

Local Plan Preferred  
Approach  
Draft Sustainability Appraisal  
2016

AA	Appropriate Assessment
AQMA	Air Quality Management Area
DMP	Development Management Policy
DPD	Development Plan Document
EAPP	The Environmental Assessment of Plan & Programmes Regulations 2004
ELF Study	Nottingham Core HMA and Nottingham Outer HMA: Employment Land Forecasting Study August 2015. Nathaniel Litchfield & Partners.
FEMA	Function Economic Market Area
HMA	Housing Market Area
lpa	Local Planning Authority
LLFA	Lead Local Flood Authority
MARR	Mansfield Ashfield Regeneration Route (Sherwood Way)
NPPF	National Planning Policy Framework
OAH	Objectively Assessed Housing Need
PPG	Planning Practice Guidance
ppSPA	Possible potential Special Protection Area
PPTS	Planning Policy for Traveller Sites
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SHLAA	Strategic Housing Land Availability Assessment
SELAA	Strategic Employment Land Availability Assessment
SFRA	Strategic Flood Risk Assessment
SHMA	Nottingham Outer 2014 Strategic Housing Market Assessment, October 2015. GL Hearn Limited,
SPD	Supplementary Planning Document.
SuDS	Sustainable Drainage System
SUE	Sustainable Urban Extension
The Rurals	The area cover by the District Council wards of Selston, Jacksdale and Underwood.

## 1.0 INTRODUCTION

***'The purpose of the planning system is to contribute to the achievement of sustainable development'. (NPPF, para.6).***

***The Council is under a duty to contribute to the achievement of sustainable development (Planning and Compulsory Purchase Act 2004, Section 39)***

- 1.1 Ashfield District Council is in the process of preparing a Local Plan which, when adopted, will guide future development of the District for the next 15 years and beyond. This Draft Sustainability Appraisal Report has been published to accompany the Preferred Approach of the Local Plan.
- 1.2 Sustainability Appraisal (SA) is an ongoing process and this draft report should be seen in conjunction with the Review of the Local Plan Sustainability Appraisal Scoping Report, June 2015<sup>1</sup>.
- 1.3 The purpose of the SA is to promote sustainable development through the consideration of the environmental, social and economic considerations of the Local Plan. It is a legal requirement under the Planning and Compulsory Purchase Act 2004. The SA incorporates the requirements of the Strategic Environmental Assessment (SEA) introduced to the United Kingdom through the European Union Directive 2001 / 42 / EC, and in England the Directive has been implemented via the Environmental Assessment of Plans and Programmes Regulations 2004 (referred to as the SEA Regulations). SEA is a systematic process for the evaluation of the likely environmental consequences of proposed policies, plans or programmes in order to ensure that environmental issues are fully integrated and assessed at the earliest appropriate stage of decision making.
- 1.4 This sustainability appraisal incorporates the requirements of the SEA Directive, by combining the more environmentally-focussed considerations of SEA with wider social and economic effects.
- 1.5 Under the Planning and Compulsory Purchase Act 2004 (Section 39) the Council is under a duty to contribute to the achievement of sustainable development. This reflects how best to shape the District of Ashfield to meet the requirements of housing and economic growth, to further social and environment objectives and to mitigating against climate change. Both the SEA and the sustainability appraisal are important in forming a judgment to be made under Section 39 (2).
- 1.6 The SA relates has informed policies and allocations for the Ashfield Local Plan Preferred Approach. The Local Plan will consider land use needs, identify sites for development or protection and list policies to guide planning decisions for the

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<sup>1</sup> The Sustainability Appraisal Scoping Report is available on Ashfield's website at:  
<http://www.ashfield-dc.gov.uk/residents/planning,-property-and-housing/forward-planning/ashfield-emerging-local-plan/sustainability-appraisal.aspx>

period to 2032 thus forming the authorities principle strategic planning and facilitating realisation of the Vision for Ashfield. However, the SA and SEA findings are not the only factors taken into account when determining a preferred approach to take forward in a plan. There will often be an equal number of positive or negative effects identified for each option, such that it is not possible to 'rank' them based on sustainability performance in order to select a preferred option. Other factors, the effect of the Green Belt, deliverability, conformity with national policy and consultation responses will also be taken into account by plan-makers in bringing forward the Local Plan.

- 1.7 The next stage is to consider all comments received to this Draft Sustainability Appraisal Report, following which The Local Plan Publication Stage will be brought forward with the full SA Report of the Local Plan.

## 2.0 METHODOLOGY

***“The local planning authority must:***

- a) carry out an appraisal of the sustainability of the proposals in each development plan document;***
- b) prepare a report on the findings of the appraisal.”***

***(Planning and Compulsory Purchase Act 2004, Section 19)***

***The SEA Directive requires:***

***A report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into the objectives and geographical scope of the plan or programme are identified described and evaluated.***

***... consideration of 'measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme'.***

2.1 The methodology for this appraisal was developed in accordance with the following guidance:

- *Planning Practice Guidance on Sustainability Appraisal November 2015.*
- *A Practical Guide to the Strategic Environmental Assessment (SEA) Directive (ODPM, 2005).*
- *Planning Advisory Service (PAS) Sustainability Appraisal guidance online.*

2.2 The sustainability appraisal is undertaken by the Forward Planning Team of Ashfield District Council. It enables the sustainability appraisal to be undertaken as an integral and iterative part of the Local Plan development.

### **Sustainability Appraisal Methodology**

2.3 The sustainability appraisal is carried out in a series of stages, which includes setting the context and objectives for the sustainability appraisal, developing and assessing the effects of policy options and carrying out consultation on a Sustainability Appraisal Report. The stages of preparation are shown below in Table One

<b>Stage A</b>	Setting the context and objectives, establishing the baseline and deciding on the scope.	1	Identify other relevant policies, plans and programmes, and sustainability objectives
		2	Collect baseline information
		3	Identify sustainability issues and problems
		4	Developing the SA framework
		5	Consult the consultation bodies on the scope of the SA report
<b>Stage B</b>	Developing and refining alternatives and assessing effects.	1	Test the Local Plan objectives against the SA framework
		2	Develop the Local Plan options including reasonable alternatives.
		3	Evaluate the likely effects of the Local Plan and alternatives.
		4	Considering ways of mitigating adverse effects and maximising beneficial effects.
		5	Propose measures to monitor the significant effects of implementing the DPDs.
<b>Stage C</b>	Prepare the SA report		
<b>Stage D</b>	Seek representations on the SA report from consultation bodies and the public.		
<b>Stage E</b>	Post adoption reporting and monitoring	1	Prepare and publish post-adoption statement
		2	Monitor significant effects of implementing the Local Plan.
		3	Respond to the adverse effects

**Table One: The sustainability appraisal process.**

Source: Based on National Planning Practice Guidance. Reference ID 11-033-20140306

### **Stage A: Scoping**

2.4 The Review of the Local Plan Sustainability Appraisal Scoping Report, June 2015 provides the evidence base and baseline for the sustainability appraisal of the Local Plan as well as the sustainability policy context and key sustainability issues. It included:

- A review of the policies, plans and programmes (PPP) relevant to the Local Plan, identifying their objectives and purposes and the relationships between them.
- Baseline information on SEA topics as well as data on social and economic issues. This baseline information provides the basis for predicting and monitoring the likely effects of the Plan and helps to identify alternative ways of dealing with any adverse effects.

- Drawing on the review of policies plans and programmes and the baseline information the Scoping reports identifies key sustainability issues (including environmental problems, as required by the SEA Directive).
  - Developing a Sustainability Appraisal framework (Section 6 of the Review of the Scoping Report). The Framework provides a means by which the impacts on sustainability can be described, analysed and compared. This included identify SA objectives, which define the long term aspirations with regard to economic, social and environmental considerations. The objectives of the Scoping Report were initially identified as joint work with other Nottinghamshire Authorities in 2009. As part of the Review of the Scoping Report these objectives were assessed as meeting the provisions of the National Planning Policy Framework. The Review built on the 2009 objectives by identified a number of additional objectives and changed the wording of other objectives to clarify the SA approach. The objectives and associated questions are used to 'interrogate' options and policies drafted during the plan preparation process.
- 2.5 Consultation is an important part of the Sustainability Appraisal and of the Local Plan process as it helps to ensure that the process is robust and has regard to the supporting evidence base. A Review of the Local Plan Sustainability Appraisal Scoping Report meeting the requirements of Stage A was undertaken from 16<sup>th</sup> March 2015 to 30<sup>th</sup> April 2015. It included the statutory bodies (Environment Agency, Natural England and Historic England) as well as a number of other stakeholders. Changes were made to the Scoping Report to reflect consultee responses and the changes made are reflected in the Scoping Report Consultation Statement<sup>2</sup> which is available on the Council's website.
- 2.6 The baseline situation and key issues are set out in the Scoping Report. This was prepared taking into account the responses received from Natural England, Historic England and the Environment Agency. Inevitably, a degree of judgement has been required in undertaking the policy appraisals to determine the 'significance' of effects. Sustainability appraisal relies on judgement, which is guided by knowledge of the likely impacts of the Plan, the baseline data available and responses and information provided by consultees and other stakeholders. A 'precautionary approach' has been taken, especially with qualitative judgements and any uncertainties are highlighted if there is any doubt as to the effect of the plan.
- 2.7 The SA Scoping Report forms part of the environmental report required by the SEA Directive. The scoping work is subject to review as evidence becomes outdated and new information made available. In particular, the Scoping Report will be reviewed and updated prior to the submission version of the Local Plan being published to ensure that effects prediction and evaluation remains accurate and consistent.

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<sup>2</sup> Review of the Local Plan Sustainability Appraisal Scoping Report Consultation Statement, June 2015

## SA Stage B: Developing and Refining Options and Assessing Effects

- 2.8 The Local Plan Preferred Options is taken forward after consider a variety of options. This is an iterative process, which has involved a number of consultations with both the public and stakeholders. Consultation responses together with the SA assessment can help identify what are the reasonable alternatives
- 2.9 Planning Practice Guidance makes it clear that the sustainability appraisal must consider all reasonable alternatives and assess them in the same level of detail as the option the plan-maker proposes to take forward in the Local Plan (the preferred approach). It also identifies that reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its. Developing options and alternatives is an important part of both the plan-making and sustainability appraisal process. Regulation 12 (2) of the Environmental Assessment of Plans and Programmes Regulations, 2004 requires that:

“The report shall identify, describe and evaluate the likely significant effects on the environment of –

- a) implementing the plan or programme; and
- b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme”

In this context any alternatives considered need to be “reasonable”. This implies that alternatives with are “not reasonable” will not form part of the appraisal. Consequently, the Regulations do not require all alternatives to be looked at.

- 2.10 The SA should report the social, environmental and economic effects of the Local Plan options predicting and evaluated their significance. The SEA Directive requires an assessment of “likely significant effects...taking into account the objectives and geographical scope of the plan or programme”<sup>3</sup>. PAS guidance states ‘you are only required to assess the likely significant effects of the plan, not all possible effects’. This SA Report sets out the social, environmental and economic effects of all Local Plan. Policies have been predicted and evaluated for their significance.
- 2.11 National Planning Policy Guidance in paragraph 152 identifies that “significant adverse impacts on any of these dimensions (economic, social and environmental) should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.” It also emphasises that where adverse impacts are unavoidable measures to mitigate should be considered and where mitigation is not possible, compensatory measures may be appropriate.
- 2.12 It is stressed that SA and SEA are tools used at the plan-making stage to assess the likely effects of the plan when judged against reasonable alternatives. They are not the only factors to be taken into account when determining the Council’s preferred option for the Local Plan. It should be recognised that typically there are

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<sup>3</sup>Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment, Article 5, paragraph 1.



both positive and negative effects in relation to options policies and site allocations and as such it is not possible to rank them based on sustainability performance in order to determine a preferred options. Other factors such as conformity with national planning policy, deliverability, and response on public consultations will need to be reflected in the Local Plan Preferred Approach. Sustainability appraisal helps to identify the most sustainable options to be taken forward but it does not decide which options are taken forward. This is reflected in The SEA Practical Guide 2<sup>4</sup>, paragraph 5.B.7 which states:

“It is not the purpose of the SEA to decide the alternative to be chosen for the plan or programme. This is the role of the decision-makers who have to make choices on the plan or programme to be adopted. The SEA simply provides information on the relative environmental performance of alternatives, and can make the decision-making process more transparent”.

- 2.13 The Council prepared the first document of the Local Development Framework process in 2009, the Core Strategy Issues and Options Paper set out a draft spatial vision for Ashfield and was published for public consultation. This was accompanied by the Sustainability Appraisal (SA) Scoping Report which sets out fourteen objectives for a Sustainability Framework, against which policies and proposals were assessed. The Review of the Local Plan Sustainability Appraisal Scoping Report concluded that the SA objectives of the Scoping Report 2009 were compatible with the requirements of the NPPF and are appropriate for continued use. However, for clarity and understanding it has been considered appropriate to amend the wording of the sustainable objectives or subdivide the objectives. The SA has taken into account the findings of the SA of a number of previous documents including the following:
- A Core Strategy Area Based Spatial Growth Options document October 2009 with the Interim Sustainability Appraisal of the Strategic Spatial Options;
  - Core Strategy Preferred Option, March 2010 and accompanying Sustainability Appraisal for the Preferred Options.
  - The Local Plan Preferred Approach September 2012 and accompanying Sustainable Appraisal.
  - The Local Plan Publication 2013 and accompanying Sustainable Appraisal.

### **SA Stage C: Preparing the Sustainability Appraisal Report**

- 2.14 This SA Report describes the process undertaken to date in carrying out the SA of the Ashfield Local Plan. It sets out the findings of the appraisal, identifying positive and negative effects and making judgements regarding secondary, cumulative and synergistic effects as well as mitigation effects, trends and identify where there is uncertainty<sup>5</sup>.
- 2.15 The development of a set of SA objectives is a recognised way in which the likely environmental and sustainability effects of a plan can be described, analysed and compared. The SA objectives were originally developed by Nottinghamshire Local

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<sup>4</sup> A Practice Guide to the Strategic Environmental Assessment Directive, Sept 2005. Office of the Deputy Prime Minister.

<sup>5</sup> Review of the Local Plan Sustainability Appraisal Scoping Report, June 2015 paragraphs 6.7 to 6.14

Council's in 2009 They have been review and amended reflecting the review of plans, policies and programmes, the collection of baseline information and the identification of the key sustainability issues undertaken as part of the Scoping Report. This included comments on these various aspects of the Scoping Report from statutory consultees and other parties which is set out in the Sa Consultation Report <sup>6</sup>.

- 2.16 Options, policies and site allocations are assessed against the SA objectives and a judgement is made regarding the likely effect against each objective utilising the "Decision Making Criteria". The SA Framework is used to 'interrogate' options and policies drafted during the plan preparation process. A consequence of this is that it leads to a matrix based approach to appraisal where options and policies are assessed against each objective. It is recognised that this result in a significant number of matrices and therefore it is importance that the narrative identifies and evaluates the impacts.
- 2.17 This approach helps to identify aspects which maximise the benefits of the Plan as well as helping to identify where improvements can be made or where mitigation will reduce negative effects.
- 2.18 Table Two sets out the Sustainability Framework derived from the Scoping Report.

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<sup>6</sup> Sustainable Appraisal Scoping Report Consultation Statement, June 2015.  
<http://www.ashfield-dc.gov.uk/residents/planning,-property-and-housing/forward-planning/ashfield-emerging-local-plan/sustainability-appraisal.aspx>

**Table Two: The Sustainability Framework**

SA/SEA Theme	Objective	Decision making criteria	Land Allocation Appraisal	Potential Indicators
Population, Human health Material assets  NPPF: Social Dimension	1. Housing To ensure that the housing stock meets the housing needs of Ashfield.	<ul style="list-style-type: none"> <li>• Will it provide sufficient new homes taking into account need and demand?</li> <li>• Will it support the range of housing types and sizes, including affordable, to meet the needs of all sectors in the community?</li> <li>• Will it create sustainable, inclusive and mixed communities?</li> <li>• Will it promote high standards of design and construction?</li> <li>• Will it reduce the number of unfit homes?</li> <li>• For a heritage asset will it help to reduce the number of vacant buildings through adaptive re-use?</li> <li>• Will it meet the needs of the travelling community?</li> </ul>	<p>The development of houses is anticipated to have a positive effect in relation to this Objective. Major sites offer the potential opportunity to bring forward affordable housing.</p> <ul style="list-style-type: none"> <li>• Major sites will have a significant positive effect (++) .</li> <li>• Small sites will have a minor positive effect (+).</li> <li>• The allocation of a gypsy and traveller sites will have a significant positive effect (++) .</li> </ul>	<ul style="list-style-type: none"> <li>• Average property price against average workplace earnings</li> <li>• Household size and composition</li> <li>• Household projections</li> <li>• Number of Affordable housing completions per annum</li> <li>• Average property price against average workplace earnings</li> <li>• Number of Housing completions (type and size) per annum</li> <li>• Local Authority stock declared non decent</li> <li>• Vacant dwellings by tenure</li> <li>• Number of households on the housing register</li> </ul>

SA/SEA Theme	Objective	Decision making criteria	Land Allocation Appraisal	Potential Indicators
Population/ Human health/ Material assets.  NPPF: Social Dimension	2. Health To improve health and wellbeing and reduce health inequalities.	<ul style="list-style-type: none"> <li>• Will it increase life expectancy?</li> <li>• Will it improve access to services?</li> <li>• Will it protect and enhance open spaces of amenity and recreational value?</li> <li>• Will it increase the opportunities for recreational physical activity?</li> <li>• Will it encourage healthy lifestyles, including travel and food choices?</li> </ul>	<p>Access to both services and open space has positive health impact. In this context:</p> <ul style="list-style-type: none"> <li>• If the site meets any two of the following requirements it will result in a significant positive effect ( ++ ). Otherwise a single element will result in a minor positive effect: <ul style="list-style-type: none"> <li>➤ If the site within 800 m or 10 minutes walking of a GP Facilities this will have a minor positive effect ( + ).</li> <li>➤ If the site within 500 m of an open space this will have a minor positive effect ( + ).</li> </ul> </li> <li>• Development located in close proximity to an unsuitable neighbour use, which has a potentially negative impact on health will have a minor negative ( - ) or significant negative effect ( - - )</li> <li>• If the proposal results in a loss of open space this will have a minor or significant negative impact.</li> </ul>	<ul style="list-style-type: none"> <li>• Adults taking part in sport</li> <li>• Health inequalities</li> <li>• Life expectancy</li> <li>• Access to open space</li> <li>• Access to sports facilities</li> <li>• New/enhanced health facilities</li> </ul>

SA/SEA Theme	Objective	Decision making criteria	Land Allocation Appraisal	Potential Indicators
<p>Cultural Heritage/ Human health/ Material assets.</p> <p>NPPF: Environmental Dimension</p>	<p>3. Historic Environment</p> <p>To conserve and enhance Ashfield's historic environment, heritage assets and their settings.</p>	<ul style="list-style-type: none"> <li>• Will it conserve and/or enhance designated heritage assets and the historic environment?</li> <li>• Will it respect, maintain and strengthen local character and distinctiveness?</li> <li>• Lead to the repair and adaptive reuse of a heritage asset?</li> <li>• Will it increase social benefit (e.g. education, participation, citizenship, health and wellbeing) derived from the historic environment?</li> <li>• Will it increase the economic benefit from the historic environment?</li> <li>• Will it ensure that repair/ maintenance is sympathetic to local character?</li> </ul>	<p>The NPPF identifies that significance derives not only from a heritage asset's physical presence, but also from its setting. It is acknowledged that the potential effects on the setting of an individual heritage asset will vary dependent on the nature of the asset or what mitigation can be achieved to avoid adverse effects or even achieve positive effects. Professional judgement will be required in assessments in relation to the nature of the heritage asset with the following criteria being utilised as a basis to assess sites:</p> <ul style="list-style-type: none"> <li>• Sites which have potential for heritage assets to be enhanced and significance better revealed will have a minor positive (+) or significant positive effect (++) on this objective.</li> <li>• Sites which are unlikely to impact on heritage assets will have a negligible (0) effect on this objective.</li> <li>• Sites which have the potential to cause less than substantial harm to heritage assets will have a minor negative (-) impact on this objective.</li> <li>• Sites which have the potential to cause substantial harm or loss to heritage assets will have a significant negative (--) impact on this objective.</li> </ul>	<ul style="list-style-type: none"> <li>• Museums &amp; local heritage – number and attendance?</li> <li>• Historic Parks and Gardens – number.</li> <li>• Listed Buildings/Buildings at risk/locally listed building.</li> <li>• Scheduled ancient monuments –number and % at risk</li> <li>• Percentage of conservation areas where appraisals have been completed.</li> </ul>

SA/SEA Theme	Objective	Decision making criteria	Land Allocation Appraisal	Potential Indicators
Population/ Human health.  NPPF Social Dimension	4.Community Safety  To improve community safety, reduce crime and the fear of crime.	<ul style="list-style-type: none"> <li>• Will it create a safe environment?</li> <li>• Will it reduce crime and the fear of crime?</li> <li>• Will it contribute to a safe secure environment?</li> <li>• Does it design out crime?</li> </ul>	This is not anticipated to be applicable at site level as it is not dependent on location but the design of the development. It will reflect layout, lighting etc and these issues will not be influenced by the location of development sites. It is anticipated that all sites will have a neutral effect (N)	<ul style="list-style-type: none"> <li>• Number of fatalities / serious injuries from road accidents</li> <li>• Secure by design schemes</li> <li>• General crime levels in the area</li> </ul>
Population/ Human health/ Material assets.  NPPF: Social Dimension	5.Social Inclusion Deprivation  To improve social inclusion and to close the gap between the most deprived areas and the rest of Ashfield.	<ul style="list-style-type: none"> <li>• Will it address the Indices of Multiple Deprivation and the underlying indicators?</li> <li>• Promote effective integration with existing communities?</li> <li>• Provide for affordable housing?</li> <li>• Provide for an appropriate housing mix?</li> <li>• Will it improve accessibility to key local services and facilities, including health, education and leisure?</li> <li>• Will it improve accessibility to shopping facilities?</li> </ul>	<ul style="list-style-type: none"> <li>• If the site meets any two of the following requirements it will result in a significant positive effect ( ++ ). Otherwise a single element will result in a minor positive effect: <ul style="list-style-type: none"> <li>➤ If the site within 800 m or 10 minutes walking of Access to Services” comprising a primary school, or GP surgery, or bus stop or post office/cash machine it will have a minor positive effect ( + ).</li> <li>➤ Housing sites that result in affordable housing will have a minor positive effect ( + ).</li> <li>➤ The employment land studies identify that there are benefits from employment sites being located close to deprived areas. Therefore, where employment sites are within 800 metres or 10 minutes walk of a deprived area this will have a minor positive effect (+).</li> </ul> </li> <li>• Development which would not provide additional services or facilities will have a neutral score.</li> <li>• Development that reduces any of these services will have a negative score unless replaced by the development.</li> </ul>	<ul style="list-style-type: none"> <li>• Average score for Indices of Multiple Deprivation</li> <li>• Number of Jobseeker's Allowance claimants</li> <li>• Percentage of people of working age that are economically active</li> </ul>

SA/SEA Theme	Objective	Decision making criteria	Land Allocation Appraisal	Potential Indicators
Biodiversity/ Human health/ Fauna/ Flora/ Climatic factors/ Landscape/ Material assets.  NPPF: Environmental Dimension	6. Biodiversity & Green Infrastructure  To conserve, enhance and increase biodiversity levels and Green & Blue Infrastructure	<ul style="list-style-type: none"> <li>• Will it protect SPAs SAC and SSSI?</li> <li>• Will it protect, maintain and enhance or provide mitigation for sites designated for their local nature conservation interest?</li> <li>• Does the plan seek to prevent habitat &amp; wildlife corridor fragmentation?</li> <li>• Does it provide opportunities for provision &amp; enhancement of priority habitat or species?</li> <li>• Does it provide opportunities for provision &amp; enhancement of green space / green infrastructure?</li> <li>• Will it lead to a loss of or damage to a designated geological site?</li> </ul> <p>N.B. International or European designated site will be informed by a screening and, if necessary, a Habitat Regulations Assessment of their potential effects.</p>	<p>The potential effects on the interest feature of a SSSI or a local designated biodiversity site will vary dependent on the nature of the biodiversity site or what mitigation can be achieved to avoid adverse effects or even achieve positive effects. Therefore, this will need to take into account why the site is designated. In broad terms the following will be used in relation to sites:</p> <ul style="list-style-type: none"> <li>• Does the site include a SSSI or Local Wildlife Site with an anticipated negative impact - a significant negative effect ( - - )</li> <li>• Is the site within Impact Risk Zones for SSSI:               <ul style="list-style-type: none"> <li>➢ Within the Impact Risk Zone for all planning applications significant negative effect ( - - ).</li> <li>➢ Within the Impact Risk Zone for residential development between 10 &amp; 49 dwellings outside existing settlements minor negative impact.</li> <li>➢ Within the Impact Risk Zone for residential development between 50 &amp; 99 dwellings outside existing settlements minor negative impact.</li> <li>➢ Within the Impact Risk Zone for residential development of 100 dwellings or more outside existing settlements minor negative impact.</li> </ul> </li> <li>• Is the site next to a local wildlife site and anticipated to have a negative impact - it will have a minor negative impact ( - ) .</li> <li>• Any proposal that impacts on ancient woodland, aged or veteran trees will have a significant negative effect ( - - )</li> <li>• If it involves the loss of a Biodiversity Action Plan Priority Habitat or Priority Species then it may have either a minor or significant negative impact.</li> <li>• Will it enhance or inhibit connectivity of habitats. This will have either a minor or a significant positive or negative effect.</li> <li>• If the site is with 400 m of an exclusion zone around the Sherwood Forest 'possible potential' SPA (ppSPA) it will have a significant negative effect ( - - ) .</li> </ul>	<ul style="list-style-type: none"> <li>• Net loss/gain Local/National nature reserves</li> <li>• Net loss/gain Local wildlife sites (Biological SINCs)</li> <li>• Net loss/gain SSSIs</li> <li>• Open space managed to green flag award standard</li> <li>• New and enhanced open space</li> <li>• Species at risk by development</li> <li>• Number of sites with mitigation work included in the project?</li> </ul>



SA/SEA Theme	Objective	Decision making criteria	Land Allocation Appraisal	Potential Indicators
<p>Biodiversity/ Human health/ Fauna/ Flora/ Landscape/ Cultural heritage/ Material assets.</p> <p>NPPF: Environmental Dimension</p>	<p>7.Landscape</p> <p>To protect enhance and manage the character and appearance of Ashfield's landscape /townscape, maintaining and strengthening local distinctiveness and sense of place.</p>	<ul style="list-style-type: none"> <li>• Will it maintain and/or enhance the local distinctiveness and character of landscape?</li> <li>• Will it recognise and protect the intrinsic character and beauty of the countryside?</li> <li>• Will it promote development that is in scale and proportionate to host settlement?</li> <li>• Will it promote sites that are well planned or soft landscaped in such a way as to positively enhance the environment?</li> </ul>	<p>There are no designated landscaped areas in Ashfield. Nevertheless the conservation of the landscape and townscape is an important local aspect. Planning Practice Guidance identifies that Landscape Character Assessment is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. The Nottinghamshire Landscape Assessment identifies the Strength of Landscape Character and the Landscape Condition. This Assessment together with specific site appraisals, where appropriate, will be utilised in assessing the landscape quality.</p> <ul style="list-style-type: none"> <li>• If the proposal will damage the landscape quality it will have either a minor or significant negative effect.</li> <li>• If the proposal will protect and enhance the landscape quality it will have either a minor or significant positive effect.</li> </ul> <p>(N.B. The Notts Character Assessments are undertaken in broad terms. Therefore these assessments may be modified by individual site assessments).</p>	<ul style="list-style-type: none"> <li>• Landscape Character Assessment</li> <li>• Local Landscape Character Assessment</li> </ul>



