Showperson pitches and plots.</u></b> ”
MM2	Page 7 Paragraph 3.9	Add text within paragraph to read: “3.9 In the 2021 GTAA it is recommended that the “... <i>evidence base is refreshed on a 5-yearly basis to ensure that the level of pitch and pitch provision remains appropriate for the Gypsy, Traveller and Travelling Showpeople population across Nuneaton and Bedworth.</i> ” This is an important element of confirming that the need in this DPD remains as required. <b><u>It is therefore the Council’s intention that the number of new pitches will be assessed each year at the Authority Monitoring Report (AMR) stage and landowners contacted to encourage the sites to come forwards. The DPD will be reviewed five years after adoption and subsequently five years thereafter on an ongoing basis, to ensure the document meets the current needs.</u></b> The update of the GTAA is referenced in Table 3 of Chapter 5.0 on Monitoring of this document. Should need be found to have changed beyond that set out in this DPD (or indeed for another reason such as undeliverability of a site or sites) then this should trigger a review of this DPD.”
MM3	Page 8	Add text at end of Policy to read:

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	Strategic Policy GT1 – Overall Need	<p>“The following levels of development will be planned for and provided within Nuneaton and Bedworth Borough between 2021 and 2037:</p> <ul style="list-style-type: none"> <li>• At least 6 permanent residential pitches to accommodate Gypsies and Travellers by 2025; and</li> <li>• At least a further 5 permanent residential pitches beyond those required by 2025 so that, in total, at least 11 permanent residential pitches to accommodate Gypsies and Travellers by 2037.</li> </ul> <p><b><u>This Policy supersedes the third bullet point of Policy DS4 of the adopted Borough Plan (2011-31).”</u></b></p>
MM4	Page 9 Paragraph 4.3	<p>Delete whole paragraph as follows:</p> <p><del>“4.3 Notwithstanding the above, of all the occupied pitches, and plots on site/yards for gypsies and travellers all but one (that at Watling Street) are within the Green Belt including the local authority provision at Griff. The travelling showperson’s yard is also outside of the Green Belt.”</del></p> <p>Replace paragraph 4.3 to read:</p> <p><b><u>“4.3 Sunrise Cottage and The Old Nursery are not currently being considered for the removal of their Green Belt status. The removal of the two sites from the Green Belt would not be consistent with Policy DS7 of the current Borough Plan (and would be noncompliant with Regulation 8(4) of the 2012 Regulations) which is the Part 1 plan. Notwithstanding this, the Borough Plan is currently being reviewed and the Green Belt status of these two sites may be revisited, if necessary, when the Borough Plan is updated as part of a wider review of the Green Belt. However, the Site Assessments and the Green Belt document explains how the Green Belt sites may be considered suitable for development subject to meeting national policy for the Green Belt.</u></b></p> <p>Add complete new paragraph to read:</p> <p><b><u>“4.4 If future planning applications on these sites are considered to be inappropriate development in the Green Belt, then it would be necessary to demonstrate ‘very special circumstances’ in accordance with the Framework. In this regard, the</u></b></p>

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		<p><b><u>allocation of these sites for new gypsy and traveller pitches in this DPD will be an important consideration in any such assessment.</u></b></p>
MM5	Page 10 Paragraph 4.5	<p>Amend and add to paragraph to read:  “4.6 Sites should also avoid locations that would impact upon land that has been designated for its interest, so, sites of ecological, heritage, or geological value. Similarly, contaminated land, land prone to flooding, and land in a sensitive landscape should also be avoided. These and other criteria for selecting new gypsy and traveller sites are set out in Policy H3 – <del>Gypsies and Travellers of the current Borough Plan.</del> <b><u>GT2 Strategy.</u></b>”</p>
MM6	Page 10 Paragraph 4.6	<p>Delete, add and amend some wording in paragraph as follows:  “4.7 The fundamental purpose of the Gypsy and Traveller Site Allocations DPD is to allocate land to provide for the number of pitches identified <del>as the need by 2036/37.</del> <b><u>for the required need to 2037.</u></b> The Issues and Options consultation draft proposed four strategies for allocating new pitches. These were all assessed within the accompanying sustainability appraisal and two of the options were found to be the most sustainable, namely the following:</p> <ul style="list-style-type: none"> <li>A. Seek to allocate new pitches firstly within the permitted area of existing sites and/or adjacent to these sites, then based on walking distances to services, and then by existing Policy H3.</li> <li>D. Seek to allocate new pitches firstly within the permitted site area of existing sites, then adjacent to these existing pitches, then based on <del>walking distances to services. Use existing Policy H3 only once sites have been allocated by any of the other means and then only if insufficient has been allocated.</del> <b><u>the criteria set out in the latter part of the policy.</u></b>”</li> </ul>
MM7	Page 10 Paragraph 4.7	<p>Amend typing error from ‘of’ to “is”. Delete one sentence to read:  “4.8 Respondents to the issues and options selected only options A and D – with an even split of numbers to these two options from respondents. Options A and D – the first difference is that option A uses extant Policy H3 to assess sites at the outset whilst option D only</p>

