



Consultation Statement

Gypsy and Traveller Site Allocations Development Plan Document (DPD)

Nuneaton and Bedworth Borough Council

December 2021

1.0 INTRODUCTION

- 1.0 This document is the 'Consultation Statement' for the Gypsy and Traveller Site Allocations Development Plan Document (DPD). This statement sets out how the public and other stakeholders were consulted on the DPD, the issues that were raised by stakeholders in relation to the DPD, and the Council's responses to those issues.
- 1.1 The Issues and Options version of the Gypsy and Traveller Site Allocations DPD was approved for public consultation by the Council's Cabinet on 26th May 2021. A public consultation was held from 11th June 2021 to 6th August 2021. Consultees on the Council's consultation database were notified of the consultation including statutory consultees and adjoining local authorities.
- 1.2 Hard copies of the DPD were made available at Nuneaton Town Hall. A press release was issued, the consultation was posted on the Council's Facebook and Twitter accounts, and all information was held on the Council's dedicated consultation webpage. Comments could be emailed to planning.policy@nuneatonandbedworth.gov.uk or posted to Planning Policy, Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, Nuneaton, CV11 5AA. A telephone number was also provided for those who wanted to ask questions or seek further information. The response form for the consultation that was held is contained within Appendix 1 of this document.
- 1.3 Comments received during the public consultation along with the Council's response to those comments are set out in Table 1 below.

Table 1: Responses and actions from the consultation on the Health Impact Assessment Supplementary Planning Document.

Ref	Title	First name	Last name	Job title	Organisation	Title	First name	Last name	Job title	Organisation	Page no.	Paragraph	Question	Table	Comments	Suggested modifications	To be informed of future documents? Yes/no?	Officer Response	Action
GTIO 1.1	Mr	Allen	Gilbey	n/a	n/a	n/a	n/a	n/a	n/a	n/a			1		Use the lowest figure possible which seems to be GTAA. Make sure they are used and that non approved sites are suitable fortified.		Yes.	Decision to use the newer figures.	
GTIO 1.2													2		No.			Noted.	
GTIO 1.3													3		Pitches should be located adjacent to existing sites wherever possible. If not they should be away from residential and employment sites for security purposes.			Strategy for locating new pitches focuses on existing sites first.	
GTIO 1.4													4		See Q3.				
GTIO 1.5													5		See Q3.				
GTIO 1.6													6		See Q3.				
GTIO 1.7													7		Travellers chose their own lifestyle and should accept the consequences of any inconvenience.			Noted.	
GTIO 1.8													8		No.			Noted.	
GTIO 1.9													9		See Q3.				
GTIO 1.10													10		No view. Didn't know it existed.			Noted.	
GTIO 1.11													11		The travellers must be held responsible for maintain their pitches in a clean and hygienic way.			Noted.	
GTIO 2.1		Melanie	Lindsley	Development Team Leader (Planning)	Coal Authority	n/a	n/a	n/a	n/a	n/a					Our records indicate that within the Nuneaton and Bedworth area there are features arising as a consequence of past coal mining activity at surface and shallow depth. These features include;		Not declared.	GIS used as part of the assessment of	

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															<p>approximately 438 mine entries, recorded and probable unrecorded coal workings and surface mining activity.</p> <p>As you will be aware we provide the LPA with downloadable GIS in respect of Development Risk and Surface Coal Resource plans. We would expect the LPA to use this Development Risk data against which to assess any sites being considered for future allocation. This should ensure that any potential risks or constraints to development arising from past coal mining activity are identified as early in the process as possible.</p> <p>Although we have no specific comments to make on the questions asked in the Issues and Options document we do consider that the potential risks posed by past coal mining activity to the use of land as Gypsy and Traveller sites, including land instability and public safety issues, should be properly considered as part of the site allocation process.</p>			sites to allocate.	
GTIO SA2.2															I can confirm that the Planning team at the Coal Authority has no specific comments to make on the Sustainability Appraisal Report.			Noted.	
GTIO 3.1	Mr	Damon	Brown	n/a	n/a	n/a	n/a	n/a	n/a	n/a			1		Option 2 is the preferable option. This option is based on more up to date information and a real assessment of the evidence.		Yes.	Decision to use the newer figures.	
GTIO 3.2													6		Option D is the preferable option. Given that many travellers travel in family groups and wish to set up at the same site, it is reasonable to make the most intensive, practical, use of existing sites.			Strategy for locating new pitches focuses	

