

# **Nuneaton and Bedworth Gypsy and Traveller Site Allocations DPD**

**SA Report Addendum:**

**Appraisal of Modifications**

June, 2023

## Quality information

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# Non-Technical Summary

## 1.1 Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the Nuneaton and Bedworth Gypsy and Traveller DPD (Thereafter referred to as 'the Plan'). SA is a mechanism for considering and communicating the likely effects of the plan, and alternatives, in terms of sustainability issues, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of the Plan is a legal requirement.

This is a Non-Technical Summary (NTS) of this SA Report Addendum, which is an Addendum to the full SA Report published in November 2021 [Exam ref: CD1.2].

The aim of the SA Report Addendum is essentially to present information on the proposed modifications, and alternatives where appropriate, with a view to informing the forthcoming consultation and subsequent plan finalisation.

## 2.1 Scope

The scope of the SA work, with respect to the Plan Review, is introduced within the SA Report published in November 2021 [Exam ref: CD1.2]. Essentially, the scope is reflected in a list of sustainability objectives and guiding questions, which collectively provide a methodological 'framework' for appraisal. The SA objectives are listed in Table 1 below.

**Table 1: Sustainability Objectives**

### Sustainability Objectives

---

#### **Economy**

Achieve a strong, stable and sustainable economy and prosperity for the benefit of all the Borough's inhabitants, through on-going investment (public and private)

---

#### **Housing**

Provide decent housing for all, of the right quantity, type, tenure and affordability to meet local needs, in clean, safe and pleasant environments

---

#### **Equality**

Ensure easy and equitable access to services, facilities and opportunities, including jobs and learning, and that people are not disadvantaged with regard to ethnicity, gender, age, disability, faith, sexuality, background or location

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#### **Crime**

Reduce crime, fear of crime and antisocial behaviour

---

#### **Deprivation**

Address poverty and disadvantage, taking into account the particular difficulties of those facing multiple disadvantage

---

#### **Recreation**

Improve opportunities to participate in the diverse cultural, sport and recreational opportunities the Borough can offer

---

#### **Sense of place**

Encourage land use and development that creates and sustains well-designed, high quality built environments, that help to create and promote local distinctiveness and sense of place

## Sustainability Objectives

---

### **Biodiversity**

To protect and enhance the natural environment, habitats, species, landscapes and inland waters

---

### **Population and Human Health**

Improve health and reduce health inequalities by encouraging and enabling healthy active lifestyles and protecting health, as well as providing equitable access to health services

---

### **Soil**

To protect and improve soil quality

---

### **Natural resource efficiency**

Use natural resources such as water efficiently, including by incorporating efficiency measures into new land use and developments, redevelopment and refurbishment

---

### **Water**

Ensure that new developments minimise water pollution levels and avoid areas which are at risk from flooding and natural flood storage areas

---

### **Sustainable Travel**

Increase use of public transport, cycling and walking as a proportion of total travel in order to reduce road traffic congestion, pollution and accidents

---

### **Existing infrastructure**

Ensure development is primarily focused in urban areas, and makes efficient use of existing physical infrastructure and reduces need to travel, especially by private car

---

### **Energy**

Reduce overall energy use through increased energy efficiency

---

### **Climate change mitigation**

Minimise the Borough's contribution to the causes of climate change by reducing emissions of greenhouse gases from transport, domestic, commercial, and industrial sources

---

### **Waste and recycling**

Encourage and enable waste minimisation, reuse, recycling, and recovery to divert resources away from the waste stream, including the use of recycled materials where possible

---

### **Land use**

To ensure the prudent use of resources including the optimum use of previously developed land, buildings and the efficient use of land

---

### **Cultural Heritage**

To conserve and enhance the historic environment

---

### **Landscape**

To maintain and enhance the quality of landscapes

---

### 3.1 Screening of Proposed Modifications

As a result of the Examination of the Plan, a number of main modifications and additional modifications to the submitted Gypsy and Traveller Plan have been proposed. It is necessary to screen the modifications to determine if they significantly affect the findings of the main SA Report [Exam ref: CD1.2] and if further appraisal work is therefore required.

The additional modifications are largely to rectify minor issues, presentation, grammar and for clarity. Therefore, none are considered to have implications for the SA findings.

All of the proposed Main Modifications have been screened to determine if further SA work is required or if they can be screened out from further appraisal work. The proposed changes and detailed findings of the screening including the rationale for why a main modification was screened in or out are provided in Appendix A of this SA Report Addendum.

The majority of modifications involve edits to the Plan text for clarification, factual correction, to enhance readability or other minor reasons and have therefore been screened out as not being significant in terms of the SA (i.e. they would be inherently unlikely to give rise to significant effects or affect the overall conclusions).

The screening of the proposed Main Modifications (Appendix A) found that the majority of modifications would not be likely to have a significant effect on the findings of the previous SA work presented in the main SA Report [Exam ref: CD1.2]. This is because the changes do not fundamentally alter the thrust of the policies.

Only the following Modifications were identified that required further consideration in the SA at this stage. These are as follows:

#### **MM10 – Changes to Policy GT2**

The change removes a hierarchical approach to the delivery of gypsy and traveller pitches. Instead, a range of suitable situations are identified, each of which need to demonstrate compliance with a range of criteria (previously reflected in Policy H3 of the Adopted Borough Plan).

#### **MM13 – Additional requirements for site allocations under GT3**

Additions to key delivery considerations could potentially have implications for the SA findings.

### 4.1 Consideration of alternatives

The Council explored whether there were any reasonable alternatives in relation to the proposed Main Modifications. It was considered that no alternatives were reasonable or needed to be appraised through further SA work.

### 5.1 Appraisal of Modifications

The appraisal identifies that the Modifications would lead to limited changes to the sustainability appraisal findings (compared to the Submission version of the Plan) when considering the overall effects of the Plan 'as a whole'. However, though the significance of effects remains unchanged for most SA Objectives, there are some differences between the Submitted Version of the Plan and the version with Modifications that are worth discussing.

The key differences are summarised below:

- The Modifications provide more flexibility in selection of additional sites, and therefore there are improvements in relation to 'Housing'.



- The requirement for a formal play space at the Winter Oak sites improves the performance of the Plan in terms of ‘Recreation’.
- The requirement for measures to manage pollution, sewerage and drainage on the allocated sites improves the performance of the Plan in terms of ‘Water’.
- Greater support / enablement of sites to come forward in urban locations and on previously developed land ought to be preferable with regards to ‘Land Use’, ‘Landscape’ and ‘Soil’.
- There is less specific requirements in relation to sustainable travel and accessibility in relation to where new gypsy and traveller sites should be located. This could be a less proactive approach than the Submitted version of the Plan.
- There are some uncertainties whether effects would be different in relation to ‘Historic Environment’, Existing Infrastructure’ and ‘Deprivation’. This relates to the greater uncertainty about where new additional sites would be located. Nevertheless, significant effects would not be anticipated given other plan provisions.

## 6.1 Mitigation and enhancement

No further mitigation or enhancement measures were identified at this stage.