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		<p>uses extant Policy H3 once insufficient sites have been found via other means. The second difference if <b>is</b> that option D separates out the permitted areas of existing sites from land adjacent to existing sites whereas option A does not and treats them together. It is considered that option D should form the basis of the allocation of new pitches as it allows for the consideration of the permitted site area of existing sites first (and in isolation) and this has the potential for the least impact. However, in hindsight, the use of the word 'adjacent' could give rise to some ambiguity and the word 'adjoining' will be used instead to emphasise that there should be a physical relationship between the new and the existing. <del>Also, another benefit of using option D is that Policy H3 is only used as a fallback if insufficient pitches have been found via other means rather than from the outset.</del> It should be noted that should planning applications be made for new pitches on unallocated sites then the strategic policy in this DPD would be used as the starting point to assess their suitability."</p>
MM8	Page 11 Paragraph 4.8	<p>Delete whole paragraph as follows:  <del>"4.8 In terms of walking distances to services a number of different ways in which this could be measured were suggested in the issues and options document and these ranged from 2-3 miles for school to 800 metres to a town centre. The intermediate distance was 1.6 kilometres to GPs (General Practitioners) and pharmacies. Given the above range of different ways to measure walking distances to specific services and that, ideally, access should be all of these, it seems a good compromise to use the intermediate distance, and this shall be used within the strategic policy."</del></p>
MM9	Page 11 Paragraph 4.9	<p>Omit and amend wording to read:  <del>"4.9 Based on the above the strategy is a tiered approach whereby land that is being developed for new pitches will be assessed against the three priority land uses. In terms of allocations, land will be allocated in the order set out in the policy so that the priority will be to allocate land that meets priority one in the first instance. If insufficient pitches to meet the Borough's needs are found to be acceptable then land use priority two will be used and then land use priority three. If insufficient remains allocated, then Policy H3 will be used. In terms of planning applications these are</del></p>

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		<p>standalone parcels of land that cannot be dealt with by the same process and, thus, any of the three priority land uses would be acceptable subject to all other matters of the proposal being found acceptable. Policy H3 of the extant Borough Plan is only utilised if there is insufficient provision to meet the identified need for new pitches. <b><u>Policy GT2 identifies that new gypsy and traveller pitches will generally be supported within the sites allocated within GT3 or within the permitted area of existing lawful, authorised gypsy and traveller sites. In addition, to ensure that consideration is given to sustainability, any new sites that come forwards within the urban area (as shown within the settlement boundary of Policy DS2 of the Borough Plan). In addition, land adjoining the permitted area of existing lawful, authorised gypsy and traveller sites will be considered as long as these are in proportion appropriate to the scale of the existing site. The intention is to supersede entirely Policy H3 in the current adopted Plan (2011 – 2031). Within the emerging Borough Plan (2024 – 2039) emerging Policy H3 will simply signpost to the adopted DPD for guidance on any new pitches or plots.</u></b></p>
MM10	Page 11 Strategic Policy GT2 - Strategy	<p>Amend, omit, and add to read:  “Planning permission will be granted for new gypsy and traveller pitches subject to compliance with other policies of the development plan <b><u>and with national policy including in relation to Green Belt</u></b> in the following priority land uses <b><u>on the following land:</u></b></p> <ol style="list-style-type: none"> <li>a) <b><u>Sites allocated in Policy GT3 or</u></b> within the permitted area of existing lawful, authorised gypsy and traveller sites; <del>or</del></li> <li>b) <b><u>Sites within the urban area (as shown within the settlement boundary of Policy DS2 of the Borough Plan);</u></b> <del>or</del></li> <li>c) <del>then land adjoining the permitted area of existing lawful, authorised gypsy and traveller sites; ___d) ___ then land within 1.6 kilometres of appropriate services, such as schools, GP surgeries, shops, and these services being capable of being accessed safely by foot.</del> <b><u>Extensions adjoining the permitted area of existing lawful, authorised gypsy and traveller sites that are proportionate in scale to the existing site.</u></b></li> </ol>

