# Appendix B: Consultation Summary

### Summary of the comments/issues raised on the SA Scoping Report and the Council’s response

The following table summarises the main issues raised during the consultation on the SA Scoping Report, sets out the Council’s response and, where appropriate, identifies how those issues have been addressed.

| **Respondents Name** | **Section of SA**  **Scoping Report** | **Comment/ Summary of proposed**  **amendment** | **Council response** |
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| Environment Agency |  | The Environment Agency commented that it was happy with the content of the SA for those matters within its remit and that the report recognises the correct plans and reports etc., where appropriate. | Support acknowledged. |
| Historic England | P29-31 Business Development and the Economy. | It is recommended that HE Heritage Counts information be included in the ‘Source of Message’ list and that the evidence base issues section includes reference to ‘identifying opportunities for heritage led regeneration’ or similar alternative.” | The Heritage and the Economy Heritage Counts 2019 has been reviewed and included in the Source of Message list and Appendix 1.  Table 5: Key Messages, Business Development and the Economy and the Section 4, Baseline Issues and problems have been amended to include in the issues ‘identifying opportunities for heritage led regeneration’. |
| Historic England | P.32 Ensuring the Vitality of Town Centres. | It is recommended that HE Heritage Counts information be included in the ‘Source of Message’ list and that the evidence base issues section includes reference to ‘identifying opportunities for heritage led regeneration’ or similar alternative.” | The Heritage and the Economy Heritage Counts 2019 has been reviewed and included in the Source of Message list and Appendix 1.  Table 5: Key Messages, Town Centres and the Section 4, Baseline Issues and problems have been amended to include in the issues ‘identifying opportunities for heritage led regeneration’. |
| Historic England | P.33 Promote Healthy and Safe Communities. | It is recommended that HE’s information on heritage and well being is included as part of the evidence base and that Bullet Point 9 is revised to read ‘The development of a high quality multifunctional green infrastructure network should be promoted, identifying any opportunities for links with and enhancement of cultural heritage’ or a similar alternative. | Wellbeing and the Historic Environment Threats, Issues and Opportunities for the Historic Environment 2018 (Historic England) has been reviewed and included in the Source of Message list and Appendix 1.  Table 5: Key Messages, Health and the Section 4, Baseline Issues and problems have been amended to include in the issues ‘identifying any opportunities for links with and enhancement of cultural heritage’. |
| Historic England | P.37 Making effective use of land - Land Use. | It is recommended that Historic Landscape Characterisation is included within the Source of message section. HLC can be used to help secure good quality, well designed and sustainable places and is relevant to the scope of this consideration. | Historic Landscape Characterisation has been reviewed and included in the Source of Message list and Appendix 1. |
| Historic England | P.38 Making effective use of land – resources. | It is recommended that HE’s information on increasing residential density in historic environments is included within the ‘Source of Message’ section since it is relevant to the intentions of the scope of this element of the report. | Increasing Residential Density in Historic Environments 2018 (Historic England) has been reviewed and included in the Source of Message list and Appendix 1. |
| Historic England | P.39 Achieving Well designed places. | It is recommended that HE’s information on increasing residential density in historic environments is included within the Source of message section since it is relevant to the intentions of the scope of this element of the report. It is recommended that the last sentence (bracketed) is revised to include cultural heritage e.g. ‘(There is substantial cross over with other key messages such as housing, employment and cultural heritage). | Increasing Residential Density in Historic Environments 2018 (Historic England) has been reviewed and included in the Source of Message list and Appendix 1.  In Issues for Ashfield, the bracketed text has been amended to read, “There is a substantial cross over with other key messages such as housing employment, biodiversity and cultural heritage”. |
| Historic England | P.41 Meeting the challenge of climate change, flooding and coastal change. | It is recommended that HE guidance on climate change be referred to in the Source of message section. | Heritage, Climate Change and Environment (Historic England) (webpage) has been reviewed and included in the Source of Message list and Appendix 1. |
| Historic England | P.43-44 Flood risk. | It is recommended that HE guidance on flood risk be referred to in the Source of message section. The Plan will need to consider any impacts of watering or dewatering on buried archaeological remains. | Flooding and Historic Buildings 2015 (Historic England) has been reviewed and included in the Source of Message list and Appendix 1. |
| Historic England | P.46 Landscape. | It is recommended that Historic Landscape Characterisation is included within the Source of message section. | Historic Landscape Characterisation has been reviewed and included in the Source of Message list and Appendix 1. |
| Historic England | P.49 Conserving and enhancing the historic environment. | It is recommended that ‘protection’ is revised to read ‘conservation’ in line with NPPF terminology and heritage assets are referred too rather than historical assets. Setting does not appear in the scope and will need to be included in Plan considerations in order for NPPF requirements for the historic environment to be considered fully. | Issues for Ashfield has been amended to reflect the wording of the NPPF and to include the setting of a heritage asset. “The conservation and enhancement of Ashfield’s heritage and archaeological assets and their setting.” |
| Historic England | P.55 - Table 6 Sustainability Issues and the Local Plan - Historic built environment at risk. | This does not fully address the requirements of the historic environment overall since it refers to built heritage only, therefore omitting buried archaeological remains which are heritage assets, and also only elements at risk. It is recommended that the Key issue is reworded to read ‘Historic Environment, heritage assets and their setting’. In line with this rewording the text for the ‘Possible role of the Local Plan’ will also need revising e.g. The Ashfield Local Plan will have an important role to play in conserving or enhancing heritage assets and their setting, including Ashfield’s industrial heritage. | The proposed amendments have been incorporated into Table 6: Sustainability Issues and the Local Plan. |
| Historic England | P.118 - Conserving and enhancing the historic environment - Issues and Problems. | BP1 should be revised to read ‘The conservation and enhancement of Ashfield’s historical and archaeological assets and their setting’ in line with NPPF terminology and requirements. BP2 should be revised to read ‘Four heritage assets…’ instead of historic assets. BP3 requires an ‘s’ at the end of ‘asset’ to read ‘assets’. It would be worth considering the inclusion of town centres as part of BP4 as the scope of the report at this stage indicates a desire to strengthen the role of these moving forward. This would again highlight the synergy between heritage led regeneration and information included in HE’s Heritage Counts information relating to the economy. | Conserving and enhancing the historic environment – Issues and Options has been amended.   * Bullet Point one sets out “The conservation and enhancement of Ashfield’s historical and archaeological assets and their setting. * Bullet Point 2 “Four heritage assets….” * An additional bullet point has been included “Promote the conservation and enhance of the heritage assets within the District town centres to support the local economy.” |
| Historic England | P.118 - Conserving and enhancing the historic environment - Potential implications of not having a new Local Plan. | BP2 could be extended to add ‘so there would be no opportunity to identify possibilities to enhance the historic environment, heritage assets or their setting’. BP3 first sentence could be extended to read: National policy emphasises the importance of designated heritage assets, which are irreplaceable. It is recommended that the first sentence of BP4 be revised to read as follows: ‘Potential for harm to heritage assets and setting as a result of development coming forward outside the Local Plan allocations’. The current wording uses terminology not directly associated with the consideration of heritage assets as set out in NPPF so is unclear. | Conserving and enhancing the historic environment – Potential Implication of not having a Plan. The implications have been amended to include the proposed wording. |
| Historic England | P121 - Table 15: SA Objectives and Theme | SA Objective 3 is noted and welcomed. | Comments acknowledged. |