## 7.1 Monitoring

No significant effects have been identified at this stage. Therefore, the monitoring indicators identified in the main SA Report remain unchanged. The monitoring framework will be finalised following adoption.

## 8.1 Next Steps

Following consultation, the Inspector(s) will consider all representations received, before deciding how to report on the Plan’s soundness. Assuming that the Inspector is ultimately able to find the Plan ‘sound’, it will then be adopted by the Council. At the time of adoption an ‘SA Statement’ will be published that explains the process of plan-making/SA in full and presents ‘measures decided concerning monitoring’.

# 1. Introduction

## 1.1. Background

- 1.1.1 Nuneaton and Bedworth Council is preparing a Gypsy and Traveller Allocations Development Plan Document (thereafter referred to as 'the Plan'). The Plan is at an advanced stage, having gone through various rounds of consultation and is currently at public examination.
- 1.1.2 A number of modifications are being proposed to the Plan. It is important to explore whether these changes will affect sustainability appraisal findings.

## 1.2. Sustainability Appraisal (SA)

- 1.2.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the Plan. SA is a legally required process that aims to ensure that the significant effects of an emerging draft plan (and alternatives) are systematically considered and communicated. It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations (the 'SEA Regulations') 2004.

## 1.3. Purpose and Structure of this SA Report Addendum

- 1.3.1 The aim of this SA Report Addendum is to present information on the proposed main modifications with a view to informing further consultation and subsequent plan finalisation.
- 1.3.2 This report is known as an SA Report 'Addendum' on the basis that it is an Addendum to the SA Report published in November 2021 [Exam ref: CD1.2]. This SA Report Addendum is structured as follows:
- **Section 2** - presents the scope of the SA;
  - **Section 3** - explains the method and presents the findings of the screening of proposed modifications;
  - **Section 4** - sets out consideration of alternatives;
  - **Section 5** – sets out an appraisal of the screened in Modifications;
  - **Section 6** – considers mitigation and enhancement; and
  - **Section 7** – discusses the next steps.

# 2. What's the scope of the SA?

## 2.1. The SA Framework

- 2.1.1 The scope of the SA work, with respect to the Gypsy and Traveller Plan is introduced within the SA Report, and was set out in detail within a scoping report. The scope is reflected in a list of sustainability objectives and supporting 'guiding criteria', which collectively provide a methodological 'framework' for appraisal.
- 2.1.2 The SA Objectives and guiding criteria are listed below in Table 2.1. It has not been necessary to update or revise the SA framework for the purposes of appraisal work at this stage.

**Table 2.1: The SA Framework**

| SA Objective  | Guiding criteria (will the proposal...)  |
|---|--|
| <p><b>Economy</b><br/>Achieve a strong, stable and sustainable economy and prosperity for the benefit of all the Borough's inhabitants, through on-going investment (public and private)</p>  | <ul style="list-style-type: none"> <li>• Will it meet the employment needs of the local community?</li> <li>• Will it help diversify the economy?</li> <li>• Will it support small businesses?</li> <li>• Will it maintain a balanced mix of development?</li> </ul>   |
| <p><b>Housing</b><br/>Provide decent housing for all, of the right quantity, type, tenure and affordability to meet local needs, in clean, safe and pleasant environments</p>   | <ul style="list-style-type: none"> <li>• Will it promote a range of housing types and tenure?</li> </ul>   |
| <p><b>Equality</b><br/>Ensure easy and equitable access to services, facilities and opportunities, including jobs and learning, and that people are not disadvantaged with regard to ethnicity, gender, age, disability, faith, sexuality, background or location</p> | <ul style="list-style-type: none"> <li>• Will it maintain and enhance existing facilities?</li> <li>• Will it put unacceptable pressure on existing services and community facilities?</li> <li>• Will it improve access to local services and facilities?</li> <li>• Will it ensure that education and skills infrastructure meet projected future demand and need?</li> <li>• Will it reduce inequalities in education and skills across the Borough?</li> </ul> |
| <p><b>Crime</b><br/>Reduce crime, fear of crime and antisocial behaviour</p>  | <ul style="list-style-type: none"> <li>• Will it promote the reduction of crime rates?</li> <li>• Will it encourage the adoption of principles to 'design out' crime in housing and employment sites?</li> </ul>   |
| <p><b>Deprivation</b><br/>Address poverty and disadvantage, taking into account the particular difficulties of those facing multiple disadvantage</p>   | <ul style="list-style-type: none"> <li>• Will it reduce poverty and exclusion in those areas most effected?</li> </ul>   |
| <p><b>Recreation</b><br/>Improve opportunities to participate in the diverse cultural, sport and recreational opportunities the Borough can offer</p>   | <ul style="list-style-type: none"> <li>• Will it ensure that facilities and locations for cultural activities are protected?</li> <li>• Will it protect and create high quality or valued recreational spaces and avoid erosion of recreational function?</li> </ul>   |

**SA Objective**

**Guiding criteria (will the proposal...)**

**Sense of place**

Encourage land use and development that creates and sustains well-designed, high quality built environments, that help to create and promote local distinctiveness and sense of place

- Will it require good urban design to create attractive, high quality environments where people will choose to live, work and invest?

**Biodiversity**

To protect and enhance the natural environment, habitats, species, landscapes and inland waters

- Will it protect and enhance species, habitats and sites at risk?
- Will it protect and enhance the natural environment, whether designated or not, including habitats, species, landscapes and controlled waters, particularly maintaining European sites, SSSIs and LNRs to a favorable standard?
- Will it support development that incorporates improvements to wildlife habitats?
- Will it increase access to green spaces?
- Will it contribute to adaptation to climate change and ecological networks?

**Population and Human Health**

Improve health and reduce health inequalities by encouraging and enabling healthy active lifestyles and protecting health, as well as providing equitable access to health services

- Will it diminish inequalities in mortality, health and wellbeing across the Borough?
- Will it promote healthy lifestyles and opportunities for exercise?
- Will it promote opportunities to participate in sport?
- Will it protect, provide and enhance the provision of quality open space?
- Will it prevent noise and light pollution?

**Soil**

To protect and improve soil quality

- Will it minimise development on Greenfield land?
- Will it reduce the amount of derelict, degraded and underused land?
- Will it reduce the quantity of contaminated land in the Borough?

**Natural resource efficiency**

Use natural resources such as water efficiently, including by incorporating efficiency measures into new land use and developments, redevelopment and refurbishment

- Will it promote the balance between water supply and demand?
- Will it encourage water efficiency and conservation?
- Will it minimise adverse effects in ground and surface water quality?
- Will it protect and enhance the quality of watercourses?

**SA Objective**

**Guiding criteria (will the proposal...)**

**Water**

Ensure that new developments minimise water pollution levels and avoid areas which are at risk from flooding and natural flood storage areas

- Will it avoid developments in areas being at risk from fluvial, sewer or groundwater flooding?
- Will it provide habitat creation?
- Will it support the connection of blue corridors

**Sustainable Travel**

Increase use of public transport, cycling and walking as a proportion of total travel in order to reduce road traffic congestion, pollution and accidents

- Will it maintain and improve local air quality?
- Will it reduce traffic congestion and improve road safety?