SA/SEA Theme	Objective	Decision making criteria	Land Allocation Appraisal	Potential Indicators
Soil/ Fauna/ Flora/ Material assets  NPPF: Environmental Dimension	8.Natural Resources  To minimise the loss of natural resources including soils,greenfield land and the best quality agricultural land.	<ul style="list-style-type: none"> <li>• Will it use land that has been previously developed (Brownfield land) ?</li> <li>• Will it protect and enhance the best and most versatile agricultural land?</li> <li>• Will it prevent soil degradation &amp; contamination?</li> <li>• Will it impact on a minerals safeguarded area?</li> </ul>	<p>The emphasis is on the development of brown field sites and avoiding the loss of best quality agricultural land.</p> <ul style="list-style-type: none"> <li>• Major sites on brownfield land will have a significant positive effect ( ++ ).</li> <li>• Small sites on brownfield land will have a minor positive effect ( + ).</li> </ul> <p>If the site meets any two of the following requirements it will result in a significant negative effect ( - - ). Otherwise a single element will result in a minor negative effect:</p> <ul style="list-style-type: none"> <li>• Development is on greenfield land ( - ).</li> <li>• Development will result in the loss of the best quality agricultural (where known) ( - ).</li> <li>• Development is within a Minerals Safeguarded Area, excluding urban areas identified by the Ashfield Local Plan Review 2002 ( - ).</li> </ul>	<ul style="list-style-type: none"> <li>• Greenfield land lost</li> <li>• Employment and housing developed on PDL</li> <li>• Loss of high quality agricultural land.</li> </ul>
Air/ Human health/ Material assets.  NPPF: Environmental Dimension	9.Air & noise pollution  To reduce air pollution and the proportion of the local population subject to noise pollution.	<ul style="list-style-type: none"> <li>• Will it limit or reduce emissions of air pollutants &amp; improve air quality?</li> <li>• Will it limit or reduce noise pollution?</li> </ul>	<p>The Council does not currently have any Air Quality Management Areas identified. If development sites result in increase vehicle traffic and are anticipated to result in an AQMA being designated the site will be regarded as having a significant negative effect ( - - ).</p>	<ul style="list-style-type: none"> <li>• Carbon dioxide emissions</li> <li>• Households in Air Quality Management Areas</li> <li>• Number of days moderate/high air pollution</li> </ul>

SA/SEA Theme	Objective	Decision making criteria	Land Allocation Appraisal	Potential Indicators
<p>Water/ Climatic factors</p> <p>NPPF: Environmental Dimension</p>	<p>10. Water Quality</p> <p>To conserve and improve water quality and quantity.</p>	<ul style="list-style-type: none"> <li>• Will it reduce water consumption?</li> <li>• Will it maintain or enhance water quality?</li> <li>• Will it implement SUDs, where appropriate, to avoid run off of polluted water to water courses or aquifers?</li> </ul>	<p>This is not anticipated to be applicable at site level as it is not dependent on location but the design of the development.</p> <p>It is anticipated that all sites will have a neutral effect (N) unless it is specifically identified that the proposed site will harm a protected aquifer, river quality or other water resources in which case it could have a minor or positive negative effect.</p> <p>If it is identified that a development will specifically improve water quality this would be scored as a positive effect.</p>	<ul style="list-style-type: none"> <li>• Biological/chemistry levels in rivers, canals and freshwater bodies – water bodies classified as having a good ecological status under Water Framework Directive.</li> <li>• Water usage in the district.</li> <li>• Proportionate of schemes that have SUDs incorporated.</li> </ul>
<p>Climatic factors/ Landscape/ Material assets.</p> <p>NPPF: Environmental Dimension</p>	<p>11. Waste</p> <p>To minimise waste and increase the re-use and recycling of waste materials.</p>	<ul style="list-style-type: none"> <li>• Will it move management of waste up the waste hierarchy?</li> <li>• Will it help in increase waste recovery and recycling?</li> <li>• Will it reduce waste in the construction industry?</li> </ul>	<p>All new development may offer opportunities for incorporating sustainable waste management practices. Consequently, this is not anticipated to be applicable at site level as it is not dependent on location but the design of the development.</p> <p>It is anticipated that all sites will have a neutral effect (N). However, if a site does offer additional opportunities or waste management then it may be regarded as have a minor or significant positive effect.</p>	<ul style="list-style-type: none"> <li>• Recycling rates in the area?</li> <li>• Tonnage of the household waste going to landfill.</li> <li>• Recycling levels of construction industry.</li> </ul>

SA/SEA Theme	Objective	Decision making criteria	Land Allocation Appraisal	Potential Indicators
<p>Water/ Climatic factors/ Material assets</p> <p>NPPF: Environmental Dimension</p>	<p>12. Climate Change and Flood Risk</p> <p>To adapt to climate change by reducing and manage the risk of flooding and the resulting detriment to people, property and the environment.</p>	<ul style="list-style-type: none"> <li>• Will it manage or reduce flooding?</li> <li>• Will it attenuate the flow and run off of water?</li> <li>• Does it avoid locations within Flood Zones 2 and 3?</li> <li>• Will it promote Sustainable Drainage systems?</li> <li>• Will it impact on of ground and surface waterflooding?</li> <li>• In relation to heritage assets does it integrate climate change mitigation and adaptation measures into the historic environment sensitively?</li> </ul>	<p>Developments in certain locations may be more vulnerable to flooding. The Council's Strategic Flood Risk Assessment identifies that in general terms there is no requirement for development in Flood Zones 2 or 3. An additional factor that needs to be taken into account is the risk of flooding from other sources such as surface water or reservoirs.</p> <ul style="list-style-type: none"> <li>• Sites that are entirely or partly within Flood Zones 2 or 3 will have a significant negative effect ( - - ).</li> <li>• Site where there is surface water flooding with have a minor negative effect ( - ) unless the majority of the site is flooded, which will have a significant negative effect ( - - ).</li> <li>• Sites at risk of flooding from other sources may have a minor or significant negative effect dependent on their anticipate impact.</li> </ul>	<ul style="list-style-type: none"> <li>• Flood risk house numbers in area.</li> <li>• Developments incorporating SUDS into their design.</li> <li>• Planning applications granted contrary to advice of EA or Lead Local Flood Authority.</li> </ul>
<p>Climatic factors/ Material assets</p> <p>NPPF: Environmental Dimension</p>	<p>13.Climate Change and Energy Efficiency</p> <p>To adapt to climate change by minimise energy usage and to develop Ashfield's renewable energy resource, reducing dependency on non-renewable sources.</p>	<ul style="list-style-type: none"> <li>• Will it improve energy efficiency of new buildings?</li> <li>• Will it support the generation and use of renewable energy?</li> <li>• Will it encourage the use of clean, low carbon, energy efficient technologies?</li> </ul>	<p>This is not anticipated to be applicable at site level as it is not dependent on location but the design of the development.</p> <p>It is anticipated that all sites will have a neutral effect (N)</p>	<ul style="list-style-type: none"> <li>• Energy use – renewables and non-renewable products</li> <li>• Renewable energy capacity installed by type and KW</li> <li>• Energy trends at LA level.</li> </ul>

SA/SEA Theme	Objective	Decision making criteria	Land Allocation Appraisal	Potential Indicators
Population/ Human health/ Climatic factors/ Landscape/ Material assets  NPPF: Social Dimension	<p>14.Travel and Accessibility</p> <p>To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys.</p>	<ul style="list-style-type: none"> <li>• Will it utilise and enhance existing transport infrastructure?</li> <li>• Will it help to develop a transport network that minimises the impact on the environment?</li> <li>• Will it potentially reduce journeys undertaken by car by encouraging alternative modes of transport?</li> <li>• Will it have access to pedestrian &amp; cycle routes for localised leisure opportunities?</li> </ul>	<p>Good access and access to public transport as key aspects of travel choice and accessibility particularly for housing sites.</p> <ul style="list-style-type: none"> <li>• If the site within 800 m or 10 minutes walk of a bus stop/railway station together with any one from a primary school, GP surgery and post office/cash machine being within 800 m or 10 minutes walk it will have a significant positive effect ( ++ ).</li> <li>• If the site within 800 m or 10 minutes walk of a bus stop/railway station it will have a minor positive effect ( + ).</li> <li>• If the site is not within 800 m or 10 minutes walking of a bus stop/railway station it will have a minor negative effect ( - ).</li> <li>• If the site is not within 800 m or 10 minutes walking of a bus stop or any other services comprising a primary school, GP surgery and Post Office/cash machine it will have a significant negative effect ( - - )</li> </ul> <p>For employment sites there is less emphasis on access to local services. The emphasis is on alternative forms of transport. Sites with access to a bus stop will have a minor positive effect those without access will have a minor negative effect.</p>	<ul style="list-style-type: none"> <li>• Percentage of major residential developments located within 30 mins public transport time of health, education, retail and employment facilities</li> <li>• Development of transport infrastructure that assists car use reduction</li> <li>• Levels of bus and light rail patronage</li> <li>• New major non-residential development with travel plans</li> <li>• People using car and non-car modes of travel to work</li> <li>• Robin Hood Line railway usage</li> <li>• Congestion – average journey time per mile during the morning peak</li> </ul>

SA/SEA Theme	Objective	Decision making criteria	Land Allocation Appraisal	Potential Indicators
Population/ Human Health/ Material assets  NPPF: Economic Dimension	15.Employment  To create high quality employment opportunities including opportunities for increased learn and skills to meet the needs of the District.	<ul style="list-style-type: none"> <li>• Will it provide employment opportunities for local people?</li> <li>• Will it support and improve education/training facilities to meet local needs?</li> <li>• Will it contribute towards meeting skill shortages?</li> <li>• Will it improve access to employment by means other than single occupancy car?</li> </ul>	<p>It is recognised that there is some cross over between this Objective and Objective 16, Economy. The effect of both these objectives will be to increase employment opportunities.</p> <p>The allocation of employments sites in relation to this option is anticipated to be positive (+). However, if the employment site is within 800 m or 10 minutes walking distance of a residential area it will have a Significant positive effect (++).</p> <p>Development of housing sites facilitates the local economy, but this is not the main emphasis of this Objective. Therefore housing site will have a minor positive effect (+). However, the loss of an active exiting employment sites or employment allocation will have a significant negative impact ( - - ).</p>	<ul style="list-style-type: none"> <li>• Average gross weekly pay (male and female)</li> <li>• Benefit claimants</li> <li>• Shops vacancies</li> <li>• Unemployment rate</li> <li>• Businesses per 1000 population</li> <li>• 15 year olds achieving 5 or more GCSEs at Grade A* - C</li> <li>• 19 year olds qualified to NVQ level 2 or equivalent</li> <li>• 21 year olds qualified to NVQ level 3 or equivalent</li> <li>• Working age population qualifications</li> </ul>

SA/SEA Theme	Objective	Decision making criteria	Land Allocation Appraisal	Potential Indicators
Population/ Human Health/ Material assets  NPPF: Economic Dimension	16. Economy To Improve the efficiency, competitiveness and adaptability of the local economy.	<ul style="list-style-type: none"> <li>• Will it improve business development and enhance competitiveness?</li> <li>• Will it make land and property available to encourage investment and enterprise taking into account current and future working environments?</li> <li>• Will it provide supporting infrastructure?</li> <li>• For a heritage asset will it promote heritage-led regeneration?</li> </ul>	<p>In general it is anticipated that larger employment sites will provide more opportunities:</p> <ul style="list-style-type: none"> <li>• Large sites (10 ha or more) may have a significant positive effect (++).</li> <li>• Small sites (less than 10 ha) will have a minor positive effect. (+).</li> </ul> <p>The loss of active employment sites is anticipated to have a negative impact on the economy as follows:</p> <ul style="list-style-type: none"> <li>• Large active exiting employment sites (10 ha or more) will have a significant negative effect ( - - )</li> <li>• The loss of a small exiting employment sites (less than 10 ha) will have a minor negative effect ( - ).</li> </ul>	<ul style="list-style-type: none"> <li>• Employment land available</li> <li>• Completed business development floorspace</li> <li>• Land developed for employment</li> <li>• Employment land lost</li> <li>• Profile of employment by sector</li> <li>• Percentage of vacant employment floorspace</li> </ul>

SA/SEA Theme	Objective	Decision making criteria	Land Allocation Appraisal	Potential Indicators
Population/ Material assets  NPPF: Economic Dimension	17. Town Centres Increase the vitality and viability of Ashfield's town centres.	<ul style="list-style-type: none"> <li>• Will it improve the vitality of existing town?</li> <li>• Will it improve the viability of existing town centres?</li> <li>• Will it provide for the needs of the local community?</li> <li>• Will it make the town centre a place to attract visitors?</li> </ul>	<p>The emphasis is upon encouraging development of Ashfield town centres. Development that are identified as 'main town centre uses' in the NPPF (Annex Two: Glossary) will:</p> <ul style="list-style-type: none"> <li>• Have a significant positive effect if within the town centre (++).</li> <li>• Have a minor positive effect if within the edge of the town centre as set out in the NPPF Appendix Two: Glossary. (+).</li> <li>• Main town centre uses outside the town centre or edge of centre will have a minor negative effect ( - ).</li> <li>• Large main town centre uses (as defined by the Ashfield Retail Study) outside the town centre or edge of centre will have a significant negative effect ( - - ).</li> </ul> <p>The NPPF identifies main town centre uses. In addition, the town centre masterplans identify that housing development is considered to facilitate the town centres:</p> <ul style="list-style-type: none"> <li>• If housing development is within the town centre or edge of centre it will have a significant positive effect. (++)</li> <li>• If the retail study identifies that the housing development is located in an area where the largest percentage share for main food shop is a specific town centre this will have a minor positive effect on the town centre. (+)</li> </ul>	<ul style="list-style-type: none"> <li>• Residential development in town centres</li> <li>• New floor space developed in town centres</li> <li>• Vacancy rates in town centres</li> <li>• Changes to retail, food, drink and entertainment uses</li> <li>• Expansion of retail units.</li> </ul>



- 2.19 Following advice from the Planning Advisory Service (PAS)<sup>7</sup> the Council has adopted a system which identifies a significant effect, a minor effect or a neutral effect for each of the SA objectives. These definitions of significance help to ensure a consistent approach to interpreting the significance of effects and will help in understand the decisions made by the assessor. Each option, policy and proposed site of the Local Plan is assessed against each SA objective and a judgement made with regards to the likely effect that the option, policy or site would have on that objective. These judgements are recorded using the colour coded and symbols set out below. The scores will be presented in a matrix, along with a brief justification of the judgement made.

<b>Key</b>	
<b>Significant positive effect</b>	<b>++</b>
<b>Positive effect</b>	<b>+</b>
<b>No relationship/neutral</b>	<b>N</b>
<b>Uncertain effects</b>	<b>?</b>
<b>Minor negative effect</b>	<b>-</b>
<b>Significant negative effect</b>	<b>--</b>

Table Three: Matrix to be utilised by the Sustainability Appraisal

- 2.20 Prediction of effects involves identifying what changes might occur to the sustainability baseline over time – these changes will need to be evaluated for their likely significance, in terms of their probability, duration, frequency, and the geographical area likely to be affected. In terms of the prediction and evaluation of significant effects, the Local Plan identifies areas for housing and employment development, and it is possible to predict effects that may be likely in those areas through, for example, examining proximity to sensitive environmental receptors and predicting future increases in traffic volumes. Actual effects will often depend on elements such as the type of development that takes place, its location in terms of sensitive environmental receptors, the sustainability of buildings i.e. materials used, energy and water efficiency etc, design, quality and transport mitigation measures. The extent of any mitigation measures to prevent or reduce any effects or compensatory measures for loss will be important and cannot always be fully assessed at this stage.
- 2.21 In relation to potential site allocations, a number of assumptions are set out in SA Framework (see Table 7 of the Review of the Local Plan Sustainability Appraisal Scoping Report). These assumptions were set out to assist with the appraisal and ensure a consistent approach to site. This approach reflects the PAS Sustainability Appraisal Advice Note, June 2010.

<sup>7</sup>Sustainability Appraisal Report Review of Ashfield's SA 2013 Planning Advisory Service



## **Alternatives**

- 2.22 The SEA Directive requires assessment of the likely significant effects of implementing the plan and “*reasonable alternatives*” taking into account “*the objectives and geographical scope*” of the plan and the reasons for selecting alternatives should be outlined in the Report. The Directive does not specifically define the term “*reasonable alternative*”; however, guidance<sup>8</sup> advises that it is should be taken to mean “*realistic and relevant*” i.e. deliverable and within the timescale of the plan. The Forest Heath judgement<sup>9</sup> clarified and provided further guidance on how alternatives should be considered in SA/SEA of spatial and land use plans. It identified that the reasons for selecting or rejecting alternatives should be explained, and that the public should have an effective opportunity to comment on appraisal of alternatives.

## **SA Stage D: Seek representations on the SA Report from consultation bodies and the public.**

- 2.23 Ashfield District Council is inviting comments on the Local Plan Preferred Approach and the Sustainability Appraisal for the Local Plan Preferred Approach. This forms part of the formal consultation stages under the Town and Country Planning (Local Planning) (England) Regulations 2012, Regulation 18.
- 2.24 The Council will take account of comments received in considering any changes to the Local Plan. The SA Report will be updated to take into account the potential impact of any changes.

## **SA Stage E: Post adoption reporting and monitoring**

- 2.25 An important element of Sustainability Appraisal is monitoring the significant social, economic and environmental effects for any unforeseen adverse effects. Ideally there should be a clear link between the significant effects predicted within an Appraisal and the indicators selected to monitor the likely effects. The detail within the monitoring programme should reflect the severity and likelihood of the predicted effects. In some cases this may involve a series of specific or targeted measures to monitor a particularly significant issue e.g. erosion of green space. Other potential effects could be monitored in existing monitoring mechanisms e.g. effects of planning policies within development plan monitoring.
- 2.26 The Review of the Local Plan Sustainability Appraisal Scoping Report set out initial proposals for the monitoring under the SA Framework. These are subject to revision and amendments as the Local Plan progresses. The Sa monitoring proposals should also be seen in conjunction with the monitoring undertaken within Monitoring of the Local Plan and Ashfield's Annual Monitoring Report.

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<sup>8</sup> A Practical Guide to the Strategic Environmental Assessment Directive, 2005 Office of Deputy Prime Minister

<sup>9</sup> Save Historic Newmarket Ltd v Forest Heath District Council (2011) EWHC 606

- 2.27 This SA Report includes elements of the final 'Environmental Report' required by the SEA Directive. Table Four identifies the relevant sections of the SA Report that meet the SEA Directive requirements.

**Table Four: The Requirements of the SEA Directive**

<b>SEA Requirements</b>	<b>Covered in the SA Report</b>
<b>Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is sets out in the Environment Assessment of Plans and Programmes Regulations 2004, Schedule 2</b>	
1) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter Appendix
2) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Chapter Appendix
3) The environmental characteristics of areas likely to be significantly affected;	Chapter Appendix
4) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC (Birds Directive) and 92/43/EEC (Habitats Directive).;	Chapter Appendix
5) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	Chapter Appendix
6) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Chapter Appendix
7) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Chapter Appendix
8) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapter Appendix
9) a description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter Appendix

10) a non-technical summary of the information provided under the above headings	Chapter Appendix
<b>The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (SEA Directive Article 5.2)</b>	
<b>Consultation:</b> <ul style="list-style-type: none"> <li>authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Parts 3 Regulation 12)</li> </ul>	Consultation was undertaken on the SA Scoping Report between September-October 2013. The Consultation Response Report on the Council's website summarises the statutory environmental bodies and other parties consultation comments and how they have been addressed in the SA Report.
<ul style="list-style-type: none"> <li>The draft plan or programme and the environmental report shall be made available for consultation to authorities with environmental responsibility and the public, within appropriate time frames to enable them to express their opinion on the draft plan or programme.</li> </ul>	The SA Report on the Local Plan Preferred Alternative is being made available alongside the Local Plan Preferred Approach.
<b>Taking the environmental report and the results of the consultations into account in decision-making (SEA Directive Article 8)</b>	
<b>Provision of information on the decision:</b> When the plan or programme is adopted, the public consulted must be informed and the following made available to those so informed: <ul style="list-style-type: none"> <li>the plan or programme as adopted</li> <li>a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report, the opinions expressed and the results of consultations entered into pursuant have been taken into account and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</li> <li>the measures decided concerning monitoring.</li> </ul>	To be completed following adoption of the SADM.
<b>Monitoring</b>	
Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10)	To be completed following adoption of the SADM.

### **What happens next?**

- 2.28 The Council will take into account the responses received to the Local Plan and SA of the Local Plan consultation. If changes are made to the Local Plan Preferred Approach the changes to options, policies or sites will be subject to a re-appraisal of the SA. A revised version of the SA Report will be taken forward alongside of the Publication draft of the Local Plan. Thereafter, it is anticipated the Local Plan and the SA Report will be submitted to the Secretary of State for Communities and Local Government to be examined by a Planning Inspector.

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## The Sustainability Context for Ashfield

### **Relationship with other Plans and programmes.**

3.1 A detail review of plans, policies and programmes relating to Ashfield was undertaken as part of the Review of the Local Plan Sustainability Appraisal Scoping Report. These plans and programmes impose both constraints and present opportunities. The plans, policies and programmes will be reviewed and updated as the Local Plan moves forward.

3.2 The Local Plan should be consistent with:

- national policy set out in the National Planning Policy Framework, Ministerial Statement and supported by National Planning Policy Guidance;
- Other Local Plans which consist of the Minerals Local Plan and the Waste Local Plan being brought forward by Nottinghamshire County Council.

The requirement to take account of the Sustainable Community Strategy no longer applies as legislation was amended by the Deregulation Act 2015.

3.3 The Local Plan must be consistent with the NPPF which identifies that “the purposes of the planning system is to contribute to the achievement of sustainable development. The policies in paragraphs 18 to 219, taken as a whole, constitute the Government’s view of what sustainable development in England means in practice for the planning system.” (para.6). Paragraph 14 identifies that there is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. In relation to plan making local planning authorities should positively seek opportunities to meet the development needs of their area with Local Plans meeting objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- specific policies in this Framework indicate development should be restricted.

The Review of the Scoping Report in Table Five sets out the sustainability appraisal objectives and how they link to the NPPF. It should be noted that the NPPF identified exceptions to the application of sustainable development with paragraph 119 identifying that it does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined.

3.4 The NPPF (paragraphs 156 & 157) requires the Council to set out the strategic priorities for the area in the Local Plan to deliver:

- the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;

- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

In addition the Local Plan should

- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
- be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
- be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations
- indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
- identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.

- 3.5 The emerging Local Plan will have to comply with the NPPF if it is to be adopted. The NPPF also requires Local Plans to be 'aspirational but realistic'. This means that opportunities for appropriate development should be identified in order to achieve net gains in terms of sustainable social, environmental and economic development; however significant adverse impacts in any of those areas should not be allowed to occur.

#### **Baseline Information**

- 3.6 The Ashfield Sustainability Appraisal Scoping Report sets out baseline information which provides the basis for predicting and monitoring the likely sustainability effects of a plan and helps to identify key sustainability issues and means of dealing with them.

#### **The Emerging Local Plan**

- 3.7 The current local plan for Ashfield is the Ashfield Local Plan Review 2002 (saved policies). It is supported by a number of supplementary planning documents.
- 3.8 The Local Plan will be the statutory development plan for the District replacing the Ashfield Local Plan Review 2002 (Saved Policies). Together with any neighbourhood plans that are brought forward, it will provide the basis for determining planning applications and outlines the main criteria that the Council

will employ in assessing planning proposals within the District of Ashfield. It also sets out a strategy for the future development of Ashfield. In this context it will:

- define the spatial vision for Ashfield;
- set out a number of objectives to achieve the vision;
- set out key strategic policies, both District and Area Based (split into Hucknall, Kirkby-in-Ashfield and Sutton-in-Ashfield and the villages of Selston, Jacksdale and Underwood);
- indicate the numbers and locations of new homes and other developments to be built over the plan period;
- provide policies which will guide the determination of planning applications.

Included with the emerging Local Plan are the following:

- The Statement of Community Involvement (which sets out how the council intends to consult and involve the community in the preparation and review of local development documents and in development management decisions).
- The Local Development Scheme also explains the timetable for bringing forward the local plan.

If necessary, new supplementary planning documents will be brought forward once the Local Plan has been adopted.

- 3.9 The Local Plan has gone through a number of stages in its preparation, initially as part of the Local Development Framework process, and latterly as a Local Plan. This has included a number of consultations:

- Consultation on Core Strategy Issues and Options(June/July 2009);
- Consultation on Spatial Growth Options (October/November 2009)
- Consultation on Core Strategy Preferred Option (March/April 2010)
- Consultation on Local Plan Preferred Approach (September/November Representations on the Local Plan Publication (July/August 2013).
- Submission of Local Plan Publication for Examination (December 2013)

The Council has built on the work already undertaken particularly in relation to the Local Plan Preferred Approach of 2012 and the Local Plan Publication 2014. Additional evidence has been brought forward to support the emerging Local Plan, which will be reflected in the SA of the Local Plan.

- 3.10 The Local Plan draws on the Ashfield Corporate Plan, the Ashfield and Mansfield Community Strategy 2014-2023, and Nottinghamshire Community Strategy.
- 3.11 It is informed by an up-to-date evidence base of key aspects of the social, economic and environmental characteristics of the District. Extensive studies have been undertaken to provide the necessary evidence base for the Local Plan and secure baseline information, which support its policy positions and specific proposals for development. The current evidence base is available on the Council's website at:

<http://www.ashfield-dc.gov.uk/residents/planning,-property-and-housing/forward-planning/ashfield-emerging-local-plan/studies-and-reports.aspx>

3.12 Currently two neighbourhood plan areas have been designated:

- The Selston Neighbourhood Area covering the Parish of Selston
- The Teversal, Stanton Hill and Skegby Neighbourhood Area which covers the area to the north of Sutton in Ashfield including Teversal, Stanton Hill and Skegby.

The work and evidence undertaken by the neighbourhood plan steering groups has been taken into account in the development of the Local Plan Preferred Approach. Further information is available on the Council's website at:

<http://www.ashfield-dc.gov.uk/residents/planning,-property-and-housing/forward-planning/neighbourhood-plans.aspx>

3.13 The SEA Regulations require a number of aspects to be considered including:

- The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme. (Schedule 2, number 2);
- The environmental characteristics of areas likely to be significantly affected. (Schedule 2, number 2);
- Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds and the Habitats Directive [92/43/EEC]. (Schedule 2, number 2);

The issues are identified in Schedule 2, point 6 and are set out as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage, including architectural and archaeological heritage, landscape, and the interrelationship between the issues. (See Review of Scoping Report, Appendix 3).

3.14 The Review of the Scoping Report sets out in Section 4 baseline data and characteristics of Ashfield. This baseline information provides the basis for predicting and monitoring the likely effects of the Plan. In Section 5, Identifying the sustainability issues, Table Two, key messages, sets out the key messages from the review of plans policies and programmes, the source of the message and the implications in relation to sustainability issues and problems for Ashfield.

3.15 The Scoping Report identified the sustainability issues arising from a review of the relevant plans, policies and programmes (Review of the Local Plan SA Scoping Report Table, Two Key messages). These are summaries in the Table Five below.



