



Consultation Statement

Gypsy and Traveller Site Allocations Development Plan Document (DPD) Publication stage responses

Nuneaton and Bedworth Borough Council

June 2022

1.0 Purpose of Report

- 1.0 This document sets out the responses received during the consultation on the Gypsy and Traveller Site Allocations Publication Development Plan Document.

2.0. Background

- 2.1 The Nuneaton and Bedworth Borough Plan was adopted on the 11th June 2019. Policies DS4 – Overall development needs and H3 – Gypsies and Travellers set out the amount of new pitches and plots required to 2031/2032. Policy H3 requires that a Gypsy and Traveller Site Allocations Development DPD is required to identify potential locations for residential and permanent pitches and plots.
- 2.2 In line with Policy H3, a Gypsy and Traveller Site Allocations DPD has been created. This has necessitated that the DPD has gone through various legal stages. The stages included an initial ‘call for sites’, ‘Issues and Options’ Document and associated public and statutory consultation and which has culminated in a final Publication version. The next stage of this process was the consultation on the Publication version which was carried out between 28th January 2022 and 25th March 2022. This has led to some suggested minor modifications.

3.0. Gypsy and Traveller Site Allocations Publication DPD responses

- 3.1 The Council received a total of 20 responses. These were from The Environment Agency, Historic England, National Grid, National Highways, Natural England, North Warwickshire Borough Council, The Coal Authority, Warwickshire County Council Infrastructure Team, Shilton and Barnacle Parish Council, Wolvey Parish Council and ten responses of support from members of the public.
- 3.2 Appendix A provides a full copy of the replies and Officers response to the comments and appendix B a copy of the response form and notes.

4.0. Conclusion

- 4.1 The responses to the Gypsy and Traveller Site Allocations Development Plan Document (DPD) provided useful information and it is considered that none of the responses provided any barriers for bringing these sites forwards subject to some minor modifications being suggested to the Planning Inspectorate.

Appendix A copy of full responses to the publication stage and officer response to these comments.

Ref. No.	Agent/ contact name	Response	Officer Response.
1	Coal Authority Melanie Lindsley	<p>Thank you for your notification received on the 28th January 2022 in respect of the above consultation.</p> <p>The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy & Industrial Strategy. As a statutory consultee, The Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.</p> <p>Our records indicate that within the Nuneaton and Bedworth area there are recorded coal mining features present at surface and shallow depth including; mine entries, shallow coal workings and reported surface hazards. These features may pose a potential risk to surface stability and public safety.</p> <p>The Coal Authority's records also indicate that surface coal resource is present on the site, although this should not be taken to imply that mineral extraction would be economically viable, technically feasible or environmentally acceptable. As you will be aware those authorities with responsibility for minerals planning and safeguarding will have identified where they consider minerals of national importance are present in your area and related policy considerations. As part of the planning process consideration should be given to such advice in respect of the indicated surface coal resource.</p> <p>As you are aware we provide the LPA with downloadable GIS data in respect of Development Risk plans. This data identifies those areas of the Borough which fall within the defined Development High Risk Area, and those areas which are defined as Low Risk areas. We would expect all sites being considered for future allocation for development to be assessed against this data. This should ensure that any constraints or issues arising from the presence of recorded coal mining legacy features at surface or shallow depth are identified at an early stage in the process. We noted this in our response to</p>	<p>Officers checked coal risk on sites and reconsulted with Coal Authority. Coal Authority confirmed all is required is Informative note to sites G TSA1, 2 and 4 and nothing for G TSA3.</p>

		<p>the LPA dated 6th August 2021 at the Issues and Options stage of the process. It is therefore assumed that the sites included as part of this consultation have been assessed against this data.</p> <p>Please do not hesitate to contact me should you wish to discuss this further.</p>	
2	<p>Environment Agency Ms Anne-Marie McLaughlin</p>	<p>Thank you for referring the above Gypsy and Traveller Site Allocations Development Plan Document (DPD) Pre-Submission which was received on 28 January 2022.</p> <p>We have no soundness or legal compliance objections to the above DPD, however, we have the following comments for your consideration. The following comments have focused for the most part on matters we consider require some minor alterations in relation to foul drainage. We have not registered these as Soundness or Legal Compliance objections, as we are aware that there is normally opportunity in the Plan-making process to secure Minor Modifications at the final stages.</p> <p>We note the above DPD has been formed as a requirement under the Nuneaton and Bedworth Borough Plan to meet the need for Gypsy and Traveller pitches under Policy H3 (Gypsies and Travellers). We have reviewed the following three site allocations to accommodate this and the additional site proposed for safeguarding which includes:</p> <ul style="list-style-type: none"> • G TSA1 - Sunrise Cottage, Mill Tree Lane • G TSA2 - The Old Nursery, Parrots Grove • G TSA3 - Winter Oak, Watling Street • G TSA4 - Spinney Lane/Whittleford Road <p>Foul Drainage Point 9 of Policy H3 in your adopted Plan requires the following for the above identified strategic site allocations: '9. The Site has suitable connection to the foul sewage system, or can demonstrate that connection is unviable and alternative arrangements can be made, in consultation with Severn Trent Water'</p> <p>Both the PPG and the Building Regulations 2010 ('Approved Document H') set out a presumption in favour of connection to the public foul sewer</p>	<p>In relation to foul sewage. Add as minor modification to Policy GT3 for the three sites and to Policy GT4 for G TSA4 the following bullet points:</p> <ul style="list-style-type: none"> • Where possible foul sewage for new pitches/plots should connect to existing Severn Trent Water foul mains drainage in consultation with Severn Trent Water. • Where connection to mains drainage is not possible, the potential impact on the water environment will need to be considered. • Note: - where alternative methods such as septic tanks or cesspits are required, consent will be required from the Environment Agency for an Environmental Permit (Regulations 2016). This is to enable the discharge of polluting substances (including sewage effluent) into surface waters or the ground. It is the Applicants responsibility to make the appropriate enquiries regarding any Environmental Permit