| Historic England | P.124 - Table 16: Proposed Matrix to be utilised by the SA.  AND  P,142 - Table 18: Consideration of Significance for Strategic Options and Policies - Part 3 Historic Environment. | It should be noted that any element relating to the historic environment identified as ‘uncertain’ as the Plan and SA progress would indicate that further consideration and analysis is required to establish whether there would be a neutral, negative or positive impact in SA terms. | Comments acknowledged. Uncertainty also relates to where there is insufficient information available (which in some cases may only come to light after plan adoption) or the relationship with the objective is dependent on how particular aspects of development are managed. This reflects that some uncertainty may remain until the full details are known at planning application stage or when further site investigation has been undertaken following planning approval. |
| Historic England | P.129-130 - Table 17: The Sustainability Framework  P. 142 Table 18: Consideration of Significance for Strategic Options and Policies | The scope of the SA will need to include setting in the decision making criteria to ensure the Local Plan complies with NPPF requirements for the historic environment. At present it is not mentioned. The Land Allocation Appraisal is noted, however it is recommended that HE’s methodology for the consideration of site allocations in Local Plans is used as part of the Plan process.  It is unclear what benefits the potential indicators would reveal. It is recommended that stronger indicators are set out in order to establish a robust scope for the Plan. | Table 17: The Sustainability Framework, Objective 3 Historic Environment Decision Making has been amended to identify the importance of setting:  “Will it conserve and/or enhance designated heritage assets, non- designated heritage assets, and their setting?”  (to be replicated in Table 18 Guide Questions p. 142)  Within the land allocation appraisal section, the text recognises that the significance of an asset can also be derived from its setting (in line with the NPPF). However, the land allocation appraisal criteria has been reviewed and the following amendments have been implemented to provide greater clarity and ensure references are included to ‘setting’.   * Sites that have potential for a designated heritage asset(s) (or its setting) to be enhanced or its significance better revealed will have a significant positive effect (++) (e.g. through removal from an ‘at risk’ register or reuse of a redundant building). Sites that have this potential but to a lesser degree will have a minor positive effect (+) * Sites, which have potential for a non-designated heritage asset or its setting to be enhanced, will have a minor positive effect (+). * Sites, which are unlikely to impact on a designated or non-designated heritage asset or its setting (0). * Sites with potential for less than substantial harm to a designated heritage asset(s), including development in its setting, will have a minor negative effect (-) * Sites which include a non-designated heritage asset or part of its setting that cannot be enhanced will have a minor negative impact( - )Sites which may have the potential for substantial harm or loss to a designated heritage asset(s), including development in its setting, will have a significant negative effect (- -).   Regarding the potential indicators, these allow a variety of changes within the historic environment to be monitored. The information is readily available and proportionate to the Local Plan. No changes are proposed. |
| Natural England | Section 1 and Section 2 | Natural England considers that the background information on the report is covered in sufficient detail.  Background information on the Local Plan history and previous SA seems appropriate and useful. | Comment acknowledged. |
| Natural England | Section 3, Table 5: Key Message, and Appendix 1. | In general Natural England considered that the report includes appropriate information within the plans and programmes however we suggest that you may want to make reference to the government’s 25 year Environment Plan – A Green Future. We would wish to ensure that the local plan takes full account of the moves towards mandatory net gain and gives consideration to related initiatives such as Nature Recovery Network and Natural Capital. You may also want to refer to the Environment Bill (depending on its progress). | The government’s 25 year environmental plan ‘A Green Future: Our 25 Year Plan to Improve the Environment. 2018 is included in Appendix 1. However, it was not brought forward and identified in Table 5 Key Message. Sources of Messages in Table 5 has been amended to reflect that this was taken into account in identifying the key messages.  The Environmental Bill was presented to Parliament on 30th January 2020. However, the intensions for the Bill set out in the Queen’s speech and the Bill itself makes it clear that there are important aspects of the Bill which:   * Should be reflected in the Sources of Messages in Table 5 and * Need to be reflected in the Local Plan policies and * Reinforce the objectives sets out in the SA Framework.   Similarly it has been identified that the Agricultural Bill also places on emphasis on farmers being paid for ‘public goods’ such as new /enhance habitats and public access. Table 5 and Appendix One has been amended to reflect the Agricultural Bill proposals. |
| Natural England | Section 3, Table 5: Key Message, and Appendix 1. | The objectives of the various plans, policies and programmes are well covered. | Comment acknowledged. |
| Natural England | Section 4 – Relevance of the  main economic, social and environmental issues identified to the SA of the Local Plan? | Within Table 6: Sustainability Issues & the Local Plan, Natural England suggests that the section that covers the “State of SSSIs and Local Wildlife Sites and Protect and promote Biodiversity”, should be strengthened. The word “enhancement” would be preferred to “promotion” of biodiversity. The role of the LPA should also include ensuring that a net gain in biodiversity is achieved which strengthens ecological networks and works towards the Nature Recovery Network at a strategic level. It is suggested that the potential influence of the local plan on this topic would be major as local plan policies are key documents in achieving enhancements to biodiversity.  We would also suggest that “access to suitable wildlife sites” is dealt with separately within an issue, which covers green infrastructure and the provision of access to green space and countryside recreation.  Climate change could also be included within the table. | Table 6: sustainability Issues & the Local Plan has been amended to:   * include ‘enhance’ rather than protect. * To reflect that local plan policies will have a major role in enhancing biodiversity and green infrastructure and tackling the impact of climate change.   The SA Framework has been amended to identify in relation to Objective 6 Biodiversity and Green Infrastructure to identify in the decision-making criteria – ‘Will it provide opportunities for people to access the natural environment?’ |
| Natural England | Section 4 – Relevance of the  main economic, social and environmental issues identified to the SA of the Local Plan. | We generally welcome the section on “Meeting The Challenge of Climate Change, and Flooding and Coastal Change (Including Water Quality)” – though we would suggest that Coastal Change need not be included in Nottinghamshire. We also suggest that the use of nature based solutions to address adverse impacts should be covered within this section for example tree planting (in the right places) and carbon sequestration (we do note that this is partly covered in the next section on the natural environment). | The reference to ‘coastal change reflected the NPPF 2019, Part 14 which sets out polies on meeting the challenge of climate change, flooding and coastal change. However, the comment is noted and the SA Report has been amended to remove the reference to coastal change.  An additional paragraph has been included to set out to identify role of nature based solutions. (Paragraph 4.88). |
| Natural England | Section 4 – Relevance of the  main economic, social and environmental issues identified to the SA of the Local Plan. | We welcome the next section on the Enhancing Natural Environment and are pleased to see that the Sherwood possible potential SPA has been considered. We also welcome the content on Biodiversity Mapping Opportunities and BMV soils. | Comments acknowledged. |
| Natural England | Section 4 – Relevance of the  main economic, social and environmental issues identified to the SA of the Local Plan. | We suggest that there should be some cross reference with the section Promote Healthy & Safe Communities regarding the topic of green infrastructure. Multi-functional green infrastructure can perform a range of functions including improved flood risk management, provision of accessible green space, climate change adaptation and biodiversity enhancement. | The comments is noted. Paragraphs have been added to Section 4 to emphasis there different roles that green infrastructure including health and wellbeing, flood risk, biodiversity and climate change. Similarly, climate change will be reduced by a number of different aspects, which are anticipated to be reflected in the Local Plan policies. (Par 4.47 & 4.72) |