**Table Five: Key messages**

	<b>Sustainability Issues and Problems</b>
<b>Accessibility and transport</b>	<ul style="list-style-type: none"> <li>• The need to improve the quality and range of services available within communities.</li> <li>• Ensure that new development has good access to facilities and alternative means of travel</li> <li>• Reducing the dependency on the private car.</li> <li>• Traffic congestion is an issue at specific locations in the District but it is unlikely that there will be significant public funding available for new roads.</li> <li>• To minimise future congestion and emissions in relation to road traffic</li> <li>• To work with partners to provide an integrated and efficient transport system including public transport, community transport, taxis, walking and cycling network in Ashfield.</li> </ul>
<b>Air quality</b>	<ul style="list-style-type: none"> <li>• Maintaining and improving air quality in accordance with National Air Quality Standards and best practice.</li> <li>• Seeking to secure a reduction in emissions from sources which contribute to poor air quality.</li> </ul>
<b>Biodiversity and habitats</b>	<ul style="list-style-type: none"> <li>• The protection and enhancement of biodiversity, particularly statutory and non statutory sites of nature conservation interest in Ashfield.</li> <li>• Ensuring that the plan proposals have no adverse effect upon the South Pennines Special Area of Conservation (SAC), the Birklands &amp; Bilhaugh SPC and the Sherwood Forest potential Special Protection Area.</li> <li>• Safeguarding nationally and locally valued species and habitats and minimising the direct and indirect impact of new development on these</li> <li>• Protect, restore and improve habitats including woodland, and aquatic ecosystems.</li> <li>• Protect wildlife corridors and networks from habitat fragmentation by development.</li> <li>• Create and integrate habitats in urban spaces and in the built environment.</li> </ul>
<b>Business development and the economy</b>	<ul style="list-style-type: none"> <li>• Meeting the needs of all current and future populations in terms of business and job opportunities.</li> <li>• Overreliance on the manufacturing sector where employment levels have declined over time.</li> <li>• Accommodating any employment land and other development opportunities as far as possible within an urban area so as to minimise the impact on greenfield sites.</li> <li>• Providing the necessary infrastructure to accommodate current and future development needs in terms of green and social infrastructure.</li> <li>• The need to encourage and accommodate both indigenous and inward investment particularly in relation to identified Sectors which have the potential for growth.</li> <li>• Creating an environment that is attractive to future growth sectors to improve performance in comparison with other locations.</li> <li>• There are pockets of deprivation particularly within the urban area. Economic regeneration is particularly important in these areas of the town to help alleviate poverty.</li> <li>• The District has three shopping centres that need to be supported in order to keep them vital and viable.</li> </ul>
<b>Climate change</b>	<ul style="list-style-type: none"> <li>• Planning for the adaptation of and long-term resilience of Ashfield in relation to all aspects of climate change.</li> </ul>
<b>Community safety</b>	<ul style="list-style-type: none"> <li>• To improve safety and security for people and property (e.g. through design intervention) and to reduce fear of crime.</li> </ul>

	Sustainability Issues and Problems
<b>Education</b>	<ul style="list-style-type: none"> <li>Ashfield has lower than average education attainment levels in schools.</li> <li>There is a need to support the extension and/or rebuilding of schools to meet future education needs from development.</li> </ul>
<b>Employment</b>	<ul style="list-style-type: none"> <li>To increase incomes and skill levels, particularly in those communities suffering high levels of deprivation.</li> <li>Using planning to improving employment prospects and training for local residents.</li> <li>Responding to future trends in employment and supporting the growth of self-employment.</li> <li>There is a lack of retention of graduates in Ashfield.</li> </ul>
<b>Energy</b>	<ul style="list-style-type: none"> <li>Improving energy efficiency and increasing use of low-carbon and renewable energy.</li> <li>Balancing the potential amenity and landscape impacts and the need for alternative sources of energy.</li> </ul>
<b>Flood risk</b>	<ul style="list-style-type: none"> <li>To take account of the impact of development on water in relation to water quality and flood risk.</li> <li>To avoid development within Flood Zones 2 and 3 unless exceptional reasons arise.</li> <li>While the risk of flooding from watercourses is relatively low there is a risk from flooding is specific area, in particular, Hucknall and Jacksdale. Further, additional water into the River Leen raises significant flood issues in Nottingham.</li> <li>To consider the impacts of other sources and particularly surface water on flood in relation to development.</li> <li>Ensuring that development contributes towards reducing flooding risk through improvements to the drainage infrastructure and the use of sustainable urban drainage systems</li> </ul>
<b>Health</b>	<ul style="list-style-type: none"> <li>Residents of Ashfield have a short life expectancy.</li> <li>To improve health and well being, and to prevent ill health (e.g. through healthy eating and exercise).</li> <li>To provision health services and facilities in relation to the demands arising from new development.</li> </ul>
<b>Housing</b>	<ul style="list-style-type: none"> <li>Understand the level of housing required in Ashfield and the interaction between different areas of the District and the relationship with the Greater Nottingham Area.</li> <li>To provide sufficient housing of a type and tenure to meet specific needs.</li> <li>While the District is perceived as an area of affordable housing, when income levels in Ashfield are taken into account, housing affordability is an issue in the District.</li> <li>Changing demographic structure will impact future household characteristics and will have implications for the provision of housing, employment opportunities and services.</li> <li>Given that substantial parts of the District are in Green Belt, there are issues in balancing the housing needs of specific areas against the impact on the Green Belt and the countryside.</li> <li>Improving the quality of the existing housing stock.</li> <li>Reduce the potential impacts on the environment and social infrastructure of Ashfield whilst allocating land to provide for housing requirements.</li> <li>There is a requirement to identify the supply and demand for sites for Gypsies, Travellers and Travelling Showpeople.</li> </ul>

	Sustainability Issues and Problems
<b>Land use</b>	<ul style="list-style-type: none"> <li>• Protecting better quality agricultural land from development.</li> <li>• Balancing the needs of agriculture, recreation &amp; access requirements, the need for alternative sources of energy, flood protection etc.</li> <li>• Providing a framework within which to manage protection of existing habitats and creation of new ones,</li> <li>• The need to safeguard and improve soil resources.</li> <li>• Addressing contamination issues relating to previous land uses.</li> <li>• Past development of brownfield sites means that currently there are limited stocks of vacant brownfield land. By implication, this means that there will be a loss of green field sites and agricultural land.</li> <li>• Reinforcing the role of the town centres.</li> </ul>
<b>Landscape &amp; Historic Environment</b>	<ul style="list-style-type: none"> <li>• Uncontrolled development could harm local landscape and settlement character.</li> <li>• Protect and enhance landscapes that contribute to the distinctive local character of areas within the District;</li> <li>• Maximise the benefits from the landscape character assessment by using landscape character to make choices about the locations for development and the design of proposals.</li> <li>• Uncontrolled development could harm local landscape and settlement character.</li> <li>• The protection and enhancement of Ashfield's historical and archaeological assets</li> <li>• The protection and enhancement of Ashfield's historic environment.</li> <li>• The need to improve and enhance the condition of heritage assets at risk, particularly the Listed Buildings at risk such as Annesley Hall;</li> <li>• The protection of non designated heritage asset within Ashfield.</li> <li>• There is a need to actively promote the character and distinctiveness of the Conservation Areas.</li> <li>• Using the Conservation Area appraisals, to inform choices about development and the design of proposals within and adjacent to those areas.</li> <li>• Improving the public realm and promoting high standards of design where regeneration is required.</li> </ul>
<b>Resources</b>	<ul style="list-style-type: none"> <li>• Protecting better quality agricultural land from development.</li> <li>• Balancing the needs of agriculture, recreation &amp; access requirements, the need for alternative sources of energy, flood protection etc.</li> <li>• Providing a framework within which to manage protection of existing habitats and creation of new ones,</li> <li>• The need to safeguard and improve soil resources.</li> <li>• Addressing contamination issues relating to previous land uses.</li> <li>• Safeguarding mineral sources to meet future needs.</li> <li>• Providing the necessary infrastructure to accommodate current and future development needs in terms of physical green and social infrastructure.</li> <li>• To ensure good design in development by minimising the overall creation of waste resulting from inefficient design; reducing the quantity of material sent to landfill during the construction process by effective waste management; recycling materials already on site and using more recycled materials.</li> </ul>
<b>Rural</b>	<ul style="list-style-type: none"> <li>• The protection and enhancement of biodiversity, particularly statutory and non statutory sites of nature conservation interest in Ashfield.</li> </ul>
<b>Sustainable communities</b>	<ul style="list-style-type: none"> <li>• To ensure that recreation and leisure facilities including open space meets future demand</li> <li>• The need to support green infrastructure (i.e. a strategic network of green spaces and recreational corridors)</li> </ul>

	Sustainability Issues and Problems
	<ul style="list-style-type: none"> <li>• There are significant pockets of deprivation in Ashfield.</li> <li>• Reinforce the role of the town centres by improving urban spaces and accessing social infrastructure.</li> </ul>
<b>Waste</b>	<ul style="list-style-type: none"> <li>• To follow the 'waste hierarchy' and in particular to reduce the growth in waste and increase the amount of waste which is re-used and recycled.</li> <li>• New development needs to include provision for waste recycling facilities.</li> </ul>
<b>Water</b>	<ul style="list-style-type: none"> <li>• To safeguard surface and groundwater resources</li> <li>• To improve water quality.</li> <li>• To take account of the impact of development on water in relation to water quality and flood risk.</li> <li>• Reducing the level of water use given the constrained water supply for Greater Nottingham and Ashfield.</li> </ul>

## INSET PLANS

Plan1 Heritage Constraints

Plan 2 Nature Conservation Constraints

Plan 3 Flood Maps

Plan 4 Deprivation

## 4.0 SUSTAINABILITY APPRAISAL OPTIONS

- 4.1 This section outlines the options which were considered leading to the preparation of Ashfield's Local Plan, the reasonable alternatives considered, the possible impacts of these options and alternatives in sustainability terms, and the reasons for rejecting them. This section summarises the work that has been undertaken in previous iterations of the SA process and the conclusions reached.

### Evolution of the SA of the Plan

- 4.2 The Local Plan has gone through a number of stages in its preparation, initially as part of the Local Development Framework process, and latterly as a Local Plan. This has included a number of consultations:
- Consultation on Core Strategy Issues and Options (June/July 2009);
  - Consultation on Spatial Growth Options (October/November 2009)
  - Consultation on Core Strategy Preferred Option (March/April 2010)
  - Consultation on Local Plan Preferred Approach (September/November 2012)
  - Representations on the Local Plan Publication (July/August 2013).
  - Submission of Local Plan Publication for Examination (December 2013)
- 4.3 The European Commission guidance on the implementation of the SEA directive<sup>10</sup> sets out in paragraphs 4.6 and 4.7 the following:
- Paragraph 4.6 - If certain aspects of a plan or programme have been assessed at one stage of the planning process and the assessment of a plan or programme at a later stage of the process uses the findings of the earlier assessment, those findings must be up to date and accurate for them to be used in the new assessment. They will also have to be placed in the context of that assessment. If these conditions cannot be met, the later plan or programme may require a fresh or updated assessment, even though it is dealing with matter which was also the subject of the earlier plan or programme.
  - Paragraph 4.7 - It is clear that the decision to reuse material from one assessment in carrying out another will depend on the structure of the planning process, the contents of the plan or programme, and the appropriateness of the information in the environmental report, and that decisions will have to be taken case by case. They will have to ensure that comprehensive assessments of each element of the planning process are not impaired, and that a previous assessment used at a subsequent stage is placed in the context of the current assessment and taken into account in the same way. In order to form an identifiable report, the relevant information must be brought together: it should not be necessary to embark on a paper-chase in order to understand the environmental effects of a proposal. Depending on the case, it

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<sup>10</sup>Implementation of Directive 2001/42 on the Assessment of the Effects of Certain Plans and Programmes on the Environment.

might be appropriate to summarise earlier material, refer to it, or repeat it. But there is no need to repeat large amounts of data in a new context in which it is not appropriate.

- 4.4 Since the Spatial Options were appraised in October 2009, the Council has progressed with evidence gathering and new information and issues have come forward, which have a bearing on the sustainability of each spatial growth option. For example, an appeal decision in relation to a proposed incinerator ruled that there was merit in potentially designating areas of Ashfield as Special Protection Area in relation to nightjar and woodlark populations.
- 4.5 The Council consulted on the Sustainable Appraisal of the Local Plan Preferred Approach (September/November 2012) and the Local Plan Publication (July/August 2013). The Local Plan was submitted for examination on 18th December 2013 with Mr Jeremy Youle BA (Hons) MA MRTPI being appointed to conduct the Examination. Following an Exploratory Meeting, the Inspector's letter dated 26th March 2014 concluded that the Plan should be withdrawn. The Inspector raised a number of concerns regarding the SA of the Local Plan including the following:
- It was not clear from the SA of sites why the allocated sites had been selected and alternative sites had been rejected. What were the key factors in making individual site selection choices or how were these factors weighed against others to reach conclusions?
  - The SA Criteria 7 for 'Environment and Landscape' related mostly to open space, cultural activities and historic sites and not landscapes. The previous iteration of the SA (Preferred Approach 2012) did not always make any reference to potential visual or landscape effects. However, even where it did, the reference was usually brief and without any substantive analysis. In order to comply with the Framework and given the potential need to consider development outside settlement boundaries, the Inspector stressed it was important that the relative merits of site options in terms of landscape and visual effects should be evaluated to a reasonable degree and the conclusions clearly factored into the decision making process.
  - In relation to town centre regeneration the Inspector identified that it was not clear from the SA why development options, including those in the Green Belt, facilitated the regeneration of Kirkby town centre.
  - The projected impact on town centres of development sites does not appear to be set out clearly in the SA of sites or elsewhere.
  - The Council had not assessed the potential to allocate smaller parcels of land within the SUEs for a variety of reasons. The Inspector considered that the small parcels of land within the SUEs should be SA on their own merits.

The Inspector concluded that he was not convinced that the SA demonstrates that the Plan is justified and so represents the most appropriate strategy when considered against the reasonable alternatives.

4.6 Reflecting the Inspector's concerns the Council has:

- Set out the reasons why sites have been taken forward in the SA;
- Undertaken a Review of the Local Plan Sustainable Appraisal Scoping Report, specifically identify landscape and town centres within the SA objectives;
- Undertaken an SA of all potentially suitable sites in the Strategic Housing Land Availability Assessment and the Strategic Employment Land Availability Assessment;
- Outside the main urban area and settlements undertaken a landscape assessment of the housing sites, which is reflected in the SA of the housing sites;
- A Review of the Green Belt has been undertaken against the five Green Belt purposes set out in the NPPF.

**Comparison of the Local Plan Preferred Approach against a 'do nothing' scenario**

- 4.7 The NPPF identifies that plans and decisions need to take local circumstances into account so that they respond to different opportunities for achieving sustainable development in different areas. (Paragraph 10). Nevertheless, the SEA regulations stipulate a requirement to consider the likely situation in the absence of a Local Plan.
- 4.8 If no Local Plan was taken forward this does not mean that there would be a void in relation to planning and considering planning applications. In the absence of a Local Plan there is still national planning policy in the form of the National Planning Policy Framework and Planning Policy Guidance. Table Six provides an analysis of the likely consequences in terms of each sustainability objective of not taking forward a Local Plan. Consequently, The Sustainability Appraisal in the Table has to be seen in the context that both national planning policy and the local plan are likely to have significant positive effect. The SA reflects a comparison of a scenario where no Local Plan is taken forward and planning strategies and determinations are reflective of national planning policy.
- 4.9 The analysis identifies that there are positives to taking forward a Local Plan. Without a plan or strategic vision, development would take place on a more ad hoc basis. The Local Plan enables local issues and factors to be considered in detail and provides a local context to site allocations which minimise the potential impact on the local environment. This would result in the granting of permission for development, which although acceptable in relation to national policy, would not represent the best outcome in achieving sustainable forms of settlement planning. The result would be forms of development that were perhaps policy compliant but would not necessarily contribute to a holistic strategy to deliver the best form of development to meet corporate and sustainability objectives for the District.



**Table Six: Ashfield Local Plan Preferred Approach Against a “Do Nothing” Scenario**

SA Objectives	Decision Making Criteria	Local Plan Preferred Approach	“Do nothing” Scenario
1. Housing - To ensure that the housing stock meets the housing needs of Ashfield.	<ul style="list-style-type: none"> <li>• Will it provide sufficient new homes taking into account need and demand?</li> <li>• Will it support the range of housing types and sizes, including affordable, to meet the needs of all sectors in the community?</li> <li>• Will it create sustainable, inclusive and mixed communities?</li> <li>• Will it promote high standards of design and construction?</li> <li>• Will it reduce the number of unfit homes?</li> <li>• For a heritage asset will it help to reduce the number of vacant buildings through adaptive re-use?</li> <li>• Will it meet the needs of the travelling community?</li> </ul>	<p>The Local Plan and its evidence base identifies the objectively assessed housing need for the District. Housing shortfall is likely to continue without a positive and proactive approach to delivery of local housing through an up to date Local Plan.</p> <p>A coordinated strategy for housing allocation is essential ensuring there are sufficient sites to meet demand. It enables the allocation of sites to meet the housing need throughout the District in a planned in a strategic manner.</p> <p>Changes to demand and needs for different types of housing is unlikely to be identified without a Local Plan and without an appropriate policy responses. For example, responding to the needs of an ageing population may be less co-ordinated in the absence of the Plan.</p> <p>The Local Plan and its evidence based enables affordable housing requirements to be identified and linked to the viability of developments.</p>	<p>The Council has a limited supply of land for housing. This is likely to continue without the allocation of sites to meet housing need. While sites will come forward through individual planning applications this may be insufficient to meet a 5 year housing supply and is less efficient and cost effective.</p> <p>Fewer opportunities to take a strategic joined up approach to the provision of housing and infrastructure across the district.</p> <p>There would be no locally derived Objective Housing Need for Ashfield and the wider Housing Market Area.</p> <p>There would be a lack of any planning for affordable housing in the absence of an evidence base for affordable housing needs of the Housing Market Area and the District.</p> <p>Changes to the population structure with an aging population is likely to create specific needs for housing and services which are unlikely to be met without allocation of sites to meet housing and community needs and specific local policy considerations in the Local Plan.</p> <p>There is likely to be continued pressure for housing development on green open spaces rather than brownfield sites.</p>
2. Health - To improve health and wellbeing and reduce health inequalities.	<ul style="list-style-type: none"> <li>• Will it increase life expectancy?</li> <li>• Will it improve access to services?</li> <li>• Will it protect and enhance open spaces of amenity and recreational value?</li> <li>• Will it increase the opportunities for recreational physical activity?</li> <li>• Will it encourage healthy lifestyles, including travel and food choices?</li> </ul>	<p>The Local Plan provides the opportunity to work in partnership with public health, Clinical commissioning bodies and NHS England to promote health in the District through a broad range of initiatives.</p> <p>An up to date Local Plan can contribute to some of the wider determinants of health.</p>	<p>National policy places a general emphasis to deliver social, recreational and cultural facilities.</p> <p>There are national, regional and county wide initiatives to consider and improve healthy lifestyles.</p> <p>Fewer opportunities for systematic improvements in service provision.</p>



SA Objectives	Decision Making Criteria	Local Plan Preferred Approach	“Do nothing” Scenario
		<p>Improved service provision could be directed towards urban areas and larger housing allocations.</p> <p>With population of the District increasing, pressure on recreation areas is likely to be exacerbated. Without an up to date Local Plan, there is less opportunity to adopt a co-ordinated, spatial approach to the development of open greenspaces/green networks for recreation, walking and cycling networks. Developments allocated through the Local Plan will provide capacity for new residential and employment developments without compromising the local integrity of the District’s recreational assets.</p>	
3. Historic Environment - To conserve and enhance Ashfield’s historic environment, heritage assets and their settings.	<ul style="list-style-type: none"> <li>• Will it conserve and/or enhance designated heritage assets and the historic environment?</li> <li>• Will it respect, maintain and strengthen local character and distinctiveness?</li> <li>• Lead to the repair and adaptive reuse of a heritage asset?</li> <li>• Will it increase social benefit (e.g. education, participation, citizenship, health and wellbeing) derived from the historic environment?</li> <li>• Will it increase the economic benefit from the historic environment?</li> <li>• Will it ensure that repair/ maintenance is sympathetic to local character?</li> </ul>	The Local Plan identifies policies with a clear vision to protect the Historic Environment. It enables the identification and some protection to be given to local heritage assets.	National policy emphasises the importance of designated heritage assets. Opportunities to plan across the district in terms of protecting and enhancing the historic environment will be reduced as development would come forward on an ad hoc basis.
4. Community Safety - To improve community safety,	<ul style="list-style-type: none"> <li>• Will it create a safe environment?</li> <li>• Will it reduce crime and the fear of crime?</li> <li>• Will it contribute to a safe secure environment?</li> </ul>	Local Plan design policies seek to design out crime in developments coming forward.	The NPPF requires good design that creates “safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or

SA Objectives	Decision Making Criteria	Local Plan Preferred Approach	“Do nothing” Scenario
reduce crime and the fear of crime.	<ul style="list-style-type: none"> <li>Does it design out crime?</li> </ul>	Organisations including the Police and local Community Safety Partnership have responsibility to reduce crime and fear of crime. However, the Local Plan could contribute by promoting the redevelopment of derelict/vacant sites.	community cohesion” (paragraph 58). However, without a more detailed local policy there is more limited opportunity to influence the best outcome.
5. Social Inclusion Deprivation - To improve social inclusion and to close the gap between the most deprived areas and the rest of Ashfield.	<ul style="list-style-type: none"> <li>Will it address the Indices of Multiple Deprivation and the underlying indicators?</li> <li>Promote effective integration with existing communities?</li> <li>Provide for affordable housing?</li> <li>Provide for an appropriate housing mix?</li> <li>Will it improve accessibility to key local services and facilities, including health, education and leisure?</li> <li>Will it improve accessibility to shopping facilities?</li> </ul>	<p>The distribution of deprivation and social exclusion in the District is likely to continue without an appropriate local policy response, linked to socio-economic regeneration, including linking employment to areas of high deprivation, providing community services and facilities and providing education facilities.</p> <p>The Council works in partnership with other organisations to promote a broad range of initiatives. In the absence of the Local Plan, opportunities would be lost to provide new community facilities and to ensure that new housing developments have good access to facilities.</p> <p>The issue of social exclusion in relation to Gypsies and Travellers should also be addressed through specific Gypsy and Traveller site allocations.</p>	<p>Opportunities for the improvement of community facilities are likely to be more opportunistic. Sites may be progressed that are acceptable in policy terms but not the best possible option in light of all the evidence available.</p> <p>It is likely to result in a lack of affordable housing and development with poor access to services.</p>
6. Biodiversity & Green Infrastructure - To conserve, enhance and increase biodiversity levels and Green & Blue Infrastructure	<ul style="list-style-type: none"> <li>Will it protect SPAs SAC and SSSI?</li> <li>Will it protect, maintain and enhance or provide mitigation for sites designated for their local nature conservation interest?</li> <li>Does the plan seek to prevent habitat &amp; wildlife corridor fragmentation?</li> <li>Does it provide opportunities for provision &amp; enhancement of priority habitat or species?</li> </ul>	<p>The Local Plan directs development away from the most valuable habitats. A less rigorous approach to the location of development could have an adverse impact on biodiversity sites and reduce opportunities to provide linked green infrastructure. With population increasing, pressure on green infrastructure and wildlife areas is likely to be exacerbated.</p> <p>Without an up to date Local Plan, there is less opportunity to adopt a co-ordinated, spatial approach to the development of open green spaces/green networks.</p>	National Guidance would offer some protection for Biodiversity and GI of international and national designated sites. However, there would be more limited opportunities to protect Local Wildlife Sites or improve Green Infrastructure routes leading to places which are not as well connected.

SA Objectives	Decision Making Criteria	Local Plan Preferred Approach	“Do nothing” Scenario
	<ul style="list-style-type: none"> <li>Does it provide opportunities for provision &amp; enhancement of green space / green infrastructure?</li> <li>Will it lead to a loss of or damage to a designated geological site?</li> </ul>	<p>Strategic developments allocated through the Local Plan will provide capacity for new residential and employment developments without compromising the local integrity of the Districts environmental assets.</p> <p>The Local Plan sets out clear strategies for protecting biodiversity and enhancing Green Infrastructure. The Local Plan gives planning weight to Local Nature designations in the decision making process.</p> <p>The severity and likelihood of adverse impacts on local ecosystems is likely to increase with current trends of climate change. Without an up to date Local Plan, there is less opportunity to adopt a co-ordinated, spatial approach to managing the effects of this change through careful site allocations and wildlife conservation and enhancement initiatives.</p>	
7. Landscape - To protect enhance and manage the character and appearance of Ashfield's landscape /townscape, maintaining and strengthening local distinctiveness and sense of place.	<ul style="list-style-type: none"> <li>Will it maintain and/or enhance the local distinctiveness and character of landscape?</li> <li>Will it recognise and protect the intrinsic character and beauty of the countryside?</li> <li>Will it promote development that is in scale and proportionate to host settlement?</li> <li>Will it promote sites that are well planned or soft landscaped in such a way as to positively enhance the environment?</li> </ul>	<p>Strategic developments allocated through the Local Plan will provide capacity for new residential and employment developments will enable a detailed consideration to be given to landscape at a local level, taking into account the District's most sensitive landscapes. However, the ability to plan strategically taking into account the cumulative impact at a district wide level would be reduced.</p>	<p>National guidance identifies that the planning system should protect and enhance valued landscapes but the emphasis is upon giving great weight to nationally important landscape and scenic beauty.</p> <p>A fragmented, piecemeal approach reflected in individual planning application is likely to result in a lack of protection of the best landscapes. It will also result in the potential development of sites with a locally high valued landscape.</p>
8. Natural Resources - To minimise the loss of natural resources including soils, greenfield land and the best quality agricultural land.	<ul style="list-style-type: none"> <li>Will it use land that has been previously developed (Brownfield land)?</li> <li>Will it protect and enhance the best and most versatile agricultural land?</li> </ul>	<p>Strategic allocation of sites through the Local Plan enables the impact on natural resources to be considered and where ever possible minimised.</p> <p>Adopting a strategic approach to development planning through the Local Plan ensures the impacts on minerals and</p>	<p>There would be an increased risk of the loss of good quality agricultural grade land through ad hoc development when compared with strategically planned growth.</p>

SA Objectives	Decision Making Criteria	Local Plan Preferred Approach	“Do nothing” Scenario
	<ul style="list-style-type: none"> <li>Will it prevent soil degradation &amp; contamination?</li> <li>Will it impact on a minerals safeguarded area?</li> </ul>	<p>higher grade agricultural land can be considered and minimised.</p> <p>The Local Plan includes assessing the capacity and feasibility of regenerating existing brownfield land to be brought forward for alternative uses such as housing.</p> <p>Brown field sites are considered as part of the coordinated local spatial strategy to housing allocation would maximise the use of previously developed land.</p>	
9. Air & noise pollution - To reduce air pollution and the proportion of the local population subject to noise pollution.	<ul style="list-style-type: none"> <li>Will it limit or reduce emissions of air pollutants &amp; improve air quality?</li> <li>Will it limit or reduce noise pollution?</li> </ul>	Without a planned approach to development through the Local Plan, there is less opportunity to adopt a coordinated, spatial approach that would manage and reduce the risk of health impacts.	<p>Climate change and a rising local population are in combination, at certain times of the year, are likely to increase the sources, pathways and receptors of harmful pollutants independently of any local plan.</p> <p>Without a strategic approach to housing and employment requirements this could result in piece meal development in areas sensitive to noise and air pollution.</p>
10. Water Quality - To conserve and improve water quality and quantity.	<ul style="list-style-type: none"> <li>Will it reduce water consumption?</li> <li>Will it maintain or enhance water quality?</li> <li>Will it implement SUDs, where appropriate, to avoid run off of polluted water to water courses or aquifers?</li> </ul>	<p>The Local Plan strengthens national safeguards by adding an important strategic spatial dimension to this local level.</p> <p>The Local Plan can introduce under Planning Policy Guidance Housing-Optional Technical Standards water efficiency standards.</p> <p>Local Plan enables detailed policies to be applied in relation to SuDS and to improve water quality.</p> <p>Enables risks to ground water to be reflected in Local Plan policies.</p> <p>The Local Plan is brought forward considering infrastructure requirements including liaising with Severn Trent Water over the level of growth proposed and the</p>	<p>If no changes are made under the Local Plan the mandatory national standard set out in the Building Regulations (of 125 litres/person/day).</p> <p>National policy gives priority to the use of sustainable drainage systems (NPPF para 103)</p>

SA Objectives	Decision Making Criteria	Local Plan Preferred Approach	“Do nothing” Scenario
		impact on wastewater infrastructure enabling enhancements to be coordinated.	
11. Waste - To minimise waste and increase the re-use and recycling of waste materials.	<ul style="list-style-type: none"> <li>• Will it move management of waste up the waste hierarchy?</li> <li>• Will it help in increase waste recovery and recycling?</li> <li>• Will it reduce waste in the construction industry?</li> </ul>	Policies in the local Plan can support the Waste Local Plan by identifies policies to reduce waste and take into account facilities to maximise the efficient collection of waste.	National Waste Policy and the Waste Local Plan produced by Nottinghamshire County Council are the key local plan document in the context of waste.
12. Climate Change and Flood Risk To adapt to climate change by reducing and manage the risk of flooding and the resulting detriment to people, property and the environment.	<ul style="list-style-type: none"> <li>• Will it manage or reduce flooding?</li> <li>• Will it attenuate the flow and run off of water?</li> <li>• Does it avoid locations within Flood Zones 2 and 3?</li> <li>• Will it promote Sustainable Drainage systems?</li> <li>• Will it impact on of ground and surface water flooding?</li> <li>• In relation to heritage assets does it integrate climate change mitigation and adaptation measures into the historic environment sensitively?</li> </ul>	<p>Without the benefits of local spatial strategy it will be more difficult to manage the effects of developments on flood risk,</p> <p>The Local Plan is able to set policies at a local level to reflect the flood risk for Ashfield and avoiding, except in exceptional cases Flood Zone 2 and 3.</p> <p>Without an up to date local policy framework, it will be more difficult to take a strategic approach to siting development in areas of lower flood risk. This may mean more development occurring in unsuitable locations.</p> <p>Can reflect the need for green field runoff rates for Hucknall reflecting local flood risk Can reflect that the severity and likelihood of flooding from surface water is likely to increase with current trends of climate change.</p>	<p>All developments would need to take account of National policy on flood risk.</p> <p>The NPPF would still apply without the implementation of the DPDs and states that “inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere” (NPPF paragraph 100).</p> <p>There would be a lack of a local approach to the SuDS elements required in the different parts of the District.</p>
13. Climate Change and Energy Efficiency - To adapt to climate change by minimise energy usage and to develop Ashfield’s renewable energy resource, reducing dependency on non-renewable sources.	<ul style="list-style-type: none"> <li>• Will it improve energy efficiency of new buildings?</li> <li>• Will it support the generation and use of renewable energy?</li> <li>• Will it encourage the use of clean, low carbon, energy efficient technologies?</li> </ul>	<p>In the absence of an up to date Local Plan there is no possibility of implementing any Local Standards and there is less clarity regarding building design</p> <p>It will also be difficult to take a strategic approach to the siting of development ensuring that locations less vulnerable to the future effects of climate change can be chosen.</p>	<p>Emissions from new development are likely to be progressively reduced due to initiatives in the Building Regulations and National Standards</p> <p>The NPPF requires local authorities to reduce greenhouse gas emissions and actively support energy efficiency improvements without the implementation of relevant DPDs.</p> <p>Carbon reduction is driven by national targets that are influencing the industry, for example</p>