	<p>wherever it is reasonable to do so: https://www.gov.uk/government/publications/drainage-and-waste-disposal-approved-document-h . Our records show the distance of the nearest mains sewers for the proposed site allocations are as follows:</p> <ul style="list-style-type: none"> • GTSA 1 Sunrise Cottage - approx. 435m to the northeast • GTSA 2 The Old Nursery – approx. 480m to the southwest • GTSA 3 Winter Oak – approx. 35m to the east • GTSA 4 Spinney Lane/Whittleford Road (safeguarded) – approx. 10m to the north <p>Therefore, we consider sites GTSA 3 and GTSA 4 should ideally connect to the existing sewage infrastructure where private non-mains foul drainage systems are not usually deemed environmentally acceptable within publicly sewered areas. We advise requesting information from Severn Trent Water to determine whether a connection can be made to the existing mains infrastructure.</p> <p>Whilst we recognise the reference to point 9 of Policy H3 in paragraph 4.20 of the DPD, we note where new or potential improvements to existing non-mains drainage infrastructure may be required to facilitate the allocations that this has not been specified within Policy GT3. You may wish to consider through Minor Modifications that where non-mains drainage proposals may be required, particularly in the case of site allocations GTSA 1 and GTSA 2, to highlight the potential impact on the water environment will need to be mitigated to improve the effectiveness of point 9 of Policy H3. This will further ensure the DPD meets the tests of soundness.</p> <p>If non-mains drainage is considered as a necessary alternative arrangement, there are other regulatory regimes to take into account that fall outside of the planning process. Under the Environmental Permitting (England and Wales) Regulations 2016, the discharge of polluting substances (including sewage effluent) into surface waters or the ground requires the authorisation of the Environment Agency. This authorisation may be either an Environmental</p>	<p>requirements. (Environmental Permitting Guidance' can be found at: https://www.gov.uk/environmental-permit-check-if-you-need-one</p> <p>In relation to flooding WCC FRM have been consulted and advised there is no historic flooding in the immediate vicinity of these sites and although there are some small areas shown on the surface water mapping there's no significant flow paths or problematic areas for surface water flooding.</p> <p>WCC FRM concluded that the likely limited increase in any impermeable surfaces, wouldn't provide a notable change in surface water flood risk and they had no concerns.</p> <p>In relation to foul drainage they support getting connections to the Severn Trent foul network where possible in lieu of a cesspit/ treatment plant connected to watercourse as these can generate issues with water quality in surrounding areas if they are not working correctly or if there isn't enough fresh water flow in the receiving ditch. They advised that</p>
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	<p>Permit to control the discharge or a registered exemption.</p> <p>We recommend that the DPD highlights that it is the applicant's responsibility to make the appropriate enquiries regarding any Environmental Permitting requirements if non-mains drainage is proposed. Additional 'Environmental Permitting Guidance' can be found at: https://www.gov.uk/environmental-permit-check-if-you-need-one</p> <p>Flood Risk – Under National Planning Policy Framework paragraph 161, the location of development should take into account all sources of flood risk including the impacts of climate change.</p> <p>We note paragraph 4.20 of the DPD identifies that the allocations are located within Flood Zone 1 in terms of fluvial flood risk and we concur with this statement. The sites are not shown to be in an area at risk of surface water flooding based on the data we currently hold. Therefore, the allocations are compliant with point 3 of Policy H3 whereby 'the site is not located in areas of high flood risk'.</p> <p>We welcome the reference to Policy NE4 of the adopted Nuneaton and Bedworth Council Borough Plan in paragraph 4.20, where proposals will be required to be compliant with this policy if flood risk is found to be an issue in the future. This should be informed by your most up to date Level 1 Strategic Flood Risk Assessment. We advise contacting the Lead Local Flood Authority at Warwickshire County Council for further advice on surface water drainage matters.</p> <p>Sustainability Appraisal We have reviewed the Sustainability Appraisal submitted in support of the above DPD Pre-Submission. Sustainability Objective 12 covers both flood risk and water pollution as outlined in Table 4 of the Sustainability Appraisal Framework. We note the site allocations are considered low risk from a flood risk perspective. Providing point 9 of Policy H3 is complied with, we wish to highlight that the potential for water pollution from non-mains foul drainage will</p>	<p>the EA guidance is referred to.</p>
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		<p>require mitigation, as highlighted above, to ensure a neutral impact on the water environment.</p> <p>Please do not hesitate to contact me if you have any queries or wish to discuss the matters raised in this response.</p>	
3	Historic England Elizabeth Boden	<p>Thank you for consulting Historic England on the Nuneaton & Bedworth Gypsy and Traveller Site Allocations DPD Publication consultation draft. We note that this document follows on from consultation on the Council's Gypsy and Traveller Site Allocations DPD Issues and Options document in August 2021 and also from policies contained within the current Borough Plan, adopted in June 2019, and has been informed by the Gypsy, Traveller, and Travelling Showpersons Accommodation Assessment (GTAA) 2021.</p> <p>In relation to this Gypsy and Traveller Site Allocations DPD Publication consultation document we have the following comments:</p> <p><u>General Comments</u></p> <p>As set out in our comments to the Gypsy and Traveller Site Allocations Regulation 18 DPD consultation to ensure that plans are positively prepared Historic England advises undertaking the process of the 'Site Selection Methodology' as specified 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/</p> <p>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/</p>	<p>The sites were assessed for the impacts to the Historic Environment as part of the site allocations. None are within Conservation Areas.</p> <p>Whilst the Old Nursery is close to the Grade II Listed Tolldish Hall and Tolldish Hall Cottage, there is a field and copse of trees between as well as a two storey dwelling known as Wayside with a number of ancillary buildings and hedgerows.</p> <p>Therefore, the impact is considered acceptable. This was also agreed by Historic England.</p> <p>In terms of the Sustainability Appraisal, as the sites are a distance from any Conservation Areas, it is considered that this is not a relevant indicator.</p>