| Natural England | Section 5 SA Framework objectives, guide questions and range of environmental, social and economic topics  Table 17: The Sustainability Framework  Table 18: Consideration of Significance for Strategic Options and Policies | The objectives appear to cover most of NEs concerns with the Natural Environment.  You may want to consider the use of the following with respect to nature base solutions for climate change:  Will the action/policy:  1. Reduce greenhouse gas emissions or promote sequestration of carbon?  2. Continue to be viable for a range of plausible future climate scenarios?  3. Increase the resilience of biodiversity to climate change?  4. Help people adapt to climate change?  5. Maintain or enhance the biodiversity of a region, now and under future climates?  6. Maintain or increase the provision of ecosystem services on which local people depend, including water, food, and materials, now and under future climates?  7. Lead to the displacement of emissions to another location? | Comment acknowledged.  Table 17: The SA Framework has been amended to identify in relation to the following:   * Objective 6: Biodiversity and Green Infrastructure to identify in the decision making criteria – * ‘Will it conserve and enhance biodiversity taking into account the impacts of climate change?’ * Will it promote carbon sequestration? * Objective 12: Climate Change and Flood Risk to identify in the decision making criteria – Will it support mitigation and adaption measures that increase biodiversity resilience?   (to be replicated in Table 18 Guide Questions) |
| Natural England | General | The review of the SA objectives and the revised SA Framework is considered to meet the requirements of the SEA Directive and the National Planning Practice Guidance. | Support acknowledged. |
| The Coal Authority | General | The Coal Authority has reviewed the Sustainability Appraisal Scoping Report and has no specific comments to make. | The response is noted. |
| Avison Young on behalf of National Grid | General | Avison Young has review the SA Scoping Report on behalf of National Grid and have no comments to make in response to the consultation. | The response is noted. |
| Teversal, Stanton Hill & Skegby Neighbourhood Forum | Not identified by the response. | General – lack of emphasis on climate change. SA should reflect the Government committed that greenhouse gas emissions in the UK will be cut to almost zero by 2050. It is essential that the sustainability strengths and weaknesses of ADC’s plans to meet this target be adequately tested in the Sustainability Appraisal. | The Forum’s concerns on climate change are noted. The SA Framework considers climate change mitigation and adaption. This is specifically identified in Climate Change and Flood Risk and Climate Change and Energy Efficiency (which have specific SA Framework Objectives) but climate change will also be a consideration in relation to a number of other aspects including:   * Diversity & green Infrastructure; * Natural resources; * Air & noise pollutions; * Water quality; * Waste; * Travel & Accessibility; * Employment; * Town centres. |
| Teversal, Stanton Hill & Skegby Neighbourhood Forum. | SA Environmental Criteria. | Site allocations - The distance to public services and public transport needs to be half that set out in the Appraisal. Services and bus stops should be no more than a 400m walk to reduce car use. These criteria should be applied to developments of any size. The availability of public transport needs to be quantified. | The distances set out in relation to land allocations relates to a number of the SA objectives set out in the SA Framework. The various distances utilised reflect a number of sources. These include:   * 800m distance is based off guidance provided in Institute of Highways & Transport (2000) Guidelines for Providing for Journeys and the Chartered Institution of Highways & Transportation (2015) Foot and Planning for Walking. * 2,000m is derived from Planning Policy Guidance 13: Transport (PPG13) (DETR, 2001, para 75) provided basis of 2km distance. However, in 2012 PPG13 was withdrawn and replaced with the NPPF. WYG (2015) provided updated analysis - 85th percentile analysis of walking distances National Travel Survey data (2002 – 2012) confirms 2km for East Midlands. * 5,000m – PPG13 cited 5km as a trip distance where some substitution of car journey with public transport could be made. Repeated in Nottinghamshire County Council (2010) Guidance on the Preparation of Travel Plans.   Given the evidence base for the distances it is considered appropriate to retain the various distances set out in the SA Framework in relation to objectives on Health, Social Inclusion Deprivation, Travel & Accessibility and Employment. |
| Teversal, Stanton Hill & Skegby Neighbourhood Forum | Not identified by the response. | * Design new dwellings - New dwellings should meet the highest construction standards particularly as regards thermal efficiency. Similar standards should be applied to new commercial buildings. * Design & construction - Developers should be required to provide quantifiable evidence that carbon emitted during construction will be recovered over a period. * Existing Buildings – empty buildings should be brought back into use. This would help preserve greenfield sites and reduce carbon imprint. * Regeneration: * References to regeneration are found a number of times without any proposals that are likely to have a significant impact and we expect specific measures proposed together with a plan of action. * There is insufficient emphasis on the need for good transport links to enable residents of deprived areas to access the jobs and training that would help reduce the level of deprivation. * While there is a reference to the town centre master plans, there is little reference to the need to develop a similar strategy and seek funding for outlying settlements for example Stanton Hill. * Alternative Energy: * Wind turbines are controversial close to residential areas but could be installed near to industrial and commercial sites and along major roads * Policy to encourage the installation of vehicle charging points across the District in public car parks and commercial units. * Air quality: * Whilst air quality is referred to, emissions overall are not mentioned. * A strategy to facilitate and encourage the switch to electric vehicles together with specific proposals to create a comprehensive off-road network of cycle and footpaths throughout the area would reduce vehicle use and improve air quality. * Concerned with the expected deterioration in air quality resulting from the major construction works related to HS2. * Tree cover - Supports Ashfield DC’s target of planting 1,000 trees. The target should be a target to doubling tree cover during the Local Plan period. | The comments are noted.  The response identifies various aspects in relation to taking the Local Plan forward placing an emphasis on the impact of climate change. These aspects of the response do not propose any specific amendments to sections of the Report, the baseline or the SA Framework. Therefore, no changes to the Scoping Report have been arising from these aspects of the response. |
| Gladman | Not identified by the response. | * Emphasised that the Council should: * Ensure that the results of the SA process clearly justify its policy choices. * In undertaking a comparative and equal assessment of each reasonable alternative, the Council’s decision making and scoring should be robust, justified and transparent. * SA should be a fundamental part of the plan preparation process and should help to inform the decisions made by the Council. * The Council must take account of all reasonable alternatives when assessing and selecting their preferred policy choices. * It is integral that each reasonable alternative is assessed to the same degree of detail as the authority’s preferred option. * Gladman highlight the importance that the issues surrounding housing delivery and need are resolved through the emerging Local Plan. * If the Council is unable to meet its housing needs in full, stressed it will be necessary to engage with neighbouring authorities across Greater Nottinghamshire to ensure housing and employment needs are addressed. | The comments are noted. The response identify the approach to sustainability appraisal that should be adopted in taken the Local Plan forward.  The response does not propose any specific amendments to sections of the Report, the baseline or the SA Framework. Therefore, no change to the Scoping Report has been made arising from the response. |
| Severn Trent Water Ltd |  | Severn Trent have no specific comments to make at this time on the Scoping Report, but set out general advice statement on sewerage strategy, surface water and sewer flooding, water quality, water supply, and water efficiency. | The response is noted. |
| Highways England | Strategic Road Network (SRN) | In relation to the SRN, Highways England noted that it is stated that development close to M1 J27 has the potential to encourage car use and increase congestion, particularly around Sherwood Business Park. We note that the impacts of growth on the highway network will be considered when deciding upon development allocations and policies will promote sustainable travel. At this stage, Highways England had no further comments. | Comments are noted. |
| Mr.J.Collins & Mr.B.Parker | Generally | The response refers through out to a specific site that has been submitted as part of the Strategic Housing and Employment Land Availability Assessment. | The Scoping Report sets out the baseline and SA Framework to addressing the sustainability of the Local Plan, policies and sites. In itself, it does not seek to consider aspects of individual sites. |
| Mr.J.Collins & Mr.B.Parker | Section 1  Page 13 | Acknowledgement that the plan needs to consider all reasonable alternatives    Supports that key issues and problems that the Local Plan should address in the interests of sustainable development” and to the recognition of “a duty to reduce (and where possible eliminate) any negative impacts.” | Support acknowledged.  Support acknowledged. |