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																		on existing sites first.	
GTIO 3.3													10		Agreed. Travelling showpeople, in my experience have a different culture and lifestyle that is distinct from gypsies and other travelling folk			Strategy for locating new pitches focuses on existing sites first.	
GTIO 4.1	Mrs	Elizabeth	Boden	Historic Environment Planning Adviser	Historic England	n/a	n/a	n/a	n/a	n/a					We note that the DPD sets out four options within the document for allocating sites. To ensure that plans are positively prepared Historic England advises undertaking the process of the 'Site Selection Methodology' as set out in Historic England's Advice Note 3 The Historic Environment and Site Allocations in Local Plans, 2015 (HEAN3): https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans/ We would also recommend that detailed Heritage Impact Assessments (HIAs) are prepared, either by or on behalf of the Local Authority, with reference to Historic England's Advice Note 3 The Historic Environment & Site Allocations in Local Plans, 2015 (HEAN3) and Good Practice Advice Note 3 (Second Edition): The Setting of Heritage Assets (2017) (GPAN3): https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/		Yes.	Noted. Impacts of allocating sites on heritage assets considered.	

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															With specific reference to non-designated heritage assets, these can make a positive contribution to the character of our settlements and enrich our sense of place. We recommend that the views of your chosen specialist archaeological adviser are sought before growth option/s are selected. This should enable confirmation that the evidence base is sufficiently robust to ensure that any proposed allocation/growth option is deliverable in accordance with local and national planning policies. Your adviser will inform you on whether further assessment work is required through field assessment prior to allocation to ensure the extent, character and significance has been adequately understood to inform the allocation of a site.				
GTIO 4.2															Historic England welcomes Objective 3 "to provide provision in such a way that the local environment is not significantly degraded", as the local environment encompasses the historic environment.			Noted.	
GTIO 4.3															Historic England welcomes that sites designated for their heritage value are included as locations to be avoided (para.4.9). However, we also suggest that reference to non-designated heritage assets should be included as areas to be avoided.			Heritage value includes non-designated assets and the impact on these has been addressed in the assessment.	

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GTIO SA4.4															Overall Historic England is pleased to see that some of our comments made in relation to the SA scoping Report have been taken on board. However, with regard to Chapter 2 and Appendix A, which identifies relevant Policies, Plans & Programmes, we suggest that the Ancient Monuments & Archaeological Areas Act, UK Government, 1979, is also included, as was previously suggested. In addition, we welcome that “to enhance, maintain and protect important historical sites” has been identified as a main issue/message arising from the review of the plans, policies and programmes.			Text added.	
GTIO SA4.5															With regard to Table 4: SA Framework, Historic England welcomes the amended wording of SA Objective 19, “To conserve and enhance the historic environment”, as this aligns the objective with a key environmental objective of the planning system, as set out in the NPPF at paragraph 8c, and we also welcome the revised wording of the criteria in relation to the historic environment.			Noted.	
GTIO SA4.6															With regard Appendix C: Assessment of Options Tables of the SA, it is noted that for SA Objective 19 this has been scored as all question marks in relation to all options (i.e. the impact between the option and SA objective is uncertain), and appraisal comments “There is no obvious link between this option and this objective” specified for all options. Historic England remains of the view that it is unclear how			Sustainability appraisal updated to appraise new policies and allocated sites.	

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															the SA will consider the impacts of any potential site allocations in relation to the historic environment, heritage assets or their setting. Historic England therefore re-iterates that the methodology should be clarified and further work relating to the historic environment/cultural heritage be included within the next iteration of the SA.				
GTIO SA4.7															<p>As noted in our response to the SA Scoping report, Historic England strongly advises that the Borough Council's expert conservation and archaeological advisers are closely involved throughout the preparation of the SEA/SA of the emerging DPD. They are best placed to advise on the following points:</p> <ul style="list-style-type: none"> local historic environment issues and priorities, including access to data held in the HER (formerly SMR); how the policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets. <p>To assist with your preparation of the SA in relation to the assessment of effect upon the historic environment we refer you to Historic England's Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment, 2016 (HEAN8):</p>			Noted.	