SA Objectives	Decision Making Criteria	Local Plan Preferred Approach	“Do nothing” Scenario
		<p>Technical housing standards for English Local Authorities. Local Authorities will no longer be able to set local requirements relating to space, water, access, security of energy but may adopt 'optional' higher national standards where justified on the basis of need and viability.</p> <p>The Local Plan has potentially some role some role to play in increasing the rate of local mitigation and adaptation in the context of national improvements.</p>	towards zero carbon standards for new homes by 2016.
14. Travel and Accessibility - To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys.	<ul style="list-style-type: none"> <li>• Will it utilise and enhance existing transport infrastructure?</li> <li>• Will it help to develop a transport network that minimises the impact on the environment?</li> <li>• Will it potentially reduce journeys undertaken by car by encouraging alternative modes of transport?</li> <li>• Will it have access to pedestrian &amp; cycle routes for localised leisure opportunities?</li> </ul>	<p>Through strategic planning policies, the Council seeks greater provision of sustainable alternatives to the private motor car through the delivery of cycle routes and pedestrian links, and to make optimum use of the highway network through planned improvements.</p> <p>A coordinated approach to the allocation of development ensures future developments are well located in terms of accessibility to existing services and facilities and public transport.</p> <p>The Local Plan provides a mechanism to prioritise improvements to the public transport in order to discourage reliance on the private car. This would be coordinated in conjunction with countywide transport planning undertaken by Nottinghamshire County Council and Nottingham City Council.</p>	<p>Existing patterns of transport are likely to be reinforced, with high levels of car dependency and less opportunities to tackle social exclusion and resolve strategic matters.</p> <p>Poorly located development would result in a lack of travel choice and high levels of dependency on the car.</p>
15. Employment - To create high quality employment opportunities including opportunities for increased learn and skills to meet the needs of the District.	<ul style="list-style-type: none"> <li>• Will it provide employment opportunities for local people?</li> <li>• Will it support and improve education/training facilities to meet local needs?</li> <li>• Will it contribute towards meeting skill shortages?</li> </ul>	<p>The Local Plan enables the identification of sites to plan positively for economic growth. Employment allocated through the Local Plan will provide capacity for employment developments without compromising the local integrity of the District's environmental/ recreational assets.</p>	<p>National policy gives significant weight to economic growth. It also places an emphasis on development widening educational choice and to the need to create, expand or alter schools.</p> <p>It will not identify Functional Economic Market Areas.</p> <p>It will not identify Local Policies to meet employment land demand and supply for the area.</p>

SA Objectives	Decision Making Criteria	Local Plan Preferred Approach	“Do nothing” Scenario
	<ul style="list-style-type: none"> <li>• Will it improve access to employment by means other than single occupancy car?</li> </ul>	<p>It enables the Functional Economic Market Area to be identified for Ashfield and the wider area.</p> <p>It enables the Council to take into account D2N2 Local Enterprise Partnership Economic Strategy within the Local Plan.</p> <p>It also enables policies and contributions to improve skills and training as Ashfield performs less well in relation to qualifications and training compared against the East Midlands. If this continues it could have a negative impact on the economic competitiveness of the District and affect local people's long term employability.</p> <p>Adopting a spatial approach to the allocation of development will ensure development is located in areas where existing education capacity is good and identify those areas where new facilities are required. This will ensure that development of new housing is planned in parallel with the development of new schools/upgrades to existing facilities.</p>	<p>Nottinghamshire County Council has responsibility for planning for education provision in the District but in the absence of the Local Plan a less coordinated approach would be adopted to future primary schools as part of larger sites or contributions under the CIL Regulations to expand existing school facilities.</p>
<p>16. Economy – To improve the efficiency, competitiveness and adaptability of the local economy.</p>	<ul style="list-style-type: none"> <li>• Will it improve business development and enhance competitiveness?</li> <li>• Will it make land and property available to encourage investment and enterprise taking into account current and future working environments?</li> <li>• Will it provide supporting infrastructure?</li> <li>• For a heritage asset will it promote heritage-led regeneration?</li> </ul>	<p>The Local Plan enables the identification of sites to plan positively for economic growth. Employment allocated through the Local Plan will provide capacity for employment developments without compromising the local integrity of the District's environmental/ recreational assets.</p> <p>With national changes to permitted development rights from offices to residential and possible changes in relation to brown field sites this may limit the ability of the Local Plan to address the issue of loss of employment land. However, without the specific mixed use and employment allocations in the Local</p>	<p>National policy gives significant weight to economic growth.</p>



SA Objectives	Decision Making Criteria	Local Plan Preferred Approach	“Do nothing” Scenario
		<p>Plan there may be a lack of employment land to facilitate economic growth.</p> <p>It enables policies and contributions to improve skills and training as Ashfield performs less well in relation to qualifications and training compared against the East Midlands. If this continues it could have a negative impact on the economic competitiveness of the District and affect local people's long term employability.</p> <p>It gives developers certainty in investing into the District and facilitates regeneration.</p> <p>It coordinates the delivery of physical and social infrastructure.</p>	
17. Town Centres - Increase the vitality and viability of Ashfield's town centres.	<ul style="list-style-type: none"> <li>• Will it improve the vitality of existing town?</li> <li>• Will it improve the viability of existing town centres?</li> <li>• Will it provide for the needs of the local community?</li> <li>• Will it make the town centre a place to attract visitors?</li> </ul>	<p>The Local Plan can specify the balance and mix of uses which are appropriate in town centres. This is less to happen in a coordinated, planned way in the absence of the Local Plan.</p> <p>The Local Plan can set out contributions towards projects that will help to improve and regenerate town centres.</p>	National policy emphasises the importance of town centres and identifies a variety of main town centre uses.



## **Developing the Local Plan Preferred Approach**

***Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;***

***Justified - The Plan must be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence***

***(NPPF para 182)***

**The SEA Directive requires assessment of the likely significant effects of implementing the plan and “reasonable alternatives”**

4.10 The Local Plan is required to be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics of the area. There was a substantial evidence base for the Local Plan submitted in December 2014. Where considered relevant to the current Plan this has been taken forward. A number of new studies have been commissioned or undertaken to inform the approach taken in the Local Plan Preferred Approach, summarised below. However, it is recognised that additional work may be required before the Local Plan is submitted to the Secretary of State for Community and Local Government for an examination.

4.11 The evidence base for the Local Plan is set out on the Council’s website in “Ashfield Emerging Local Plan” “Studies and Reports” and “Additional Studies and Reports”<sup>11</sup>.

### **Strategic Housing Market Assessment (SHMA)**

4.12 GL Hearn was commissioned by Ashfield District Council, Mansfield District Council and Newark and Sherwood District Council, to prepare a Strategic Housing Market Assessment (SHMA) for the Nottingham Outer Housing Market Area (HMA)<sup>12</sup>. GL Hearn led a consultancy team which includes Justin Gardner Consulting (JGC) and Chris Broughton Associates (CBA). The SHMA was commissioned to respond to the requirements of the NPPF and PPG to provide a fit-for-purpose evidence base to inform and support planning and housing policies, including to:

- Reflect the latest datasets including population and household projections;
- Comply with the requirements of the NPPF, the NPPG and objectively assessed need guidance;

<sup>11</sup><http://www.ashfield-dc.gov.uk/residents/planning,-property-and-housing/forward-planning/ashfield-emerging-local-plan.aspx>

<sup>12</sup> Ashfield District Council, Mansfield District Council and Newark & Sherwood District Council.

- Incorporate and have full regard for housing and economic growth imperatives and the connections between them;
- Enable improved alignment between housing and workspace evidence bases.

The commissioning authorities throughout the SHMA process gave neighbouring local authorities, local developers and wider stakeholders the opportunity to comment on the emerging work. This included two stakeholder events which took place on 11th of December 2014 (to discuss methodology and HMA) and on the 22nd of June (to discuss emerging findings) and a consultation on the draft SHMA.

4.13 The SHMA sets out an evidence for a number of areas including:

- Reviewing the definition of the Housing Market Area;
- Understanding the Nottingham Outer Housing Market Area;
- Assessing “Overall Housing Need” as set out by the NPPF and Planning Policy Guidance;
- Examining housing market dynamics and market signals;
- Assessing affordable housing need;
- Examining the need for different sizes of homes;
- Analysing the housing needs of particular groups.

It provides the basis for making decision regarding the housing element of the Local Plan.

#### **Housing and Employment Land Requirements**

4.14 The Strategic Housing Land Availability Assessment (SHLAA) and the Strategic Employment Land Availability Assessment form an important evidence base to support the delivery of housing and employment sites to meet the need within the Ashfield District. It forms an essential part of the planning process by ensuring an adequate supply of land for housing and employment using a robust evidence-based approach.

4.15 Basically, the SHLAA and SELAA aim to:

- identify sites with potential for housing and employment;
- assess their potential; and
- to ensure that there is sufficient land available to meet the housing needs of communities.

These assessments form a key part of the evidence base underpinning the Ashfield Local Plan. It provides an appraisal of available land to inform the allocation of sites for residential and employment development to meet strategic targets. The reports presents an analysis of the potential supply capacity for residential and employment development in the District.

#### **Employment Land Demand and the Economy**

4.16 In considering the approach in the Local Plan to the local economy the policies have been influenced by an extensive evidence base which includes Ambition A

Plan for Growth, Ashfields and Mansfield Joint Economic Masterplan. The Employment Land Forecasting Study and other studies relating to the local economy and employment sites, and the D2N2 strategies in relation to the wider economy in Nottingham and Derbyshire.

- 4.17 Ambitions for Growth, Ashfield and Mansfield Joint Economic Strategy set out the following vision for Ashfield:

*“To be ambitious for Ashfield and Mansfield by providing the opportunity for people and business to grow and prosper”*

Against this vision, the Economic Masterplan is based on the following principles of change, which will guide the delivery of growth and regeneration:

- Developing a new economy for the area, built on old strengths and focused on raising productivity and embracing innovation;
- Creating economic resilience, through the sensitive rebalancing of the economic base;
- Building upon and enhancing regeneration efforts to date;
- Selling the area as a place to invest and succeed and a better quality of life;
- Ensuring our communities are sustainable and able to benefit from prosperity and better quality of life;
- Ensuring supply meets demand, through tackling market failure –the basic economic principle.

- 4.18 D2N2 Local Enterprise Partnership has set out a Strategy for Growth and various plans to improve the wider economy includes:

- D2N2 Strategy for Growth 2013 -2023;
- D2N2 Strategic Economic Plan;
- D2N2 Implementation Plan
- D2N2 Skills for Growth Strategy 2013-2015
- D2N2 Report 4 Employment and Skills
- D2N2 Report 5 Education & Training

- 4.19 The Councils comprising the Nottingham Outer HMA (Ashfield, Mansfield, Newark & Sherwood) and Nottingham Core HMA (Broxtowe, Erewash, Gedling, Nottingham City & Rushcliffe) commission Nathaniel Litchfield & Partners to undertake an Employment Land Forecasting Study (ELFS) August 2015. The Study:

- **Examines the economic context** – a review of current economic conditions and trends within the two HMAs, identifying the strengths and weaknesses that may affect future needs for employment space;
- **Provides an overview of employment space** – analysis of the current stock and trends of employment space within the two HMAs in terms of mix of uses, development rates, gains and losses and provision in adjoining areas;

- **Examines the commercial property market** – a review of the sub regional commercial property market, including the supply and demand for different types of employment space and the needs of different market segments
- **Sets out future requirements for B class employment space** – estimates future employment space requirements for B-class sectors in quantitative terms, drawing on employment forecasts and other factors;
- **Sets out implications and conclusions** – outlines the key implications in relation to planning for employment land needs across the Core and Outer HMAs

4.20 Further information is set out in a series of studies which examines the Ashfield local economy, the relationship between Ashfield and Mansfield and the quantity and quality of employment land<sup>13</sup>.

#### **Accessible Settlements Study for Greater Nottingham**

4.21 The Study assesses in general terms the level of accessibility of existing settlements within the Greater Nottingham area, including Ashfield, in terms of their residents' access to jobs, shopping, education and other services by walking, cycling and public transport. Table A1.1 of this Study indicates the total score by District for each settlement within it.

#### **Infrastructure**

4.22 The evidence base includes the Infrastructure Delivery Plan 2013, which has a number of roles but its main function is to identify the infrastructure that is required to support the level of growth anticipated in Ashfield. It is acknowledged that the Infrastructure Delivery Plan will require updating.

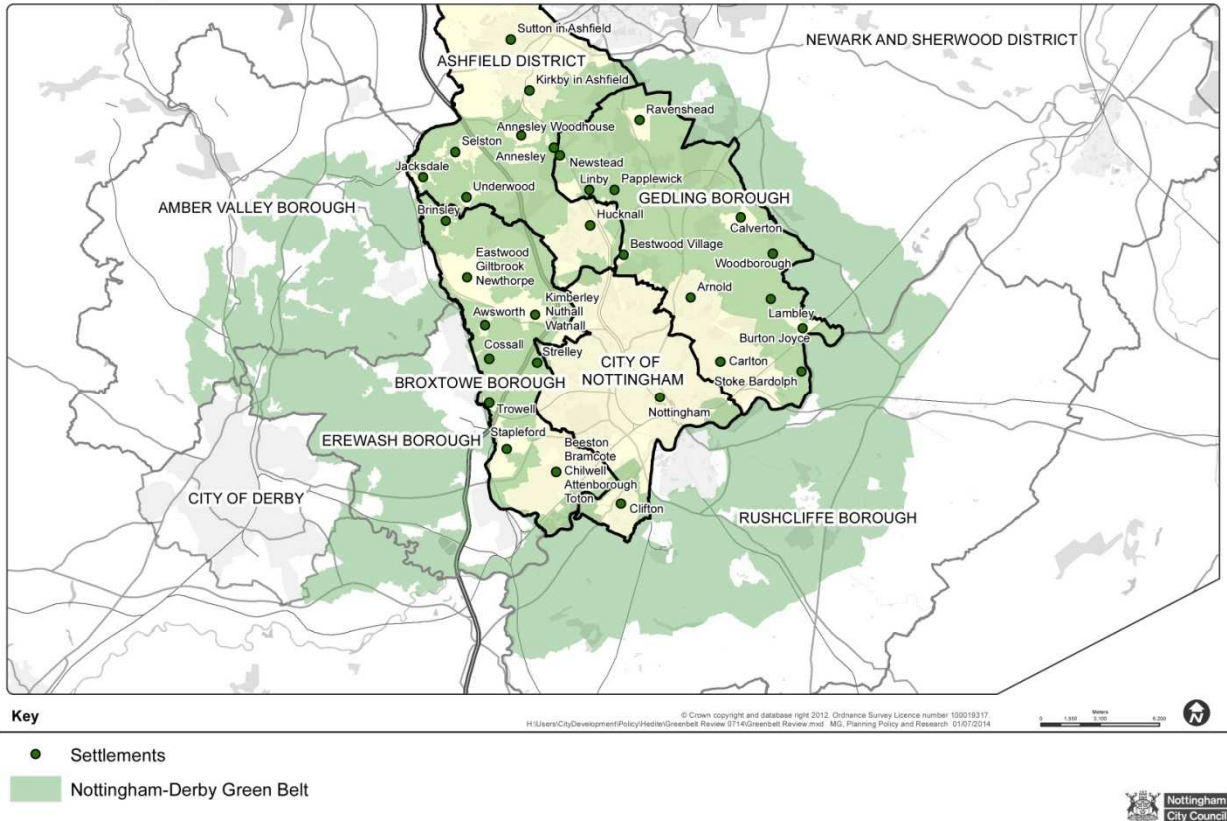
#### **Green Belt**

4.23 An extensive part of the District of Ashfield lies within the Nottingham - Derby Green Belt including land around Hucknall, land to the south and east of Kirkby-in-Ashfield and land surrounding the rural villages of Selston, Jacksdale, Underwood and part of Brinsley.

4.24 The Council has undertaken a Green Belt Review (2015) as part of its evidence base for the Local Plan. The Review reflects the Joint Green Belt Assessment Framework taken forward by the authorities of Ashfield, Broxtowe, Gedling and Nottingham City to ensure a consistent approach to Green Belt assessment. It provides a means of identifying the most important areas of Green Belt, when assessed against the purposes of Green Belt as set out in national policy (NPPF paragraph 80). **The Review does not determine whether or not land should remain or be excluded from the Green Belt.** It is the role of the District's emerging Local Plan to formally revise Green Belt boundaries and to allocate land for development, where appropriate, having taken into account all relevant planning considerations. Neither is it the role of the Review to establish whether exceptional circumstances exist, but should there be a need to alter Green Belt boundaries, for instance to accommodate an established need for new development, the Review is intended to inform how this might best be done.

<sup>13</sup>See Ashfield Dc website Studies and Reports - **Providing Jobs**  
<http://www.ashfield-dc.gov.uk/residents/planning,-property-and-housing/forward-planning/ashfield-emerging-local-plan/studies-and-reports.aspx>

### Context Map Showing the Extent of the Nottingham-Derby Green Belt



### Plan Five: Nottingham and Derby Green Belt

- 4.25 The Green Belt Review is not intended to identify existing minor anomalies to the Green Belt boundaries. This has been undertaken as a separate exercise with the Green Belt Technical Paper, 2015.
- 4.26 It is stressed that this SA and the Green Belt Review are two distinct sources of evidence base prepared to inform decisions. The SA is objective led and takes into account the requirements of the European Directive and the Environmental Assessment of Plans and Programmes Regulations 2004. The specific objectives for the SA are set out in the SA Framework. In contrast, the Green Belt is a specific policy at a national level whose fundamental aim is to prevent urban sprawl by keeping land permanently open. The NPPF identifying five purposes of the Green Belt against which the assessment of the Green Belt has been undertaken.

### Masterplans and Retail Studies

- 4.27 Masterplans<sup>14</sup> have been prepared for Sutton and Kirkby (2007) and Hucknall<sup>15</sup> and these provide an evidence base for a wide variety of projects for improvements to both town centres. A Retail Study for the District was undertaken in 2011.

<sup>14</sup>Ove Arup & Partners Ltd (2007) Masterplans for Sutton-in-Ashfield and Kirkby-in-Ashfield

<sup>15</sup> URBED with Gordon Hood Regeneration & Simon Fenton Partnership (2009) Hucknall Town Centre Masterplan

### **Transport Assessment**

- 4.28 The Ashfield Transport Study Update was undertaken in 2013 by MVA Consultancy. Its findings were based on approximately 7,640 dwellings with 4,438 dwellings in Sutton and Kirkby, 2460 dwellings in Hucknall and 742 dwellings in the Rurals. It also look specifically at a number of major housing allocations proposed in the Local Plan Publication 2013. There has been some changes to these sites such as Rushley Farm and sites in the Green Belt off Derby Road. Nevertheless sites set out in the Preferred Approach Local Plan will still utilised the same strategic road network and in this context the Transport Assessment has been utilised to inform the SA.

### **Environment**

- 4.29 Ashfield is recognised as one of the most biodiverse areas in Nottinghamshire, due largely to its varied geological context of magnesian limestone, triassic sandstone (to the east) and coal measures (to the west). The District supports a broad range of habitats, including heathland, ancient woodland dumbles, calcareous grasslands (often on post-industrial sites) and fields rich in wild flowers. The east is characterised by small fields and streams, while the west and south contains large blocks of tree planting. The rivers and streams within the District provide habitat for significant populations of water vole and native crayfish.
- 4.30 The local approach to green infrastructure and biodiversity is set out in the Council's Green Infrastructure and Biodiversity Technical Paper. This examines the connectivity of green spaces at a local level and identifies green infrastructure network opportunities and ensures that the Green Infrastructure network is protected and enhanced. The evidence relating to Sites of Special Scientific Interest (SSSI) Ancient Woodlands, Local Wildlife Sites Local Nature Reserves, the UK Biodiversity Action Plan (UK BAP) and the possible potential Special Protection Area for Sherwood Forest will have an important influence on development specific location.
- 4.31 The Council is committed to protecting, conserving and where opportunities arise enhancing the historic environment of the District. This is reflected in a variety of formally designated historic assets including:
- 4 Conservation Areas;
  - 79 Listed Buildings;
  - 9 Scheduled Ancient Monuments;
  - 2 Registered Historic Parks and Gardens.
  - Locally listed buildings and features.

### **Landscape Assessment**

- 4.32 SEA identifies that a factor to be considered in any plan is the effect on landscapes. Landscape Assessments have been undertaken as an aid to identifying the effects of new development on views and the landscape itself. The assessments have been undertaken by the Council's in-house Landscape Architects using a methodology based on best practice guidance from the "Guidelines for Landscape and Visual Impact Assessment" 3<sup>rd</sup> edition published by The Landscape Institute and Institute of Environmental Management and

Assessment. The methodology ensures a consistent approach is taken to assessments using a standard set of criteria. The assessments have been utilised to inform the SA of the housing and employment sites as well as planning policies and decisions.

### **Flood Risk**

- 4.33 Ashfield falls within the Humber Basin Management Plan<sup>16</sup>, the Environment Agency has also produced the River Trent Catchment Flood Management Plan, 2010 and the Council has prepared a Strategic Flood Risk Assessment, 2009. Additional evidence is also available from a variety of other sources including Nottinghamshire County Council and Nottingham City Council, as Lead Local Flood Authorities. Ashfield is located upstream of the Trent Valley with a number of the River Trent's tributaries rising in Ashfield. Consequently, the flood zones from water courses are not as extensive and less of a constraint to development compared to neighbouring local authorities. This is reflected in the Strategic Flood Risk Assessment (SFRA) conclusion that the risk of flooding from watercourse in Ashfield is relatively low. Nevertheless, flood risk is an issue. Properties in parts of Hucknall are at risk of flooding from the Baker Lane Brook and a number of properties at Jacksdale are at risk from flooding from the River Erewash and the Bagthorpe Brook. Only minor parts of Sutton in Ashfield, Kirkby in Ashfield and Annesley Woodhouse are identified as being medium to high probability of flooding from watercourses.
- 4.34 Surface water management has an impact in parts of Ashfield, due to the receiving catchments being recognised as rapid response due to historical urbanisation. Additional water from development into the River Leen and its tributary streams has significant implications for flooding downstream in the City of Nottingham. This is reflected in the necessity in Hucknall to keep runoff to greenfield rates or lower if possible.
- 4.35 In accordance with Planning Practice Guidance<sup>17</sup>, flood risk has been taken into account through the Strategic Housing Land Availability Assessment and the Strategic Employment Land Availability Assessment in the assessment of sites. A further check is that one of the objectives of the Sustainability Appraisal is Climate Change and Flood Risk. Therefore, flood risk has been taken into account as part of the SA of the Local Plan, its policies and site considerations.

### **Water Supply**

- 4.36 Water is an important resource and valuable natural asset to the people and environment of Ashfield. Ashfield's water supply comes from a variety of sources, the Derwent Valley, Ogston Reservoir and groundwater.
- 4.37 The Environment Agency's Water Resources Strategy Regional Action Plan for the Midlands Region 2009, recognises that there are increased pressure on water resources over the next 30 years. There are significant challenges to the way water resources are managed, and as a result, the way water is valued will

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<sup>16</sup> Environment Agency: River Basin Management Plan Humber River Basin District, 2009

<sup>17</sup> What is the role of sustainability appraisal in the sequential test? (Paragraph: 022 Reference ID: 7-022-20140306)

become more important. At a local level, The Greater Nottingham and Ashfield Outline Water Cycle Study 2010 concluded that:

- Water resource situation in the East Midlands is significantly constrained with Severn Trent Water forecasting a shortfall of supply against demand if no interventions are made;
- The company plans a programme of measures that will maintain a surplus of supply over demand. This should not constrain growth at the strategic level, provided that strategic water resources infrastructure is implemented in a timely manner in relation to growth.

Severn Trent plans to resolve potential deficits in supply through increasing capacity of existing sources, demand management and metering. However, this situation reinforces the importance of managing the demand for water in this area. The Study recommends that:

- As a result of the constraint in the region on water resources, all new homes are built to the water consumption standards of the Code for Sustainable Homes Level 3/4 as a minimum in order to reduce demand from new households.
- The councils also include policies to support the water company's water efficiency activities to help reduce demand from existing development.

#### **Water Quality**

- 4.38 The head waters of the Rivers Leen, Maun, Meden and Erewash rise or run through Ashfield District and each of these watercourses are not yet at good ecological status or potential. Further information on the current status of rivers in Ashfield is set in the River Basin Management Plan Humber River Basin District, 2009 specifically in relation to in the Idle and Torne District Catchment and the Lower Trent and Erewash District Catchments. Under the Water Framework Directive the watercourses must achieve Good Ecological and Chemical Status by 2027. In this context, the Council must ensure that development sites do not cause a deterioration to water bodies or to their tributaries and where possible proposes an improvement to the water bodies ecological status or potential. This reinforces the importance of utilising SuDS, which reduces pollution reaching adjacent watercourses.

#### **Housing and Employment Strategies - Establishing the Reasonable Alternatives.**

- 4.39 The SA process involves identification and assessment of 'reasonable alternatives'. This means comparing different approaches that could be taken to achieve the objectives of the Local Plan. There is no single factor that determines what is a reasonable alternative but it can be seen to arise from a variety of sources including:
- The demand side arising from the Objectively Assessed Housing Need and the requirement for employment land;
  - The supply side derived from the SHLAA and SELAA;



- The importance placed on the Green Belt;
- Recognising the intrinsic character and beauty of the Countryside as set out in the NPPF;
- Green Infrastructure;
- Encouraging the reuse of brownfield land;
- The importance improving the viability and vitality of the town centres; and
- The provision of infrastructure.

### **The Vision**

4.40 The Council's Vision is a key factor in assessing the spatial options. The emphasis of the Council's Vision in relation to sites reflects the following:

- Regeneration of the District will continue through a policy of urban concentrating development within and adjoining the urban and settlement areas;
- The needs of Selston, Jacksdale and Underwood will be catered for.
- Public transport, walking and cycling links will be improved to connect residents more easily with local and regional destinations;
- Housing will meet the needs of local people;
- New development will be planned to provide the necessary infrastructure including roads, schools and health facilities.
- Strategic employment sites will be established including land to the north of the Mansfield Ashfield Regeneration Route in Sutton in Ashfield and the rolls Royce complex at Hucknall
- There will be continued investment in the three town centres of Hucknall, Kirkby-in-Ashfield and Sutton in Ashfield.

4.41 The vision sets a general aspiration to become a sustainable and distinctive District. Taken together the Vision and strategic objectives will have a positive effect in relation to the SA objectives as set out in Table Seven. The Table also identifies the links and compatibility between the Local Plan Objectives and the Sustainability Appraisal Objectives. It shows a substantial compatibility between the two sets of objectives while indicating that some tensions do exist between different objectives.

		Sustainability Appraisal Objectives																	
		1. Housing	2. Health	3. Heritage	4. Community Safety	5. Deprivation	6. Biodiversity & GL	7. Landscape	8. Natural Resources	9. Air & Noise Pollution	10. Water quality	11. Waste	12. Flood Risk	13. Energy Efficiency	14. Travel & Accessibility	15. Employment	16. Economy	17. Town Centre	
	VISION	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	
Local Plan Objectives	Economic Prosperity for All	n	+	n	n	+	-	-	-	-	-	-	-	+	+	+	+	+	
	Employment and Enterprise	n	+	n	n		-	-	-	-	-	-	-	+	+	+	+	+	
	Sutton-in-Ashfield Town Centre	+	+	n	+	+	n	+	+	-	-	-	+	+	+	+	+	+	
	Hucknall Town Centre	+	+	n	+	+	n	+	+	-	-	-	+	+	+	+	+	+	
	Kirkby-in-Ashfield Town Centre	+	+	n	+	+	n	+	+	-	-	-	+	+	+	+	+	+	
	Local Shopping Centres	+	+	n	+	+	n	+	+	-	-	-	+	+	+	+	+	+	
	Strong and Vibrant Rural Communities	+	+	?	n	+	+	+	+	n	n	n	n	+	+	+	+	n	
	Provision of Sustainable Housing	+	+	-	n	+	-	-	-	-	-	-	-	+	+	+	+	+	
	Safer Communities	+	+	n	+	+	n	n	n	n	n	n	n	n	n	+	+	+	
	Opportunities for All	+	+	+	+	+	+	+	n	n	n	n	n	n	n	n	n	n	
	Timely and Viable Infrastructure	+	+	?	?	+	?	n	?	?	?	?	?	?	?	?	+	+	+
	Addressing Climate Change	-	n	n	n	?	+	?	n	+	+	+	+	+	+	-	-	+	
	Reducing the Need to Travel by Car	?	+	n	n	+	n	n	n	+	n	n	n	+	+	?	?	+	
	Environmental Responsibility	+	n	n	n	+	+	+	+	+	n	n	n	n	+	+	+	+	
	Environmental Capacity	?	?	n	+	+	+	+	+	+	+	+	+	+	+	?	?	?	
	Legacy and Natural Resources	?	+	+	n	+	+	+	+	+	n	n	+	+	n	?	?	?	
	Natural Assets	-	+	+	n	+	+	+	+	n	+	n	+	+	n	-	-	n	
	Built Assets	-			n	n	n		n	n	n	n	n	n	n	-	-		
	Character of the District	+	n	+	+	+	+	+	+	n	n	n	+	+	+	+	+	+	
	Sustainable and High Quality Design	+	+	+	+	+	+	+	n	+	+	+	+	+	+	+	+	+	
+	Compatible.			?	Uncertain of more than one possible outcome dependent upon the way LP objectives are met.														
n	No relationship or effect is neutral.			-	Incompatible/conflicting.														