		<p>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 allocations are selected. This should enable confirmation that the evidence base is sufficiently robust to ensure that any proposed allocation 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.</p> <p><u>Specific Comments</u></p> <p>We welcome that the ‘Gypsy and Traveller Site Assessment’ Final Report, November 2021, which forms part of the evidence base for this DPD, includes heritage assets as a criterion within the ‘major planning considerations’ for each site assessed.</p> <p>With regard to the site allocations, we note the proximity of G TSA2 ‘The Old Nursery’, Mile Tree Lane, to the Grade II Tolldish Old Hall and Tolldish Hall Cottage, and note that this has been acknowledged within the “Site Allocations and Green Belt” document and within the Plan itself.</p> <p><u>Sustainability Appraisal (SA)</u></p> <p>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.</p> <p>With regard to Chapter 2 and Appendix A, which identify relevant Policies, Plans & Programmes, we are pleased to see that the Ancient Monuments & Archaeological Areas Act, UK Government, 1979, has been included, as was previously suggested. In addition, we welcome that “to enhance, maintain and protect important historical sites” has been identified as a key message arising from the review of the plans, policies and programmes.</p> <p>With regard to Chapter 4 ‘Identifying Sustainability Issues and Problems’ we welcome the inclusion of ‘Cultural Heritage’ as a distinct</p>	
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		<p>topic and particularly welcome the reference to heritage at risk and conservation area management as matters for focus. We are also pleased to see the acknowledgement of interrelationships between heritage, diversity of townscape and economic growth.</p> <p>With regard to Chapter 5, Table 4: SA Framework, Historic England welcomes the inclusion of the SA Objective “To conserve and enhance the historic environment”, and also the criteria applied. With regard to the ‘Indicators’, Historic England also considers that it would also be appropriate to include an indicator related to conservation area management, to reflect the sustainability issue previously identified within the SA report.</p> <p>In Chapter 8, ‘Appraisal of the DPD’, we note the acknowledgment that the Old Nursery site is 70 metres from a Grade II listed building and are content that the assessment of ‘no significant effects are predicted to the asset or its setting’ is appropriate, given the intervening vegetation and overall setting of the asset. We are also content with the assessment that ‘Overall, neutral effects are predicted at individual sites and cumulatively’, as we agree that the other proposed allocations are not in sensitive locations with regards to heritage assets, their settings, or any historic character of surrounding areas, and as the scale of growth is small.</p> <p>As noted in our responses to previous iterations of the SA and 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	
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		<ul style="list-style-type: none"> • 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): heag036-sustainability-appraisal-strategic-environmental-assessment historicengland.org.uk</p> <p>Overall we consider that the Nuneaton & Bedworth Gypsy and Traveller Site Allocations DPD Publication consultation draft is positively prepared, justified, effective and consistent with national policy in relation to the historic environment and that the Plan is therefore sound in this respect.</p> <p>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> <p>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.</p>	
4	Avison Young on behalf of National Grid Matt Verlander	<p>National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>About National Grid National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution</p>	No response required.

		<p>network operators, so it can reach homes and businesses.</p> <p>National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.</p> <p>National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.</p> <p>Response We have reviewed the above document and can confirm that National Grid has no comments to make in response to this consultation.</p> <p>Further Advice National Grid is happy to provide advice and guidance to the Council concerning their networks.</p> <p>Please see attached information outlining further guidance on development close to National Grid assets.</p> <p>If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets.</p>	
5	National Highways Catherine Townend	National Highways (formally Highways England) welcomes the opportunity to comment on Nuneaton & Bedworth Councils proposed 'Gypsy and Traveller Site Allocations DPD'.	Due to their comments, they were reconsulted about the possible required amendments to the access. They

	<p>National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.</p> <p>In responding to local plan and SPD consultations, we have a regard to DfT Circular 02/2013: The Strategic Road Network and the Delivery of Sustainable Development ('the Circular'). This sets out how interactions with the Strategic Road Network should be considered in the making of local plans. In addition to the Circular, the response set out below is in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.</p> <p>The Gypsy and Traveller Site Allocations DPD sets out a plan to provide sufficient pitches for the needs of the travelling community; to provide provision in sustainable locations with good access to local services; and to provide provision in such a way that the local environment is protected and, where appropriate, enhanced.</p> <p>Whilst we have no comments to make on the broader contents of this document, we note that one of the preferred sites (G TSA3 – Winter Oak) sits adjacent to the A5, Watling Street. This is an existing site with a direct access onto the A5, which forms part of the SRN managed and operated by National Highways. The DPD states that planning permission will be granted within the site boundary for six additional pitches and that planning applications for this site shall contain details of:</p> <ul style="list-style-type: none"> • Suitable bin collection points within the site so that bins are not stored within the highway • Preliminary ecological assessment • Retention of existing boundary vegetation <p>As the highway authority for the A5 trunk road, we have considered how the proposed increase in pitches at the site could impact on our network and make the following comments:</p> <p>Highways Access</p>	<p>responded to advise that the access could require a priority controlled junction and ghost island. However, they appreciated this would likely be unviable so in reality they would likely request an Approval in Principle for a Departure from the Standards (DFS).</p> <p>Due to National Highways comments about noise and air quality, NBBC Environmental Health were contacted. They consider that a noise assessment and air quality exposure assessment may be required during any subsequent planning application stage but the likely mitigation if anything is likely to be an acoustic fence and standard conditions which include a dust mitigation plan, electric charging points and low emission boilers.</p> <p>ADD as minor modification:</p> <p>ii) Add to Policy GT3 for G TSA3 the following bullet points:</p> <ul style="list-style-type: none"> • It is suggested that prior to any submission of a planning application, that the Applicant contacts National Highways to discuss the access and the information they will require to be submitted
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	<p>The A5 at this location is single lane carriageway with a speed limit of 50 mph. It is not considered to be a route of near motorway standard. Whilst the principle of an access onto the SRN has already been established at this location, the continued safe operation of the access, linked to any increase in vehicular movements will need to be established through our development management process. This process should demonstrate the safe operation of the current arrangement, or alternatively, that a sufficient upgrade to the access can be delivered.</p> <p>Physical Impact of Development on the A5 As per paragraphs 49 and 50 of Circular 02/2013, developments that sit adjacent to the SRN have the potential for direct or indirect physical impact on our network which can put road users at risk (e.g. fire hazards; integrity of structures; water run-off; etc.). As such, promoters and local authorities are encouraged to identify such potential risks and discuss with National Highways at the earliest opportunity to avoid the possibility of delaying or putting the delivery of their proposals at risk. As per paragraph 50 of The Circular, new third-party connections to National Highway drainage assets are not permitted.</p> <p>Environmental Impacts Policy H3, bullet point 7 of the local plan indicates that Gypsy and Traveller sites should be allocated where air or noise pollution will not affect the health and well-being of site residents, and neighbouring uses will not be affected by air or noise pollution as a result of the Gypsy and Traveller development.</p> <p>Regarding the above policy, as the Winter Oak site sits adjacent to the A5 which is a heavily trafficked road, we would ask the council to consider whether planning proposals for this site may need to include suitable air quality and noise assessments.</p> <p>RIS 3 Pipeline The site is situated on land to the east of the A5 south of the Higham Lane roundabout. It should be noted that this is along the corridor of the A5 Hinckley to Tamworth RIS3 Pipeline scheme as identified in the Road Investment Strategy 2</p>	<p>for any formal submission.</p> <ul style="list-style-type: none"> • An Air Quality Exposure Assessment and Noise Assessment may be required to determine any formal planning application to inform of any mitigation required.
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		<p>(RIS2). The current commitment for National Highways is up to option development. Progress into further stages, including construction, will be determined through the RIS3 process. However, as the site is situated adjacent the A5, notwithstanding work currently being undertaken by us, it is considered that expansion of the site could have the potential to prejudice the options which may be available for the RIS3 Pipeline scheme.</p> <p>Summary and Conclusion In summary, whilst we have no objections in principle to the expansion of the Winter Oak site as a Gypsy and Traveller site allocation, any potential highways, boundary and environmental impacts will need to be assessed via our development management process at the planning application stage. Any potential implications for our RIS 3 pipeline scheme will also need to be considered, when more information about our scheme is known.</p> <p>We have no comments to make on the other proposed sites within the DPD, which are not adjacent to our network.</p> <p>To discuss any of our comments in more detail, or if I can be of any further assistance on this matter, please do not hesitate in contacting me.</p>	
6	Natural England Sharon Jenkins	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England does not consider that this Gypsy and Traveller Site Allocations Development Plan Document poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.</p> <p>The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take</p>	No response required.