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															<p>Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment</p> <p>Historic England would be happy to provide further comments as the Nuneaton and Bedworth Gypsy and Traveller Site Allocations DPD is progressed over the coming months. We should like to stress that the above opinion is based on the information provided by the Council in their consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise (either as a result of this consultation, or in later versions of the plan/guidance) where we consider that these would have an adverse impact upon the historic environment.</p>				
GTIO 5.1	Mr	Philip	Sharpe	Planning Officer	Inland Waterways Association (On behalf of both Lichfield and Warwickshire branches)	n/a	n/a	n/a	n/a	n/a	4	3.3			<p>The term 'bargee travellers' is considered a pejorative one not appropriate for those people whose primary residence is a canal boat. Occupiers of residential boats, or 'residential boaters', should be catered for by approval of a proportion of residential berths in marina and other boat mooring developments, where appropriate services and facilities can be provided and Council Tax levied to integrate them into the local community.</p>			Noted.	
GTIO 6.1		Dan	Lamb		Lead Local Flood Authority	n/a	n/a	n/a	n/a	n/a					No comments.			Noted.	
GTIO 7.1	Dr	Isher	Kehal	Public Health Principal in	Public Health at	n/a	n/a	n/a	n/a	n/a			4		<p>The DPD states that generally, the existing sites do not have good access to services other than by</p>			Strategy makes reference	

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				Wider Determinants	Warwickshire County Council										<p>car. This is a concern for Public Health as there is a need to improve access to healthcare services, particularly among Gypsies and Travellers, as this can be seen as a barrier to good health and wellbeing. Accessing healthcare services are important because studies have consistently shown that members of this community experience inequalities in health and poorer health outcomes when measured against the general population. There is a need to ensure that sites are located within a reasonable distance to GP practices to promote active travel / healthcare services to improve health and wellbeing outcomes and reduce inequalities in health.</p> <p>Furthermore, Gypsies and Travellers are less likely to receive effective, continuous healthcare including access to primary care and community care services, maternal and childcare, screening and immunisation, and end-of-life and palliative care. Barriers to health care include racism and discrimination, cultural beliefs, illiteracy, negative experiences, traditional role of the family, inadequate health service provision, and no fixed abode. Having access to services at a distance which allows for active travel could help improve health and wellbeing outcomes and reduce health inequalities across the Borough.</p> <p>To align with key public health principles, it is recommended that our Public Health Promoting</p>			to walking distances .	

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															Health and Wellbeing through Spatial Planning document is utilised for locating sites and when assessing planning applications for sites. https://democracy.warwickshire.gov.uk/documents/s2123/04%20Appendix%20A.pdf				
GTIO 7.1													7		Public Health support ensuring places are well connected to green spaces that provide opportunities for people to exercise outside and walk and/or cycle to key services and facilities. The proportion of physically inactive adults in Warwickshire has increased since 2015/16. In 2019/20, the highest percentage of physically inactive adults was in Nuneaton & Bedworth Borough (25.9%). The percentage of adults walking for travel at least three days per week in 2019/20 in Nuneaton and Bedworth Borough (15.5%) was statistically significantly lower than the average for England (22.7%). Prioritising walking and cycling routes can encourage active travel and reduce car dependency. Incorporating measured miles signage to surrounding areas can support active travel. Public Health recommend ensuring that facilities such as schools and access to fresh food and health services are accessible by walking and cycling routes, as well as public transport.			Strategy makes reference to walking distances .	
GTIO 8.1		Jackie	Essex	Clerk	Shilton & Barnacle Parish Council	n/a	n/a	n/a	n/a	n/a					Allowing sites to expand to meet the need for pitches will further concentrate sites in a very small			Further assessment of	

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															<p>area of the borough and increase the impact these sites have on the settled community. Many of the existing sites are located in positions that should not be considered suitable for large development, being on roads without walking access to local shops/facilities. The sites that could be identified for expansion are privately owned and there is no evidence that the site owners wish, or have the capability, for the sites to expand. They are also located within the Green Belt and would therefore constitute significant Green Belt development.</p> <p>Many of the sites with frontages in Nuneaton & Bedworth are actually predominantly located within Rugby borough area, and the parish council would therefore recommend consultation with Rugby to determine its support for a policy whose impact would be predominantly felt within its area.</p>			sites undertaken.	
GTIO 9.1		Jackie	Essex	Clerk	Wolvey Parish Council	n/a	n/a	n/a	n/a	n/a					<p>(a) There should be a distribution of gypsy and traveller sites across the whole borough, and not a concentration of sites in a small area; and</p> <p>(b) All parties should fully cooperate with one another to ensure that the objectives of neighbouring borough and district councils are considered.</p>			Strategy seeks to look at existing sites.	

Appendix 1: Gypsy and Traveller Site Allocations Development Plan Document issues and Options Consultation Response Form.