**Table Seven: Compatibility of The Vision, Local Plan Objectives and SA Objectives.**

### **Objectively Assessed Housing Need**

- 4.42 A key element of the Local Plan is to identify the scale of new development to be accommodated in Ashfield. In relation to housing, Local planning authorities are required under national planning guidance to use their evidence base to ensure that:
- Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area;
  - Identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% or 20% to ensure choice and competition in the market for land.
  - Identify a supply of specific, developable sites or broad locations for growth, for years 6–10 and, where possible, for years 11–15;
  - For market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target.
- 4.43 The SMHA concludes that Ashfield, Mansfield and Newark and Sherwood comprises a single housing market area. The NPPF sets out that plans should be prepared on the basis of meeting full needs for market and affordable housing. Planning Practice Guidance (PPG) identifies that the latest national projections should be seen as a starting point but that authorities may consider sensitivity testing projections in response to local circumstances and the latest demographic evidence. Consideration should also be given as to whether the housing need should be increased in order to:
- Support economic growth, based on interrogation of trends and forecast for future growth in employment;
  - Improve affordability, taking account of evidence from market signals and of the need for affordable housing.
- 4.44 The OAH need for the Nottingham Outer Housing Market Area is set out in Table Eight.
- 4.45 Each of the authorities within the Housing Market Area has agreed to meet the dwelling requirements within their respective districts. The authorities comprising the Nottingham Core HMA have all adopted Core Strategies which sets out their OAH needs and how it will be met. In these circumstances, no additional adjustment is required and the OAH need for Ashfield is 480 dwellings per annum, which for a 15 year plan has a requirement for 7,200 dwellings.

	Ashfield	Mansfield	Newark & Sherwood	Nottingham Outer HMA
Households 2013	51,956	45,575	49,728	147,260
Household 2033	61,217	52,786	58,416	172,419
Dwellings per annum	480	376	446	1,271

Table Eight: Nottingham Outer Housing Market Area  
Source: GL Hearne & CLC (numbers may not add due to rounding).

- 4.46 The SHMA provides a breakdown of the OAH needs for specific areas of the three districts which make up the housing market area. However, these figures are identified as being less reliable than District figures. This reflects that there are a number of issues with this approach which make the outputs less robust than at the local authority level. Key ones include the fact that birth and death rates are assumed to be the same in different parts of each area (in the absence of any robust up-to-date local information) whilst the migration patterns are developed from an understanding of the current population profile in each area rather than any specific local data about the profile of the population moving into and out of each area in the past (again this is due to a lack of up-to-date information)<sup>18</sup>. Although less robust, it still provides an indication of needs and is the most reliable up-to-date evidence. For Ashfield the SHMA identifies that the housing requirement could be distributed across the District as follows:

- Sutton and Kirkby-in-Ashfield - 306 dwellings per annum
- Hucknall - 148 dwellings per annum; and
- The Rurals - 26 dwellings per annum.

- ***The Objectively Assessed Housing need for the Nottingham Outer Housing Market Area is 1,271 dwellings per annum.( Nottingham Outer SHMA, Oct 2015)***
- ***For the District of Ashfield the Objectively Assessed Housing Need is 480 dwellings per annum. (Nottingham Outer SHMA, Oct 2015).***
- ***Each of the authorities within the Nottingham Outer Housing Market Area has agreed to meet the dwelling requirements within their respective districts.***

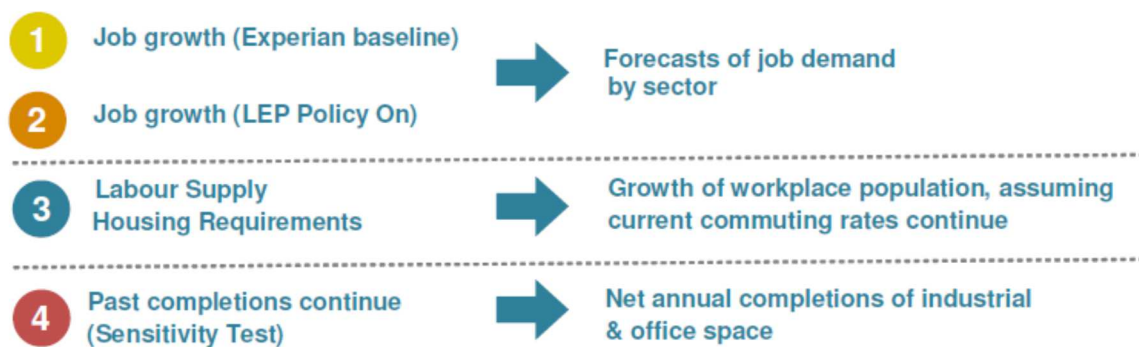
<sup>18</sup>Nottingham Outer Strategic Housing Market Assessment, October 2015 para 4.55 to 4.57

### **Affordable Housing Requirements**

- 4.47 Information on the affordable housing requirement is set out in detail in the SHMA and the following paragraph only provides a short summary in relation to affordable housing requirements.
- 4.48 The SHMA considers affordable need which has been subject to a number of recent High Court decisions and also interpretation through advice from the Planning Advisory Service (in the July 2015– Technical advice note). The PAS advice identifies that affordable need, as defined and measured in paragraphs 22-29 of Planning Practice Guidance cannot be a component of the Objectively Assessed Needs. The SHMA examines the level of household income that is necessary to meet housing needs. Based on a 30% affordability threshold the SHMA identifies that for the period from 2013 to 2033, the analysis suggest a need for 405 affordable homes per annum for the Nottingham Outer Housing Market Area (164 dwellings for Ashfield). The analysis supports a requirement for new affordable housing in the study area. On the basis of viability assessments and other evidence it is estimated that each of the three authorities might expect to provide around 15-20% of future housing as affordable homes; given that this would provide a level of provision that fits within the range identified the evidence does not support any strong requirement for the Councils to plan for more housing than is suggested through the demographic projections (which in any case are suggesting a level of need which is well above that within the latest official projections).

### **Employment Land Requirements**

- 4.49 The NPPF identifies that significant weight should be placed on the need to support economic growth through the planning system and to help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century (NPPF paragraph 19 and 20). In relation to employment land, the emphasis is upon local planning authorities use an evidence base to assess:
- the needs for land or floor space for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period,
  - the existing and future supply of land available for economic development and its sufficiency and suitability to meet the identified needs.
- 4.50 The ELF Study undertakes an analysis of the economy for both the Nottingham Outer HMA and the Nottingham Core HMA. It identifies a series of scenarios to inform the assessment of future employment space needs for office and industrial (i.e. manufacturing and distribution) uses. This reflect the requirements of the NPPF and Planning Practice Guidance and this framed the scenarios set out in Figure One.



**Figure One: Range of Growth Scenarios/Approaches**

Source: Nottingham Core HMA and Nottingham Outer HMA : Employment Land Forecasting Study 2015 Nathaniel Litchfield & Partners.

#### Notes

- Forecasts of job growth for the five Core and three Outer HMA districts for the period up to 2031 were obtained from Experian's December 2014 quarterly release. The total job growth figures were taken forward on a pro-rata basis from 2031 to 2033 to align with the requirements of the brief. Unless otherwise stated, the term 'jobs' refers to total 'workforce jobs' and includes part time and full time employment.
- Scenario 2 reflects an alternative job-based estimate of future needs has been compiled which includes evidence from the D2N2 Local Enterprise Partnership's Strategic Economic Plan with one single Growth Strategy target – to support the creation of an additional 55,000 private sector employee jobs in D2N2
- Scenario 3 forecasts the supply of labour rather than labour demand reflecting the SHMA undertaken by GL Hearne. It then indicates the amount of new jobs needed to take-up this future supply of workers and minimise local unemployment, and how much employment space would be needed to accommodate these jobs.
- Past rates of delivery project forward past take up rates to arrive at a figure. However, the ELF Study identifies that cautions needs to be taken in looking at these figures including that future demand picture may not reflect past trends.

- 4.51 For Ashfield the ELF Study identifies a range of 41,877 to 48,470 sq m of office floorspace and 48 to 132 ha of industrial land.

***For Ashfield the ELF Study identifies four scenarios with an employment land requirement ranging from 41,877 to 48,470 sq m of office floor space and 48 ha to 132 ha of industrial land.***

#### Supply

- 4.52 On the housing supply side the Council's Strategic Housing Land Availability Assessment (SHLAA) identifies potential housing sites, assesses whether these sites are developable, and how many housing units could be accommodated on them. It also highlights where action or policy changes to Countryside or Green Belt policies are needed to make sure sites will become deliverable, for example where sites are constrained by land ownership issues, the need for infrastructure improvements – roads, drainage, etc.

4.53 The Strategic Employment Land Availability Assessment (SELAA) provides an up to date assessment of Ashfield's future employment land supply, which is suitable, available and achievable for economic development uses over the period of the Local Plan. It reflects sites that have been submitted to the Council as potentially suitable for development for employment purposes or have been previously identified in the Local Plan as suitable for development for employment purposes. The SELAA does not allocate sites to be developed but it provides information on the range of sites which are available to meet employment need.

4.54 The SELAA concludes that a number of sites capable of delivering employment land, which provides a supply of 130.49 ha based on the estimated developable area. This can be broken down into the following:

- Kirkby-in-Ashfield 35.39 ha
- Sutton in Ashfield 55.30 ha
- Hucknall 35.30 ha

The supply includes a number of sites which are allocated in the Ashfield Local Plan Review 2002, which have already seen development and where the necessary infrastructure is already in place. Therefore, there is a mixture of available sites in terms of size and potential employment use which is also anticipated to reflect the potential different requirements of a local against a regional or national market.

***The supply of housing and employment sites is identified in:***

- ***Strategic Housing Land Availability Assessment (SHLAA)***
- ***The Strategic Employment Land Availability Assessment (SELAA)***

**Green Belt**

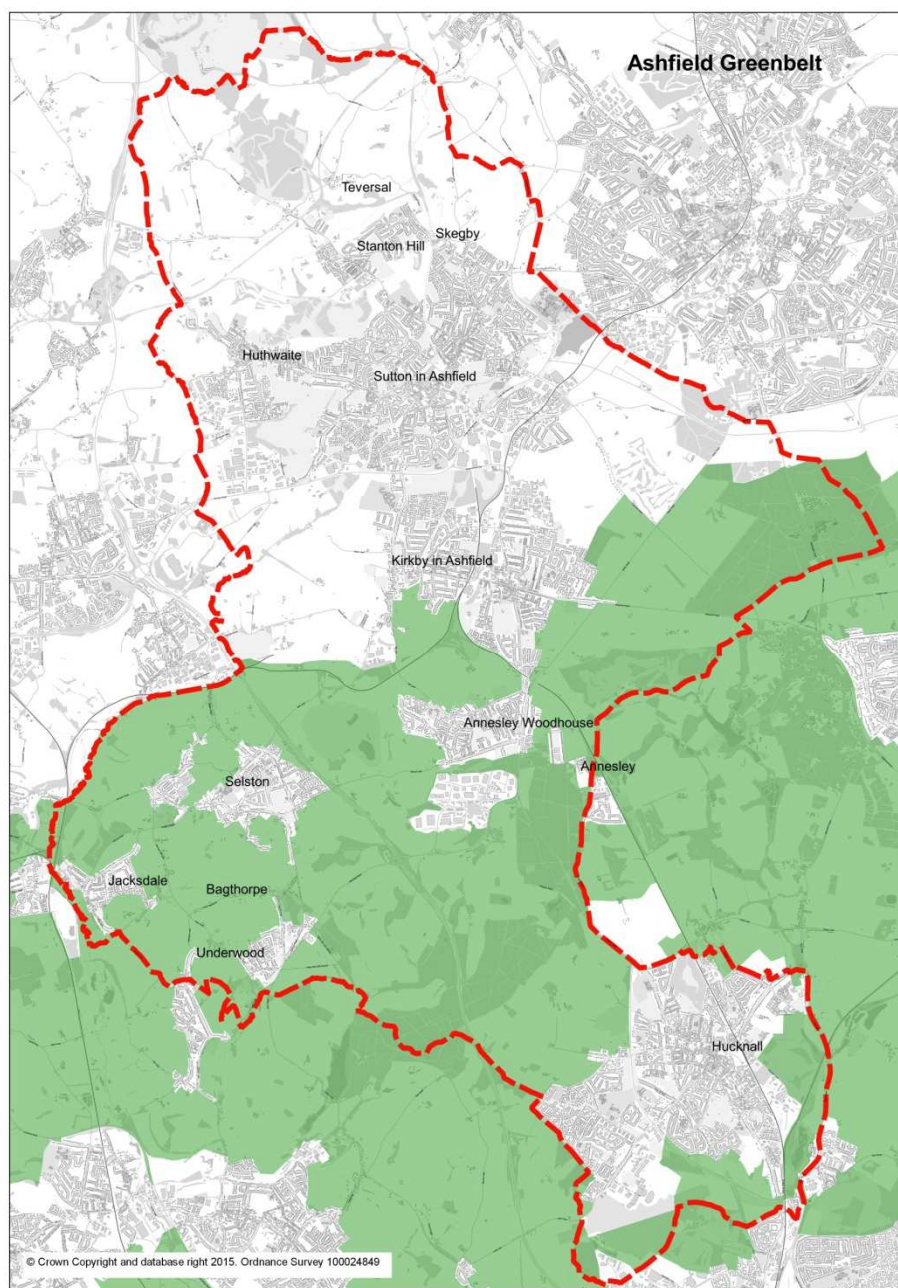
4.55 An extensive part of the District of Ashfield lies within the Nottingham – Derby Green Belt including land around Hucknall, land to the south and east of Kirkby-in-Ashfield and land surrounding the rural villages of Selston, Jacksdale, Underwood and part of Brinsley. Plan Six shows the extent of the Green Belt in Ashfield.

4.56 Green Belt land is designated for five purposes<sup>19</sup> which include assist in urban regeneration, to prevent unrestricted sprawl, to preserve the merging of towns and to safeguard the countryside from encroachment. As such Green Belt is not an environmental designation but a policy to manage the patterns of urban development. Factors such as the quality of landscape or nature designation are not Green Belt consideration as they are not within the identified purposes of the Green Belt. (These will be a planning consideration in their own right).

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<sup>19</sup>NPPF, paragraph 80





**Plan Six: Green Belt Ashfield & surrounding districts**

Source: Ashfield DC

- 4.57 The boundary to the Green Belt can be amended through the Local Plan review but should only be altered in exceptional circumstances<sup>20</sup>. The legal case of *Hunston Properties Ltd v St Albans*, which centred on a planning application clarified the planning approach to Green Belt:

“Having identified the full objectively assessed needs figure the decision maker must then consider the impact of the other policies set out in the NPPF. The Green Belt policy is not an outright prohibition on development in the Green Belt. Rather it is a prohibition on inappropriate development in the absence of very special

<sup>20</sup>The NPPF, paragraph 83



circumstances.” Hunston Properties Ltd and Secretary of State for Communities and Local Government and St Albans City & District Council [2013] EWHC 2678 (Admin), paragraph 29

In the context of a Local Plan, Green Belt boundaries should only be altered in exceptional circumstances. However, as is demonstrated by the Examiner’s conclusion on the Aligned Core Strategy for Broxtowe, Gedling and Nottingham this can include meeting the requirements of the OAH needs. Consequently, housing or employment land needs can be an exceptional circumstance to justify a review of the Green Belt boundary. In these circumstances, the Council has to consider whether sites currently within the designated Green Belt provide social, economic and environmental benefits, which provide exceptional circumstances to amend Green Belt boundaries.

- ***Land around Hucknall, to the south and east of Kirkby-in-Ashfield and surrounding the rural villages of Selston, Jacksdale, Underwood and part of Brinsley is within the Green Belt.***
- ***The Green Belt policy is not an outright prohibition on development in the Green Belt, rather it is a prohibition on inappropriate development in the absence of very special circumstances.***
- ***Housing or employment land needs can be an exceptional circumstance to justify a review of the Green Belt boundary.***

#### **Requirements of Neighbouring Authorities**

4.58 The duty to cooperate was created in the Localism Act 2011, and amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. The NPPF also outlines that authorities will be expected to demonstrate that they have effectively cooperated to plan for issues with cross-boundary impacts when their plans are submitted for examination. This is one of the soundness tests against which plans are assessed, with plans expected to make provision for meeting unmet development and infrastructure requirements from adjoining authorities where it is reasonable to do so and consistent with achieving sustainable development.

4.59 Consultation has taken place with adjoining local authorities to understand the extent of their development requirements. This has identified that there are no unmet requirements in relating to housing or employment land requirements in neighbouring authorities, which will necessitate additional housing or employment land requirements in Ashfield. However, The Broxtowe, Gedling and Nottingham Aligned Core Strategies, adopted in 2014 have a number of implications in relation to Ashfield. The Aligned Core Strategies identify that:

- Greater Nottingham is made up of the administrative areas Broxtowe, Erewash, Gedling, Nottingham City and Rushcliffe Councils, and the Hucknall part of Ashfield Council.
- Where relevant it makes reference to Hucknall as a Sub Regional Centre, which are defined as towns which are large enough to contain a critical mass of services and employment. (Hucknall was originally identified as a sub regional centre in the East Midlands Regional Plan).
- The councils comprising the Nottingham Core HMA have produced the Greater Nottingham Infrastructure Delivery Plan (which includes Erewash and Rushcliffe together with the Hucknall part of Ashfield) to ensure that there is adequate infrastructure to support the proposals of the Aligned Core Strategies. (Para 1.2.2).
- There are two Sub Regional Centres within Greater Nottingham, Hucknall and Ilkeston both important towns with their own identity and economic roles. Hucknall, with a population of 31,100, is in Ashfield District, but will extend into Gedling once the proposed Sustainable Urban Extensions are implemented. (Para 2.2.5).
- The Vision identifies in para 2.3.6 That *“The Sustainable Urban Extensions in Gedling adjoining the Sub Regional Centre of Hucknall (which is in Ashfield District) are now successful neighbourhoods in their own right and have contributed to Hucknall’s vibrant local economic and retail roles.”*
- The Spatial Objectives identify the following in relation to Hucknall:
  - High quality new housing identifies that “Sustainable Urban Extensions at Top Wighay Farm and North of Papplewick Lane to the north east of Hucknall (which is in Ashfield District), will support the regeneration of this Sub Regional Centre.”
  - Opportunities for all: to give all children and young people the best possible start in life by providing the highest quality inclusive educational, community and leisure facilities, for instance through improving existing or providing new schools (eg at Top Wighay, north of Hucknall) and academies, and to meet the needs of older and disabled people, especially through providing appropriate housing opportunities.
- Policy 2: The Spatial Strategy identifies that Most development will therefore be located in or adjoining the built up area of Nottingham, with development adjacent to the Sub Regional centre of Hucknall aimed at regeneration and supporting its role. It sets out that approximately 1,300 homes in Gedling adjoining Hucknall Sub Regional Centre (which is in Ashfield District), comprising of Sustainable Urban Extensions at: i) North of Papplewick Lane (up to 300 homes); and ii) Top Wighay Farm (1,000 homes). However, it also identifies a further Bestwood Village (up to 560 homes), which is anticipated to impact on Hucknall. In terms of employment, the Top Wighay sustainable urban extension includes 8.5 ha of employment land;

- It recognises that the Rolls Royce site in the Hucknall part of Ashfield District, which will serve the employment needs of the conurbation as a whole. (Para 3.4.6)

- 4.60 Ashfield District Council expressed concerns at the Examination of the Aligned Core Strategy regarding the level and impact of the housing proposals in the Borough of Gedling but which were located geographically adjacent Hucknall. This resulted in a reduction in the housing requirements but there remains substantial housing and employment development proposals at Top Wighay and North of Papplewick Lane. Effectively these proposals significantly expand Hucknall, although technically remain within the Borough of Gedling. In this context, these developments will need to consider their impact and contribute towards the infrastructure in Hucknall. However, no housing need for the Nottingham Core Housing Market Area are identified as requiring additional development in Ashfield.
- 4.61 Within the Nottingham Outer Housing Market the other authorities within the HMA, Mansfield District Council and Newark and Sherwood District Council have identified that they will be meeting their housing and employment land requirements arising from the SHMA and ELF Study within their districts.

- ***No additional housing need for Ashfield arises from the Broxtowe, Gedling and Nottingham Aligned Core Strategy.***
- ***The Aligned Core Strategy identifies substantial housing and employment development around Hucknall (within the Borough of Gedling).***
- ***The Aligned Core Strategy recognises that the Rolls Royce site, Hucknall will serve the employment needs of the Greater Nottingham conurbation as a whole.***
- ***Mansfield DC & Newark & Sherwood DC will meet their own housing and employment needs.***
- ***No other housing or employment needs for Ashfield are identified in relation to other neighbouring authorities.***

#### **District or Area Approach?**

- 4.62 From a geographic perspective, there are three Main Urban Areas in the District where housing, jobs and services are generally concentrated. The southernmost is Hucknall which lies immediately north of Nottingham. Kirkby-in-Ashfield and Sutton in Ashfield are to the north of the District and include the adjoining settlements of, Annesley, Kirkby Woodhouse, Annesley Woodhouse, Nuncargate, Huthwaite, Stanton Hill and Skegby. Three settlements to the west of the M1,

Jacksdale, Selston and Underwood (including Bagthorpe), contain significant residential areas but lack the concentration of employment opportunities and services found in the main centres. The remainder of the District is primarily countryside but containing a number of smaller settlements including New Annesley, Teversal and Fackley.

Area	Population
Sutton in Ashfield	47,430
Kirkby-in-Ashfield	28,373
Hucknall	32,943
Selson, Jacksdale & Underwood including Bagthorpe	12,807
Ashfield	121,553

Table Nine: Ashfield Estimated Population 2013

Source: 2013 Mid Year Population Estimates. Office for National Statistics <sup>21</sup>

4.63 Historically, Ashfield has been separated into different areas for planning purposes as follows:

- Nottinghamshire County Council Joint Structure Plan identified Ashfield in two areas from a strategic perspective:
  - a) South Nottinghamshire – Nottingham, Rushcliffe, Gedling, Broxtowe, Ashfield (Part - Hucknall) Newark & Sherwood (Part )
  - b) West & North-West Nottinghamshire – Mansfield, Ashfield (part), Bassetlaw (part) and Newark & Sherwood (part)
- The East Midlands Regional Assembly adopted a Housing Market Area approach to spatial planning using the research undertaken by DTZ Pida<sup>22</sup>. In The East Midlands Regional Plan 2009, Ashfield formed part of the Nottingham Outer Housing Market Area (with Mansfield District Council and Newark and Sherwood District Council). Policy 13a Regional Housing Provision set out the district requirement for Ashfield as part of the Nottingham Outer HMA but Policy Three Cities SRS3 split this down identifying a housing requirement for the Nottingham Core HMA and the Hucknall part of Ashfield.

4.64 Housing in the East Midlands - Profile Information for the Housing Market Areas of the East Midlands (2006)<sup>23</sup> set out the results of profile work on housing market

<sup>21</sup> The population estimates reflect the Ashfield District Council Wards prior to May 2015. In May 2015 new ward boundaries came into effect . (See Local Government Boundary Commission-Ashfield)

<sup>22</sup>East Midlands Regional Assembly East Midlands Regional Housing Board Identifying the Sub-Regional Housing Markets of the East Midlands. DTZ Pida. 2005

<sup>23</sup>Housing in the East Midlands - Profile Information for the Housing Market Areas of the East Midlands (2006). Centre for Comparative Housing Research, De Montfort University - Professor Michael Oxley, Dr Tim Brown & Dr Andrew Golland

areas in the East Midlands. It builds on DTZ Peda, 2005 Study and the studies that have been done by the University of Birmingham Centre for Urban and Regional Studies and Bob Line in 2003 and 2004 to inform the Regional Strategy for Housing Investment and the Regional Housing Strategy. In terms of travel to work the Study identifies that the Ashfield is split in a broadly north south way in terms of commuting patterns:

- The links between the Hucknall wards and Nottingham city are extremely strong with between 30% and 40% of the workforce travelling from the south eastern corner of the district to Nottingham.
- The Kirkby in Ashfield wards, on the other hand, are more closely associated with travelling to the Mansfield district for employment.

It concluded that Ashfield can be described as an 'overlap' district as it 'faces' in both the direction of the Nottingham Core HMA, and towards its own HMA and to Mansfield in particular.

4.65 The Geography of Housing Markets Areas in England<sup>24</sup> was funded by the National Housing and Planning Advisory Unit (NHPAU). The initial report was dated 2010. The research produced the first theoretically-based and rigorously-defined housing market area (HMA) boundaries for England. The objective was to provide HMA boundaries that would be useful for the planning of housing. The report identifies that there are no easy answers to the definition of housing market areas given both theoretical and practical challenges. It suggests a sub-national set of housing markets made up of three tiers:

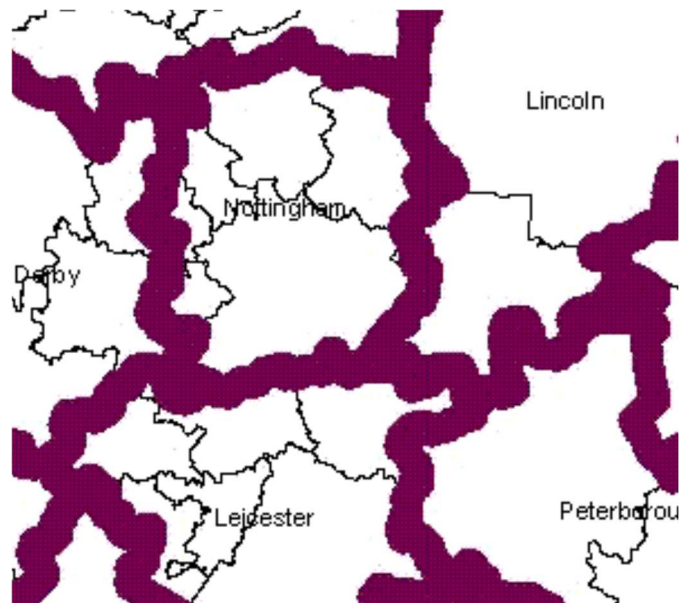
- framework housing market areas, defined by a high level of commuting (77.5 per cent self-containment).
- local housing market areas, defined by migration patterns (50 per cent self-containment).
- Submarkets, defined by neighborhood or house type.

The diagrams below identify the Strategic and Local Housing Markets in relation to Ashfield and the wider area.