		<p>account of any environmental risks and opportunities relating to this document.</p> <p>If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.</p>	
7	<p>North Warks. Borough Council. Mike Dittman</p>	<p>Thank you for consulting North Warwickshire Borough Council on the Gypsy and Traveller Site Allocations Development Plan Document (DPD). The Borough Council welcome the publication of the Site Allocation DPD and identification and provision of pitches to address the needs of the Gypsy and Traveller community, as identified in the Nuneaton and Bedworth Borough's Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2016.</p> <p>The Council welcome and support the identification of sufficient sites to address the Planning Policy for Traveller Sites (2015) (PPTS) potential need for permanent residential pitches, but there are some concerns over the indication of a zero/0 need indicated for Transit pitches in the DPD.</p> <p>The Borough Council notes that the earlier Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) for North Warwickshire and Nuneaton and Bedworth in 2013 indicated a need for 5 transit pitches. However, the Gypsy and Traveller and Travelling Showperson Accommodation Assessment update from 2016 (GTAA), used as the evidence based for the current DPD, indicated that the Transit need that was identified from the previous GTAA was now reduced to zero (0).</p> <p>There are some concerns on the assumptions perhaps made by the DPD and the evidence in the 2016 updated GTAA for Nuneaton and Bedworth. As noted in paragraph 7.13 of the 2016 GTAA, an 'emergency stopping place is being progressed by Warwickshire County Council at Oldbury Road near Hartshill which will provide capacity for up to 12 caravans'. It should be noted that this site lies outside Nuneaton and</p>	<p>The Assessments NWBC were considering were old evidence bases and the latest evidence base showed that no transit pitches were required for NBBC.</p>

		<p>Bedworth and within North Warwickshire Borough administrative area.</p> <p>An assumption may appear to have been made that the nominal availability of the 12 pitches on this site provide sufficient pitches to both address North Warwickshire’s transit needs (identified as 5 from the earlier June 2013 Gypsy, Traveller and Travelling Showpeople Accommodation Assessment: for both North Warwickshire and Nuneaton and Bedworth) and the needs of Nuneaton and Bedworth as indicated by that earlier 2013 GTAA. However, North Warwickshire Borough also updated their GTAA (in conjunction with Tamworth Borough and Lichfield District) in 2019, which post dates the Nuneaton and Bedworth update of 2016.</p> <p>In the updated November 2019 GTAA for North Warwickshire, the Report highlighted on page 75 in relation to adjoining Boroughs’ that there were no transit pitches in Nuneaton and Bedworth and “It was felt that, due to the numerous unauthorised encampments over the last few years, transit provision and temporary stopping places are needed in the area”. The North Warwickshire 2019 GTAA also didn’t assess or address any further transit needs for North Warwickshire as it was aware that the Borough Council had an emergency stopping site with capacity to address its needs at that time. The GTAA didn’t identify any further site need as this issue had been considered to be dealt with. In paragraph 10.10 dealing with Transit needs the 2019 GTAA noted that “Due to potential changes to travelling behaviour as a result of changes to PPTS (2015) the use of historic evidence to assess current and future transit need is not recommended....It is therefore recommended that the situation relating to levels of unauthorised encampments throughout the area should be monitored whilst any potential changes associated with PPTS (2015) develop.” Furthermore, in para 10.12 it noted “A review of the evidence base ...should be undertaken To establish whether there is a need for investment in any further formal transit sites or emergency stopping places, or whether a managed approach is preferable alongside the use of existing public and private transit pitches in Lichfield and North Warwickshire”.</p>	
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		<p>In addition, with regard to the Oldbury Road emergency stopping site, there have been no discussions between the two adjoining Borough Council's over the use and availability of the site to serve both Borough's needs. Returning to the N&BBC's GTAA update of 2016, the assessment also noted in paragraph 7.13 that "Use of this site should be monitored as this could count towards meeting the need of transit provision for Nuneaton and Bedworth" (bold text my emphasis). The 2016 GTAA does not explicitly indicate that this site will address Nuneaton and Bedworth's needs. North Warwickshire Borough are unaware whether this monitoring was undertaken and are not aware of any discussions undertaken towards the use of the site for N&BBC's needs. The Nuneaton and Bedworth Gypsy and Traveller Site Allocations DPD, in primarily using the 2016 GTAA update, may therefore not have as robustly assessed the current transit need within Nuneaton and Bedworth Borough's area.</p> <p>The Borough Council are not therefore aware or confident that the Oldbury site can necessarily accommodate the Nuneaton and Bedworth Transit need previously identified and/or the potential current transit need.</p> <p>I trust that you will find the above comments and responses to the Nuneaton and Bedworth Borough Gypsy and Traveller Site Allocations Development Plan Document useful and if you require any further clarification., or seek to respond to the concerns raised above, please do not hesitate to contact the Forward Planning team at the Borough Council.</p>	
8	WCC Infrastructure Team Janet Neale	<p>Thank you for allowing Warwickshire County Council the opportunity comment on the Gypsy and Traveller Site Allocations DPD.</p> <p>I shared the link to the consultation widely within the County Council and asked that people either respond directly within the given timeframe or to submit their comments to me for me to submit an overall response on behalf of the County Council.</p> <p>This email is to confirm that I have received no comments to feed into the consultation.</p>	No response required.

