



Historic England

Our ref: PL – 00751007 & PL-00738742

Your ref:

Telephone: [REDACTED]

Email:  
[REDACTED]

05 August 2021

FAO: [REDACTED] Principal Planning Policy Officer  
[REDACTED]

Dear Sir,

**Re: Nuneaton & Bedworth Gypsy and Traveller Site Allocations DPD Issues & Options Consultation June 2021**

Thank you for consulting Historic England on the Nuneaton & Bedworth Gypsy and Traveller Site Allocations DPD Issues & Options consultation draft. We note that this document follows on from policies contained within the current Borough Plan, adopted in June 2019, and that a new Gypsy, Traveller, and Travelling Showpersons Accommodation Assessment (GTAA) 2021 updates the need for new pitches to inform this DPD.

In relation to this Gypsy and Traveller Site Allocations DPD Issues & Options document we have the following comments:

General Comments

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,



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Correspondence or information which you send us may therefore become publicly available.





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/>

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.

## Specific Comments

### Objectives

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.

### Location of Pitches - Issues

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.

### Sustainability Appraisal (SA)

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.

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.





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 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.

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:

- 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.

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):

[Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment](#)

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.

We hope that the above comments will assist, but if you have any queries about any of the matters raised or consider that a meeting would be helpful, please do not hesitate to contact me.

Yours faithfully,

[Redacted signature]



Historic England

[REDACTED]  
Historic Environment Planning Adviser

E-mail: [REDACTED]



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

**Email:** [planning.policy@nuneatonandbedworth.gov.uk](mailto: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](http://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><b>1. Personal details*</b> * 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><b>2. Agent's details (if applicable)</b></p>
Title	[Redacted]	
First name	[Redacted]	
Last name	[Redacted]	
Job title (where relevant)	Historic Environment Planning Adviser	
Organisation (where relevant)	Historic England	
House no. and street	The Axis, 100 Holliday Street	
Town	Birmingham	
Post code	B1 1TF	
Telephone number		
Email address	[Redacted]	

## **Part B**

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### **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.

Please see the attached letter for the response on this document from Historic England.

(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)
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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)
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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)
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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)
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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)
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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)
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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)
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### **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	<p>Please see the attached letter for the response on this document from Historic England.</p> <p style="text-align: right;">(Expand box if necessary)</p>

### **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	05.08.21