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<sup>24</sup>The Geography of Housing Markets Areas in England  
<http://www.ncl.ac.uk/curds/research/defining/NHPAU.htm>

## The Geography of Housing Markets Areas in England - Strategic Housing Market Areas Nottingham

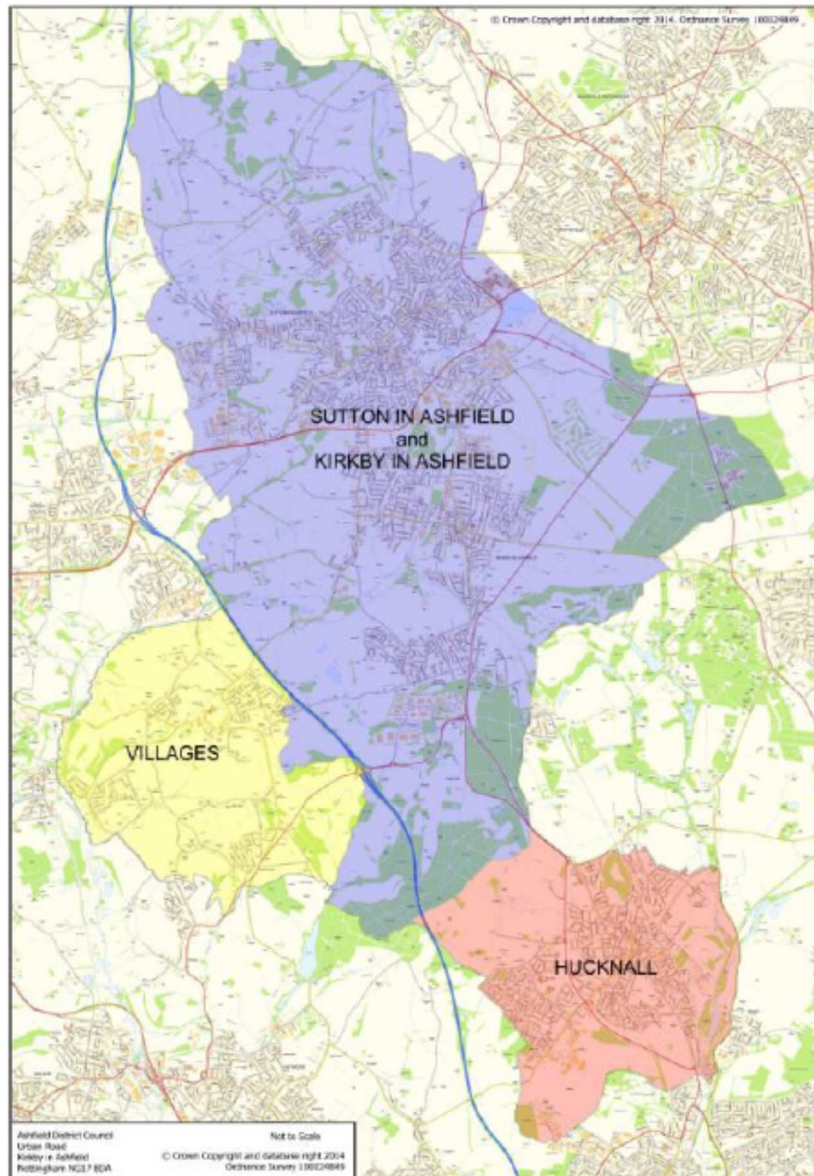


## The Geography of Housing Markets Areas in England - Local Housing Markets





- 4.66 The Three Dragons Housing Viability Assessment<sup>25</sup> and Ashfield Local Plan & CIL Viability Assessment<sup>26</sup> identified that Ashfield could be divided into three principal sub-market areas for residential land and property. These were identified as Low Value Zone (Sutton in Ashfield & Kirkby- in-Ashfield) Medium Value Zone (Selston, Jacksdale & Underwood) and High Value Zone (Hucknall). These sub market areas formed the basis for residential viability testing, Plan Seven.



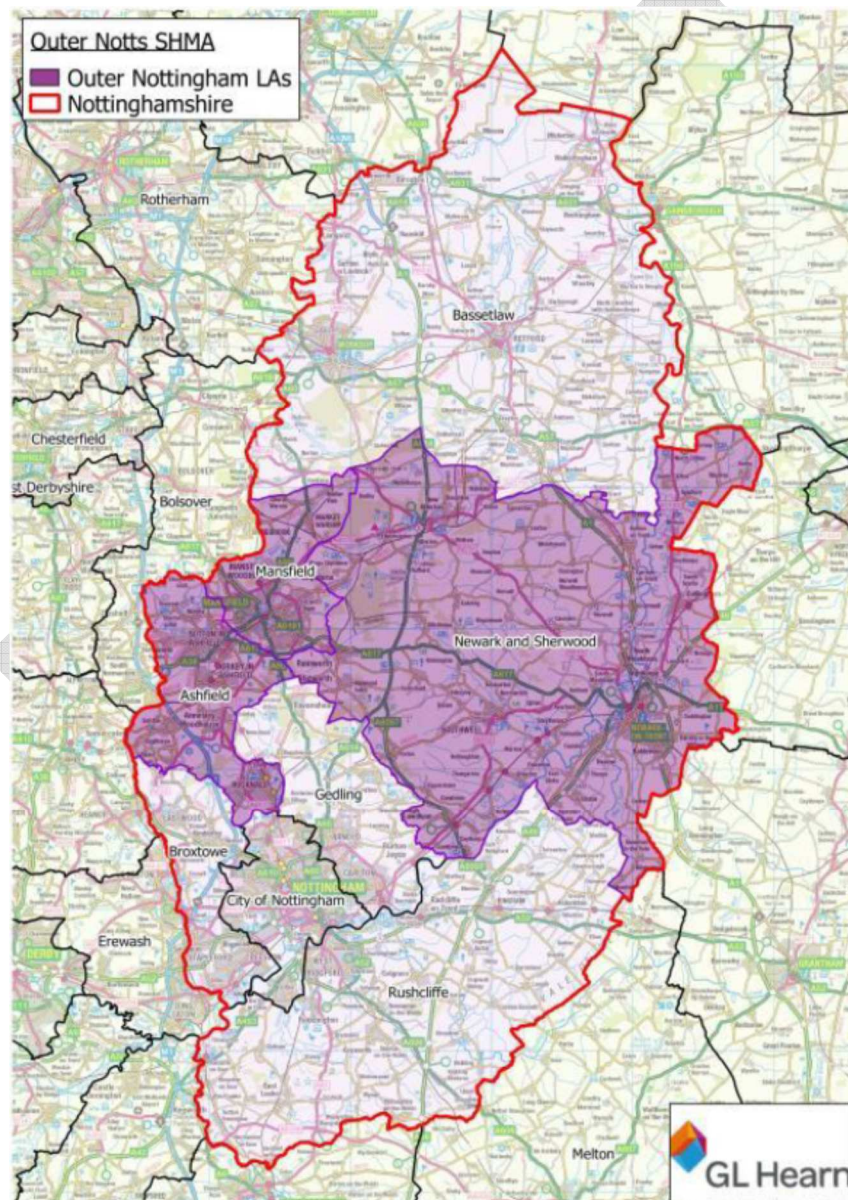
**Plan Seven: Ashfield Sub Market Areas**  
**Source: Ashfield District Council**

<sup>25</sup> Ashfield District Council Nottingham Core Affordable Housing Viability Assessment Final Report, Three Dragons, April 2009

<sup>26</sup> Ashfield District Council Local Plan & CIL Viability Assessment. Nationwide CIL Services. December 2013

- 4.67 The Strategic Housing Market Assessment, October 2015<sup>27</sup> concluded that Ashfield, Mansfield and Newark and Sherwood, in view of all the current and historic evidence as well as the existing ties, comprises a single housing market area. However, it stressed that it is important to recognise that in reality the market areas are not defined by hard and fast boundaries and in areas close to the defined boundaries, there are relationships and interactions in several directions. Similarly reflecting the geography of markets on the ground, significant housing development in a settlement may influence surrounding areas. However for strategic planning purposes, we have identified a single HMAs based on a 'best fit' to local authority boundaries as a practical solution to support analysis and policy development.

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Plan Eight: Nottingham Outer Housing Market Area.  
Source: GL Hearn

<sup>27</sup>Nottingham Outer 2014 Strategic Housing Market Assessment. G L Hearn. September 2015



- 4.68 As well as the HMA geographies the SHMA sets out information on sub-areas identified by council's within each local authority. The three sub-areas identified in Ashfield comprising Hucknall; Sutton-in-Ashfield and Kirby-in-Ashfield; and the Villages to the west of the M1.
- 4.69 The Employment Land Forecasting Study, August 2015<sup>28</sup> examined Function Economic Market Areas (FEMA). It concluded that the Nottingham Core HMA forms a distinct self-contained FEMA, although applying the FEMA tests for the three Nottingham Outer HMA districts is slightly less clear cut, although on the basis of the assessment an argument can be made that the Outer HMA is self-contained. For Hucknall, the Study concluded that whilst it is within the administrative boundaries of Ashfield/Outer HMA, it is highly connected to the Core HMA and could be viewed as being located within that FEMA.
- 4.70 Consequently, it is considered that the evidence supports a variety of approaches:
- District wide approach to the Local Plan;
  - An area based approach that identifies Hucknall and the rest of the District (excluding Hucknall);
  - An area based approach based on three areas Sutton in Ashfield & Kirkby-in-Ashfield, Hucknall and the "Rural Area" comprising Selston, Jacksdale, Underwood and Bagthorpe. This would reflect the relevant ward boundaries.
- It should be noted that the ward boundaries for the District Council are not the same as the Parish of Selston or for the Parish of Annesley & Felley. Consequently, the Selston Neighbourhood Plan will cover a slight different area as it reflects the parish boundary.
- 4.71 From a sustainability aspect, there is not considered to be substantial sustainable issues arising from any of these three different approaches. Policies in all three approaches can reflect issues specific to the different areas and Table Ten should be seen in this context. However, the Table does identify that there may be benefits from adopting an area based approach to reflect the different nature of the housing markets and submarkets, the nature and character of the main urban area and the needs of the more rural area to the west of the M1.

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<sup>28</sup> Nottingham Core HMA & Nottingham Outer HMA : Employment Land Forecasting Study,. Nathaniel Litchfield & Partners. August 2015

**Table Ten: Ashfield Local Plan Preferred Approach, District against an Area Approach**

SA Objectives	Decision Making Criteria	District Approach	Area Approach reflecting Hucknall and the rest of the District	Area Approach reflecting three areas
1. Housing - To ensure that the housing stock meets the housing needs of Ashfield.	<ul style="list-style-type: none"> <li>• Will it provide sufficient new homes taking into account need and demand?</li> <li>• Will it support the range of housing types and sizes, including affordable, to meet the needs of all sectors in the community?</li> <li>• Will it create sustainable, inclusive and mixed communities?</li> <li>• Will it promote high standards of design and construction?</li> <li>• Will it reduce the number of unfit homes?</li> <li>• For a heritage asset will it help to reduce the number of vacant buildings through adaptive re-use?</li> <li>• Will it meet the needs of the travelling community?</li> </ul>	The approach will meet to meet the Objectively Assessed Housing Need. A breakdown of the OAH for different areas can be reflected in a specific policy in a District wide approach	<p>The approach will meet to meet the Objectively Assessed Housing Need. It can provided for a different OAH need for Hucknall but becomes more difficult to break down the rest of the District.</p> <p>The approached enables consideration to be given to the potentially different housing mixed required between Hucknall and the rest of the District.</p> <p>The approaches allows for a different scenario in relation to affordable Housing in Hucknall.</p>	<p>The approach will meet to meet the Objectively Assessed Housing Need. It can provide an OAH need for the three areas within area based policies.</p> <p>The approached enables consideration to be given to the potentially different housing mixed required in the different areas of Ashfield</p> <p>The approaches allows for a different scenario in relation to affordable Housing in the three areas identified in the Viability Report.</p>
2. Health - To improve health and wellbeing and reduce health inequalities.	<ul style="list-style-type: none"> <li>• Will it increase life expectancy?</li> <li>• Will it improve access to services?</li> <li>• Will it protect and enhance open spaces of amenity and recreational value?</li> <li>• Will it increase the opportunities for recreational physical activity?</li> <li>• Will it encourage healthy lifestyles, including travel and food choices?</li> </ul>	The approach will need the health requirements for the District	<p>The approach reflects that Hucknall is covered by the Nottingham &amp; North Clinical Commissioning Body while the rest of the District is covered by the Mansfield &amp; Ashfield NHS Clinical Commissioning Body.</p> <p>This enables the Local Plan to reflect "on the ground" the health and property strategies of the relevant CCB including the provisions of the Infrastructure Delivery Plan.</p>	<p>The approach reflects that Hucknall is covered by the Nottingham &amp; North Clinical Commissioning Body while the rest of the District is covered by the Mansfield &amp; Ashfield NHS Clinical Commissioning Body</p> <p>This enables the Local Plan to reflect "on the ground" the health and property strategies of the relevant CCB including the provisions of the Infrastructure Delivery Plan.</p>

SA Objectives	Decision Making Criteria	District Approach	Area Approach reflecting Hucknall and the rest of the District	Area Approach reflecting three areas
3. Historic Environment - To conserve and enhance Ashfield's historic environment, heritage assets and their settings.	<ul style="list-style-type: none"> <li>• Will it conserve and/or enhance designated heritage assets and the historic environment?</li> <li>• Will it respect, maintain and strengthen local character and distinctiveness?</li> <li>• Lead to the repair and adaptive reuse of a heritage asset?</li> <li>• Will it increase social benefit (e.g. education, participation, citizenship, health and wellbeing) derived from the historic environment?</li> <li>• Will it increase the economic benefit from the historic environment?</li> <li>• Will it ensure that repair/maintenance is sympathetic to local character?</li> </ul>	It is not anticipated that there will be any difference between a District based approach and an Area approach in terms of heritage conservation.	<p>It is not anticipated that there will be any difference between a District based approach and an Area approach in terms of heritage conservation.</p> <p>An area based approach will enable the local character and distinctiveness to be drawn out in area based policies.</p> <p>An area based approach may be able to increase the economic benefits from an area by drawing on area specific financial assistance.</p>	<p>It is not anticipated that there will be any difference between a District based approach and an Area approach in terms of heritage conservation.</p> <p>An area based approach will enable the local character and distinctiveness to be drawn out in area based policies</p> <p>An area based approach may be able to increase the economic benefits from an area by drawing on area specific financial assistance.</p>
4. Community Safety - To improve community safety, reduce crime and the fear of crime.	<ul style="list-style-type: none"> <li>• Will it create a safe environment?</li> <li>• Will it reduce crime and the fear of crime?</li> <li>• Will it contribute to a safe secure environment?</li> <li>• Does it design out crime?</li> </ul>	It is not anticipated that there will be any difference between a District based approach and an area approach as design based policy will cover the whole of the District.	It is not anticipated that there will be any difference between a District based approach and an Area approach as design based policy will cover the whole of the District.	It is not anticipated that there will be any difference between a District based approach and an Area approach as design based policy will cover the whole of the District.
5. Social Inclusion Deprivation - To improve social inclusion and to close the gap between the most deprived areas and the rest of Ashfield.	<ul style="list-style-type: none"> <li>• Will it address the Indices of Multiple Deprivation and the underlying indicators?</li> <li>• Promote effective integration with existing communities?</li> <li>• Provide for affordable housing?</li> <li>• Provide for an appropriate housing mix?</li> <li>• Will it improve accessibility to key local services and facilities, including health, education and leisure?</li> <li>• Will it improve accessibility to shopping facilities?</li> </ul>	Either approach will address measures to improve social inclusion.	<p>Either approach will address measures to improve social inclusion.</p> <p>The approach allows for a different scenario in relation to affordable Housing in Hucknall.</p>	<p>Either approach will address measures to improve social inclusion.</p> <p>The approach allows for a different scenario in relation to affordable Housing in the three areas identified in the Viability Report.</p>

SA Objectives	Decision Making Criteria	District Approach	Area Approach reflecting Hucknall and the rest of the District	Area Approach reflecting three areas
6. Biodiversity & Green Infrastructure - To conserve, enhance and increase biodiversity levels and Green & Blue Infrastructure	<ul style="list-style-type: none"> <li>• Will it protect SPAs SAC and SSSI?</li> <li>• Will it protect, maintain and enhance or provide mitigation for sites designated for their local nature conservation interest?</li> <li>• Does the plan seek to prevent habitat &amp; wildlife corridor fragmentation?</li> <li>• Does it provide opportunities for provision &amp; enhancement of priority habitat or species?</li> <li>• Does it provide opportunities for provision &amp; enhancement of green space / green infrastructure?</li> <li>• Will it lead to a loss of or damage to a designated geological site?</li> </ul>	It is not anticipated that there will be any difference between a District based approach and an area approach in terms of the protection and enhancement of nature conservation interests.	<p>It is not anticipated that there will be any difference between a District based approach and an area approach in terms of the protection and enhancement of nature conservation interests.</p> <p>The area approach to Hucknall enables the importance of the Green Infrastructure links between Hucknall and , Nottingham to be emphasised</p>	<p>It is not anticipated that there will be any difference between a District based approach and an area approach in terms of the protection and enhancement of nature conservation interests.</p> <p>The area approach enables the links between:</p> <ul style="list-style-type: none"> <li>• Hucknall and Nottingham,</li> <li>• Kirkby, Sutton and their surrounding countryside,</li> <li>• The Rural Areas and their surrounding countryside,</li> </ul> <p>to be emphasised.</p>
7. Landscape - To protect enhance and manage the character and appearance of Ashfield's landscape /townscape, maintaining and strengthening local distinctiveness and sense of place.	<ul style="list-style-type: none"> <li>• Will it maintain and/or enhance the local distinctiveness and character of landscape?</li> <li>• Will it recognise and protect the intrinsic character and beauty of the countryside?</li> <li>• Will it promote development that is in scale and proportionate to host settlement?</li> <li>• Will it promote sites that are well planned or soft landscaped in such a way as to positively enhance the environment?</li> </ul>	It is not anticipated that there will be any difference between a District based approach and an area approach in terms of the landscape.	It is not anticipated that there will be any difference between a District based approach and an area approach in terms of the landscape.	It is not anticipated that there will be any difference between a District based approach and an area approach in terms of the landscape.
8. Natural Resources - To minimise the loss of natural resources including soils, greenfield land and the best quality agricultural land.	<ul style="list-style-type: none"> <li>• Will it use land that has been previously developed (Brownfield land) ?</li> <li>• Will it protect and enhance the best and most versatile agricultural land?</li> <li>• Will it prevent soil degradation &amp; contamination?</li> </ul>	It is not anticipated that there will be any difference between a District based approach and an area approach in terms of natural resources.	It is not anticipated that there will be any difference between a District based approach and an area approach in terms of natural resources.	It is not anticipated that there will be any difference between a District based approach and an area approach in terms of natural resources.

SA Objectives	Decision Making Criteria	District Approach	Area Approach reflecting Hucknall and the rest of the District	Area Approach reflecting three areas
	<ul style="list-style-type: none"> <li>Will it impact on a minerals safeguarded area?</li> </ul>			
9. Air & noise pollution - To reduce air pollution and the proportion of the local population subject to noise pollution.	<ul style="list-style-type: none"> <li>Will it limit or reduce emissions of air pollutants &amp; improve air quality?</li> <li>Will it limit or reduce noise pollution?</li> </ul>	It is not anticipated that there will be any difference between a District based approach and an area approach in terms of pollution.	It is not anticipated that there will be any difference between a District based approach and an area approach in terms of pollution.	It is not anticipated that there will be any difference between a District based approach and an area approach in terms of pollution.
10. Water Quality - To conserve and improve water quality and quantity.	<ul style="list-style-type: none"> <li>Will it reduce water consumption?</li> <li>Will it maintain or enhance water quality?</li> <li>Will it implement SUDs, where appropriate, to avoid run off of polluted water to water courses or aquifers?</li> </ul>	It is not anticipated that there will be any difference between a District based approach and an area approach in terms of water quality.	It is not anticipated that there will be any difference between a District based approach and an area approach in terms of water quality.	It is not anticipated that there will be any difference between a District based approach and an area approach in terms of water quality.
11. Waste - To minimise waste and increase the re-use and recycling of waste materials.	<ul style="list-style-type: none"> <li>Will it move management of waste up the waste hierarchy?</li> <li>Will it help in increase waste recovery and recycling?</li> <li>Will it reduce waste in the construction industry?</li> </ul>	It is not anticipated that there will be any difference between a District based approach and an area approach in terms of waste.	It is not anticipated that there will be any difference between a District based approach and an area approach in terms of waste.	It is not anticipated that there will be any difference between a District based approach and an area approach in terms of waste.
12. Climate Change and Flood Risk To adapt to climate change by reducing and manage the risk of flooding and the resulting detriment to people, property and the environment.	<ul style="list-style-type: none"> <li>Will it manage or reduce flooding?</li> <li>Will it attenuate the flow and run off of water?</li> <li>Does it avoid locations within Flood Zones 2 and 3?</li> <li>Will it promote Sustainable Drainage systems?</li> <li>Will it impact on of ground and surface waterflooding?</li> <li>In relation to heritage assets does it integrate climate change mitigation and adaptation measures into the historic environment sensitively?</li> </ul>	It is not anticipated that there will be any difference between a District based approach and an area approach in terms of flooding. However, any flood policy will need to identify the significant flood risk issues around the River Leen catchment area in terms of the implications for flooding in Hucknall and Nottingham.	It is not anticipated that there will be any difference between a District based approach and an area approach in terms of flooding. However, any flood policy will need to identify the significant flood risk issues around the River Leen catchment area in terms of the implications for flooding in Hucknall and Nottingham.	It is not anticipated that there will be any difference between a District based approach and an area approach in terms of flooding. However, any flood policy will need to identify the significant flood risk issues around the River Leen catchment area in terms of the implications for flooding in Hucknall and Nottingham.
13. Climate Change and Energy Efficiency - To adapt to climate change by minimise energy usage and to develop Ashfield's renewable	<ul style="list-style-type: none"> <li>Will it improve energy efficiency of new buildings?</li> <li>Will it support the generation and use of renewable energy?</li> </ul>	It is not anticipated that there will be any difference between a District based approach and an area	It is not anticipated that there will be any difference between a District based approach and an area	It is not anticipated that there will be any difference between a District based approach and an area

SA Objectives	Decision Making Criteria	District Approach	Area Approach reflecting Hucknall and the rest of the District	Area Approach reflecting three areas
energy resource, reducing dependency on non-renewable sources.	<ul style="list-style-type: none"> <li>Will it encourage the use of clean, low carbon, energy efficient technologies?</li> </ul>	approach in terms of energy efficiency.	approach in terms of energy efficiency.	approach in terms of energy efficiency.
14. Travel and Accessibility - To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys.	<ul style="list-style-type: none"> <li>Will it utilise and enhance existing transport infrastructure?</li> <li>Will it help to develop a transport network that minimises the impact on the environment?</li> <li>Will it potentially reduce journeys undertaken by car by encouraging alternative modes of transport?</li> <li>Will it have access to pedestrian &amp; cycle routes for localised leisure opportunities?</li> </ul>	It is not anticipated that there will be any difference between a District based approach and an area approach in terms of transport and accessibility. However, the Transport Study 2013 identifies the impact of proposed development in specific areas upon the highway and sets out where improvements will be need to specific junctions.	It is not anticipated that there will be any difference between a District based approach and an area approach in terms of transport and accessibility. However, the Transport Study 2013 identifies the impact of proposed development in specific areas upon the highway and sets out where improvements will be need to specific junctions.	It is not anticipated that there will be any difference between a District based approach and an area approach in terms of transport and accessibility. However, the Transport Study 2013 identifies the impact of proposed development in specific areas upon the highway and sets out where improvements will be need to specific junctions.
15. Employment - To create high quality employment opportunities including opportunities for increased learn and skills to meet the needs of the District.	<ul style="list-style-type: none"> <li>Will it provide employment opportunities for local people?</li> <li>Will it support and improve education/training facilities to meet local needs?</li> <li>Will it contribute towards meeting skill shortages?</li> <li>Will it improve access to employment by means other than single occupancy car?</li> </ul>	It would be possible to take a District wide approach to employment land demand and supply. The Employment Land Forecasting Study identifies that an argument can be made for the Nottingham Outer Housing Market Area being a Functional Economic Market Area.	The Employment Land Forecasting Studies identifies that in terms of Functional Economic Market Areas there is a close relationship between Hucknall and the Nottingham Core Housing Market Area.	The Employment Land Forecasting Studies identifies that in terms of Functional Economic Market Areas there is a close relationship between Hucknall and the Nottingham Core Housing Market Area. The NPPF places an importance for rural economies and therefore there are advantages to an area approach which identifies the main rural area of Ashfield to the west of the M1.
16. Economy – To improve the efficiency, competitiveness and adaptability of the local economy.	<ul style="list-style-type: none"> <li>Will it improve business development and enhance competitiveness?</li> <li>Will it make land and property available to encourage investment and enterprise taking into account current and future working environments?</li> </ul>	It would be possible to take a District wide approach to employment land demand and supply. The Employment Land Forecasting Study identifies that an argument can be made for the	The Employment Land Forecasting Studies identifies that in terms of Functional Economic Market Areas there is a close relationship between Hucknall and the	The Employment Land Forecasting Studies identifies that in terms of Functional Economic Market Areas there is a close relationship between Hucknall and the Nottingham Core Housing

SA Objectives	Decision Making Criteria	District Approach	Area Approach reflecting Hucknall and the rest of the District	Area Approach reflecting three areas
	<ul style="list-style-type: none"> <li>Will it provide supporting infrastructure?</li> <li>For a heritage asset will it promote heritage-led regeneration?</li> </ul>	Nottingham Outer Housing Market Area being a Functional Economic Market Area.	Nottingham Core Housing Market Area.	Market Area. The NPPF places an importance for rural economies and therefore there are advantages to an area approach which identifies the main rural area of Ashfield to the west of the M1.
17. Town Centres - Increase the vitality and viability of Ashfield's town centres.	<ul style="list-style-type: none"> <li>Will it improve the vitality of existing town?</li> <li>Will it improve the viability of existing town centres?</li> <li>Will it provide for the needs of the local community?</li> <li>Will it make the town centre a place to attract visitors?</li> </ul>	The town centre masterplans set out an analysis of the three town centres in Ashfield identifying different issues and regenerations projects moving forward. While this could be reflected in a District wide plan it would support an area based approach.	The town centre masterplans set out an analysis of the three town centres in Ashfield identifying different issues and regenerations projects moving forward. While this could be reflected in a District wide plan it would support an area based approach.	The town centre masterplans set out an analysis of the three town centres in Ashfield identifying different issues and regenerations projects moving forward. While this could be reflected in a District wide plan it would support an area based approach.

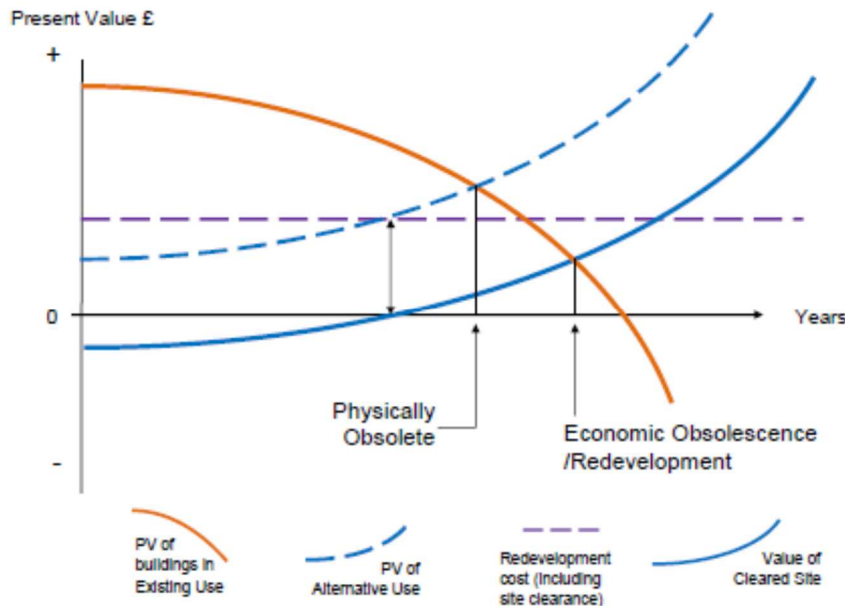


## HOUSING NEED

- 4.72 The NPPF outlines in the following paragraphs how local authorities should plan to meet housing need.
- Paragraph 14: Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
    - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
    - specific policies in this Framework indicate development should be restricted.
  - Paragraph 17: Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.
  - Paragraph 47: To boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing
- 4.73 The nature of Ashfield with the majority of the population, services and infrastructure being located within the three principle towns means these towns are the focus of potential development. All the Options take forward prioritise the concentrating of new housing development within or adjacent to the existing boundaries of towns and settlements in Ashfield, reflecting the Council's Vision.
- 4.74 Where ever possible, the opportunity has been taken to take forward brownfield sites within urban areas. However, this needs to be seen in the context that:
- a) A large number of brownfield sites typically used for coal production or textile manufacturing have already been developed. Between 1<sup>st</sup> April 2001 and 31<sup>st</sup> March 2014, 27.33 ha of employment land has been redeveloped for housing with 4.15 ha of employment land lost to other uses.
  - b) An industrial building or warehouse and the associated land will only be put forward by landowners for redevelopment when the building reaches the end of its economic life. The timing of redevelopment will depend on the relationship between:
    - The capital value of the existing use (the value of the existing use plus the cleared value of the site in its existing use);
    - The capital value of the best alternative use;
    - The cost of rebuilding.



A building will continue in its existing use until the value of the cleared site for the new development (housing) exceeds the value of the site and building in its existing use (industrial or warehouse).