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		<p><b><u>Any proposed sites considered must comply with all of the following:</u></b></p> <ul style="list-style-type: none"> <li>a) <b><u>The site should have reasonable access to essential services including health and education facilities and access to local shops;</u></b></li> <li>b) <b><u>The number of pitches or plots is in proportion to the size and scale of the site;</u></b></li> <li>c) <b><u>The number of pitches or plots is in proportion to the size and density of the nearest settled community;</u></b></li> <li>d) <b><u>The site is not located in areas of high flood risk;</u></b></li> <li>e) <b><u>The site avoids adverse impact on historic and important open spaces, landscape or local nature conservation designations, ecology and biodiversity assets;</u></b></li> <li>f) <b><u>The site is located where the privacy, visual and residential amenity for both site residents and neighbouring land uses are protected;</u></b></li> <li>g) <b><u>The site has suitable access to the highway network;</u></b></li> <li>h) <b><u>The site is located where air or noise pollution will not significantly affect the health and well-being of site residents; and</u></b></li> <li>i) <b><u>The site has suitable connection to the foul sewage system or can demonstrate that connection is unviable and alternative arrangements can be made.</u></b></li> </ul> <p>If there is insufficient provision to meet the minimum needs identified in Strategic Policy GT1 – Overall Need then extant Policy H3 – Gypsies and Travellers of the Borough Plan will be used to determine the acceptability of the new development.</p> <p><b><u>This Policy supersedes Policy H3 of the adopted Borough Plan (2011-31)."</u></b></p>
MM11	Page 12 Paragraph 4.12	<p>Sentences omitted at beginning of paragraph to read:  <del>"4.13 This site does not meet the three bullet points of Strategic Policy GT2 – Strategy but the policy allows for sites in other locations that accord with Policy H3 where the need set out in Strategic Policy GT1 – Overall Need has not been met. The other two sites would provide nine pitches, leaving a shortfall of two pitches to meet the identified need. An assessment of the site against Policy H3 has concluded that the site would be acceptable for allocation. The number of pitches provided by the three sites found acceptable</del></p>

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		for allocation would provide 14-15 pitches which would, firstly, meet the minimum 11 pitches required and, secondly, build in some resilience should the anticipated levels of turnover at The Griff not take place.”
MM12	Page 13 Paragraph 4.15	Deleted sentences at end of paragraph to read: “4.16 The need for new gypsy and traveller pitches set out in Strategic Policy GT1 – Overall Need is for at least 11 permanent residential pitches to accommodate Gypsies and Travellers. The sites that have been found acceptable to allocate would provide up to 15 pitches at three locations and these are set out in Policy GT3 – Site Allocations. Below the policy an accompanying plan is provided showing the area to which the allocation relates.” <del>Two of the sites are within the Green Belt, namely Sunrise Cottage and The Old Nursery, and these have been found to meet the terms of exceptions and thus allowable development in the Green Belt. The extant proposals map will need to be updated to remove these two sites from the Green Belt.</del>
MM13	Pages 15-16 Policy GT3 – Site Allocations	<p>Additions to the Policy to read:</p> <p>“Planning permission will be granted for new gypsy and traveller pitches at the following sites and as denoted with a solid red line on the accompanying site plans:</p> <p>GTSA1 – Sunrise Cottage for three additional pitches within the existing site as shown as a solid red line on the accompanying plan.</p> <p>GTSA2 – The Old Nursery for five to six new pitches within the site as shown as a solid red line on the accompanying plan.</p> <p>GTSA3 - Winter Oak for six additional pitches within the existing site as shown as a solid red line on the accompanying plan.</p> <p><u>Key Development Requirements</u></p> <p>Planning applications at the allocated sites shall contain the details as set out below:</p>