**Existing infrastructure**

Ensure development is primarily focused in urban areas, and makes efficient use of existing physical infrastructure and reduces need to travel, especially by private car

- Will it focus development in the major urban areas?
- Will it promote compact, mixed-use developments with good accessibility to local facilities and service that reduce the need to travel?
- Will it reduce the number and length of journeys made by car?
- Will it promote alternative, more sustainable modes of transport to the car (including walking and cycling) through location of housing, employment sites, services and facilities, and appropriate infrastructure for sustainable modes of transport?

**Energy**

Reduce overall energy use through increased energy efficiency

- Will it reduce or minimise greenhouse gas emissions?
- Will it increase the proportion of energy generated from renewable and low carbon sources, including by micro-generation, CHP, district heating and transportation?

**Climate change mitigation**

Minimise the Borough's contribution to the causes of climate change by reducing emissions of greenhouse gases from transport, domestic, commercial, and industrial sources

- Will it contribute to the creation of a low carbon economy and minimise the Borough's contribution to the causes of climate change by reducing emissions of greenhouse gases from transport, domestic, commercial and industrial sources?
- Will it promote the adoption of climate change adaption and climate proofing principles in planning and design?
- Will it promote sustainable urban drainage systems?

**Waste and recycling**

Encourage and enable waste minimisation, reuse, recycling, and recovery to divert resources away from the waste stream, including the use of recycled materials where possible

- Will it reduce waste arising (household and commercial)?
- Will it increase recycling and composting rates and encourage easily accessible recycling systems?
- Will it promote re-use of resources?

| SA Objective  | Guiding criteria (will the proposal...)  |
|---|--|
| <p><b>Land use</b><br/>To ensure the prudent use of resources including the optimum use of previously developed land, buildings and the efficient use of land</p> | <ul style="list-style-type: none"> <li>• Will it encourage land use and development that optimises the use of previously developed land and buildings?</li> <li>• Will it encourage development which makes more efficient use of land; and seek greater intensity of development at places with good public transport accessibility?</li> </ul> |
| <p><b>Cultural Heritage</b><br/>To conserve and enhance the historic environment</p>  | <ul style="list-style-type: none"> <li>• Will it conserve and enhance sites, features and areas of historical, archaeological and cultural value?</li> </ul>   |
| <p><b>Landscape</b><br/>To maintain and enhance the quality of landscapes</p>   | <ul style="list-style-type: none"> <li>• Will it enhance and manage the character and appearance of the Borough's landscapes, maintaining and strengthening local distinctiveness and sense of place?</li> </ul>   |

## 3. Screening of Proposed Modifications

### 3.1. Introduction

3.1.1 A number of 'additional' and Main Modifications to the submitted Plan are proposed as a result of the examination hearing sessions and representations received. It is necessary to screen these modifications to determine if they could significantly affect previous SA findings and if further appraisal work is therefore required.

### 3.2. Method

3.2.1 All of the proposed Main Modifications were screened to determine if further SA work was required or if they could be screened out from appraisal. The findings of the screening exercise, including the rationale for why a modification was screened in or out, are provided in Appendix 1.

3.2.2 The majority of modifications involve minor edits to the Plan text for clarification, factual correction, to enhance readability or other minor reasons and have therefore been screened out as not being significant in terms of requiring further exploration through the SA (i.e. they would be inherently unlikely to give rise to significant effects).

3.2.3 Where modifications are identified as potentially giving rise to significant effects, then additional appraisal work has been undertaken.

### 3.3. Screening Findings

3.3.1 The screening of the proposed Main Modifications (**Appendix 1**) found that the majority of modifications would not be likely to have a significant effect on the findings of the previous SA work presented in the November 2021 [Exam ref: CD1.2]. This is because the changes do not fundamentally alter the thrust of the policies when considering the Plan 'as a whole'.

3.3.2 Several modifications have been identified as requiring further consideration through the SA process. These are as follows:

### **MM10 – Changes to Policy GT2**

- 3.3.3 The change removes a hierarchical approach to the delivery of gypsy and traveller pitches. Instead, a range of suitable situations are identified, each of which need to demonstrate compliance with a range of criteria (previously reflected in Policy H3 of the Adopted Borough Plan).

### **MM13 – Additional requirements for site allocations under GT3**

- 3.3.4 Additions to key delivery considerations could potentially have implications for the SA findings.

## **3.4. Appraising modifications**

- 3.4.1 Each of the modifications that have been 'screened-in' have been considered in further detail; covering the following elements:
- Consideration of reasonable alternative approaches
  - Appraisal against the SA framework
  - Potential for mitigation / enhancement
  - Monitoring

## 4. Consideration of alternatives

### 4.1. Appraising modifications

4.1.1 For each modification that has been screened-in, the potential for alternative approaches has been considered. This is discussed below.

#### **MM10 – Changes to Policy GT2**

4.1.2 The changes proposed are an alternative to the approach within the Submission version of the Plan (i.e. a hierarchical approach to site delivery). The Council have not identified any further alternatives with regards to Policy GT2.

#### **MM13 – Additional requirements for site allocations under GT3**

4.1.3 The modifications being proposed are based on enhancement / mitigation and do not lend themselves to the testing of reasonable alternatives.



## 5. Appraisal of the modifications

### 5.1. Introduction

- 5.1.1 The Main Modifications that are 'screened-in' have been appraised in further detail against the full SA Framework. The findings are discussed below, first summarising the predicted effects of the submission version of the Plan review, and then commenting on the implications that the modifications have in relation to these effects. This helps to provide a context for which the modifications are being appraised within.
- 5.1.2 In some instances, the effects are not predicted to be significantly different as a result of the modifications, but it has been possible to discuss whether the modifications are generally more or less beneficial with regards to a particular SA topic.
- 5.1.3 Following the discussion of each topic is a table summarising how each 'iteration' of the Plan performs with regards to the SA topic 'relative to each other'. It could be the case that positive effects are predicted in both iterations, but that it is possible to conclude on the overall rank of preference.
- 5.1.4 The two iterations covered are: the proposed version of the Plan at Submission stage; and, the Plan incorporating the main modifications.

### 5.2. SA Objective 1

#### Summary of effects of the Plan on Economy (Submission version)

- 5.2.1 Mainly neutral effects / limited relationship. However, some minor positive effects are predicted due to the proximity of Winter Oak site to employment (which could have benefits for residents).

#### Implications of modifications

- 5.2.2 The modifications that have been screened in are unlikely to significantly affect the SA findings in relation to Economy. The additional key development requirements are unlikely to affect schemes in terms of economic factors. The amended strategy is more flexible in terms of the use of land for gypsy and traveller accommodation, which could possibly involve land that might also be suitable for employment uses (such as previously development land / urban windfall sites). However, the magnitude of effects are likely to be very small and thus the overall effects are predicted to be the same (i.e. minor positive effects).

|             | Submission Plan | Plan review with modifications |
|-------------|-----------------|--------------------------------|
| <i>Rank</i> | -               | -                              |

### 5.3. SA Objective 2

#### Effects of the Plan on Housing (Submission version)

5.3.1 Significant positive effects are predicted through the allocation of sites to meet identified housing needs for specific communities.