| Mr.J.Collins & Mr.B.Parker | Section 2  Page 14  Page 19  Page 23 | Emphasises the importance of considering reasonable alternatives.  Support to a commitment to ‘Sustainable Development’. Draw particular attention to an obligation on the Council to “make effective use of land”.  Response supports Green Belt policy. Stress that the Local Plan should examine Green Belt Boundaries and where anomalies exist, address them. It sets out that the Council should make a clear commitment to do this in the Scoping Report. | Support acknowledged.  Comment acknowledged.  The Scoping Report includes the consideration of the Green Belt under the landscape objective. The Council will consider the requirements for any amendments to Green Belt boundaries or potentially the remove of proposed sites from the Green Belt as part of the Local Plan and its evidence base. |
| Mr.J.Collins & Mr.B.Parker | Section 3  Page 26, para 2.21  Page 27, Table 5  Page 28/29, Table 5 & Page 38/39 :  Page 33, Table 5  Page 35.  Page 37/38/39  Page 45/46. | Particular support is given to the stated commitment: “It is considered that the Green Belt should be taken into account particularly as it is a significant factor in considering the reasonable alternatives and arriving at an appropriate strategy.”  Key Messages “sufficient housing of a type and tenure to meet specific needs”, should include, in accordance with NPPF guidance, to provide a choice of sites both in location and size.  The Council, in its Scoping Report and the Local Plan process, should prioritise development on brownfield sites before considering the release of green field sites.  Key messages Support for emphasis on high quality muti functional green infrastructure and assessable cycle networks.  Particular support for the Council’s stated commitment to “Ensure that new development has good access to facilities (but would prefer it to say ‘community facilities and services’) and alternative means of travel” (but would request the addition of “giving access to a choice of destinations for employment, shopping, health care and recreation).  Support for the stated implications and resulting Issues arising from the need to “make effective use of land” and contamination issues. Amendment proposes to ‘identify sites or land where effective use is not being made and where changes to current planning policy are required to enable and encourage effective use.’  We strongly support the stated commitment to “Conserve and enhance the natural environment and protect the Green Belt”. However, this should not be applied to small sections of currently designated Green Belt such as the former Beacon Farm site, which no longer fulfil the purposes for which Green Belt was designated. Suggested a number of amendments to key messages:   * “Wherever possible and appropriate, these spaces should be made accessible to encourage an interaction with and respect for the natural environment”. * “Open up access to, enhance and utilize urban greenspace including that associated with potential development sites”. * “Regeneration is required”. | Support acknowledged.  Table 5 has been amended to include reference to a choice and mix of sites.  The Scoping Report considers previously developed land in Objective 8, Natural Resources. The emphasis is giving priority to developing brownfield sites subject to the requirements of other policy aspects and the sustainability appraisal.  Support acknowledge.  Comments noted but it is not consider that the issues from the evidence base need to be further elaborated.  Comments noted but it is not consider that the issues from the evidence base need to be further elaborated.  Comments noted but it is not consider that the issues from the evidence base need to be further elaborated. |
| Mr.J.Collins & Mr.B.Parker | Consultation Question 3 | The Council should commit to identifying ‘problem sites’. These are sites where significant environmental problems exist which could appropriately be addressed and rectified by targeted Local Plan policies and proposals. | Comments noted. |
| Mr.J.Collins & Mr.B.Parker | Section 4 | Para 4.2 Support the approach but requests the addition of environmental problems across the District to assist in developing alternatives.  Various general comments are made regarding this section. | The paragraph reflects a broad approach which includes the environment, community and economy. No changes are proposed.  It is considered that the baseline has been covered in detail in the in the Scoping Report and the SA Framework reflects the various aspects raised in terms of the policy and programmes and sustainability issues identified. |
| Mr.J.Collins & Mr.B.Parker | Consultation Question 5 | Proposed that more prominence is given to the role of the Local Plan in improving the physical environment, which is further elaborated in the response. | Section 4 set out the baseline for Ashfield. Various aspects are identified including brownfield land. The matters raised are considered to be reflected in the objectives of the SA Scoping Report. |
| Mr.J.Collins & Mr.B.Parker | Consultation Question 5, 6 & 7 | The economic, social and environmental issues identified are identified as relevant but the response raised the important of reviewing Green Belt boundaries, the identification and resolution of problem sites and a commitment by the Council to a ‘Brownfield First’ approach. | The SA Scoping Report reflects that the Green Belt should be taken into account as part of the sustainability appraisal. The SA Framework set out the basis of an assessment of the sustainability aspects of the Plan, including sites. The Local Plan will reflect, if necessary, the requirement to review Green Belt boundaries and consider the approach to problem sites. The SA will inform the Council’s decision making on these aspects. However, any decision on these aspects has to be seen in the context of the provisions of the National Planning Policy Framework, Planning Practice Guidance, the evidence base, and policies and site allocations in the Local Plan. |
| Mr.J.Collins & Mr.B.Parker | Consultation Question 8 | The response provides qualified support subject to the points already raised. | The Council response to the matters raised is set out above. |
| Mr.J.Collins & Mr.B.Parker | Consultation Question 9 | The response stresses that it has raised important issues with regard to ‘problem sites’, brownfield sites and the Green Belt which we trust will receive careful consideration in a report to the appropriate committee and that in the spirit of meaningful consultation, this will subsequently be made public together with the minutes arising. | The Council response to the matters raised is set out above. |
| Selston Parish Council | Consultation Question 2 | Should there be a section specifically highlighting the new information and approaches in this Scoping Report, to illustrate how this will affect the differences in the development of the new Local Plan?  The need for a more specific outline of an approach to Green Belt, addressing the five purposes of Green Belt.  Raises that Green Belt was considered against a detailed Analysis of Green Belt sites.  Proposes that SA should set out the Full five purposes of the Green Belt  Question over Best Agricultural Land and its relationship with Green Belt. | The Scoping Report reflects the review of current plan and programmes, identification of key issues and a revised sustainability Framework. The SA Framework has been updated to reflect this evidence but there is a significant cross over with the 2015 Scoping Report. Amendments to the 2019 include taking into account Green Belt and an additional Table 18: Consideration of Significance for Strategic Options and Policies to clarify this aspect of the SA approach.  The Strategic Green Belt Review (SGBR) and its supporting appendices form part of the evidence base for the emerging Local Plan.  Para 2.19 of the Scoping Report has been amended to set out in full the five purposes served by the Green belt set out in the NPPF paragraph 134.  Best Agriculture is subject to grades according to the aspects set out in Table 14 on page 107 of the Sa Report, which relates to the quality of soils for growing crops. It is independent of the five purposes of the Green Belt. |
| Selston Parish Council | Consultation Question 5 | The main economic, social and environmental issues identified are relevant, but we would welcome further contextualisation for the Rurals/Selston Parish, which is different by nature from the rest of (largely urban) Ashfield. Concern regarding over development and the lack of supporting facilities and services.  We would welcome it if the phrase on page 36 could be amended to “… particularly around Sherwood Business Park and impacting also on roads in Selston Parish” and if the same amendment could be made in all concluding paragraphs referring to development around Junction 27. | Additional text has been provide in Section 4 to sets out a summary of the characteristics of the villages of Selston, Jacksdale and Underwood with a reference to the information set out in the Neighbourhood Plan.  The Issues for Ashfield has been amended to include additional text “Development close to the M1 motorway at Junction 27 has the potential to encourage car use and increase congestion, particularly around Sherwood Business Park and the roads to the west and east of Junction 27. “ This reflects the potential to reflect additional traffic on both sides of the Junction. |
| Ashfield District Council | Table 5 Key Message Sustainable Appraisal | The wording the draft report reflect the NPPF 2012. | Sustainable Development has been amended to update the wording to reflect the NPPD 2019 with its emphasis on objectives and the definition of sustainable appraisal. |
| Ashfield District Council | Paragraph 2.11 | NPPF refers to objectives not dimensions. | Amended to update the wording to reflect the NPPD 2019. |

### Responses to Preferred Options

The following table summarises the main issues raised during the consultation on the 2021 Regulation Draft Local Plan SA Report, sets out the Council’s response and, where appropriate, identifies how those issues have been addressed.