Ref	Page/Policy/ Paragraph	Main Modification
		<p>GTSA1 – Sunrise Cottage</p> <ul style="list-style-type: none"> <li>• Provision of visibility splays of 160 metres.</li> <li>• Suitable bin collection points should be provided within the site so that bins are not stored within the highway.</li> <li>• Preliminary Ecological Assessment.</li> <li>• <b><u>Where possible foul sewage for new pitches/plots should connect to existing foul mains drainage. Where connection to mains drainage is not possible, the potential impact on the water environment will need to be considered.</u></b></li> </ul> <p>GTSA2 – The Old Nursery</p> <ul style="list-style-type: none"> <li>• Closure of the northern access within the site.</li> <li>• Access to be made in and out of the site from the southern access within the site.</li> <li>• Configuration of an access that allows for sufficient manoeuvring room for any vehicles entering/exiting the site.</li> <li>• Any gates within the access to be setback sufficient distance to allow any vehicle entering the site to exit the highway completely whilst the gates are opened or closed.</li> <li>• Provision of visibility splays of 160 metres.</li> <li>• Suitable bin collection points should be provided within the site so that bins are not stored within the highway.</li> <li>• Landscaping of the site boundary to soften the appearance of the pitches from external views.</li> <li>• Preliminary Ecological Assessment.</li> <li>• Retention of existing boundary vegetation.</li> <li>• Provision of communal play area within the site.</li> <li>• <b><u>Address any contamination on the site.</u></b></li> <li>• <b><u>Where possible foul sewage for new pitches/plots should connect to existing foul mains drainage. Where connection to mains drainage is not possible, the potential impact on the water environment will need to be considered.</u></b></li> </ul> <p>GTSA3 – Winter Oak</p> <ul style="list-style-type: none"> <li>• Suitable bin collection points should be provided within the site so that bins are not stored within the highway.</li> </ul>



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		<ul style="list-style-type: none"> <li>• Preliminary Ecological Assessment.</li> <li>• Retention of existing boundary vegetation.</li> <li>• <b><u>Provision of communal play area within the site.</u></b></li> <li>• <b><u>Ensure air and noise quality to future residents of the site is acceptable.</u></b></li> <li>• <b><u>Where possible foul sewage for new pitches/plots should connect to existing foul mains drainage. Where connection to mains drainage is not possible, the potential impact on the water quality will need to be considered.</u></b></li> </ul>						
MM14	Page 19 Policy GT4 – Site Safeguarding	<p>Amend and omit some wording to read: “The travelling showpeople site at Spinney Lane/Whittleford Road, Nuneaton as denoted on plan GTSA4 with a solid red line will be safeguarded for use by travelling showpeople.</p> <p>Alternative uses will <b><u>only</u></b> be permitted if it is <b><u>clearly demonstrated</u></b> <del>proven that either there is no longer a requirement</del> <b><u>the site is no longer required</u></b> for travelling showpeople accommodation.” <del>or that an alternative site for travelling showpeople is available within Warwickshire.</del></p>						
MM15	Page 20 Table 3	<p>Omit and amend some wording in the table to read: “Table 3 - Monitoring indicators and targets for the policies of the Gypsy and Traveller Site Allocations Development Plan Document (DPD).</p> <table border="1" data-bbox="683 1323 1469 1816"> <thead> <tr> <th data-bbox="683 1323 906 1451">Policy</th> <th data-bbox="906 1323 1182 1451">Indicator</th> <th data-bbox="1182 1323 1469 1451">Target</th> </tr> </thead> <tbody> <tr> <td data-bbox="683 1451 906 1816">Strategic Policy GT1 – Overall Need</td> <td data-bbox="906 1451 1182 1816"><del>Gypsy and traveller accommodation.</del></td> <td data-bbox="1182 1451 1469 1816"><del>11 residential pitches Provided.</del></td> </tr> </tbody> </table>	Policy	Indicator	Target	Strategic Policy GT1 – Overall Need	<del>Gypsy and traveller accommodation.</del>	<del>11 residential pitches Provided.</del>
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Strategic Policy GT1 – Overall Need	<del>Gypsy and traveller accommodation.</del>	<del>11 residential pitches Provided.</del>						