#### Implications of modifications

5.3.2 The modifications are considered to be positive with regards to housing, but this does not change the already significantly positive effects predicted within the Submitted version of the Plan. The modifications for GT2 are considered to support a wider range of potential locations that could be suitable for gypsy and traveller sites compared to a more hierarchical approach. As such, this approach is considered more preferable with regards to the Housing SA Objective.

|             | Submission Plan | Plan review with modifications |
|-------------|-----------------|--------------------------------|
| <i>Rank</i> | 2               | 1                              |

### 5.4. SA Objective 3

#### Effects of the Plan on Equality (Submission version)

5.4.1 Mixed effects are recorded. On one hand, significant positive effects are predicted due to meeting the needs of an ethnic minority group. However, minor negative effects are also predicted due to a pattern of poor accessibility likely being maintained.

#### Implications of modifications

5.4.2 The allocations remain the same, and so in this respect, the effects are no different with regards to equality factors. In terms of additional provision, it is uncertain what the effects would be as any number of sites could be considered suitable. However, there is no firm requirement for sites to have good access to essential services, and so minor negative effects remain. The submission version provided a hierarchical approach that prioritised sites with good access to services (i.e. within 1.6km) before exploring other options. This could be more likely to bring about sites with comparable access to services to other communities. However, the modifications would still support accessible development, as well as supporting growth in the urban areas, which are likely to have good accessibility. On balance, there is little to differentiate the approaches within regards to equality.

|             | Submission Plan | Plan review with modifications |
|-------------|-----------------|--------------------------------|
| <i>Rank</i> | -               | -                              |

## 5.5. SA Objective 4

### Effects of the Plan on Crime (Submission version)

5.5.1 Neutral effects are predicted, as there is no clear relationship with this SA Objective.

#### Implications of modifications

5.5.2 The modifications are unlikely to have an effect on crime, as the changes proposed are unrelated to this SA Objective. Therefore, both 'versions' of the Plan are ranked the same in this respect.

|             | Submission Plan | Plan review with modifications |
|-------------|-----------------|--------------------------------|
| <i>Rank</i> | -               | -                              |

## 5.6. SA Objective 5

### Effects of the Plan on Deprivation (Submission version)

5.6.1 Neutral effects are predicted as there is no link between the allocated sites, supporting policies and locations experiencing multiple deprivation.

#### Implications of modifications

5.6.2 The changes to GT2 are more supportive of sites within the urban areas. This could mean that gypsy and traveller sites are permitted in areas that overlap with deprived communities. This could possibly bring some tensions and a sense that 'less desirable' development has been directed to areas experiencing deprivation. However, there is a great deal of uncertainty in respect of what additional sites would be involved, and it could also be possible to successfully integrate communities in urban areas. Neutral effects are predicted, but there is uncertainty and it is unclear which version of the Plan performs most favourably with regards to deprivation.

|             | Submission Plan | Plan review with modifications |
|-------------|-----------------|--------------------------------|
| <i>Rank</i> | ?               | ?                              |

## 5.7. SA Objective 6

### Effects of the Plan on Recreation (Submission version)

5.7.1 Minor negative effects are predicted as there may be limited access to formal open space at the allocated sites.

#### Implications of modifications

5.7.2 The modifications add a clause requiring a formal play area for GTSA3, which adds positive effects in respect of recreation. There is still not ideal access to recreation opportunities at the other existing / allocated sites. Policy GT2 does state that any additional new sites will need to have 'reasonable access to essential services', but it is unclear whether this means access to play and green space. As such, though the modifications are an improvement with regards to 'Recreation' at one of the site allocations, the overall effects are still considered to be minor negative.

|             | <b>Submission Plan</b> | <b>Plan review with modifications</b> |
|-------------|------------------------|---------------------------------------|
| <i>Rank</i> | 2                      | 1                                     |

## 5.8. SA Objective 7

### Effects of the Plan on Sense of Place (Submission version)

- 5.8.1 Minor positive effects are predicted as the allocations promote intensification of existing sites and management of amenity impacts.

#### Implications of modifications

- 5.8.2 The modifications are unlikely to have any significant implications with regards to design of development and how this affects 'sense of place'. As such, minor positive effects remain. It is not possible to differentiate performance / rank of the two versions of the Plan.

|             | <b>Submission Plan</b> | <b>Plan review with modifications</b> |
|-------------|------------------------|---------------------------------------|
| <i>Rank</i> | -                      | -                                     |

## 5.9. SA Objective 8

### Effects of the Plan on Biodiversity (Submission version)

- 5.9.1 Neutral effects are predicted as there are no direct links or secondary effects likely on designated habitats or locally important habitats.

#### Implications of modifications

- 5.9.2 The allocations remain the same, and the policy criteria for GT2 includes reference to the need to consider biodiversity impacts when determining suitability of new sites. Therefore, the modifications have no implications for the SA findings with regards to biodiversity (with neutral effects remaining).

|             | <b>Submission Plan</b> | <b>Plan review with modifications</b> |
|-------------|------------------------|---------------------------------------|
| <i>Rank</i> | -                      | -                                     |

## 5.10. SA Objective 9

### Effects of the Plan on Health (Submission version)

5.10.1 Minor negative effects are predicted as the sites are unlikely to promote active lifestyles and are not ideally located to health facilities. Minor positives are also predicted, as having a settled community is beneficial for wellbeing.

### Implications of modifications

5.10.2 On one hand modifications to GT3 are likely to be positive with regards to health, as there is a firm requirement for a play space at one of the site allocations. However, this is unlikely to change the significance of the effects from minor given the small magnitude of effects. Conversely, modifications to GT2 could lead to additional sites being acceptable that are not well-located with regards to services. It is debateable what constitutes 'reasonable access' to services, and in some instances this could lead to sites being approved in sub-optimal locations. On the flip-side, the policy supports development un urban areas, which are generally better served by health and education facilities – which is not the case for some existing Gypsy and Traveller sites (which would be prioritised for expansion if possible under the submission version of the Plan). On balance, the effects of the modifications are unlikely to alter in significance (both positive and negative), and it is difficult to clearly identify which version of the Plan performs best with regards to health.

|             | Submission Plan | Plan review with modifications |
|-------------|-----------------|--------------------------------|
| <i>Rank</i> | -               | -                              |

## 5.11. SA Objective 10

### Effects of the Plan on Soil (Submission version)

5.11.1 Neutral effects are predicted. The allocated sites are very small scale, and despite being classified as Grade 3 agricultural land, they are already in use.