 <p>Nuneaton & Bedworth United to Achieve</p>	<p>Gypsy and Traveller Site Allocations DPD Response Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Please return to Nuneaton and Bedworth Borough Council by 6th August 2021 via:

Email: planning.policy@nuneatonandbedworth.gov.uk or

Post: Town Hall, Coton Road, NUNEATON, CV11 5AA.

Data Protection

We will treat your data in accordance with our Privacy Notice:

www.nuneatonandbedworth.gov.uk/info/21004/access_to_information/410/privacy_notice/7.

Information will be used by Nuneaton and Bedworth Borough Council solely in relation to the Gypsy and Traveller Site Allocations DPD. Please note that all responses will be available for public inspection, and cannot be treated as confidential. Representations, including names, may be published on our website. By submitting this response form you are agreeing to these conditions. The Council is not allowed to automatically notify you of future consultations unless you 'opt-in'. Do you wish to be kept informed of future stages of the Gypsy and Traveller Site Allocations DPD? Yes

This form has two parts –

Part A – Personal details

Part B – Your response.

Part A

	<p>1. Personal details* * If an agent is appointed, please complete only the title, name and organisation boxes below but complete the full contact details of the agent in 2.</p>	<p>2. Agent's details (if applicable)</p>
Title		
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		
House no. and street		
Town		
Post code		
Telephone number		
Email address		

Part B

Numbers of new pitches

Question 1. Which of the options set out in the Issues and Options document and below do you favour for providing new gypsy and traveller pitches?

- Option 1 – Provide the number of gypsy and traveller pitches as set out in the adopted Borough Plan.
- Option 2 -Provide the number of gypsy and traveller pitches as set out in the more recent GTAA.
- Option 3 -Provide the number of gypsy and traveller pitches intermediate to options 1 and 2 above.
- Option 4 - Provide a number of gypsy and traveller pitches above that set out in option 1 above.

Please justify your answer and state to which option(s) it relates.

(Expand box if necessary)

Question 2. Are there any other reasonable options for the number of new gypsy and traveller pitches to provide that have not been set out in the Issues and Options document? Please justify your answer.

(Expand box if necessary)

Location of pitches

Question 3. Should new traveller pitches be allocated by looking firstly within and adjoining existing permitted sites, then looking for appropriate land based on walking distances to services, and then by existing Policy H3 (option A)? Please justify your answer.

(Expand box if necessary)

Question 4. Should new traveller pitches be allocated by looking firstly for appropriate land based on walking distances to services, and then by existing Policy H3 (option B)? Please justify your answer.

(Expand box if necessary)

Question 5. Should the existing Policy H3 be used solely to allocate new pitches rather than any of the other options (option C)? Please justify your answer.

(Expand box if necessary)

Question 6. Should the existing Policy H3 be used to allocate new pitches only once insufficient pitches have been found via another method (option D)? Please justify your answer.

(Expand box if necessary)

Question 7. Is it reasonable to apply walking distances to services as a method of allocating new pitches (options A, B, and D)? If not, is there another way of applying distance criteria to allocating new pitches? Please justify your answer.

(Expand box if necessary)

Question 8. Are there other reasonable options for the allocation of new pitches? If so what are they? Please justify your answer.

(Expand box if necessary)

Question 9. Should no new pitches be allocated and instead new proposals dealt with by existing Policy H3 only? Please justify your answer.

(Expand box if necessary)

Question 10. Do you agree that the travelling showpeople yard at Spinney Lane/Whittleford Road, Nuneaton should be safeguarded from other uses? If not, why not. Please justify your answer.

(Expand box if necessary)

Question 11. Are there any other parts of the Gypsy and Traveller Site Allocations document that you wish to comment on?

Vision	
Objectives	
Page number	
Paragraph number	
Comments	(Expand box if necessary)

Where there are groups who share a common view on how they wish to see the document modified, it would be very helpful for that group to send a single response

which represents the view, rather than for a large number of individuals to send in separate responses which repeat the same points. In such cases the group should indicate how many people it is representing and how the response has been authorised.

(Continue on a separate sheet / expand box if necessary)

Sustainability Appraisal Report

Question 12. Do you have any comments you would like to make on the Sustainability Appraisal Report that accompanies the Gypsy and Traveller Site Allocations document?

Page number	
Paragraph number	
Table number	
Comments	

(Expand box if necessary)

Future Consultations

If you would like to be kept informed of other future stages of planning policy production then please tick the relevant box below.

Do you wish to be kept informed of other Supplementary or Development Plan Documents?
 Yes

Do you wish to be kept informed of the Borough Plan review?
 Yes

Signature	
Date	