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				Monitor the continued need for additional pitches.	Within five years of adoption of this DPD undertake a new Gypsy, Traveller, and Showpeople Accommodation Assessment.
			Strategic Policy GT2 – Strategy	Sites permitted in accordance with the <u>policy criteria mentioned in policy GT2.</u>	100%. <b><u>Timescales as below.</u></b>
			Policy GT3 – Site Allocations	Monitor the supply and delivery of allocated sites and report annually through the Authority Monitoring Report. <b><u>Contact the proposed sites on a yearly basis after the AMR to encourage the sites to come forwards and answer any concerns the owners may have on bringing the sites forwards at that time.</u></b>	A minimum of six additional residential pitches permitted and available for use by 2025/26 and a minimum of 11 additional residential pitches permitted and available by 2036/37.
			Policy GT4 – Site Safeguarding	Monitor the use of the safeguarded site.	The identified site at Spinney Lane/Whittleford Road, Nuneaton to remain used for travelling

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					<p>showpeople unless it <del>is</del> was proven to be no longer required. <b><u>clearly demonstrated that the site is no longer required for travelling showpeople accommodation.</u></b></p> <p>” —</p>						
MM16	Page 22 Appendix 1	<p>Omit and amend some wording to read: “Relationship between the policies in this DPD and the extant Borough Plan.</p> <table border="1" data-bbox="587 1032 1481 1442"> <tr> <td data-bbox="587 1032 1043 1182"><b><u>Superseded Existing</u></b> Borough Plan policies</td> <td data-bbox="1043 1032 1481 1182"><b><u>Superseding Effect of</u></b> Gypsy and Traveller Site Allocations DPD policies</td> </tr> <tr> <td data-bbox="587 1182 1043 1294">Policy DS4 – Overall development needs (third bullet point only).</td> <td data-bbox="1043 1182 1481 1294"><b><u>Superseded by</u></b> Strategic Policy GT1 – Overall Need.</td> </tr> <tr> <td data-bbox="587 1294 1043 1442">Policy H3 – Gypsies and Travellers. (<del>figures contained in first sentence</del>)</td> <td data-bbox="1043 1294 1481 1442"><b><u>Superseded by</u></b> Strategic Policy GT1 – Overall Need. <del>GT2 – Strategy</del>” –.</td> </tr> </table>				<b><u>Superseded Existing</u></b> Borough Plan policies	<b><u>Superseding Effect of</u></b> Gypsy and Traveller Site Allocations DPD policies	Policy DS4 – Overall development needs (third bullet point only).	<b><u>Superseded by</u></b> Strategic Policy GT1 – Overall Need.	Policy H3 – Gypsies and Travellers. ( <del>figures contained in first sentence</del> )	<b><u>Superseded by</u></b> Strategic Policy GT1 – Overall Need. <del>GT2 – Strategy</del> ” –.
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Policy H3 – Gypsies and Travellers. ( <del>figures contained in first sentence</del> )	<b><u>Superseded by</u></b> Strategic Policy GT1 – Overall Need. <del>GT2 – Strategy</del> ” –.										
MM17	Page 22 Appendix 1	<p>Add to appendix to read: “<b>For reference Policy DS4 Overall development needs should now read:</b> <b><u>The following levels of housing and employment development will be planned for and provided within Nuneaton and Bedworth Borough between 2011 and 2031:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>At least 14,060 homes</u></b></li> <li>• <b><u>At least 107.8 ha of employment land</u></b></li> <li>• <del>At least 39 residential pitches and 5 transit pitches to accommodate Gypsies and Travellers”</del></li> </ul>									