### Implications of modifications

5.11.2 The allocated sites remain the same, and therefore effects on soil are unchanged in this respect. The approach to identifying suitable additional sites is less hierarchical, and is also supportive of previously developed land and land in the urban areas. It could therefore be slightly more likely to avoid the loss of agricultural land, which is a slight improvement on the submission version of the Plan (but not to the extent that the significance of effects will change from neutral).

|             | Submission Plan | Plan review with modifications |
|-------------|-----------------|--------------------------------|
| <i>Rank</i> | 2               | 1                              |

## 5.12. SA Objective 11

### Effects of the Plan on Resource Efficiency (Submission version)

5.12.1 Neutral effects are predicted. Sites are very small scale and opportunities for higher levels of resource efficiency on sites are limited.

#### Implications of modifications

5.12.2 There are no links between the modifications are resource efficiency, as such neutral effects remain.

|             | Submission Plan | Plan review with modifications |
|-------------|-----------------|--------------------------------|
| <i>Rank</i> | -               | -                              |

## 5.13. SA Objective 12

### Effects of the Plan on Water (Submission version)

5.13.1 Neutral effects are predicted as none of the sites are at significant risk of flooding, nor is water pollution likely.

#### Implications of modifications

5.13.2 The modifications relating to GT3 site allocations sets out new direct requirements for the allocated sites with regards to the need to avoid contamination and to ensure suitable access to waste water and drainage. The policy for GT2 also sets out this same requirement for any further potential sites. Though this would be expected of developments, the clarity provided and need to liaise with stakeholders to ensure appropriate arrangements should lead to some minor positive effects. This is an improvement on the submission version of the Plan.

|             | Submission Plan | Plan review with modifications |
|-------------|-----------------|--------------------------------|
| <i>Rank</i> | 2               | 1                              |

## 5.14. SA Objective 13

### Effects of the Plan on Sustainable Travel (Submission version)

5.14.1 Minor negative effects are predicted as the allocated sites are not attractive for walking and cycling.

#### Implications of modifications

5.14.2 The allocated sites are the same and so minor negative effects remain in this respect. Additional sites that come forward could potentially be located in sustainable locations in urban areas, but equally so could potentially be in areas that are more isolated with only 'reasonable access' to services and transport. There is a degree of uncertainty as it depends on the location of future sites and also the interpretation of 'reasonable' when decisions are made regarding accessibility. The submitted version of the Plan gave a more defined requirement of 1.6km to key services and required safe access by foot (and this was also a sequentially preferred approach).

5.14.3 Therefore, the modified version of the Plan is deemed to be slightly less preferable (though the significance of effects is considered to stay the same).

|             | <b>Submission Plan</b> | <b>Plan review with modifications</b> |
|-------------|------------------------|---------------------------------------|
| <i>Rank</i> | 1                      | 2                                     |

### 5.15. SA Objective 14

#### Effects of the Plan on Existing Infrastructure (Submission version)

5.15.1 The allocated sites can make use of existing infrastructure for drainage, roads, and waste collection. Though social infrastructure is not all ideally located, it can still be accessed. Therefore, neutral effects are predicted.

#### Implications of modifications

5.15.2 The allocated sites remain and thus the effects are the same in this respect. In terms of additional sites, the changes to policy GT2 could be considered more likely to involve sites on previously developed land and in the urban areas (which were not explicitly mentioned in the Submission Version). This could help make use of existing infrastructure slightly better, but there is great uncertainty as the sites involved are unknown at this stage. The unmodified policy would also support sites with good accessibility and adjacent to existing sites, making use of infrastructure. Therefore, the differences are small.

|             | <b>Submission Plan</b> | <b>Plan review with modifications</b> |
|-------------|------------------------|---------------------------------------|
| <i>Rank</i> | ?                      | ?                                     |

### 5.16. SA Objective 15

#### Effects of the Plan on Energy (Submission version)

5.16.1 Neutral effects are predicted given the small magnitude of effects and limited relationship between the objective and the Plan policies.

#### Implications of modifications

5.16.2 The modifications are unlikely to have any further effects with regards to energy, and thus neutral effects remain.

|             | <b>Submission Plan</b> | <b>Plan review with modifications</b> |
|-------------|------------------------|---------------------------------------|
| <i>Rank</i> | -                      | -                                     |

## 5.17. SA Objective 16

### Effects of the Plan on Climate Change Mitigation (Submission version)

5.17.1 Neutral effects are predicted. Though allocated sites could encourage car travel, it also provides a permanent accommodation for travellers, reducing the amount of transit travelling. Limited opportunities to minimise energy usage.

#### Implications of modifications

5.17.2 The sites allocated remain the same, and the criteria for selecting sites support accessible sites.

|             | Submission Plan | Plan review with modifications |
|-------------|-----------------|--------------------------------|
| <i>Rank</i> |                 |                                |

## 5.18. SA Objective 17

### Effects of the Plan on Waste and Recycling (Submission version)

5.18.1 Minor positive effects are predicted as policies require adequate waste storage, and existing sites should benefit from existing collection regimes.

#### Implications of modifications

5.18.2 There are no significant changes with regards to waste and recycling as a result of the Modifications. As such, the effects remain minor positive.

|             | Submission Plan | Plan review with modifications |
|-------------|-----------------|--------------------------------|
| <i>Rank</i> | -               | -                              |

## 5.19. SA Objective 18

### Effects of the Plan on Land Use (Submission version)

5.19.1 Minor positive effects are predicted due to the avoidance of greenfield land when allocating sites / identifying new space for accommodation.

#### Implications of modifications

5.19.2 The allocated sites remain the same, and therefore effects on land use are unchanged in this respect. The approach to identifying suitable additional sites is less hierarchical, and is also supportive of previously developed land. It could therefore be slightly more likely to avoid the loss of greenfield land, which is a slight improvement on the submission version of the Plan (but not to the extent that the significance of effects will change from minor).

|             | Submission Plan | Plan review with modifications |
|-------------|-----------------|--------------------------------|
| <i>Rank</i> | 2               | 1                              |



## 5.20. SA Objective 19

### Effects of the Plan on Historic Environment (Submission version)

5.20.1 Neutral effects are predicted as the allocated sites are not in sensitive locations with regards to heritage and the scale of growth is small.

#### Implications of modifications

5.20.2 Neutral effects are likely to remain given that the allocations have not changed. Though the approach to the delivery of further sites is different, without knowing locations it is uncertain what the implications would be for heritage. Given that there are requirements to take account of heritage assets in the site identification process, it is considered that neutral effects can still be concluded at this strategic level.

|             | Submission Plan | Plan review with modifications |
|-------------|-----------------|--------------------------------|
| <i>Rank</i> | -               | -                              |

## 5.21. SA Objective 20

### Summary of effects of the Plan on Landscape (Submission version)

5.20.3 Neutral effects are predicted as the allocated sites are currently in use / not sensitive, development is small scale and mitigation is required.