9	Shilton and Barnacle Parish Council. Jackie Essex.	Shilton and Barnacle Parish Council considered this document at its meeting on 1 March 2022. The parish council makes the comment that there is an over intensive concentration of sites within Bulkington compared to the rest of the borough. Several sites which had been allocated for development along Mile Tree Lane are on the boundary with Rugby Borough Council. The frontages of these properties are in Nuneaton & Bedworth, but the rear gardens fall within Shilton & Barnacle parish. Any further development in this area will, therefore, result in an increase in sites which added to those already in the immediate area, would lead to an over intensification of sites and development in this area and further inappropriate development in the Green Belt.	There is only one site proposed that borders with Rugby BC and this site is for intensification within the site and therefore will have no further impact on the Green Belt or intensification in the area. In addition, a Green Belt assessment has been carried out as part of the process and the impact considered acceptable. The Old Nursery is on the opposite side of the road and the two other sites are not within Bulkington.
10	Wolvey Parish Council Jackie Essex.	Wolvey Parish Council has reviewed the above document and would raise concerns that the proposals could result in inappropriate development in the Green Belt as the sites identified in Bulkington adjoin the boundary with Rugby and will impact on Rugby Borough Council's area of Green Belt.	As above.
11	Mr & Mrs H. Brindley	Response to question 5 I wish to offer my support and approval for NBBC up dated Gypsy and Traveller site allocation document (DPD). This will allow the council to show that they have a 5 year supply of Gypsy and Traveller accommodation sites as required by the national planning policy framework (NPPF). Subsequent to the adoption of the updated Gypsy and Traveller allocation DPD will finally negate the excuse used by many of the Gypsy and Traveller community that they should be allowed temporary planning permission to remain in the Borough because the council were unable to demonstrate an adequate supply of Gypsy and Traveller accommodation sites. By complying fully with the requirements of the NPPF the council will have finally recognised that the human rights of the local settled community will be addressed.	The DPD will be reviewed every 5 years similarly to the Borough Plan.

		<p>Hopefully with the adoption of the DPD the council can now address the issues of openness and protection of the green belt from misuse including the use of retrospective planning application by Gypsy and Traveller families to circumvent the planning process.</p> <p>Response to Question 6 With regard to the DPD, in order for it to remain legally compliant and fair to all parties, a timetable for regular review and validation needs to be actioned.</p> <p>All planning decisions should be subject to a set of specific criteria which are open and transparent and apply equally to all member of the community. This should be overseen by democratically elected officials.</p>	
12	Mr J Claridge	<p>Response to question 5 I would like to register my support and approval for the Nuneaton & Bedworth Borough Council [NBBC] updated Gypsy & Traveller Site Allocation Document [DPD], it allows the Council to demonstrate that there is a 5 year+ supply of Gypsy & Traveller Accommodation Sites, as per the requirements of the National Planning Policy Framework [NPPF]. The detailed accommodation demand modelling and local need-based research conducted amongst the local Gypsy & Traveller Community by Arc4 Planning Consultants ensures that the conclusions are evidenced based and can stand up to scrutiny.</p> <p>Moving to adopt the updated Gypsy and Traveller Site Allocations DPD finally removes a key argument that has been used by many from the Gypsy & Traveller community when occupying Greenbelt Land across the borough that they should be allowed a temporary planning permission to stay given that Council could not demonstrate an up to-date view of Gypsy & Traveller accommodation site supply.</p> <p>The Council by moving to fully comply with the requirements of the NPPF have finally restored balance to the local Planning System, ensuring that the human rights of the existing home owning settled community are now fully</p>	As above.

		<p>respected and protected. The change ensures that both Communities can at least live in relative harmony.</p> <p>Through the adoption of the DPD the Council can ensure that the planning system now works fairly for all and that where planning permission has been correctly refused for an occupation of Greenbelt Land by Gypsy & Travellers that these eyesore planning issues can now be fully resolved, given the planning weight that will be attached to the adoption of the DPD by the Planning Inspectorate and the Secretary of State for Housing, Communities and Local Government.</p> <p>Response to question 6 In terms of the DPD my one comment is that Nuneaton & Bedworth Borough Council constitute a process of regular review and validation of the local demand for Gypsy & Traveller sites within the borough in order to ensure that fairness in the planning system is maintained and members of the Gypsy & Traveller community can no longer 'game' the system for commercial benefit.</p> <p>We need to ensure that planning remains 'rules' based and that decisions are made through a democratically elected body rather than being 'gamed' by individuals who claim to be from a designated ethnic status.</p>	
13	Ms J Knight	<p>Thank you for your recent and informative news sheet. I read the article relating to the new gypsy and traveller accommodation needs and would like to make the following comments:</p> <p>" Pleased to see that the council are addressing this difficult and important situation. Can I ask that when considering the sites for travellers that they are spread evenly across the borough and not in one saturated location. This way helping to ensure that the services they will be using , such as health and education, can more easily accommodate their changing needs."</p> <p>I did try to send these though the web site on the news sheet, but had some difficulty in locating the site, therefore hope this is an appropriate to add my comments to the work you are doing.</p>	It is considered that the sites are spread across the Borough.