**Figure 2: The Timing of Redevelopment**

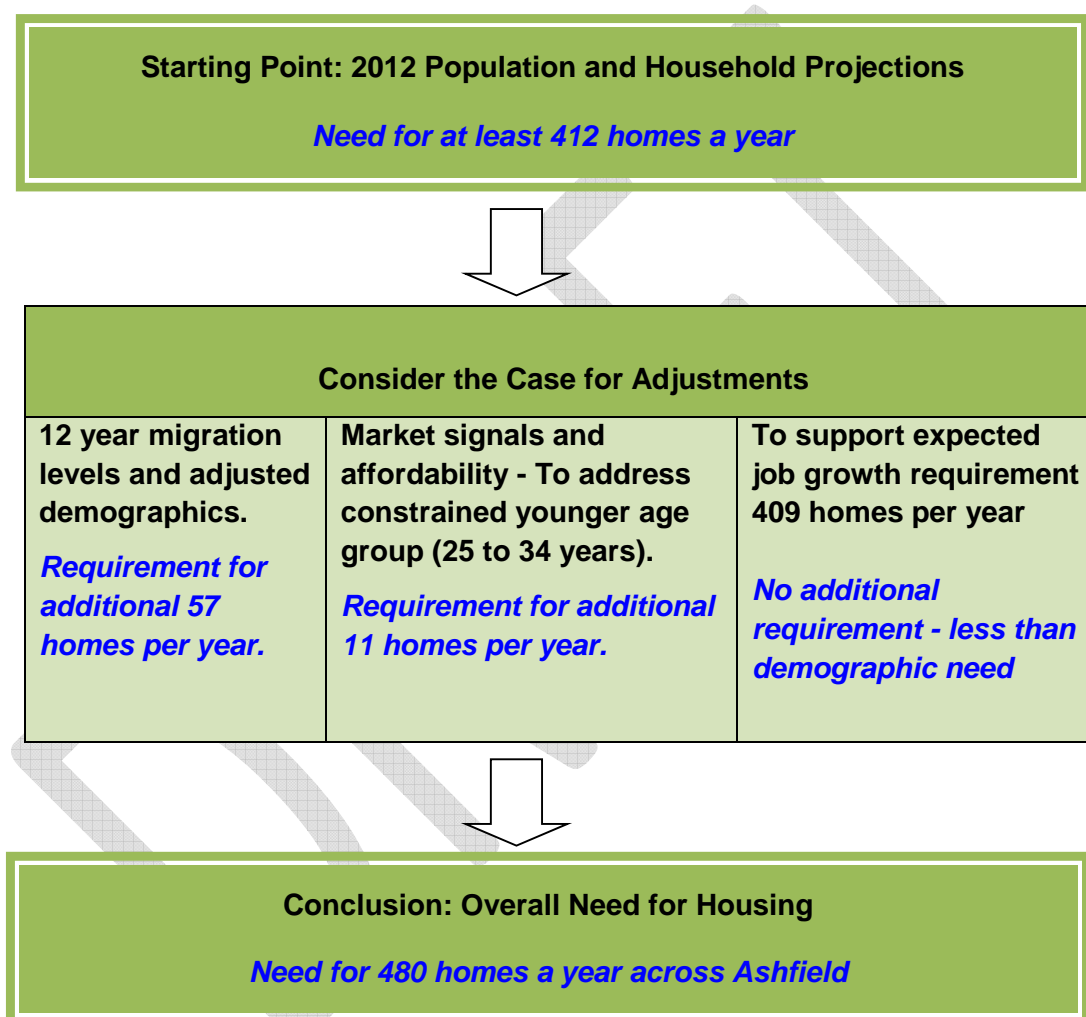
Source: Based on J. Harvey "The Economics of Real Property"

- 4.75 In relation to Objectively Assessed Housing the SHMA uses the Population and Household Projections as the starting point. The latest sub-national population projections suggest that the population in Ashfield will grow to 135,226 by 2033. These feed into the latest household projections which (when rebased to 2013) suggest a need for 412 dwellings per annum for the period 2013 to 2033. However, adjustments are made for longer term migration patterns over the last 12 years as well as making an adjustment for historic under or over recording of population change pre -2006. The OAH need also considered the implication of returning the household formation rates of the 25-34 age group back to 2001 levels. The SHMA set out a requirement for Ashfield of 480 dwellings per annum.
- 4.76 Across the HMA (and for each local authority), the level of housing provision necessary to support economic growth is lower than the baseline demographic trend-based projections. Therefore, there is no need to increase housing supply above the demographic projections and that these would support the planned economic growth in the HMA.
- 4.77 No additional housing requirements from neighbouring authorities have been identified.
- 4.78 The Objectively Assessed Housing need in relation to the sites put forward in the SHLAA or otherwise identified as suitable for housing purposes, means that focusing all new housing development within the existing boundaries of the main

towns and settlements cannot be achieved. All options will have to look at development on greenfield sites within what is defined by the Ashfield Local Plan Review, 2002 as either Countryside (Policy EV2) or Green Belt (Policy EV1).

## Figure Two Overall Housing Need – Ashfield 2013 to 2033

Source: Nottingham Outer 2014 Strategic Housing Market Assessment, Sept 2015. G L Hearn.



- 4.79 Broad locations for housing were identified using the SHLAA and considering the Green Belt areas within the District.
- 4.80 In relation to Hucknall, the Appraisal of Sustainable Extensions<sup>29</sup> for the Nottingham Core HMA by Tribal Urban Studio, 2008 reached conclusions regarding potential development areas around Hucknall. The Rolls Royce, Watnall Road, which is within the urban area defined by the Ashfield Local Plan Review

<sup>29</sup> A Sustainable Urban Extension (SUE) comprises a planned expansion of a town which can contribute to creating more sustainable patterns of development when located in the right place, with well-planned infrastructure including access to a range of facilities, and when developed at appropriate densities. (Planning Portal). The Appraisal of Sustainable Extensions for the Nottingham Core HMA but which also included Hucknall, by Tribal Urban Studio, 2008 assumed that a SUE related to 500 or more dwellings.

2002, has been taken forward with planning permission granted for approximately 900 dwellings, a 27 ha employment site, a new primary school and a local centre.

- 4.81 No similar study has been undertaken for the rest of the District, However, past consultations have identified the possibility for two SUA which have developer support:
- Mowlands, Kirkby-in-Ashfield - located to the West of Kirkby-in-Ashfield extending from the A38 to Pinxton Lane. A planning application has been submitted for approximately 1,800 dwellings together with an employment allocation, new primary school and a new road proposed from Pinxton Lane to the A38.
  - Sutton East, Lowmoor Road, Kirkby-in-Ashfield/Sutton in Ashfield – The SUE is located off Lowmoor Road and Newark Road, adjacent to the Searby Road/Sutton Junction estate. The site extended to around 90 ha and provided for approximately 1,000 dwellings, a local centre, and a new primary school.
- 4.82 From the evidence it is considered that three broad approaches can be taken to the housing development required for the District:
- Option 1 – To meet OAH Need of 480 dwellings per annum, which result in a requirement for 7,200 dwellings over the 15 year plan period. This reflects the conclusions of the SHMA and is illustrated in Figure ????
  - Option 2 – To meet OAH Need based on demographic changes 412 dwellings per annum, which results in a requirement for 6,180 over the 15 year plan period. This is based on the evidence from the SHMA. It reflects the latest sub-national population projections which suggests that the population in Ashfield will grow to 135,226 by 2033. These feed into the latest household projections which (when rebased to 2013) suggest a need for 412 dwellings per annum for the period 2013 to 2033.
  - Option 3 – To meet OAH Need plus 10% to give a requirement of 528 dwellings per annum, which results in a requirement for 7,920 dwellings over a 15 year plan period. Option 3 reflects that in a number of cases other authorities SHMA on OAH need have identified an uplift to reflect market signals in relation to housing prices and affordability. For example, Eastleigh sets out a 10% uplift, Uttlesford a 20% uplift.

Table Eleven sets out a SA of these three options.

- 4.83 A 'no growth' option is not considered a reasonable or realistic option because:
- It does not meet OAH needs;
  - There would be no opportunities to meet either the outstanding need for affordable housing, or the additional demand arising the changing needs of an ageing population;

- It would negate opportunities for the regeneration of sites which become unused or redundant;
- no housing growth would have an adverse impact upon the growth of the local economy; and  
no growth would be contrary to Government policy which has to be reflected in the Local Plan.

### **Uncertainties and Assumptions**

4.84 In undertaken the SA in Table Eleven, there are a number of uncertainties relating to the options proposed as:

- The Options SHMA is based on number of projections/assumptions including demographic changes, employment growth and current market position. The supply of sites reflects information set out in the SHLAA. However, these studies provide the best and most up-to-date evidence available regarding Objective Assessed Housing needs and the supply of housing sites.
- The exact composition of the Options in terms of specific sites is uncertain and minor changes in the housing numbers and percentages can be anticipated over time.
- The exact composition of the Options in terms of specific sites is uncertain. A number of potential sites could make up the options.
- The supply of housing sites includes assumptions regarding the developable area and is reflected in the SHLAA.
- Where planning permission has been granted it has been assumed that the permission takes into account various impacts such as flooding, health, transport and biodiversity as part of the planning process.
- The SA is based on as assumption that the Council will work with infrastructure providers to bring forward relevant infrastructure generated from development. However, the requirements for new infrastructure from the new development is uncertain at this time. In relation to developer contributions there may be issues in relation to viability to the development.
- Specific impacts in relation to specific SA objectives such as energy efficiency will depend on a variety of factors. For example the design of a specific development, location travel choice national policy.
- The extent to which new housing development meets local needs will be dependent on the housing mix and tenure which is not known at this time.
- Development of employment land generates jobs but these are not necessary taken by local people who live adjacent or near to the development.
- It is assumed that development will include measures to minimise flooding and the impact on water quality through SuDS.

**Table Eleven: Meeting Objectively Assessed Housing Need Against an Increase/Decrease in the OAH Needs**

SA Objectives	<b>Commentary</b> (Including secondary, cumulative and synergistic effects)				
	Option 1 - Meet OAH Need (480 dwellings pa , 7,200 over 15 years).	Option 2 - Meet OAH Need based on demographic changes (412dwellings pa, 6,180 over 15 years).	Option 3 - Meet OAH Need plus 10% (528 dwellings pa, 7,920 over 15 years).	Commentary:	Mitigation
<b>1. Housing</b> - To ensure that the housing stock meets the housing needs of Ashfield.	++	--	++	<p>The Local Plan and its evidence base identify the objectively assessed housing need for the District. Given the context of the NPPF in meeting objectively assessed housing need and the SA objective, the Option for meeting only the demographic changes leaves potentially a short fall in the OAH need identified in the SHMA. This may have implications in terms of not meeting peoples aspirations to own a home, have a negative impact on affordability It will also make a lower contribution towards the provision of affordable housing. Given the findings of the SHMA on labour supply this is not anticipated to result in issues from in commuting. Consequently, while Option 2 does have benefits in terms of providing housing in the context of the SA objective Option it fails to meet housing needs and is identified as a significant negative effect.</p> <p>Meeting the housing needs of Ashfield has been identified as a strong positive impact on the basis that it is achieving the SA objective based on the evidence from the SHMA. The increase of the OAH needs will have a strong positive effect as it will meet the SA objective and will potentially allow for additional affordable housing units to be delivered. However, the larger the number of houses above the OAH need the greater the potential negative impacts on other SA objectives. There are also wider impacts across the Housing Market Area as it will result in an oversupply of housing in relation to the findings of the SHMA and therefore potentially reduce housing delivering in the other authorities. The economic impact of Option 3 is uncertain. The SHMA did not identify that that labour supply is a significant aspect of housing demand in the District. It could lead to a greater percentage of people who live and work in the district as Ashfield alternatively it could increase the number of people commuting to jobs outside the District.</p> <p><b>Geographic Area likely to be effected - District in the context of the HMA. Timescale – Short, Medium and Long Term.</b></p>	Policies will be require to influence the type and mix of housing, affordable housing levels and the design of housing developments in order to meet housing needs.
<b>2. Health</b> - To improve health and	+ ?	+ ?	+ ?	<p>New development can improve access to facilities and employment locally. Appropriate design and linkages encouraging cycling and walking routes will improve health benefits although this is a less certain effect. Development should contribute</p>	Policies should seek to encourage modal shift.

SA Objectives	<b>Commentary</b> (Including secondary, cumulative and synergistic effects)				
	Option 1 - Meet OAH Need (480 dwellings pa , 7,200 over 15 years).	Option 2 - Meet OAH Need based on demographic changes (412dwellings pa, 6,180 over 15 years).	Option 3 - Meet OAH Need plus 10% (528 dwellings pa, 7,920 over 15 years).	Commentary:	Mitigation
wellbeing and reduce health inequalities.				<p>to the provision of open space. In practical terms green space is typical not generally accessible unless there is a local footpath over the land. In principle, a higher level of housing will increase the level of open space provision or financial contribution to offsite open space provision. Open space provision and good linkages to green infrastructure has been proven to have a number of health benefits.</p> <p>On the negative side an increased population and an aging population will result in an increase demand for health facilities and services. Within a constrained financial environment going into the future, this raises a question over what effect this will have and whether it can on balance be seen to be positive.</p> <p><b>Geographic Area likely to be effected – District.</b>  <b>Timescale – Short, Medium and Long Term.</b></p>	<p>Policies should require open space/contributions towards open space &amp; improve links to the wider green / blue infrastructure.</p> <p>Policies should ensure that development is not located in close proximity to unsuitable neighbouring uses.</p> <p>Accessibility of sites to informal leisure activities is important and needs to be considered in relation to green infrastructure links.</p> <p>Development needs to be coordinated with investment and expansion of GP and other health facilities/services. Where appropriate, to negate the negative impacts on health from development, policies should seek provision or contributions towards the local health infrastructure.</p>
<b>3. Historic Environment</b> - To conserve and enhance Ashfield's historic environment, heritage assets and their settings.	-	n	-	<p>The precise impact of the development will depend on its locations. However, it is anticipated that Options 1 &amp;b3 will have the potential to impact on heritage assets but to a limited degree. Option 2 would enable a choice of sites which would enable the impact on the historic assets to be minimised.</p> <p>New dwellings may also have positive aspects by increasing resident's accessibility to cultural heritage assets.</p> <p><b>Geographic Area likely to be effected –District.</b>  <b>Timescale – Short, Medium and Long Term.</b></p>	<p>Specific policies which will need to have regard to designated and undesignated heritage assets and stress the importance of design in relation to mitigating any potential negative aspects on heritage assets.</p>

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<b>4. Community Safety</b> - To improve community safety, reduce crime and the fear of crime.	n	n	n	New development can design out crime and in this context is considered to have a neutral impact.	To ensure a negative impact does not arise it is important that policies on new development should ensure good design & promote designing out crime.
				<b>Geographic Area likely to be effected – Neutral effect</b> <b>Timescale – Neutral effect.</b>	
<b>5. Social Inclusion Deprivation</b> - To improve social inclusion and to close the gap between the most deprived areas and the rest of Ashfield.	+	+	+	<p>All Options are likely to have a negligible impact on this objective. New development may result in investment in the provision of new, services and facilities in the District which potentially improves accessibility to services. However, it could equally increase pressures on those services if there is a lack of supporting infrastructure.</p> <p>The provision of new housing will have a positive impact on affordability. A higher housing number would enable the provision of a mix of good quality housing for all location and income, would generate affordable housing helping to meet Ashfield's affordable housing needs and options, contributing to redressing inequalities. However, given the level of affordable housing viability in Ashfield it is anticipate that the impact will be limited over all Options.</p> <p>Overall it is anticipated that there is a minor positive effect for all options but it will depend on the level of affordable housing and investment in local services.</p> <p><b>Geographic Area likely to be effected –District &amp; areas in the context that a higher level of affordable housing is identified for Hucknall &amp; the Rurals.</b> <b>Timescale – Short, Medium and Long Term.</b></p>	Develeoeer contributions and viability appraisals should look to maximise the level of affordable housing and other contributions from development to help address inequality.
<b>6. Biodiversity &amp; Green Infrastructure</b> - To conserve, enhance and increase biodiversity levels and Green & Blue Infrastructure	-	-	-?	The exact impact will be dependent on locations. However, for all Options it is not anticipated that any nationally protected sites such as SSSIs will be directly impact and the Council will take note of the potential Impact Risk Zones for SSSI. Within Ashfield there is a possible potential SPA (ppSPA) for Sherwood Forest which will also need to be taken into account in relation to specific site allocations. Under this option could have indirect negative effects on these assets due to, for example, disturbance arising from increased recreational activity and wild bird	Local Plan locational choices should mitigate the effects on sites. Policies should include provision for protecting biodiversity sites, enhancing the connectivity of habitats/green infrastructure and seek to improve blue infrastructure, avoid fragmentation and provide



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				<p>By its very nature development on greenfield sites is likely to have an impact on biodiversity such as disturbance from additional recreational and possibly loss of habitat. The magnitude of any negative effects in this regard will be dependent on the scale of greenfield land lost to development and the existing biodiversity value of the sites that would be affected which is currently uncertain. Arable fields can have limited value for biodiversity. However, with the increased emphasis on the environment in the Rural Payments Agency's Basic Payment System the environmental benefits of agricultural land can be anticipated to increase over the Plan period.</p> <p>Under these circumstances, it is considered that development in broad terms has the potential to have a minor negative effect. The impact will increase with the number of dwellings developed under these options and there is a degree of uncertainty of the impact for Option 3 as it will result in development of additional sites.</p> <p><b>Geographic Area likely to be effected - Beyond District Boundary.</b>  <b>Timescale – Short, Medium and Long Term.</b></p>	<p>habitat linkages. On developments landscaping/screening and good quality design will be important.</p>
<b>7. Landscape</b> – To protect enhance and manage the character and appearance of Ashfield's landscape /townscape, maintaining and strengthening local distinctiveness and sense of place.	--	-	--	<p>There are no designated landscaped areas in Ashfield, nevertheless the conservation of the landscape and townscape is an important local aspect. Overall, the development of any significant area of undeveloped land has the potential to effect landscape character but the precise impact of greenfield development will depend on its location. The Council has undertaken Landscape Assessments for sites located outside the main urban areas to identify the potential impact on the landscape. However, the balancing of the social economic needs against the landscape means that it is anticipated that some site with higher landscape quality may need to be allocated particularly in relation to Options 1 and 3. The higher the number of dwellings required the great the potential impact on the landscape quality.</p> <p><b>Geographic Area likely to be effected - Beyond District Boundary.</b>  <b>Timescale – Short, Medium and Long Term.</b></p>	<p>Policies should conserve and enhance the character and quality of the District's landscapes. Where higher valued local landscapes are allocated the design of the sites should consider how to mitigate the impacts on the landscape.</p>
<b>8. Natural Resources</b> - To	--	-	--	<p>Substantial areas of brownfield land have been developed in Ashfield. For the period 2001 to 2014 27.33 ha of employment land has been redeveloped for housing</p>	<p>Policies should avoiding developing on the best quality</p>

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minimise the loss of natural resources including soils, greenfield land and the best quality agricultural land.				<p>including former colliery and textile sites. However, there are limited brownfield sites that are anticipated to come forward going into the future. Consequently, none of the housing requirements of the options can be met from sites within the urban or settlement boundaries as defined by the Ashfield Local Plan Review 2002. Consequently, there will be a loss of greenfield sites, a potential impact on the best quality agricultural land and a loss of soils. Option 2 allows a greater choice of sites which enables the better quality agricultural land to be potentially avoided. With Options 1 &amp; 3 there is a more limited choice of sites and therefore these Options have been identified as having a high negative effect. However, the negative effects will increase in relation to the higher the number of dwellings required.</p> <p><b>Geographic Area likely to be effected –District. Timescale – Short, Medium and Long Term.</b></p>	<p>agricultural land but typically the difference between Grade 3a and Grade 3b is not identified and the protection of best quality agricultural land has to be considered against other SA factors.</p> <p>Allocation of sites should prioritise brownfield sites before taking forward Greenfield allocations.</p>
<b>9. Air &amp; Noise Pollution</b> - To reduce air pollution and the proportion of the local population subject to noise pollution.	- ?	- ?	- ?	<p>There is currently no AQMA in the district but new development is likely to result in increased car journeys. The Transport Assessment identifies there will be increased congestion regardless of the level of development but development increases the pressures on the road network. There will need to be improvements to road junctions and traffic management measures. Consequently, it can be anticipated that there will be a negative impact on greenhouse gas emissions, which are likely to increase with the number of dwellings. A question identifies that the specific effect is uncertain.</p> <p><b>Geographic Area likely to be effected – Beyond District Boundary. Timescale – Short, Medium and Long Term.</b></p>	<p>Policies which encourage sustainable transport would help improve air quality and contributions to mitigating the effects in relation to climate change.</p>
<b>10. Water Quality</b> - To conserve and improve water quality and quantity.	- ?	- ?	- ?	<p>A growth in new housing and the population of Ashfield is anticipated to increase demand for water. The specific effects of housing development on water consumption is uncertain as it will dependent on the level of housing and what if any water efficiencies measures are utilised. However, more housing will result in an overall net increase of demand as a result of new development and The Watercycle Study identifies a need to reduce water consumption and to support Severn Trent Water Resources Management Plan.</p> <p>The Humber Basin Management Plans and its supporting documents identify that there are water quality issues with rivers within the District. Additional development could potentially increase the adverse impacts on, water quality. This will depend of the waste water treatment required. The Infrastructure Delivery Plan identifies that</p>	<p>Utilising policies which:</p> <ul style="list-style-type: none"> <li>• make provision for water efficiency will mitigate the potential impact, and</li> <li>• improving water quality over the period of the Local Plan in order to help to meet the requirements of the Water Framework Directive.</li> </ul> <p>The Council will need to work in conjunction with Severn</p>

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				<p>there are capacity issues at Huthwaite but improvements are being made to various other waste treatment works. On this basis the Option have been identified as have a minor negative effect but with a question mark as until sites locations are specifically identified the effect is uncertain.</p> <p><b>Geographic Area likely to be effected - Beyond District Boundary.</b>  <b>Timescale – Short to medium term negative effect. Over the longer term it is anticipated that it will be necessary to improve water quality to meet the Water Quality Directive.</b></p>	<p>Trent and the EA to facilitate the timing of water and waste treatment infrastructure</p> <p>Policies should include the utilisation of SuDS to minimise the impact on water quality and flooding.</p>
<b>11. Waste - To minimise waste and increase the re-use and recycling of waste materials.</b>	- ?	- ?	- ?	<p>Given the recycling rates for domestic properties, in the short term new households will produce additional waste which will go into land fill sites. There are specific issues for Ashfield in relation to the current low recycling rate which are 34%. The Nottinghamshire Waste Core Strategy 2013 identifies that a recovery target of at least 45% of household waste should be recycled or composted by 2015, rising to 50% by 2020. Over the medium to longer term, the specific impact may depend on arrangements for recycling and composting. On this basis all option have been identified as a negative effect. If improvements are not made there will be an increasing negative effect in relation to the number of new dwellings. However recycling is likely to be driven by national and EU policy<sup>30</sup>.</p> <p><b>Geographic Area likely to be effected - Beyond District Boundary.</b>  <b>Timescale – Recycling is likely to be driven by national and EU policy over the medium to longer term and reflected in the Waste Local Plan. This will should reduce the impact over time.</b></p>	<p>The impact may be mitigated on dependent on the Waste Local Plan requirements and the specific measures adopted by the Council's Environmental Services for recycling.</p> <p>Policies should support the maximisation of recycling and minimising other forms of waste.</p>
	-	-	-		
<b>12. Climate Change and Flood Risk - To adapt to climate change by reducing and manage the risk of flooding and the resulting detriment to people, property and the environment.</b>	-	-	-	<p>The Ashfield SFRA identifies that flood risk is relatively low compared to neighbouring authorities. Flooding from water courses is anticipated to be within close proximity to rivers and watercourses. Potential new development sites within Ashfield are assessed against the risks of flooding within the SHLAA. The SHLAA is anticipated to identify sufficient sites to meet the three options without the necessity of developing sites at risk from flooding from watercourses.</p> <p>It is identified that a significant number of the sites will by necessity be Greenfield sites. This could reduce infiltration of precipitation, increasing surface runoff and the</p>	<p>Sites should not be allocated in Flood Zones 2 and 3. (See SFRA). Surface water flooding can be mitigated against by using SuDS and ensuring run off from greenfield sites is maintained at green field rates. (This is a key aspect in the catchment of the River Leen).</p>

<sup>30</sup> The ECs plans to impose a legally-binding target on most EU member states of recycling 65 per cent of all household waste by 2030.

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				<p>risk of flooding. However, to manage this risk, any development should be compliant with the requirements in the NPPF and achieve runoff rates consistent with existing greenfield runoff rates. This can be achieved through the use of SUDS techniques. The limitation of development to Greenfield rates is particularly important within the catchment of the River Leen which is a quickly rising river as there are flooding risks to Hucknall, particularly from the Baker Lane Brook and down-stream in Nottingham.</p> <p>The majority of site will be subject to potential surface water flooding based on the EA surface water maps. However, SuDS should minimise the surface water risks. On this basis none of the options are anticipated to have a major impact on flooding in the District.</p> <p><b>Geographic Area likely to be effected – Beyond District Boundary.</b>  <b>Timescale – Short, Medium and Long Term.</b></p>	<p>Policies should look to improve blue infrastructure and where appropriate improve the water storage aspects of green infrastructure.</p>
<b>13. Climate Change and Energy Efficiency</b> - To adapt to climate change by minimise energy usage and to develop Ashfield's renewable energy resource, reducing dependency on non-renewable sources.	+	+	+	<p>New development may involve an increase in energy usage and greenhouse gas Emissions from energy consumption and an increase in the number of movements of vehicles associated with new dwellings. However, new dwellings also but it also offers the opportunity to incorporate renewable energy and energy efficiency measures in new dwellings. Over the time scale of the Local Plan it is anticipated that new dwellings will move toward achieving zero carbon. The Options are not anticipate to result in any significant differences between the approaches, although the greater the number of dwellings the greater the potential for energy efficiency measures. However, this will be dependent on Government policy over the period of the Local Plan. Over the longer term, a drive to reduce greenhouse gas emissions through technological advances in sustainable design, construction and transportation, providing continued improvements is likely to be driven by national and EU policy.</p> <p><b>Geographic Area likely to be effected – Beyond District Boundary.</b>  <b>Timescale – Anticipate that energy efficiency may have increased impact over the long terms dependent on national policy.</b></p>	<p>Under nation guidance any locally policies for encourage higher sustainability standards for new development has to be considered against the impact on viability and costs justified at a local level. In Ashfield the viability position makes it significantly more difficult to take forward local policies in this area.</p> <p>New dwellings should be located to maximize travel choice and reduce the need to use the car.</p>
<b>14. Travel and Accessibility</b> - To	--	--	--	<p>New development is likely to result in increased car journeys, and add to greenhouse gas emissions. The Traffic Assessment identifies that housing will impact on a</p>	

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improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys.				<p>number of road junctions. All Options will result in additional housing with the implication that car use will increase.</p> <p>The delivery of approximately 8,000 dwellings may help to maintain existing, and generate new bus services reflecting a greater population and switching of transport utilised. However, this is more likely to be achieved in larger site allocations rather than a dispersed approach given the increasing reliance on commercial operators. The location of sites in relation to potential transport hubs is also likely to be an important factor in travel choice.</p> <p>On this basis all options are considered to have a significant negative impact. However, the long term impact on this SA is uncertain as travel choice may off set the impact to some degree. The Vision's focus on sites being in or on the edge of towns and settlements assists in maximising travel choice.</p> <p><b>Geographic Area likely to be effected –District.</b>  <b>Timescale – The impact is anticipated to increase over time with increased congestion on the roads over the plan period. However, there may also be switching</b></p>	<p>Locations should maximize travel choice in relations to jobs and services.</p> <p>Policies should require sustainable transport measures, contributions to improve capacity of the roads network with transport assessments identifying the impact of significant new developments proposals.</p> <p>Policies should facilitate walking and cycling as part of new developments.</p> <p>It is important that the Local Plan policies should be consistent and support the Local Transport Plan.</p>
<b>15. Employment</b> - To create high quality employment opportunities including opportunities for increased learn and skills to meet the needs of the District.	+	+	+	<p>The provision of new housing is likely to have a positive effect on access to employment opportunities, however, this will depend on the location. Housing development is anticipated to provide jobs both in the construction phase and in the longer term. An increased population will generate additional jobs through servicing the needs of the additional population.</p> <p>Development will increase demands on education and it is important that education improvements are achieved in Ashfield. The evidence identifies that local schools are under pressure in terms of capacity. Increased housing growth will potentially increase these pressures dependent on the locations of sites in relation to local school capacity. However, housing and an increased population can result in additional investment in facilities. Any investment in educational facilities has the potential to assist in improving education standards in the District.</p>	<p>The needs for education contributions where appropriate is important. Where appropriate negotiating training and apprentices as part of development will assist in approving skills in the District.</p>

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				<p>Given that there are potential negatives and positives all options are anticipated to have a slight positive effect but this effect will increase in relation to the number of dwellings and increasing population.</p> <p><b>Geographic Area likely to be effected –District. Timescale – Short, Medium and Long Term.</b></p>	
<b>16. Economy</b> – To improve the efficiency, competitiveness and adaptability of the local economy.	++	++	++	<p>The economic benefits from additional homes and given the finds of the SHMA in relation to jobs it is not anticipated that there will be any significant labour supply issues.</p> <p>The proportion of people working from home has been increasing steadily over the last 10-15 years. This reflects an increase in self-employed and flexible working patterns together with improvements in telecommunications technology. Suitably designed and serviced new housing facilities this trend.</p> <p><b>Geographic Area likely to be effected – District in the context of the FEMA. Timescale – Short, Medium and Long Term.</b></p>	
<b>17. Town Centres</b> - Increase the vitality and viability of Ashfield's town centres.	+	+	+	<p>The provision of new housing will reflect an increasing population which has the potential to have a positive effect of the vitality and viability of existing town centres. However, in this context it is important that development is related to existing towns and settlements.</p> <p><b>Geographic Area likely to be effected –District. Timescale – Short, Medium and Long Term.</b></p>	<p>Sites should be located to maximise the potential benefits for town centres.</p> <p>Policies/projects should enhance the town centres to facilitate access &amp;the attraction of centres. Where appropriate contributions should be sought towards improving these centres.</p>

- 4.85 The SA of the Options identifies that housing development brings both sustainability positives as well as negatives. In general terms benefits arise in terms of housing and the economy with less significant positive effects in relation to health, social inclusion energy efficiency and town centres. There a significant negative impacts from development in relation to natural resources relating to the necessity to develop greenfield sites, landscape and air & noise pollution. None of the option are anticipate to have more than a minor negative effect on the historic assets, biodiversity, water quality or flooding.

