



Historic England

[REDACTED]
Nuneaton and Bedworth Borough Council
Town Hall
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Nuneaton
CV11 5AA

Direct Dial: [REDACTED]

Our ref: PL00738742

11 March 2021

Dear [REDACTED]

**NUNEATON AND BEDWORTH BOROUGH COUNCIL GYPSY AND TRAVELLER
SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT (DPD)
STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA)/SUSTAINABILITY
APPRAISAL (SA) SCOPING REPORT**

Thank you for consulting Historic England about the SEA/SA Scoping Report for the Gypsy and Traveller site allocations DPD.

In respect of the historic environment, we consider that the Report has identified the majority of plans and programmes which are of relevance to the development of the Plan, that it has established an appropriate Baseline against which to assess the Plan's proposals and that it has put forward a suitable set of Objectives and Indicators. Overall, therefore, we believe that it provides the basis for the development of an appropriate framework for assessing the significant effects which this DPD might have upon the historic environment.

However, there are a few aspects of the Report where we consider that some amendments are necessary. These are detailed on Appendix 1, attached.

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.

Historic England has produced guidance for all involved in undertaking SEA/SA exercises which gives advice on issues relating to the historic environment. This can be found in HEAN 8 through the following link: <https://historicengland.org.uk/images->



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[books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>](#)

This opinion is based on the information provided by you in the SA Scoping Report document dated February 2021. For the avoidance of doubt, this advice does not prejudice any future advice we may wish to offer as the DPD progresses.

If you have any queries about any of the matters raised above or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,

[Redacted signature]

[Redacted name]

Team Leader (Development Advice)

[Redacted contact information]



Appendix 1: Table of Historic England’s comments on the Scoping Report of the Gypsy and Traveller Site Allocations DPD (February 2021)

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
pp. 5-8	Plans Policies and Programmes	Comment	The lists of PPP omits some key historic environment related items. HE welcomes the inclusion of Historic Landscape Character information and Conservation Area Management Appraisals	<i>Include reference to the following:</i> International/European: „ „ „ The Convention for the Protection of the Architectural Heritage of Europe; „ The European Convention on the Protection of Archaeological Heritage „ National: „ Ancient Monuments & Archaeological Areas Act 1979; relevant Historic England GPA’s and HEAN’s
pp.21	Table 4: SA Framework	Comment	HE welcomes the SA objective relating to cultural heritage. It is noted that the terminology used is not linked to NPPF wording in relation to the historic environment and it is recommended that this be amended. In addition, it would be worth considering whether there are any opportunities for the historic environment through additional indicators – HE’s Heritage Counts information may be able to assist with this: https://historicengland.org.uk/research/heritage-counts/	<i>Objective – revise wording to read ‘conserve and enhance’ instead of protect and enhance;</i> <i>Criteria - revise wording to read ‘conserve and enhance’ instead of protect and enhance;</i> <i>Consider whether there are any opportunities for the historic environment through additional indicators.</i>
p.21	Table 4: SA Framework	Support	HE welcomes the SA objective relating to landscape and that Historic Landscape Characterisation information will be used	N/A

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			to inform the SA and Plan review process.	
p.24	Scoring of effects – Table 5: seven point scale	Comment	<p>It is not clear how the SA will consider the impacts of any potential site allocations in relation to the historic environment, heritage assets or setting through the proposed seven point scale.</p> <p>If the generic seven point scale approach is pursued as an overarching assessment this will need to be made clear in the next iteration of the SA, and we would recommend that supplementary work is undertaken through a heritage topic paper including site assessment work based on the five step approach contained in HEAN 3: https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p>	<i>Clarify methodologies and any additional work relating to the historic environment/cultural heritage in next iteration of the SA.</i>
p.28	Table 7: SA Objectives	Comment	HE welcomes the SA objective relating to cultural heritage. It is noted that the terminology used is not linked to NPPF wording in relation to the historic environment and it is recommended that this be amended.	<i>Objective – revise wording to read ‘conserve and enhance’ instead of protect and enhance</i>
pp.56 -	Appendix B: Baseline data Tables 10 - Cultural heritage	Comment	<p>It is recommended that the Council considers whether there are any opportunities for the historic environment through additional indicators – HE’s Heritage Counts information may be able to assist with this: https://historicengland.org.uk/research/heritage-counts/ and also whether there are opportunities to identify for the Conservation Areas and buildings at risk, including HAR, that are already identified in the table. It is apparent that there is a lack of comment in the ‘comments/gaps’ column which may indicate that there is a gap in this assessment information. We would be happy to discuss further with you in due course</p>	Seek opportunities for conserving and enhancing the historic environment/cultural heritage through further consideration of existing data sets and whether other indicators could be included in the SA considerations to inform the Plan as it progresses.

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
			if you consider that may be of use.	