| **Respondents Name/Organisation Name** | **Section of SA Report** | **Comment/ Summary of proposed**  **amendment** | **Council response** |
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| Coxmoor Golf Club |  | SUSTAINABILITY APPRISAL • The Strategic Spatial Options study is flawed and the conclusions do not follow from the evidence provided in the report. It is also subject to a high level of uncertainty where there is ‘insufficient evidence for expert judgement to conclude an effect.’ • There is insufficient evidence in the Strategic Spatial Option assessments to select Option 10 above others Options and in particular Option 7. Conclusions about option 10 ‘Two New Settlement’s’ are flawed and on examination we would conclude that option 7 is a better option particularly given the level of subsidy that would be required for option 10 to be viable. Identifies: - The majority of the 8 options assessed have virtually identical numbers of neutral and negative impact scores and only differ in the number of positive impact scores. - There are a high number of assessments made where it has been declared that uncertainty exists and there is ‘insufficient evidence for expert judgement to conclude an effect’. It is noted that in Option 10 New Settlements that includes area SA085, that this is the case in 47% of the assessments. - The level of uncertainty of assessment is high with one option marked as having 71% of such assessments and five of the eight options considered having over 35% uncertainty ratings included. - Consider that options 7 and 10, for the reasons set out are identical in effect. Therefore, concluded that Strategic Spatial Option Appraisal does not provide an adequate basis for the decision to choose option 10 over option 7. We would further contend that given the assessed non-viability of the SA085 site then option 10 is seriously compromised and option 7 should be a better choice. | As is set out in national planning practice guidance, the role of SA is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. In doing so it will help ensure that decisions are made that contribute to achieving sustainable development.  The SA framework is the method by which the SA has considered the likely effects of the strategic options with the application of professional judgement as to the effects. The comments on the assessment are noted. The assessment of the strategic spatial options has been reviewed.  As noted in the main report the Council has selected an alternative option, which was appraised at preferred options, to that identified in the Preferred Options report (this is Option 3). It is stressed that the SA is informative of the approach to the Plan but is not determinative with the Council determining. The Council has taken the SA findings into account in making a decision on what are the reasonable alternatives and in determining the appropriate strategy to take forward in the Local Plan. |
| Nottinghamshire County Council |  | The County Council particularly welcomes the inclusion of the decision-making criteria ‘Will it impact on a mineral safeguarded area?’ under Soil/Fauna/Flora/Material Assets in Table 17 part 8) of the SA. | Comments noted. |
| Planning and Design Group (UK) Ltd |  | The response objects to the taking forward of the option of two new settlements which it sets out ‘does not score the highest in the SA appraisal and yet is the option taken forward’. Considers that there is a lack of clarity in why the new settlement at Whyburn Farm is taken forward and no consideration is given to reducing the size of this settlement, whilst allowing for additional release of more readily delivered and sustainable sites located adjacent to the built-up areas.  Objects to the lower housing growth option of 450- 475 dwellings per annum, being taken forward rather that the alternative option which allows for a 20% uplift of 540-570 dwellings per annum. Sets out various aspects in the response including the historical low deliver of housing in Ashfield and failing to meet the NPPF objective of significant boosting the supply of homes.  Considers that the site off Common Lane, Hucknall should have been included in the housing land allocations the Green Belt Review and the SA, it is not clear from the evidence base why the site has not been allocated including the SA. Therefore, Policy HO1 listing the housing allocations has not been fully justified and although reasonable alternatives have been considered the findings of the assessment do not align with the resultant strategy. | The Council considered the alternative options set out in the SA and identified that the strategic housing growth option and the spatial strategy set out in the Draft Local Plan (Regulation 18) was an appropriate strategy to take forward to consultation at preferred option stage. Following further consideration of consultation responses and the evidence base the Council has chosen to take forward an alternative strategy appraised in the 2021 SA Report (Option 3 – dispersed development). This is reflected in Section 5.5 of the SA Report.  The housing requirement is based on the up to LHN of 446 dpa and considered in Section 5.3 of the SA Report.  The 'Reasons for the selection/rejection of site alternatives' contained in Appendix H reflect the Council's reasoning for the choices made in relation to identifying draft allocations. |
| DLP Planning Limited, Strategic Planning Research Unit |  | The Sustainability Appraisal of Site Alternatives (Appendix H) states that the Ashland Road West site has not been selected for allocation because “The site is currently subject to a planning appeal. Site has been subject to previous planning applications which have been refused by the Council on various grounds. (See v/2014/0658 & v/2020/0184). The site is currently subject to a planning appeal”.  The fact that the site is currently subject to a planning appeal is not a valid reason for not carrying the site forward as a proposed allocation, particularly as the site scored highly against the sustainability appraisal objectives and only received one ‘significant negative’ assessment score against Objective 8 (Natural Resources).  The conclusions in the Sustainability Appraisal should therefore be revised to reflect the outcome of the sustainability appraisal assessment rather than the planning status of the site. | Comments noted. The 'Reasons for the selection/rejection of site alternatives' contained in Appendix H reflect the Council's reasoning for the choices made in relation to identifying draft allocations. They do not present conclusions of the SA as the response infers. It is noted that the site in question has been granted planning permission on appeal. |
| Gedling Borough Council |  | Sustainability Appraisal 38. It is not clear from the document how the Council has arrived at its preferred option for growth. Table 5.4 sets out the summary of strategic spatial options, which is followed by a written summary of each option. The document then sets out the reasons for selection of the preferred option followed by reasons for rejecting the other identified options. This approach makes it difficult to make comparisons between the various options previously appraised in the SA and fails to establish a clear storyline of how the site selection process for allocations has led to the preferred option.  39. Reading is made difficult by the fact that Appendix H Appraisal of Site Alternatives does not provide explanation on why sites are given specific scores. | Comment noted. The 2021 SA Report set out the appraisal of housing/employment quantum options and reasons for the choices made (sections 5.3- 5.4), then the preferred overarching spatial strategy (and alternatives) and reasons for selection/rejection (section 5.5) and then the appraisal of the draft allocations chosen to meet the preferred spatial strategy (with reasons for selection/rejection set out in Appendix H) (section 5.6). It is considered that this is clear approach that considers the overarching strategic approach and the detailed site allocations (and reasons for choices made). The Council has further considered the reasons for selection/rejection as plan preparation has proceeded. This is reflected in updated sections of the SA Report.  The appraisal In Appendix H contains the overall scored assessed for each alternative site against each SA objective. The thresholds for identification of effects for each objective is set out in Appendix M (as stated in Appendix H). The appendix clearly states that a separate Excel spreadsheet with the full assessment was available to view by contacting the Local Plans team. The spreadsheet included detailed considerations that has led to each score for the SA objective. |
| Environment Agency |  | Looking at Sustainable Appraisal Appendices E, F, G, I and J, they highlight the impact of the Local Plan proposals as well as the strategic and development management policies. We have paid particular interest in the outputs for strategic objective 10) Water Quality and 12) Climate Change and Flood Risk. We note that there are no major negative impacts associated with these and where any minor negative impacts are proposed, the mitigation measure will need to be put into the Local Plan as part of the strategic and development management policies. After reviewing the document it would appear that policies are included within the Local Plan and where they aren’t, they should be included.  The Sustainability Appraisal Scoping Report should also be considering Biodiversity Net Gain, this should include an objective around biodiversity and net gain that could be tested against all policies in the emerging draft plan. | The Policies within the Draft Local Plan are considered to cover the aspects of Water Quality, Climate change and flooding but, where appropriate changes have been made to reflect comments received on the consultation.  Comments regarding Biodiversity Net Gain are noted. The SA identifies that enhancing biodiversity and the natural environment is a key sustainable issue and this is reflect in SA Objective 6 ‘Biodiversity & Green Infrastructure: To conserve, enhance and increase biodiversity levels and Green & Blue Infrastructure’ and the associated questions which include reference to biodiversity enhancement (of particular relevance are ‘Will it protect, maintain and enhance or provide mitigation for sites designated for their local nature conservation interest? Does it provide opportunities for provision & enhancement of green space / green infrastructure? And Will it conserve and enhance biodiversity taking into account the impacts of climate change?) |
| Private |  | For the reasons set out in the SA and Appendix E, the need to significant boost homes and the previous low levels of housing delivery the respondent considers the Council should be taken forward, in terms of housing delivery, the Flexible Buffer of 540-570 dwellings were annum. | The Council considers that the strategic housing growth option identified in the Draft Local Plan (Regulation 18) and taken forward to Regulation 19 (with a minor change to reflect the latest LHN figure) was an appropriate strategy to take forward and meets the NPPF requirement of being an appropriate strategy. |