14	Mr Anthony Masters	<p>Response to question 5</p> <p>I would like to register my support and approval for the Nuneaton & Bedworth Borough Council [NBBC] updated Gypsy & Traveller Site Allocation Document [DPD], it allows the Council to demonstrate that there is a 5 year+ supply of Gypsy & Traveller Accommodation Sites, as per the requirements of the National Planning Policy Framework [NPPF]. The detailed accommodation demand modelling and local need-based research conducted amongst the local Gypsy & Traveller Community by Arc4 Planning Consultants ensures that the conclusions are evidenced based and can stand up to scrutiny.</p> <p>Moving to adopt the updated Gypsy and Traveller Site Allocations DPD finally removes a key argument that has been used by many from the Gypsy & Traveller community when occupying Greenbelt Land across the borough that they should be allowed a temporary planning permission to stay given that Council could not demonstrate an up to-date view of Gypsy & Traveller accommodation site supply.</p> <p>The Council by moving to fully comply with the requirements of the NPPF have finally restored balance to the local Planning System, ensuring that the human rights of the existing home owning settled community are now fully respected and protected. The change ensures that both Communities can at least live in relative harmony.</p> <p>Through the adoption of the DPD the Council can ensure that the planning system now works fairly for all and that where planning permission has been correctly refused for an occupation of Greenbelt Land by Gypsy & Travellers that these eyesore planning issues can now be fully resolved, given the planning weight that will be attached to the adoption of the DPD by the Planning Inspectorate and the Secretary of State for Housing, Communities and Local Government.</p> <p>Response to question 6</p> <p>In terms of the DPD my one comment is that Nuneaton & Bedworth Borough Council</p>	<p>The DPD will be reviewed every 5 years similarly to the Borough Plan.</p>
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		<p>constitute a process of regular review and validation of the local demand for Gypsy & Traveller sites within the borough in order to ensure that fairness in the planning system is maintained and members of the Gypsy & Traveller community can no longer 'game' the system for commercial benefit.</p> <p>We need to ensure that planning remains 'rules' based and that decisions are made through a democratically elected body rather than being 'gamed' by individuals who claim to be from a designated ethnic status.</p>	
15	Mr Jason Masters	<p>Response to question 5</p> <p>I would like to register my support and approval for the Nuneaton & Bedworth Borough Council [NBBC] updated Gypsy & Traveller Site Allocation Document [DPD], it allows the Council to demonstrate that there is a 5 year+ supply of Gypsy & Traveller Accommodation Sites, as per the requirements of the National Planning Policy Framework [NPPF]. The detailed accommodation demand modelling and local need-based research conducted amongst the local Gypsy & Traveller Community by Arc4 Planning Consultants ensures that the conclusions are evidenced based and can stand up to scrutiny.</p> <p>Moving to adopt the updated Gypsy and Traveller Site Allocations DPD finally removes a key argument that has been used by many from the Gypsy & Traveller community when occupying Greenbelt Land across the borough that they should be allowed a temporary planning permission to stay given that Council could not demonstrate an up to-date view of Gypsy & Traveller accommodation site supply.</p> <p>The Council by moving to fully comply with the requirements of the NPPF have finally restored balance to the local Planning System, ensuring that the human rights of the existing home owning settled community are now fully respected and protected. The change ensures that both Communities can at least live in relative harmony.</p> <p>Through the adoption of the DPD the Council can ensure that the planning system now works fairly for all and that where planning permission has</p>	<p>The DPD will be reviewed every 5 years similarly to the Borough Plan.</p>

		<p>been correctly refused for an occupation of Greenbelt Land by Gypsy & Travellers that these eyesore planning issues can now be fully resolved, given the planning weight that will be attached to the adoption of the DPD by the Planning Inspectorate and the Secretary of State for Housing, Communities and Local Government.</p> <p>Response to question 6 In terms of the DPD my one comment is that Nuneaton & Bedworth Borough Council constitute a process of regular review and validation of the local demand for Gypsy & Traveller sites within the borough in order to ensure that fairness in the planning system is maintained and members of the Gypsy & Traveller community can no longer 'game' the system for commercial benefit.</p> <p>We need to ensure that planning remains 'rules' based and that decisions are made through a democratically elected body rather than being 'gamed' by individuals who claim to be from a designated ethnic status.</p>	
16	Mrs Rebecca Masters	<p>Response to question 5 I would like to register my support and approval for the Nuneaton & Bedworth Borough Council [NBBC] updated Gypsy & Traveller Site Allocation Document [DPD], it allows the Council to demonstrate that there is a 5 year+ supply of Gypsy & Traveller Accommodation Sites, as per the requirements of the National Planning Policy Framework [NPPF]. The detailed accommodation demand modelling and local need-based research conducted amongst the local Gypsy & Traveller Community by Arc4 Planning Consultants ensures that the conclusions are evidenced based and can stand up to scrutiny.</p> <p>Moving to adopt the updated Gypsy and Traveller Site Allocations DPD finally removes a key argument that has been used by many from the Gypsy & Traveller community when occupying Greenbelt Land across the borough that they should be allowed a temporary planning permission to stay given that Council could not demonstrate an up to-date view of Gypsy & Traveller accommodation site supply.</p>	The DPD will be reviewed every 5 years similarly to the Borough Plan.

		<p>The Council by moving to fully comply with the requirements of the NPPF have finally restored balance to the local Planning System, ensuring that the human rights of the existing home owning settled community are now fully respected and protected. The change ensures that both Communities can at least live in relative harmony.</p> <p>Through the adoption of the DPD the Council can ensure that the planning system now works fairly for all and that where planning permission has been correctly refused for an occupation of Greenbelt Land by Gypsy & Travellers that these eyesore planning issues can now be fully resolved, given the planning weight that will be attached to the adoption of the DPD by the Planning Inspectorate and the Secretary of State for Housing, Communities and Local Government.</p> <p>Response to question 6 In terms of the DPD my one comment is that Nuneaton & Bedworth Borough Council constitute a process of regular review and validation of the local demand for Gypsy & Traveller sites within the borough in order to ensure that fairness in the planning system is maintained and members of the Gypsy & Traveller community can no longer 'game' the system for commercial benefit.</p> <p>We need to ensure that planning remains 'rules' based and that decisions are made through a democratically elected body rather than being 'gamed' by individuals who claim to be from a designated ethnic status.</p>	
17	Mr Sean & Mrs C Mathieson	<p>Response to question 5 I would like to register my support and approval for the Nuneaton & Bedworth Borough Council [NBBC] updated Gypsy & Traveller Site Allocation Document [DPD], it allows the Council to demonstrate that there is a 5 year+ supply of Gypsy & Traveller Accommodation Sites, as per the requirements of the National Planning Policy Framework [NPPF].</p> <p>Moving to adopt the updated Gypsy and Traveller Site Allocations DPD finally removes a</p>	The DPD will be reviewed every 5 years similarly to the Borough Plan.