#### Implications of modifications

5.20.4 The change in strategy is unlikely to lead to significantly different sites being brought forward, but there is an explicit mention of urban sites and previously developed sites. Broadly speaking, such sites could be less likely to have negative effects on landscape character compared to extensions to existing sites in countryside locations, or new sites provided they are within 1.6km of key services (which are prioritised in a hierarchy in the submission version of the plan). Therefore, whilst both approaches are predicted to have neutral effects, the modifications are likely to be slightly more effective in terms of protecting landscapes.

|             | Submission Plan | Plan review with modifications |
|-------------|-----------------|--------------------------------|
| <i>Rank</i> | 2               | 1                              |

## 5.22. Summary of Effects

5.22.1 The previous sections discuss how the modifications are likely to affect each of the Sustainability Objectives. Whilst several implications have been identified (both positive and negative), these do not change the significance of the effects when compared to the Submission version of the Plan. This is reflected in table 5.1 below, which shows the effects of the Submission version of the Plan, a brief commentary on the implications of the Modifications, and finally the 'residual' effects of the modified version of the Plan. The key differences in effects are as follows:

- Effects upon water have changed from neutral to minor positive effects, due to the insertion of policy clauses relating to drainage and pollution control on allocated sites.
- There is increased uncertainty in relation to deprivation, as it is possible that supporting sites within the urban areas could overlap with deprived communities.

- There is some uncertainty relating to sustainable travel objectives, as the modified approach is less prescriptive with regards to accessibility.

**Table 5.1: Summary of SA findings**

| Topic/Objective               | Effects of Submission Plan             | Implications of the modifications | Effects taking account of modifications |
|-------------------------------|--|-----------------------------------|---|
| 1. Economy                    | Minor positive                         | None                              | Minor positive                          |
| 2. Housing                    | Significant positive                   | Improvement                       | Significant positive                    |
| 3. Equality                   | Significant positive<br>Minor negative | None                              | Significant positive<br>Minor negative  |
| 4. Crime                      | Neutral                                | None                              | Neutral                                 |
| 5. Deprivation                | Neutral                                | Uncertain                         | Neutral ?                               |
| 6. Recreation                 | Minor negative                         | Improvement                       | Minor negative                          |
| 7. Sense of place             | Minor positive                         | None                              | Minor positive                          |
| 8. Biodiversity               | Neutral                                | None                              | Neutral                                 |
| 9. Health                     | Minor positive<br>Minor negative       | Limited                           | Minor positive<br>Minor negative        |
| 10. Soil                      | Neutral                                | Improvement                       | Neutral                                 |
| 11. Resource efficiency       | Neutral                                | None                              | Neutral                                 |
| 12. Water                     | Neutral                                | Improvement                       | Minor positive                          |
| 13. Sustainable Travel        | Minor negative                         | More negative?                    | Minor negative?                         |
| 14. Existing infrastructure   | Neutral                                | Uncertain                         | Neutral                                 |
| 15. Energy                    | Neutral                                | None                              | Neutral                                 |
| 16. Climate change mitigation | Neutral                                | None                              | Neutral                                 |
| 17. Waste and recycling       | Minor positive                         | None                              | Minor positive                          |
| 18. Land use                  | Minor positive                         | Improvement                       | Minor positive                          |
| 19. Historic Environment      | Neutral                                | Uncertain                         | Neutral                                 |
| 20. Landscape                 | Neutral                                | Improvement                       | Neutral                                 |

## 5.23. Ranking

5.23.1 Though the significance of effects as remained the same for the majority of SA Objectives, it has been possible to comment on whether the modifications contribute more positively toward the objective or not. This allows the two versions of the plan to be compared and relatively ranked. For several of the SA objectives, there has been limited change, and the different plan versions are ranked on par with each other (represented by the - symbol in table 5.2 below). The modifications serve to improve the performance against several SA Objectives relatively speaking including SA2 Housing, SA6 Recreation, SA10 Soil, SA12 Water, and SA20 Landscape. There is one instance where the Submitted version of the Plan is ranked relatively better than with the Modifications, which is for SA13 Sustainable Travel. For three SA Objectives it is uncertain whether the modifications would be an improvement on the Submitted version of the plan (SA5 Deprivation, SA14 Existing Infrastructure, SA19 Historic Environment).

**Table 5.2: Rank of performance**

| SA Objective                  | Submission Plan | Plan with modifications |
|-------------------------------|-----------------|-------------------------|
| 1. Economy                    | -               | -                       |
| 2. Housing                    | 2               | 1                       |
| 3. Equality                   | -               | -                       |
| 4. Crime                      | -               | -                       |
| 5. Deprivation                | ?               | ?                       |
| 6. Recreation                 | 2               | 1                       |
| 7. Sense of place             | -               | -                       |
| 8. Biodiversity               | -               | -                       |
| 9. Health                     | -               | -                       |
| 10. Soil                      | 2               | 1                       |
| 11. Resource efficiency       | -               | -                       |
| 12. Water                     | 2               | 1                       |
| 13. Sustainable Travel        | 1               | 2                       |
| 14. Existing infrastructure   | ?               | ?                       |
| 15. Energy                    | -               | -                       |
| 16. Climate change mitigation | -               | -                       |
| 17. Waste and recycling       | -               | -                       |
| 18. Land use                  | 2               | 1                       |
| 19. Historic Environment      | ?               | ?                       |
| 20. Landscape                 | 2               | 1                       |

## 6. Mitigation and enhancement

- 6.1.1 Where modifications are predicted to result in less positive effects (e.g. for carbon emissions and air quality), this is due to less prescriptive / less challenging policy measures. There are no mitigation or enhancement measures that would alter this position. It is also noted that the even with modifications in place, the Plan will still have a more positive effect in relation to these SA topics when compared to the relevant policies in the Adopted Local Plan.
- 6.1.2 For some topics, the modifications lead to improved outcomes for SA topics (i.e. historic environment / landscape / housing). Therefore, the Modifications in and of themselves are considered to constitute 'mitigation/enhancement'. No further measures are considered necessary at this stage.

## 7. Next steps

### 7.1. Monitoring

- 7.1.1 The SA Report [Exam ref: CD1.2] submitted alongside the Local Plan presented a range of 'measures envisaged concerning monitoring'.
- 7.1.2 The modifications are not likely to lead to significant changes to the SA findings, and therefore, it is considered unnecessary to identify further monitoring measures to address significant effects.
- 7.1.3 A final list of monitoring measures will be presented within the SA Statement produced once the Local Plan is adopted. This could include updates to reflect any changes to the Council's proposed monitoring framework for the Plan.

### 7.2. Plan Finalisation

- 7.2.1 Following consultation on the modifications and supporting evidence (including this SA Addendum), the Inspectors will consider all representations received, before deciding how to report on the Plan's soundness.
- 7.2.2 Assuming that the Inspectors are ultimately able to find the Plan 'sound', it will then be adopted by the Council. At the time of adoption an 'SA Statement' will be published that explains the process of plan-making/SA in full and presents 'measures decided concerning monitoring'.

## APPENDIX A: SCREENING THE MAIN MODIFICATIONS

**Nuneaton & Bedworth Gypsy and Traveller Site Allocations DPD**

**Inspector: Thomas Hatfield BA (Hons) MA MRTPI**

**Programme Officer: Helen Wilson**

**Reference: PINS/W3710/429/5**

## **CD 6.2 - Schedule of Main Modifications**

(Further Additional Modifications are provided in CD 6.3).