| Private | H1Ka - Beacon Farm, Derby Road, Kirkby-In-Ashfield | Para 4.2.3 & Table 4.2 shows the extent to which the SA objectives encompass the range of issues identified in the SEA Regulations. This table seems difficult to interpret, especially for the layman wanting to engage in the consultation process. In fairness, the main focus of the public consultation exercise, the Draft Plan itself, has been well written and the issues and decision making process and the Local Plan Policies and Proposals are clearly set out and explained. For us at least, this element of the Consultant's Report falls short of that standard in being difficult to interpret. | Comment noted. However, it is difficult to determine how the Table could be amended without extensive explanations of the SEA Topics. |
| Private | H1Ka - Beacon Farm, Derby Road, Kirkby-In-Ashfield | Page 27 - Still in relation to "Resources", we are pleased to read that the Plan's objectives should "maintain and prevent degradation of soils and protect best and most versatile agricultural land". We strongly support this and trust that every effort will be made to comply unless there are overriding community benefits to be gained from some utilization of better quality land. | Support noted. |
| Private | H1Ka - Beacon Farm, Derby Road, Kirkby-In-Ashfield | Page 23 - In relation to "Resources", we are pleased to read that the Plan's objectives should "promote development such that brownfield land is utilized as a priority". We strongly support this stance and trust that it will be maintained throughout the Plan process. | Support noted. |
| Private | H1Ka - Beacon Farm, Derby Road, Kirkby-In-Ashfield | Pages 18 -22, Table 2.1 - General support for the 'Key Messages'. In particular we note and support that "making effective use of land" requires objectives to ensure the best use of land is made "prioritising the re-use of land and buildings" (brownfield land). Whilst commending this approach, we trust that the Council will continue to give priority to brownfield sites such as Site H1Ka - the former Beacon Farm site. | Support noted. |
| Private | H1Ka - Beacon Farm, Derby Road, Kirkby-In-Ashfield | Page 12 - We note and appreciate the explanation that the Sustainability Appraisal (SA) will help ensure that the Local Plan "is justified" - i.e. the extent to which it is an appropriate strategy when considered against the reasonable alternatives and available proportionate evidence. Thus far we would agree that this is the case. | Support noted. |
| Private | H1Ka - Beacon Farm, Derby Road, Kirkby-In-Ashfield | Page 11 - We note and appreciate the clarity with which the intended progress towards adoption of the final Plan is explained. Whilst appreciating the difficulties, we trust every effort will be made to adhere to the programme outlined with a view to adoption in the summer of 2023. | Following the Prime Ministers Speech of 6th October 2021, which included that "you can also see how much room there is to build the homes that young families need in this country not on green fields not just jammed in the south east but beautiful homes on brownfield sites in places where homes make sense'" The Leader of the Council paused the Plan preparation seeking clarification on this aspect. Therefore, this resulted in a delay to the timetable anticipated for the Plan. |
| Private | Appendix 10/Policy EV9 | Strong support for this initiative. With so few elements in the Plan area, it is all the more important to conserve and protect them. | Support for Policy EV9 welcomed. |
| Pegasus Planning | Appendix H | The representations are made in relation to Land at Leen Valley Golf Course, Wigwam Lane, Hucknall. It sets out a number of reasons why it is considered that the Plan does not meet the test of soundness set out in national Planning Policy Framework paragraph 35. This includes that “in contrast with other, much larger, Green Belt releases proposed within the Draft Local Plan exceptional circumstances can be identified for this site. These include ensuring the longevity of Leen Valley Golf Course, improvements to biodiversity, flood risk and the provision of affordable housing. Given these clear benefits it is unjustified why the site has not been allocated nor even considered as a reasonable alternative site within the Sustainability Appraisal.” | The SHELAA (HK045) in relation to various aspects including highways issues and flood risks identified that while the site is available, it is not suitable. Therefore, the Council identified that it was not be considered as part of the SA assessment of reasonable alternative site options. |
| Private | Baseline Analysis | Table 3.1 We broadly support the key sustainability issues identified. On a minor point, is the table numbered correctly? | Comment noted. No issues with the numbering of the tables has been identified. |
| Private | Building a Strong Economy | Paragraphs 5.7.21 - 5.7.23 - The positive effects identified are encouraging. However, we feel the potential negative effects referred to in Para 5.7.23 lack substance and are little more than speculation. Accordingly, we feel little weight should be given to them. | Comments noted. No changes proposed. |
| Private | Conclusions and Next Steps | Para 6.1.1 - 6.1.3 - The Vision is assessed as performing well against the SA objectives with the proviso that it could perhaps give greater emphasis to landscape and the natural environment. However, the consultants state that any potential incompatibility can be overcome by specific Local Plan Policies focussed on issues relating to environmental policy. We concur with this view. Moreover, we believe that the Council's commitment to issuing development briefs to guide and control the planning application and development process will be an important factor in this regard and in realising the Vision. | Comments noted. The Council has amended the Vision and strengthened references to the landscape and natural environment. |
| Private | Cumulative, Synergistic and Secondary Effects | 5.8.1, 5.8.5 and 5.8.7 - 5.8.9 in particular and Table 5.14- In line with SEA regulations, the cumulative nature of effects arising from Draft Plan policies and proposals assessed and summarized in Table 5.14 serve to re-affirm our support for the Plan. The possible cumulative negative effects identified in the table and referred to in Para 5.8.5 are the inevitable consequence of development and in our view are vastly outweighed by the potential overall benefits. Much will depend on delivering a good quality planning application service, a process which will be greatly assisted by the Council's commitment to producing clear developer guidance in a series of development briefs. | Support noted. |
| Private | Draft Local Plan Policies | Paras 6.1.15 and 6.1.16 identify significant positive effects from the implementation of Local Plan Policies. However, Para 6.1.17 identifies potential negative effects. We note the consultants conclude that proposed management should largely mitigate potential negative effects and we concur with this view. | Comment noted. |
| Private | Draft Local Plan Policies | 5.7.2 - 5.7.11 - Sustainable development - Spatial Strategy & Strategic Objectives, paras 5.7.2 - 5.7.11 serve to re-affirm our support for the Draft Local Plan policies. | Comment noted. |
| Private | Employment Growth Options | 5.4.16 - 5.4.20 - The preferred Employment Growth Options adopted in the Draft Plan and assessed here are supported. | Comment noted. |
| Private | Employment Land Allocations | Table 5.13 - The assessment in Table 5.13 is considered to confirm the overall acceptability of the proposed Employment Site Allocations and we support them. | Comment noted. |
| Private | H1 | This objection refers to all development on and nearby the Rolls Royce site.  School provision is completely inadequate in this area. The Flying High school built on the estate is already oversubscribed, with the furthest admission accepted last year just 0.22 miles away. Parents on the Rolls Royce estate are having to send their children to schools many miles away. This inevitably requires driving, adding to the congestion on the roads and massive parking issues around schools. It makes it very difficult for families to live on the estate without a car.   I understand that the school was originally supposed to be much larger. I suggest that further development is not permitted until there is a plan in place to extend the existing school to a size that is sufficient to handle all primary aged children from the estate as a minimum. Alternatively, a second primary school could be built as part of further development on the estate. The estate is particularly popular with young families, and this should be taken into account when calculating the primary school places required for any future dwellings. | The Rolls Royce site has made provision for a primary school on site and has made significant contributions towards secondary school provision. Clearly, parental choice has a role in determining where school places are available but the school meets the County Council's requirements as the Education Authority to meet the need arising from the development. |
| Private | H1 | 5.6.19 - In addition to concerns raised in relation to Table 5.9, sites H1Sd (SA016/SA044) and H1St (SA084) are of concern for the reasons expressed in the paragraph. Again we would ask the Council to give particular consideration as to how these negative impacts can be mitigated. If this proves impossible/unsatisfactory, then we would ask that one or more alternative replacement sites be allocated which have less negative impacts. | Comments noted. The Council will consider how negative aspects from site allocations could be mitigated. |
| Private | H1 | Table 5.9 - General support for the housing allocations in Sutton with the exception of Site SA057 (H1Sk) and Site SJU031 (H1Vg) and HK024 (H1Hf) where the currently assessed/anticipated negative impacts are a concern. We would ask the Council to give particular consideration as to how these negative impacts can be mitigated. If this proves impossible/unsatisfactory, then we would ask that an alternative replacement site or sites be allocated which have less negative impacts. | Comments noted. The Council will consider how negative aspects from site allocations can be mitigated. |