		<p>key argument that has been used by many from the Gypsy & Traveller community when occupying Greenbelt Land across the borough that they should be allowed a temporary planning permission to stay given that Council could not demonstrate an up to-date view of Gypsy & Traveller accommodation site supply.</p> <p>By complying fully with the requirements of the NPPF the council will have finally recognised that the human rights of the local settled community will be addressed.</p> <p>Through the adoption of the DPD the Council can ensure that the planning system now works fairly for all and that where planning permission has been correctly refused for an occupation of Greenbelt Land by Gypsy & Travellers that these eyesore planning issues can now be fully resolved, given the planning weight that will be attached to the adoption of the DPD by the Planning Inspectorate and the Secretary of State for Housing, Communities and Local Government.</p> <p>Response to question 6 With regard to the DPD, in order for it to remain legally compliant and fair to all parties, a timetable for regular review and validation needs to be actioned. All planning decisions should be subject to a set of specific rules which are open and transparent and apply equally to all members of the community. This should be overseen and final decisions made by a democratically elected body.</p>	
18	Mr Peter Scarff	<p>Response to question 5 I would like to register my support and approval for the Nuneaton & Bedworth Borough Council [NBBC] updated Gypsy & Traveller Site Allocation Document [DPD], it allows the Council to demonstrate that there is a 5 year+ supply of Gypsy & Traveller Accommodation Sites, as per the requirements of the National Planning Policy Framework [NPPF]. The detailed accommodation demand modelling and local need-based research conducted amongst the local Gypsy & Traveller Community by Arc4 Planning Consultants ensures that the conclusions are evidenced based and can stand up to scrutiny.</p>	The DPD will be reviewed every 5 years similarly to the Borough Plan.


		<p>Moving to adopt the updated Gypsy and Traveller Site Allocations DPD finally removes a key argument that has been used by many from the Gypsy & Traveller community when occupying Greenbelt Land across the borough that they should be allowed a temporary planning permission to stay given that Council could not demonstrate an up to-date view of Gypsy & Traveller accommodation site supply.</p> <p>The Council by moving to fully comply with the requirements of the NPPF have finally restored balance to the local Planning System, ensuring that the human rights of the existing home owning settled community are now fully respected and protected. The change ensures that both Communities can at least live in relative harmony.</p> <p>Through the adoption of the DPD the Council can ensure that the planning system now works fairly for all and that where planning permission has been correctly refused for an occupation of Greenbelt Land by Gypsy & Travellers that these eyesore planning issues can now be fully resolved, given the planning weight that will be attached to the adoption of the DPD by the Planning Inspectorate and the Secretary of State for Housing, Communities and Local Government.</p> <p>Response to question 6 In terms of the DPD my one comment is that Nuneaton & Bedworth Borough Council constitute a process of regular review and validation of the local demand for Gypsy & Traveller sites within the borough in order to ensure that fairness in the planning system is maintained and members of the Gypsy & Traveller community can no longer 'game' the system for commercial benefit.</p> <p>We need to ensure that planning remains 'rules' based and that decisions are made through a democratically elected body rather than being 'gamed' by individuals who claim to be from a designated ethnic status.</p>	
19	Mrs Lynne Shilton	<p>Response to question 5 I would like to register my support and approval for the Nuneaton & Bedworth Borough Council</p>	The DPD will be reviewed every 5 years

	<p>[NBBC] updated Gypsy & Traveller Site Allocation Document [DPD], it allows the Council to demonstrate that there is a 5 year+ supply of Gypsy & Traveller Accommodation Sites, as per the requirements of the National Planning Policy Framework [NPPF]. The detailed accommodation demand modelling and local need-based research conducted amongst the local Gypsy & Traveller Community by Arc4 Planning Consultants ensures that the conclusions are evidenced based and can stand up to scrutiny.</p> <p>Moving to adopt the updated Gypsy and Traveller Site Allocations DPD finally removes a key argument that has been used by many from the Gypsy & Traveller community when occupying Greenbelt Land across the borough that they should be allowed a temporary planning permission to stay given that Council could not demonstrate an up to-date view of Gypsy & Traveller accommodation site supply.</p> <p>The Council by moving to fully comply with the requirements of the NPPF have finally restored balance to the local Planning System, ensuring that the human rights of the existing home owning settled community are now fully respected and protected. The change ensures that both Communities can at least live in relative harmony.</p> <p>Through the adoption of the DPD the Council can ensure that the planning system now works fairly for all and that where planning permission has been correctly refused for an occupation of Greenbelt Land by Gypsy & Travellers that these eyesore planning issues can now be fully resolved, given the planning weight that will be attached to the adoption of the DPD by the Planning Inspectorate and the Secretary of State for Housing, Communities and Local Government.</p> <p>Response to question 6 In terms of the DPD my one comment is that Nuneaton & Bedworth Borough Council constitute a process of regular review and validation of the local demand for Gypsy & Traveller sites within the borough in order to</p>	<p>similarly to the Borough Plan.</p>
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		<p>ensure that fairness in the planning system is maintained and members of the Gypsy & Traveller community can no longer 'game' the system for commercial benefit.</p> <p>We need to ensure that planning remains 'rules' based and that decisions are made through a democratically elected body rather than being 'gamed' by individuals who claim to be from a designated ethnic status.</p>	
20	Mr Steve Shilton	<p>Response to question 5</p> <p>I would like to register my support and approval for the Nuneaton & Bedworth Borough Council [NBBC] updated Gypsy & Traveller Site Allocation Document [DPD], it allows the Council to demonstrate that there is a 5 year+ supply of Gypsy & Traveller Accommodation Sites, as per the requirements of the National Planning Policy Framework [NPPF]. The detailed accommodation demand modelling and local need-based research conducted amongst the local Gypsy & Traveller Community by Arc4 Planning Consultants ensures that the conclusions are evidenced based and can stand up to scrutiny.</p> <p>Moving to adopt the updated Gypsy and Traveller Site Allocations DPD finally removes a key argument that has been used by many from the Gypsy & Traveller community when occupying Greenbelt Land across the borough that they should be allowed a temporary planning permission to stay given that Council could not demonstrate an up to-date view of Gypsy & Traveller accommodation site supply.</p> <p>The Council by moving to fully comply with the requirements of the NPPF have finally restored balance to the local Planning System, ensuring that the human rights of the existing home owning settled community are now fully respected and protected. The change ensures that both Communities can at least live in relative harmony.</p> <p>Through the adoption of the DPD the Council can ensure that the planning system now works fairly for all and that where planning permission has been correctly refused for an occupation of Greenbelt Land by Gypsy & Travellers that these eyesore planning issues can now be fully</p>	<p>The DPD will be reviewed every 5 years similarly to the Borough Plan.</p>