**June 2023**

This document (CD 6.2) provides details of the Main Modifications that are recommended by the Inspector to make the DPD sound and legally compliant.

The Additional Modifications found in the separate document (CD 6.3) are those which do not materially affect the Policies in the DPD, but which are generally minor factual updates; corrections of any errors or which are considered necessary for clarity.

| Main Modification Reference | DPD Sub Section / Paragraph / Policy box /table / Page number of amended DPD | Proposed Main Modification. (New words added in bold and underlined. Deletions stricken through.)   | Reasons for modification  | SA Screening   |
|-----------------------------|--|---|---|--|
| MM1                         | '1.0 Introduction'/ Paragraph 1.2/ Page 1                                    | Alter minor wording and add text at end of paragraph to read:<br>"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> " | To make clear that Policy H3 of the current adopted Borough Plan (2011-2031) is superseded by the Gypsy and Traveller Site Allocations DPD. To state that Policy H3 of the emerging Borough Plan will be amended purely to refer to Policies within the Gypsy and Traveller Site Allocations DPD. | The SA assessed the effects of the DPD, presuming this would largely supersede Policy H3. Therefore, the outcome for SA findings will be the same. |
| MM2                         | '3.0 Need/Future Need'/ Paragraph 3.9/ Page 7                                | Add text within paragraph to read:<br>"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</u></b>  | To clearly set out what will be carried out at the AMR stage in order to encourage sites coming forwards and when the DPD will be reviewed.   | Clarity is helpful to encourage up to date evidence of need. However, this is unlikely to significantly  |



|     |  |   |  |   |
|-----|--|---|--|---|
|     |  | <p><b><u>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.”</p>                        |  | alter findings. SA  |
| MM3 | Strategic ‘Policy GT1 – Overall Need’/ Page 8                                | <p>Add text at end of Policy to read:<br/> “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> | <p>To make clear that the numbers for pitches within the existing Borough Plan (2011-2031) and the period of cover.</p> <p>This modification is also necessary to clarify which section of the existing Local Plan is superseded by the DPD.</p> | The outcome is the same with regards to the SA findings, as only additional provision beyond the baseline position (i.e. that within the adopted Plan) was factored into the assessment of effects. |
| MM4 | ‘4.0 Location of Pitches’/ Under new sub section ‘Green Belt’/ Paragraph 4.3 | <p>Delete whole paragraph as follows:<br/> “4.3 <del>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</del></p>  | Clarity of the position of the sites in relation to Green Belt Policy and to be consistent   | Though the green belt status of the sites is not  |

|  |  |  |                                    |   |
|--|--|--|------------------------------------|---|
|  | <p>and new paragraph 4.4/ Pages 9 and 10</p> | <p><del>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 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> | <p>with existing Borough Plan.</p> | <p>being changed, their allocation is still important in contributing to exceptional circumstances. It also ensures that the sites are not developed for other less suitable uses if they do not come forward as Gypsy and Traveller sites. This clarification is useful, but unlikely to significantly affect the SA findings.</p> |
|--|--|--|------------------------------------|---|

|     |  |   |   |  |
|-----|--|---|---|--|
| MM5 | '4.0 Location of Pitches'/ Now under new sub section 'Sustainability'/ Previously Paragraph 4.5 now 4.6/ Page 10 | Amend and add to paragraph to read:<br>"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> "  | Reference to Policy H3 removed as to be superseded. Instead refers to Policies within DPD.  | No implications for the SA findings.   |
| MM6 | '4.0 Location of Pitches'/ under sub section 'Locational Strategy'/ Previously Paragraph 4.6 now 4.7/ Page 10    | Delete, add and amend some wording in paragraph as follows:<br>"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:<br>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.<br>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> " | Make clear the cover period of the DPD. Remove reference to acceptability of walking distance as the location of the sites is unable to comply with this. | Relates to MM10, which is screened in. |

|     |  |  |  |   |
|-----|--|--|--|---|
| MM7 | '4.0 Location of Pitches'/ under sub section 'Locational Strategy'/Previously Paragraph 4.7 now 4.8/ Pages 10-11 | Amend typing error from 'of' to "is". Delete one sentence to read:<br>"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 uses extant Policy H3 once insufficient sites have been found via other means. The second difference if <u>is</u> 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." | To remove reference to the future use of Policy H3 of extant Borough Plan. | The criteria within H3 is now covered in the DPD itself, so the outcomes are unlikely to be significantly different compared to the baseline position.<br><br>Changes to strategy are covered under MM10. |
| MM8 | '4.0 Location of Pitches'/ under sub section 'Locational   | Delete whole paragraph as follows:<br>"4.8 <del>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</del>   | Remove reference to walking distance of sites to services to               | Relates to MM10, which is screened in.  |

|     |   |   |  |  |
|-----|---|---|--|--|
|     | Strategy'/ Previously Paragraph 4.8   | 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."  | reflect revised policy wording   |  |
| MM9 | '4.0 Location of Pitches'/under sub section 'Locational Strategy'/ Paragraph 4.9/ Page 11 | Omit and amend wording to read:<br>"4.9 <del>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 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</u></b></del> | Deleted reference to H3 of the extant Borough Plan and to clarify the criteria in GT2 and GT3 is instead used for allocating acceptable sites. | Relates to MM10, which is screened in. |

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|      |  | <p><b><u>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 | Strategic 'Policy GT2 Strategy'/ Pages 11 and 12 | <p>Amend, omit, and add to read:<br/> “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> <ul style="list-style-type: none"> <li>a) <b><u>Sites allocated in Policy GT3</u></b> or within the permitted area of existing lawful, authorised gypsy and traveller sites; or</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> or</li> <li>c) <del>then land adjoining the permitted area of existing lawful, authorised gypsy and traveller sites;</del> d) <del>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. <b><u>Extensions adjoining the permitted area of existing lawful,</u></b></del></li> </ul> | See note above. Instead of having to demonstrate the priority land uses all the criteria is equally acceptable. Thus, negating a staged approach to the criteria. | Screened in<br><br>The change increases flexibility of use, but takes away a sequential approach. |

authorised gypsy and traveller sites that are proportionate in scale to the existing site.

Any proposed sites considered must comply with all of the following:

- a) The site should have reasonable access to essential services including health and education facilities and access to local shops;
- b) The number of pitches or plots is in proportion to the size and scale of the site;
- c) The number of pitches or plots is in proportion to the size and density of the nearest settled community;
- d) The site is not located in areas of high flood risk;
- e) The site avoids adverse impact on historic and important open spaces, landscape or local nature conservation designations, ecology and biodiversity assets;
- f) The site is located where the privacy, visual and residential amenity for both site residents and neighbouring land uses are protected;
- g) The site has suitable access to the highway network;
- h) The site is located where air or noise pollution will not significantly affect the health and well-being of site residents; and
- i) The site has suitable connection to the foul sewage system or can demonstrate that connection is unviable and alternative arrangements can be made.