| Private | H1Ka | 5.6.24 - Here the consultants indicate that, "Some sites were assessed as having significant negative effects on landscape due to the sites being located within the current Green Belt." This negative assessment in relation to Site H1Ka (the former Beacon Farm site) is a travesty and most unjust. As explained in relation to Table 5.8, the site no longer fulfils the purposes of Green Belt. It is not predominantly green or open. The majority of it is brownfield, either surfaced, previously developed land which hasn't and never will be naturally reclaimed or disused or derelict buildings, some of which are very large indeed and collectively represent an eyesore. The double -ve (negative) assessment is unjustified, indeed unjustifiable. This element of the consultant's assessment of Site H1Ka gives rise to concern that the consultants have never actually visited the sites - that their assessment and report is merely a desktop exercise. If this is the case, then in our view, this is inadequate and, as in the case of Site H1Ka, may well have produced some inappropriate, misleading and unjustified assessments. | The SA site assessment is based on the scoping thresholds identified in Appendix M. All sites located in the Green Belt are scored as having significant negative effect on SA Objective 7 (landscape). The SA itself does not set out an assessment of Green Belt purposes. |
| Private | H1Ka | The response sets out general support for the housing allocations in the Kirkby area and in particular, strong support for Site H1Ka.  Commenting on the various elements assessed in relation to each site, we would take issue with the assessments given to elements 2, 6, 7 and 14 in relation to Site KA002/H1Ka, the former Beacon Farm, Derby Road, Kirkby-in-Ashfield. | Comments noted. The assessment has been carried out in line with site criteria thresholds set out in SA Report Appendix M and reflects pre-mitigation scoring. With regards to SA Objective 2 a mixed (positive/negative) score relates to the proximity to the A611 and railway line as potentially detrimental neighbouring uses with regards to noise/air pollution. The score for SA Objective 6 reflects the proximity to the Sherwood ppSPA and SA Objective 7 reflects the Green Belt designation. The site is located in the Green Belt and has been designated since the Green Belt Local Plan was adopted in 1989, therefore it falls to be considered accordingly. It is not considered that amendments are required based on the SA framework, guide questions and site assessment criteria. |
| DLP Planning Limited | H1Saa | The representation sets out that:  - The development of Site H1Saa is assessed as having a significant positive impact upon sustainability appraisal objectives relating to housing and social inclusion / deprivation, and a positive impact upon objectives relating to health, travel and accessibility, employment, economy and town centres. - The site is assessed as having a negative impact upon objectives relating to biodiversity and green infrastructure, air and noise pollution, and climate change and flood risk. - The site is assessed as having a significant negative impact upon objectives relating to landscape and natural resources. They object to the assessment of the site as having a ‘significant negative’ landscape impact as this is not an area of high landscape character nor Green Belt. We believe this assessment should be changed to ‘minor adverse’ impact. | The SA Appendix M Site Scoring Framework in relation to Strategic Objective 7: Landscape sets out that if development will likely have a significant adverse effect on landscape/townscape character, and/or designated landscape and/or site is located in the Green Belt it will be assessed as a significant negative effect. The scale of the potential development in this location extending north of Sutton from existing built development is reflected in why the site has been identified as having a likely significant negative effect on landscape. The SA site assessment is based on pre-mitigation scoring. |
| DLP Planning Limited | H1Su | The representations are made in relation to the proposed Allocation Sites H1Saa and H1Su. In relation to the SA and allocation H1Sui there is an objection to the assessment of the site as having a ‘significant negative’ impact on travel and accessibility as the Sustainability Appraisal Site Scoring Framework (Appendix M) states that the ‘significant negative’ rating will be applied to sites that “are not within 800m or 10 minutes walking of a bus stop or any other services comprising a primary school, GP surgery and Post Office”. The site is located within 800m of the existing bus stop for service 417 located on Mansfield Road to the south. This service is also due to be enhanced as part of the development of Site H1Saa to the south. The assessment of Site H1Su against the ‘Travel and Access’ sustainability objective should be changed to a positive impact as the site is within 800m or a 10 minute walk of a bus stop. | The Sites H1Saa and H1Su are assessed in Table 5.9 Travel and accessibility as having a minor positive effect. |
| Aspbury Planning | H1Sb | This representation is submitted on land at Cauldwell Road, which forms proposed allocation ref: H1Sb. The Ashfield Local Plan Sustainability Appraisal, Table 5.9 provides a summary of the assessment of site ref: H1Sb. The assessment notes the site as being incompatible for the landscape, natural resources, air and noise pollution and climate change and flood risk objectives. A planning application has recently been submitted to the LPA for the proposed development comprising the provision of highways and drainage infrastructure (Full Planning Application) in combination with the residential development of the site of up to 235 dwellings and landscaping and infrastructure (Outline Planning Application) on site reference H1Sb. The application is supported by an Environmental Statement and a suite of technical assessments including a Landscape and Visual Impact Assessment, Air Quality Assessment, Transport Assessment, Noise and Vibration Assessment, a Flood Risk Assessment and Drainage Strategy, Ecology Assessment, Geo-Environmental Assessment, Sustainability Assessment which provide the technical evidence to demonstrate that the site is compatible with these Sustainability Appraisal objectives. This evidence further supports the proposed allocation of site H1Sb for housing. | Comment noted. |
| DLP Planning Ltd |  | The representations are submitted on land West of Beck Lane, Skegby. Objects to Policies S3, S6, S7 and supports aspects of Policy S9  Sets out that it is unclear why the Council has taken forward the two settlements option over the other available strategic approaches. The issues identified in the SA regarding the deliverability and viability of the two new settlements are not reconciled either in the SA or the background evidence documents. The Council has not sufficiently assessed the alternative spatial option of reduced large Green Belt releases and focus development on sustainably located non Green Belt sites. Disagrees with the scoring of the spatial strategic options in relation to Option 3 Dispersed Development and Option 10 Two New Settlements with one in Hucknall Green Belt and one at Cauldwell Road. | As is set out by national planning practice guidance, sustainability appraisal is a tool used to assess the likely effects of the plan when judged against reasonable alternatives. Clearly, different parties can have different views and focus on the likely impacts particularly at a strategic level. The assessment is informed by professional judgement with the detailed findings set out in Appendix G and summarised in the SA Report text. The assessment includes identification of a range of uncertainties (including in relation to the location of dispersed development). The Council has subsequently decided to take forward dispersed development (Option 3). |
| Private | Housing | 5.7.19 - 5.7.20 - Statements summarizing assessments made regarding housing policies serve to re-affirm our support for the housing content in the Draft Plan. | Support noted. |
| Private | Housing Growth Options | 5.3.18 and 5.3.19 - The reasons for the selection of the preferred Housing Growth Options and rejection of alternatives (set out in paras 5.3.18 and 5.3.19) are sound and broadly supported. The reasoning shows a concern both for the environment and for residents' wellbeing. On both counts, it reinforces the need to retain, re-affirm and give priority to brownfield sites like H1Ka (the former Beacon Farm site). | Support noted. |
| Private | Housing Growth Options | 5.3.13 - It is significant to note that the higher growth option also performs well, indeed very similarly to the stance adopted in the Draft Plan. Whilst supporting the Draft Plan as presented, this would indicate that there is no room for complacency in seeking to ensure that the new housing sites identified are delivered in practice. Should problems arise with delivery, suitable alternatives will be required to avoid shortfalls and potential hardship for the community. | Support noted. |
| Private | Housing Growth Options | 5.3 and 5.3.1 - Here the preferred Housing Growth Options (Policy S9) are appraised against SA Objectives together with the reasonable alternatives. We are pleased to see that the assessment appears to confirm the reasonableness of the approach adopted in the Draft Plan., which we support.  Some negative effects on the landscape in particular are, we believe, inevitable in order to accommodate necessary new development to serve the needs of the community in the most appropriate sustainable locations. We believe the proposed development briefs should help to minimise any negative impacts and help to create attractive living environments. In a small number of cases, like Site H1Ka (the former Beacon Farm site), development will have a positive effect on landscape by replacing extensive, roughly surfaced areas and large, unattractive, mainly disused and largely derelict buildings with an attractive new living environment which retains, enhances and makes positive use of the locally significant, attractive landscape elements on the site - notably the established native woodland planting. | Support noted. |
| Private | Introduction | 1.12 and 1.21 in particular - We support the approach taken to Plan preparation as described and in particular support the intention to help promote sustainable development. | Support noted. |
| Private | Land Allocations | Pages 92-94 & Table 5.7 - General support for the proposed housing allocations in the Hucknall area with the exception of Site Ref HK024 (H1Hf) where the anticipated negative impacts are a concern. We would ask the Council to give particular consideration as to how these negative impacts can be mitigated. If this proves unsatisfactory, then we would ask that an alternative replacement site be allocated which has less negative impact. | Comment Noted - The site H1Hf is Rolls Royce, Hucknall where planning permission has been granted for a substantial mixed use development where consideration has been given to biodiversity and infrastructure aspects. |
| Private | Land Allocations - Housing | Table 5.11 - The assessment in Table 5.11 confirms the suitability of the proposed site allocation, which is supported. | Support noted. |