	<p>resolved, given the planning weight that will be attached to the adoption of the DPD by the Planning Inspectorate and the Secretary of State for Housing, Communities and Local Government.</p> <p>Response to question 6 In terms of the DPD my one comment is that Nuneaton & Bedworth Borough Council constitute a process of regular review and validation of the local demand for Gypsy & Traveller sites within the borough in order to ensure that fairness in the planning system is maintained and members of the Gypsy & Traveller community can no longer 'game' the system for commercial benefit.</p> <p>We need to ensure that planning remains 'rules' based and that decisions are made through a democratically elected body rather than being 'gamed' by individuals who claim to be from a designated ethnic status.</p>	
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**Appendix B Response form and Notes for
Publication version of DPD.**

 <p>Nuneaton & Bedworth United to Achieve</p>	<p>Gypsy and Traveller Site Allocations Development Plan Document (DPD)</p> <p>Publication Stage Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Please return to Nuneaton and Bedworth Borough Council by 25th March 2022

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 Development Plan Document (DPD). Please note that all responses will be available for public inspection and cannot be treated as confidential. A copy of all responses will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination (i.e. the Inspector) and all responses will be 'made available' in line with the Regulations (The Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulations 20, 22 and 35) including publication 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 Development Plan Document (DPD)?

Yes

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

	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.	2. Agent's details (if applicable)
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 – Please use a separate sheet for each representation

3. To which part of the DPD does this representation relate?

Paragraph

Policy

Policies
Map

4. Do you consider the DPD is :

4.(1) Legally
compliant

Yes

No

4.(2) Sound

Yes

No

4.(3)
Complies with
the Duty to
co-operate

Yes

No

Please tick as appropriate.

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Please tick as appropriate.

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

1. Guidance Note to Accompany Representation Form

1.1 Introduction

- 1.1.1. The plan has been published by the Local Planning Authority [LPA] for representations to be made on it before it is submitted for examination by a Planning Inspector. The Planning and Compulsory Purchase Act 2004, as amended, [PCPA] states that the purpose of the examination is to consider whether the plan complies with the relevant legal requirements, including the duty to co-operate, and is sound. The Inspector will consider all representations on the plan that are made within the period set by the LPA.
- 1.1.2. To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the plan. The LPA will therefore ensure that the names of those making representations can be made available (including publication on the LPA's website) and taken into account by the Inspector.

1.2 Legal Compliance and Duty to Co-operate

- 1.2.1. You should consider the following before making a representation on legal compliance:
- The plan should be included in the LPA's current Local Development Scheme [LDS] and the key stages set out in the LDS should have been followed. The LDS is effectively a programme of work prepared by the LPA, setting out the plans it proposes to produce. It will set out the key stages in the production of any plans which the LPA proposes to bring forward for examination. If the plan is not in the current LDS it should not have been published for representations. The LDS should be on the LPA's website and available at its main offices.
 - The process of community involvement for the plan in question should be in general accordance with the LPA's Statement of Community Involvement [SCI] (where one exists). The SCI sets out the LPA's strategy for involving the community in the preparation and revision of plans and the consideration of planning applications. The LPA is required to provide a Sustainability Appraisal [SA] report when it publishes a plan. This should identify the process by which

SA has been carried out, and the baseline information used to inform the process and the outcomes of that process. SA is a tool for assessing the extent to which the plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic, and social objectives.

- The plan should comply with all other relevant requirements of the PCPA and the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended [the Regulations].

1.2.2. You should consider the following before making a representation on compliance with the duty to co-operate:

- Section 33A of the PCPA requires the LPA to engage constructively, actively and on an ongoing basis with neighbouring authorities and certain other bodies over strategic matters during the preparation of the plan. The LPA will be expected to provide evidence of how they have complied with the duty. Non-compliance with the duty to co-operate cannot be rectified after the submission of the plan. Therefore, the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector cannot recommend adoption of the plan.

1.3 Soundness

1.3.1. The tests of soundness are set out in paragraph 35 of the National Planning Policy Framework (NPPF). Plans are sound if they are:

- **Positively prepared** – providing a strategy which, as a minimum seeks to meet the area’s objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring authorities is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** - deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the NPPF.

1.3.2. If you think the content of the plan is not sound because it does not include a policy on a particular issue, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy?
- Is the issue with which you are concerned already covered by another policy in this plan?
- If the policy is not covered elsewhere, in what way is the plan unsound without the policy?
- If the plan is unsound without the policy, what should the policy say?

1.4 General advice

1.4.1. If you wish to make a representation seeking a modification to a plan or part of a plan you should set out clearly in what way you consider the plan or part of the plan is legally non-compliant or unsound, having regard as appropriate to the soundness criteria in paragraph 1.3.1 above. Your representation should be supported by evidence wherever possible. It will be helpful if you also say precisely how you think the plan should be modified.

1.4.2 You should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification. You should not assume that you will have a further opportunity to make submissions. Any further submissions after the plan has been submitted for examination may only be made if invited by the Inspector, based on the matters and issues he or she identifies.

1.4.3. Where groups or individuals share a common view on the plan, it would be very helpful if they would make a single representation which represents that view, rather than a large number of separate representations repeating the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

1.4.4. Please consider carefully how you would like your representation to be dealt with in the examination: whether you are content to rely on your written representation, or whether you wish to take part in hearing session(s). Only

representors who are seeking a change to the plan have a right to be heard at the hearing session(s), if they so request. In considering this, please note that written and oral representations carry the same weight and will be given equal consideration in the examination process.