If there is insufficient provision to meet the minimum needs identified in Strategic Policy GT1 – Overall Need then extant

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|      |   | <p><del>Policy H3 – Gypsies and Travellers of the Borough Plan will be used to determine the acceptability of the new development.</del></p> <p><b><u>This Policy supersedes Policy H3 of the adopted Borough Plan (2011-31)."</u></b></p>  |   |   |
| MM11 | <p>Supporting text under Strategic 'Policy GT2 Strategy'. Under subheading 'Allocation of Sites'/ Previously Paragraph 4.12 now 4.13/ Page 13</p> | <p>Sentences omitted at beginning of paragraph to read:</p> <p><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 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."</del></p> | <p>Removed reference to Policy H3 of Borough Plan so reference to this has been removed for clarity.</p>  | <p>No implications for SA findings.</p>     |
| MM12 | <p>Supporting text under Strategic 'Policy GT2 Strategy'. under subheading 'Allocation of Sites'/ Previously Paragraph 4.15 now 4.16/ Page 13</p> | <p>Deleted sentences at end of paragraph to read:</p> <p><del>"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." Two of the sites are within the Green</del></p>  | <p>Omitted the requirement to remove sites from the Green Belt as there is no intention of removing these sites within the extant Borough Plan which would have meant the</p> | <p>No implications for the SA findings.</p> |



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|      |  | <p><del>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></p>  | DPD conflicted with the extant Local Plan.   |   |
| MM13 | Strategic 'Policy GT3 – Site Allocations'/ Pages 15 and 16 | <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> <p>GTSA1 – Sunrise Cottage</p> <ul style="list-style-type: none"> <li>• Provision of visibility splays of 160 metres.</li> </ul> | Added requirements that became apparent during the Publication consultation process. | Screened in<br><br>Additions to policy could potentially have implications for the SA findings. |

- Suitable bin collection points should be provided within the site so that bins are not stored within the highway.
- Preliminary Ecological Assessment.
- **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.**

GTSA2 – The Old Nursery

- Closure of the northern access within the site.
- Access to be made in and out of the site from the southern access within the site.
- Configuration of an access that allows for sufficient manoeuvring room for any vehicles entering/exiting the site.
- 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.
- Provision of visibility splays of 160 metres.
- Suitable bin collection points should be provided within the site so that bins are not stored within the highway.
- Landscaping of the site boundary to soften the appearance of the pitches from external views.
- Preliminary Ecological Assessment.
- Retention of existing boundary vegetation.
- Provision of communal play area within the site.

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|      |   | <ul style="list-style-type: none"> <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> <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 | Strategic 'Policy GT4 – Site Safeguarding'/ Page 19 | <p>Amend and omit some wording to read:<br/> “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> proven that either there is no longer a requirement <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>  | Reworded Policy in order to require demonstration if the site is no longer required and deleted reference to the removal of the protection in the event a new site is located in | No implications for SA findings. |

|                                     |  |   |  | Warwickshire which is unlikely to happen. |           |        |                                     |   |   |  |  |  |                                  |
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| MM15                                | '5.0 Monitoring'/Table 3/ Page 21                  | Omit and amend some wording in the table to read:<br>"Table 3 - Monitoring indicators and targets for the policies of the Gypsy and Traveller Site Allocations Development Plan Document (DPD). | <table border="1"> <thead> <tr> <th>Policy</th> <th>Indicator</th> <th>Target</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Strategic Policy GT1 – Overall Need</td> <td><del>Gypsy and traveller accommodation.</del></td> <td><del>11 residential pitches Provided.</del></td> </tr> <tr> <td>Monitor the continued need for additional pitches.</td> <td>Within five years of adoption of this DPD undertake a new Gypsy, Traveller, and Showpeople Accommodation Assessment.</td> </tr> </tbody> </table> | Policy                                    | Indicator | Target | Strategic Policy GT1 – Overall Need | <del>Gypsy and traveller accommodation.</del> | <del>11 residential pitches Provided.</del> | Monitor the continued need for additional pitches. | Within five years of adoption of this DPD undertake a new Gypsy, Traveller, and Showpeople Accommodation Assessment. | Make clearer the monitoring process and requirement for a new Accommodation Assessment Survey to see if the number of pitches has changed and therefore requires amending. Amend wording to replicate the wording within Policy GT4. | No implications for SA findings. |
| Policy                              | Indicator  | Target  |  |   |           |        |                                     |   |   |  |  |  |                                  |
| Strategic Policy GT1 – Overall Need | <del>Gypsy and traveller accommodation.</del>      | <del>11 residential pitches Provided.</del>   |  |   |           |        |                                     |   |   |  |  |  |                                  |
|                                     | Monitor the continued need for additional pitches. | Within five years of adoption of this DPD undertake a new Gypsy, Traveller, and Showpeople Accommodation Assessment.  |  |   |           |        |                                     |   |   |  |  |  |                                  |

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|  |  |  | 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. |  |  |

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|      |                            |   | 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 showpeople unless it <del>is was proven to be no longer required.</del> <b><u>clearly demonstrated that the site is no longer required for travelling showpeople accommodation</u></b> |  |                                  |
| MM16 | 'Appendix 1'/Table/Page 22 | Omit and amend some wording to read:<br>"Relationship between the policies in this DPD and the extant Borough Plan. |                                |  | To make clearer what is to be superseded in the extant Borough Plan when the DPD is adopted.  |  | No implications for SA findings. |
|      |                            | <b>Superseded Existing</b> Borough Plan policies  |                                | <b>Superseding Effect of</b> Gypsy and Traveller Site Allocations DPD policies |   |  |                                  |
|      |                            | Policy DS4 – Overall development needs (third bullet point only).   |                                | <b>Superseded by</b> Strategic Policy GT1 – Overall Need.                      |   |  |                                  |

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|      |  | Policy H3 – Gypsies and Travellers. (figures contained in first sentence)   | <b>Superseded</b> by Strategic Policy <del>GT1</del> Overall Need- <del>GT2</del> – Strategy” –. |  |   |
| MM17 | 'Appendix 1'/<br>Supporting text to table /<br>Page 22 | Add to appendix to read:<br><b>“For reference Policy DS4 Overall development needs should now read:</b><br><u><b><i>The following levels of housing and employment development will be planned for and provided within Nuneaton and Bedworth Borough between 2011 and 2031:</i></b></u> <ul style="list-style-type: none"> <li>• <u><b><i>At least 14,060 homes</i></b></u></li> <li>• <u><b><i>At least 107.8 ha of employment land</i></b></u></li> <li>• <del><u><b><i>At least 39 residential pitches and 5 transit pitches to accommodate Gypsies and Travellers”</i></b></u></del> </li></ul> |  | To make clear that reference to pitches in third bullet point of Policy DS4 of the extant Borough Plan is to be deleted. | No implications for the SA findings. Meeting needs for gypsies and travellers is addressed through the DPD, and not reliant on DS4. |