| Private | Land Allocations - Housing | 5.6.25 - According to the text, due to their location on brownfield land, 4 sites have been assessed as having a positive effect on land use, with two a significant effect because the sites are over 1 hectare. Again, according to the text, one site has been identified as having a mix of positive and negative effects due to the mix of greenfield and brownfield land. We are perplexed because Table 5.8 has no Land Use element in the list of assessments and would ask for clarification. Given that the site is in excess of 2 hectares in extent, we believe that Site H1Ka, the former Beacon Farm site, should have been assessed as having a significant positive effect on land use, but can find no evidence of this in the report. Please clarify. | Brownfield sites are considered under the SA 8 Natural Resources objective with a key question being ‘Will it use land that has been previously developed (brownfield land)?’ Six sites are identified in Tables 5.7, 5.8, 5.9 and 5.10 where they are purely brownfield sites and have been identified as having a positive effect. Beacon Farm is identified as a mixed site part of which is brownfield and part greenfield. As such a judgement has to be exercised regarding the SA appraisal of the site in relation to Natural Resources. Mixed greenfield/brownfield sites are assessed as having a minor negative effect reflecting the loss of some greenfield land (Note that the site identified as having a mix of positive/negative score has been revised to a minor negative score). |
| Private | Local Plan Vision and Strategic Objectives | 5.2 and Table 5.1 - We have made clear in our comments on the Draft Plan itself our support for the Council's 'Vision'. Whilst perhaps idealistic, in our view it is also worthy and apt. However, perhaps the Consultants have a point when stating that the 'Vision' could incorporate greater emphasis on landscape and the natural environment (Page 49-50, Para 5.2.4). | Support and comments noted. |
| Private | Methodology | Pages 43-48 - Fortunately, and importantly, the appraisal of the Plan's key components in the Methodology section is for the most part clearly set out. | Comment noted |
| Private | Mitigation and Enhancement | Para 5.9.1 - Appendices E, F, G, I and J contain a range of potential mitigation measures which we trust will be considered by the Council when refining the Plan. Please confirm this will be the case. | Comments noted. The Council will consider how negative aspects from site allocations could be mitigated. |
| Private | Monitoring | Paras 6.2.1 - 6.2.5 - The advice and guidance given here with regard to future monitoring seems commendable and we would ask the Council to have regard to it, in particular with regard to sustainability effects when monitoring outcomes of the Plan. | Comment noted. |
| Private | Other Plans & Programmes | Paras 5.8.7 - 5.8.9 - It's pleasing to note that no significant cumulative negative effects were identified. This re-affirms our support for the Draft Plan as a whole. | Support noted. |
| Private | S6 | Referring to the Sustainability Appraisal Table 5.4 on page 67 it gave Whyburn Farm a Climate Change and Flood Risk of neutral the same as all the other spatial options, which is incorrect. The risk of flooding by building over Whyburn Farm area will be higher than the other spatial options. Hucknall has an historic problem of flooding. The size of the proposed settlement coupled with the increased rainfall we expect due to climate change will only serve to exacerbate this. This will significantly increase the surface run off and the amount of water expected to travel down the Baker Lane Brook, which will increase the risk to flood to areas lower down, as we have already seen flooding in these areas many times in the past. Further, mitigating risks of flooding for a brook travelling through the centre of a town cannot be an easy task due to the restrictions on a brook passing through a heavily urban area. It would make far more sense to share the new housing developments over multiple locations rather than one big site in areas with less flood risk than Hucknall centre, such as multiple separate sites on the The Mowlands (potential 1,800 houses), in Kirkby in Ashfield, and Sutton Parkway (potential 2,265 houses) . | It is considered that the SA assessment on climate change for Whyburn Farm is correct. Based on the Environmental Agency’s Flood Risk Maps the site is in Flood Zone 1, an area of land where there is the least risk of flooding. In relation to surface water, the development would be required to achieve greenfield run off rates through the use of sustainable drainage systems (SuDS). As such flood risk will not be increased from the proposed development and it is not considered the development will result in additional water expected to go into the Baker Lane Brook. |
| Oxalis Planning | S6 | Table 5.6 within the SA, and the accompanying explanation in paragraphs 5.6.4 to 5.6.14 assesses a new settlement at Whyburn Farm (ref. HK028) against the 17 criteria as set out in the methodology. The Consortium consider that in order to provide a full assessment of the new settlement, the development should be considered as a whole with all the benefits and mitigation in place.  The Whyburn Farm Consortium have provided an appraisal of the site against the 17 criteria in reflection of the benefits and mitigation to be delivered as part of the new sustainable settlement at Whyburn Farm (see table at para 5.13 attached). This demonstrates the overall positive effects to be delivered by the new settlement. | Comments noted. The SA site assessment is undertaken with pre-mitigation scoring to enable equal treatment of all site reasonable alternatives within the assessment utilising the criteria thresholds for each SA objective set out in Appendix M. The respondent's scoring for H28 employs a post mitigation/post development scenario which does not comply with the SA methodology. |
| Historic England | SA | Welcomes the inclusion of a specific indicator for the historic environment (SA Objective 3) and considers this essential for the SA process and that the key sustainability issues listed in Table 3.1 include heritage at risk and non-designated heritage assets. Strongly recommend that further work is undertaken in the form of Heritage Impact Assessments for allocations, to enable a more robust assessment to be made for the SA assessment. Table 5.6 sets out the appraisal of individual housing allocations, and we note that for both new settlement proposals the effects on the historic environment have been determined as significantly negative. We also note that the proposed strategic employment allocation to the south east of M1 Junction 27 has been determined as having a significantly negative effect on the historic environment, with the northern area of this proposed allocation having a minor negative effect. We refer you to our comments on these sites contained in Appendix A to this letter and would reiterate that further heritage evidence is required to inform the plan process. With regard to the assessment of cumulative effects on the historic environment (Table 5.14) we consider that the scoring of ++/-/? requires further explanation, especially with regard to the significant positive effect determined, given the negative scorings determined in relation to the proposed strategic allocations. | Comments Noted. Further work has been undertaken through a heritage impact assessment which has informed the Local Plan and the SA.  Table 5.14 of the Preferred Options SA Report was informed by the cumulative appraisal scores for the policies contained in the local plan (Section 5.7 and Appendix I and Appendix J) including taking into account proposed policy provisions to enhance the historic environment or reduce negative effects. For Objective 3 this does include mixed significant positive/minor negative score with additional 'uncertainty' which reflects that the magnitude of effect is not certain. |
| Historic England | SA Approach | Pages 39-43 & Table 4.1 - General support - The decision making criteria listed in Table 4.1 appear both comprehensive and logical. | Support noted. |
| Historic England | Site Allocations | Para 6.1.11 - 6.1.14 - We are concerned to learn in Para 6.1.14 that significant areas of Grades 1 and 2 agricultural land are included within development proposals. We assume this is land in the Hucknall area and would urge caution in including Grade 1 land in particular. | Comment noted. There is no Grade 1 land in Ashfield but allocations will result in the loss of some Grade 2 and Grade 3a agricultural land. Any losses of Grade 2 or 3a land has to be balanced against the positive aspects of development. Reference to Grade 1 land will be removed from future reports. |
| Historic England | Spatial Strategy Options | 5.5.76 - 5.5.82 and Table 5.5 - We support the reasons for the selection of the preferred option and the rejection of the alternatives. We agree that the Spatial Strategy embodied in the Draft Plan is the most appropriate given the needs of the community, the opportunities presented by the sites selected and the extent to which adverse effects can be mitigated, the aim being to achieve the 'Vision' to the extent to which that is possible. Being realistic, there will always be some adverse effects when seeking to achieve the levels of development required, but we feel that by and large the Council has struck the right balance in this Draft Plan. | Support noted. The SA Report has been updated in light of the changes to the emerging Local Plan made by the Council. |
| Historic England | Spatial Strategy Options | 5.5.5 - 5.5.14 and Table 5.4 - The preferred Option 10 is strongly supported. | Support noted. The SA Report has been updated in light of the changes to the emerging Local Plan made by the Council. |
| Historic England | Spatial Strategy Options | 5.5.2 - The stance taken by the Council in dismissing the two spatial options described in Para 5.5.2 is supported. Both those options are in our view untenable. | Support noted. The SA Report has been updated in light of the changes to the emerging Local Plan made by the Council. |
| Historic England | Strategic Employment Land Allocation | Page 106-109 - In terms of location for purpose, the sites selected are good and supported in principle. However, we are particularly concerned about the potential negative impact of Site KA025 on the setting of Annesley Hall & Gardens and upon the Fishponds south of Damstead Farm. Great care will be needed in implementing this proposal with regard to site landscaping and the siting of built development. We would ask the Council to commit to the production of a development brief for both Strategic Employment sites, with priority being given to site KA025 so as to safeguard against unnecessary potential harm. | Comments noted. The Council has reviewed the sites identified in the Draft Local Plan taking into account the representations received and further evidence base gathering. Further policy wording has been developed in S6 relating to the historic environment. |
| Historic England | Vibrant Town and Local Centres | 5.7.24 - 5.7.26 - The positive assessment is noted and it is encouraging to see that no significant negative effects arising from the Draft Plan have been identified in this respect. | Support noted. |