### **Options 1 & 3**

- 4.86 In relation to Options 1 and 3 they respectively meet Ashfield housing need (480 dwellings per annum) or provide for 10% more houses (528 dwellings per annum). Both Options will therefore meet Ashfield's anticipated housing needs. On the broad district based approach to the SA assessment both Options can be seen to score equally well with the same negative aspects identified for both Options. However, on a number of the SA objectives the potential impact of additional houses will increase the negative effects. Equally more housing will potentially result in additional affordable housing. The evidence from the SHMA supports Option 1 as reflecting the OAH need. While no different SA issues have been identified with the housing associated with Option 3 the SHMA did not identify specific affordability issues for Ashfield. The response to the SHMA consultation where a 10% increase was raised highlighted that:

- The market signals do not look to be particularly strong although an uplift has been included where there is evidence that household formation rates continue to sit slightly below historical trends. The issue here is that any uplift needs to be considered against the same level of population; any increase in population due to increasing housing delivery will draw population from elsewhere and hence reduce need in other locations (and would hence become a Duty to Cooperate issue).
- The uplift in the percentage figure for Eastleigh and Uttlesford is in areas where there are more significant affordability pressures than the Nottingham Outer HMA.
- The uplift at Uttlesford and Eastleigh is not based any reasonable rational. Inspectors on Examinations of Local Plans for other authorities including Crawley and Stratford upon Avon have dismiss any uplift despite the Local Authorities planning on this basis.

### **Option 2**

- 4.87 As SA 1, Housing, is to ensure that the housing stock meets the housing need, Objective 2 results in a significant negative effect for this SA objective. This reflects that it only meets the demographic element of the OAH need whereas the SHMA identifies upwards adjustments in the housing need in relation to adjusted migration and market signals. It will have a reduced impact on landscaped and natural resources compared to the other Options.



### **Green Belt**

- 4.88 The NPPF identifies that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. While there are not considered to be environmental constraints in Ashfield, which would prevent OAH needs being restricted, the southern half of the District is within the Green Belt which provides a policy constraint.
- 4.89 Hucknall has Green Belt to all its urban boundaries. If the OAH need identified for Hucknall in the SHMA is taken forward, it would be necessary to release Green Belt land around Hucknall in order to meet that need. In relation to the Rurals the same issue arises. These villages are within the Green Belt with very limited opportunity for development within the settlement boundaries. At Kirkby-in-Ashfield there is Green Belt to the south of and west of the town. The land areas to the west and north are located in the countryside.
- 4.90 The protection of the Green Belt has to be considered against a number of issues including:
- The north half of the District is outside the Green Belt but there is a limited to the capacity of sites that can be taken forward without;
  - The evidence identifies that Hucknall is closely linked to the Greater Nottingham HMA or a sub market within the Nottingham HMA with close links to Greater Nottingham;
  - Nottingham is a major source of employment and leisure activities and a significant percentage of the working population in Hucknall work within Nottingham.
  - The needs to minimise travel distances with a choice of travel methods.
  - For the Rurals there are demographic issues and additional housing is anticipated to support and facilitate local infrastructure and services.
  - The Duty to Cooperate as, if the Council is not meeting its fully assessed housing need, it should consider whether there are opportunities to co-operate with neighbouring planning authorities to meet needs across housing market areas. However:
    - The adjacent authorities of Gedling BC, Broxtowe BC and Nottingham City are located within the Green Belt and as part of the Aligned Core Strategy amended the Green Belt boundaries to identify housing on Green Belt housing sites;
    - It is clear from discussions with the other authorities within the Nottingham Outer HMA that each authority within the HMA is expected to meet the requirements identified in the SHMA for their respective districts.

- 4.91 Option 2 was rejected on the basis that it does not meet Ashfield's OAH needs and it was highly unlikely that any deficiency would be met by neighbouring authorities. In relation to Option 3 it was not considered that Ashfield had specific affordable issues and for the reasons set out above it was determined not to take forward this option.

**The Council concluded that it was appropriate to proceed with Option 1 which identifies the full, objectively assessed housing needs for Ashfield as 480 dwellings per annum.**

## **HOUSING SPATIAL OPTIONS**

- 4.92 The housing spatial option reflect evidence from a variety of sources including the following:
- Housing needs based on the SHMA with a requirement for 480 dwellings per annum.
  - The potential housing supply from the SHLAA regarding the number of potentially suitable housing sites can be identified in broad areas in and around the three towns in Ashfield and the Rurals. This approach reflects the principles of:
    - recognising that while development of brownfield sites is maximised, if there are insufficient brownfield sites there is no option but to develop on greenfield sites;
    - Minimising the impact on sites which are important from a biodiversity perspective,
    - Avoiding, as far as possible, sites identified with a high landscape value,
    - Taking into account the Green Belt,
    - Avoiding sites where there is a flood risk from watercourses in Flood Zones 2 or 3
    - Avoiding the loss of sports pitches and open space unless it has been identified as surplus to requirements;
    - Minimising the impact on heritage assets.
  - The Landscape Assessment of sites in the countryside and where appropriate the Green Belt;
  - SA of all suitable sites,
  - The findings of the Green Belt Review.

4.93 The SHMA provides a breakdown of the OAH needs for specific areas of the three districts which make up the housing market area. It is acknowledged that these figures are less reliable than District figures<sup>31</sup> but they provide an indication of potential housing need for three areas comprising the follows:

- Sutton and Kirkby-in-Ashfield - 306 dwellings per annum (63.75%).
- Hucknall - 148 dwellings per annum (30.83%).
- The Rurals - 26 dwellings per annum (5.42%).

4.94 The housing site at Rushley Farm of the A60 has not been included in the Options. The site is located within close proximity to the possible potential Special Protection Area for the Sherwood Forest Region. The standing advice from Natural England is that a 'risk based' approach to the ppSPA should be taken. Taking forward Rushley Farm would pose a significant risk to the Council as it may result in the need to de-allocate the site if it is designated as an SPA at a later date. This would reducing the land supply by around 675 dwellings and potentially the Council would not meet the objectively assessed need for the area on this basis.

#### **Approach to Green Belt Land**

4.95 In relation to Kirkby-in-Ashfield, the Green Belt is located to the south and south east of the town. This means that land to the west and north of Kirkby-in-Ashfield is in the countryside, which does not have the same national policy emphasis. On this basis, it is not considered that the development of Green Belt land would represent a significantly more sustainable option than development of land which is not in the Green Belt. As such the evidence would not clearly demonstrate that there are exceptional circumstances to justify altering the Green Belt boundary in relation to Kirkby-in-Ashfield.

4.96 Crucially, the Council first needed to determine if the objectively assessed housing needs (OAHN) for the 15 year Plan period could be delivered on sites within the urban area and on sites adjoining settlement boundaries in designated countryside. The results indicate that a strategy of no Green Belt release could just meet the OAHN within the 15 year Plan period. However, this would be reliant on the two submitted large urban extensions to deliver enough housing over that period. It could potentially provide 15 years supply if development was brought forward more quickly than anticipated (this is based on the sites delivering 130 dwellings each per annum, past delivery rates suggest an average of 60 to 80 dwellings per annum). However, based on local evidence of commencement periods (typically 5 years from the adoption of a Plan) and past delivery rates on large urban extensions, this is considered to be a high risk approach which may not meet the OAHN within the plan period. It would also result in development being concentrated in the north of the District and therefore lead to a disproportionate pattern of growth. This is contrary to the Council's Settlement Hierarchy Policy S2 which directs the largest scale of growth to the main towns and larger villages. This policy is evidenced by the Greater Nottingham Accessible Settlements Study.

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<sup>31</sup>Nottingham Outer Strategic Housing Market Assessment, October 2015 para 4.55 to 4.57

- 4.97 Given both the lack of certainty regarding the timescale for delivery of the urban extensions (which is likely to result in the OAHN not being met within the Plan period), together with the potential for unbalanced growth, the Council considers that there are exceptional circumstances for Green Belt release.

**Options ruled out**

- 4.98 One large urban extension at Sutton East with no Green Belt release in Kirkby but with Green Belt release in Hucknall and Selston

In considering potential options, the Council has considered one large urban extension with dispersed growth across the District (including Green Belt sites in Hucknall and Selston to meet the identified OAHN in these areas). This option looked at both the Mowlands and Sutton East sites. It was determined that it would not be possible to meet the OAHN by only allocating Sutton East and not Mowlands. Sutton East provides much greater flexibility as it can be brought forward in smaller parcels due to the fact that it has much less severe access constraints. Mowlands requires major infrastructure, a new road from the A38 through to Sutton Road and Pinxton Lane. Consequently, it would be very problematic to bring forward smaller areas of the site.

- 4.99 Dispersed Development with no large Urban Extensions but with Green Belt release in Hucknall and Selston.

As part of this process, the Council considered an option of no urban extensions with dispersed development across the District. This option would deliver just over 13 years supply of housing and would be contrary to the NPPF in terms of meeting the full OAHN within the 15 year Plan period.

**Alternative Options considered potentially appropriate**

- 4.100 Three Housing Spatial Options have been identified as being potentially appropriate:

- Option 1 - One Urban Extension at Mowland's plus dispersed sites with Green Belt release in Hucknall and Selston.
- Option 2 - Two Large Urban Extensions at Sutton East and Mowlands with no Green Belt release
- Option 3 - Two Smaller Urban Extensions at Sutton East and Mowlands with Green Belt release in Hucknall and Selston

An sustainability assessment was undertaken of the three options as is set out in Table Twelve.

### Table Twelve: Sustainability Appraisal of Housing Spatial Options

Reference to Short, Medium, and Long terms in the SA analysis is defined as follows: Short term - up to 5 years, Medium term - 5 year up to 10 years, Long term -10 years or more.

SA Objectives	Option 1			Option 2			Option 3			Mitigation
	One Large Urban Extension (at Mowlands) Farm)with Green Belt release in Hucknall and Selston			Two Large Urban Extensions (Mowlands Farm and Sutton East) with no Green Belt release			Two smaller urban extensions (Mowlands Farm and Sutton East) with Green Belt Release in Hucknall and Selston			
	Sutton/Kirkby	Hucknall	Rurals	Sutton/Kirkby	Hucknall	Rurals	Sutton/Kirkby	Hucknall	Rurals	
1. Housing	+	++	++	+	n	n	++	++	++	
<p>All the options include sites which have the capacity to meet the objectively assessed housing needs for Ashfield within the 15 year Plan period.</p> <p>Option 1 marginally meets the need and does not provide any flexibility if sites are not developed within the 15 year plan period. This could result in the OAHN not being fully met within the 15 year plan period particularly in Kirkby in Ashfield if Mowlands did not deliver. This would be contrary to NPPF policy for the delivery of housing which seeks to ensure that the full OAHN is met. Option 1 proposes Green Belt release in Hucknall and the rural areas to meet the identified OAHN. Given the level of uncertainty with regard to fully meeting the OAHN within 15 years, this option has been scored as a single positive for Kirkby and Sutton. Sites allocated in Hucknall and Selston would deliver slightly less than the OAHN for those areas (as identified by the SHMA) within the 15 year Plan period. However, Hucknall and the rurals are identified as the most viable areas of the District for bringing forward affordable housing. Consequently, both have scored double positive.</p> <p>The two Sustainable Urban Extensions (SUE) have the capacity to deliver large volumes of housing together with supporting infrastructure. They are also well-located with respect to schools and employment land. However, there may also be significant initial costs associated with their development and they are unlikely to deliver housing in the short term. Based on evidence of lengthy commencement periods and past delivery rates, it is very unlikely that the sites could deliver enough housing to meet the needs of the OAHN. This option is based on an annual delivery of 130 dwellings per site, which is not considered to be realistic. It could result in an undersupply of approximately 500 dwellings if build rates continue in line with past trends (see appendix 1). This would be contrary to the NPPF as it would not fully meet the OAHN within the 15 year Plan period. It also proposes no Green Belt release and this significantly reduces housing provision in Hucknall and the villages. Given the level of uncertainty with regard to fully meeting the OAHN within 15 years, this option has been scored as a single positive</p>										









SA Objectives	Option 1 One Large Urban Extension (at Mowlands) Farm)with Green Belt release in Hucknall and Selston			Option 2 Two Large Urban Extensions (Mowlands Farm and Sutton East) with no Green Belt release			Option 3 Two smaller urban extensions (Mowlands Farm and Sutton East) with Green Belt Release in Hucknall and Selston			Mitigation
	Sutton/Kirkby	Hucknall	Rurals	Sutton/Kirkby	Hucknall	Rurals	Sutton/Kirkby	Hucknall	Rurals	
	<p>landscape value of the sites the Landscape assessment has been utilised to identify the higher scoring sites from a SA aspect.</p> <p>Option 1 would result in the development of 2 large sites which have scored high for landscape value where the capacity to accommodate development is low (part of Mowlands and Beck Lane).</p> <p>Option 2 includes 3 larges sites which have scored high for landscape value where the capacity to accommodate development is low (part of Mowlands, part of Sutton East and Beck Lane).</p> <p>Option 3 includes 2 large sites which have scored high for landscape value where the capacity to accommodate development is low (part of Sutton East and Beck Lane).</p>									to mitigate the effect of residential development through the design of the scheme and the incorporation of open space, including sports pitches.
8. Natural Resources	--	--	--	--	--	--	--	--	--	<p>Ideally locational choices should avoiding developing on the best quality agricultural land but typically the difference between Grade 3a and Grade 3b is not identified and the protection of best quality agricultural land has to be considered against other SA factors.</p>
9. Air & noise pollution	-	-	-	-	-	-	-	-	-	<p>Locating dwellings near to alternative forms of transport such as the Robin Hood Line and the NET offer transport choice and potentially reduce the effects</p> <p>Development management policies should look to take forward transport choice and look to try and achieve modal sifts away from the car.</p>









4.101 Option 1 – One large urban extension (Mowlands) with smaller sites in Sutton in Ashfield and Kirkby in Ashfield and Green Belt release in Hucknall and Selston

**Dwelling Proposed (considered deliverable within the Plan period)**

• Mowlands	900 (within plan period)
• Dispersed sites Sutton & Kirkby	4596
• Hucknall sites	2431
• Rural sites	407

**Green Belt**

- No Green Belt release in Kirkby in Ashfield.
- Green Belt release Hucknall & Rurals.

Option 1 will just meet the 15 year OAHN requirement for the Sutton/Kirkby.

- 4.102 Option 1 proposes a large urban extension at Mowlands Farm (c.1800 dwellings) and smaller sites in Kirkby in Ashfield and Sutton in Ashfield, with no Green Belt release in Kirkby in Ashfield. It also includes Green Belt sites in Hucknall and Selston and includes some smaller sites which form part of the Sutton East extension. A potential benefit of this option is the fact that it provides an opportunity to deliver a large sustainable development with new facilities such as a primary school, small local centre, and recreational areas, green infrastructure on the Mowlands site.
- 4.103 Whilst Option 1 would only just meet the 15 year requirement, it would not provide flexibility if Mowlands, or other sites, were not brought forward to meet the needs of the District. Mowlands is also reliant on the construction of a new road from the A38 through to Kirkby Cross and Pinxton Lane in order to provide a satisfactory access route. This is likely to take many months to construct and is likely to delay development in the early years of the Plan. Analysis on the housing trajectory of large urban extensions in Ashfield indicates that the timescale for delivery of a large urban extension is often prolonged by the complexities of such schemes. It has been determined that Mowlands is capable of delivering approximately 900 of the potential 1800 dwellings within the 15 year Plan period (based on evidence of delivery rates/lead in period of recent urban extensions in the District).
- 4.104 In addition to the uncertainty regarding delivery of development, the Council has strong concerns about the impact it would have on the landscape to the south of the site. The Landscape Assessment indicates that the landscape value is high and the site's capacity to accommodate development is low. Whilst it is anticipated that the impact could be partially mitigated, through the design and layout of a development, the effect of development on the landscape would be high, resulting in a total or major alteration to key elements, features or characteristics of the local



or wider landscape resource, so that post development the baseline situation will be fundamentally changed. The Council does not consider that the southern section of the site, south of Boars Hill, is suitable for development due to the adverse impact of development on the landscape.

4.105 With regard to the rest of the District, the Council considers that there are exceptional circumstances for Green Belt release in Selston and Hucknall. Selston, Jacksdale and Underwood for reasons set out above.

4.106 In conclusion, Option 1 is not considered to be the most appropriate approach for Ashfield for the following reasons:-

- a. It does not provide any flexibility if development was not brought forward to the projected timescale;
- b. Development of the whole site at Mowlands would not be appropriate as it would have an adverse impact on the landscape south of Boars Hill.

4.107 Option 2 – Two large Urban Extensions in Kirkby in Ashfield and Sutton in Ashfield and no Green Belt release

#### **Dwelling Proposed**

- |                                   |       |
|-----------------------------------|-------|
| • Mowlands                        | 1,300 |
| • Sutton East                     | 1,000 |
| • Dispersed sites Sutton & Kirkby | 3,920 |
| • Hucknall sites                  | 1,951 |
| • Dispersed sites Rurals          | 160   |

#### **Green Belt**

- No Green Belt release in Kirkby in Ashfield.
- Green Belt release Hucknall & Rurals.

Option 2 will meet the 15 year OAHN requirement if sites are delivered at a more advanced rate.

4.108 Option 2 proposes two major sustainable urban extensions to the west of Kirkby (Mowlands c.1800 dwellings) and to the east of Sutton/Kirkby (c.1000 dwellings), with no Green Belt release in the District. Benefits of this option will include opportunities to deliver new facilities such as a primary school, small local centre, new recreational areas and potential to help alleviate surface water flooding issues near Searby Road.

- 4.109 Option 2 potentially could just meet the 15 year requirement but would not provide a flexible approach to the delivery of housing in the District. There are elements of risk with this option, namely a potential delay in delivery of housing until later in the plan period and potential over-reliance on a two large urban extensions ('all eggs in one basket'). Furthermore, it assumes a delivery rate of 130 dwellings per annum at Mowlands and a slightly higher delivery rate at Sutton East (approximately 90 dwellings per annum). Based on evidence relating to Nottingham Outer HMA urban extensions, these urban extensions will have a longer lead-in time and are likely to realistically deliver approximately 80 dwellings per annum. It is therefore highly unlikely that these sites will be fully developed within the 15 year Plan period.
- 4.110 NPPF paragraph 47 requires local planning authorities to maintain a rolling 5 year supply of deliverable housing land when set against the OAHN. If at any time this cannot be demonstrated, the relevant policies for the supply of housing will not be considered up-to-date and the District would be vulnerable to unplanned ad-hoc proposals. Over-reliance on two large urban extensions could therefore be a high risk approach with regard to a 5 year supply of land in the early years of the plan period.
- 4.111 Both urban extensions have areas of high landscape value. The Landscape Assessment indicates that the landscape value is high and the sites' capacity to accommodate development is low. Whilst it is anticipated that the impact could be partially mitigated, through the design and layout of a development, the effect of development on the landscape would be high, resulting in a total or major alteration to key elements, features or characteristics of the local or wider landscape resource, so that post development the baseline situation will be fundamentally changed. The Council does not consider that the southern section of Mowlands, south of Boars Hill, or the western part of Sutton East to be suitable for development due to the adverse impact of development on the landscape.
- 4.112 The two large urban extensions would concentrate development in one area to the east and west of Kirkby in Ashfield. It is considered more appropriate to have wider dispersal of sites, spreading development across Sutton in Ashfield which is a settlement of sub-regional significance with a good range of services and facilities. This would also provide greater certainty that development would be delivered within the Plan period.
- 4.113 With regard to the rest of the District, as set out earlier, the Council considers that there are exceptional circumstances for Green Belt release in Selston and Hucknall. Selston, Jacksdale and Underwood.
- 4.114 In conclusion, Option 2 is not considered to be the most appropriate option for Ashfield for the following reasons:
- 4.115 **Preferred Option** Option 3 – Two smaller urban extensions in Kirkby in Ashfield and Sutton in Ashfield and Green Belt release in Hucknall and Selston

**Dwelling Proposed**

• Mowlands	900
• Sutton East	760
• Dispersed sites Sutton & Kirkby	3970
• Hucknall sites	2431
• Rurals sites	407

**Green Belt**

- No Green Belt release in Kirkby in Ashfield
- Green Belt release Hucknall.
- Green Belt release Rurals.

Option 3 provides the most certainty that the OAHN will be met within the 15 year Plan period. It provides more land than is required and this should provide greater flexibility to ensure that the OAHN is met.

- 4.116 Option 3 will meet the housing needs of the District and provide an over-supply of approximately 200 dwellings. This will provide greater flexibility and less risk if development is not brought forward on all of the sites within the 15 year Plan period.
- 4.117 This option excludes Green Belt sites in Kirkby in Ashfield but includes some Green Belt release in Selston and Hucknall. The Green Belt areas to be released have been informed by the Green Belt review 2015, i.e., those areas that are least sensitive with regard to fulfilling the five purposes of a Green Belt as set out in the NPPF. The Council considers that there are exceptional circumstances for Green Belt release for the reasons set out earlier.
- 4.118 In order to accommodate the level of need, the option includes two smaller sustainable urban extensions at Mowlands Farm (northern part only c. 900 dwellings) and Sutton East (c.760), alongside the majority of smaller sites submitted and deemed to be suitable and deliverable. Given the size of Mowlands and Sutton East, it is not considered to be feasible to develop the whole sites within the 15 year Plan period for reasons set out previously. Furthermore, Option 3 will protect areas of high landscape value south of Boars Hill and west of the Sutton East site. Other sites with less severe landscape impact are capable of accommodating the required level of development to meet the OAHN. Option 3 includes Beck Lane, which has scored high in terms of Landscape impact. However, since the principle of development has already been established at Beck Lane this was considered to be appropriate and necessary in order to ensure that development is delivered within the 15 year Plan period. Furthermore, Development will be dispersed throughout Sutton in Ashfield and Kirkby in Ashfield, thereby ensuring that the OAHN has the best chance of being delivered within the 15 year Plan period.

- 4.119 No sites have been selected in Teversal and Fackley as the settlements have poor access to services and facilities. Sites in Teversal that are closest to Stanton Hill have physical constraints that are very likely to impact on the delivery of development. Site S74 also scores high in terms of landscape impact.
- 4.120 In conclusion, Option 3 is considered to be the most appropriate option for the following reasons:-
- a. It provides the most certainty with regard to meeting the OAHN within the 15 year Plan period whilst also ensuring that development is sustainable.
  - b. This option will provide approximately 200 more homes than the OAHN, thereby providing more flexibility if sites are not brought forward within the projected timescale.
  - c. By allocating more numerous but smaller sites, the District will be less vulnerable to having a lack of 5 year deliverable housing sites at any one time.
  - d. It protect areas of high landscape value.
  - e. The Council considers that there are exceptional circumstances for Green Belt release in Hucknall and Selston in order to ensure the OAHN is fully met within the 15 year plan period with an appropriate distribution of growth. This approach accords with the NPPF.

## **EMPLOYMENT SPATIAL OPTIONS**

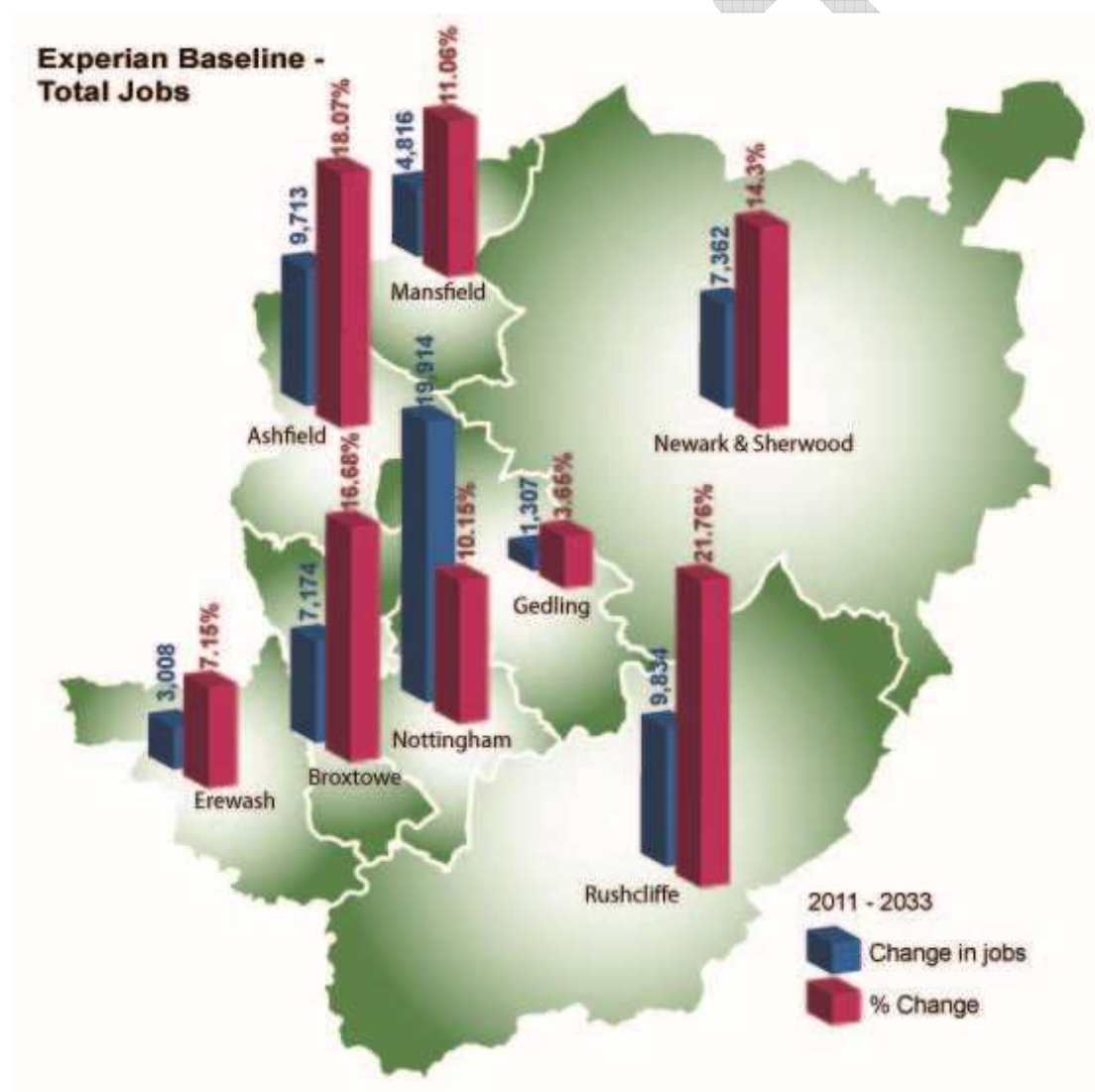
- 4.121 The NPPF identifies that significant weight should be placed on the need to support economic growth through the planning system and to help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century. (NPPF paragraph 19 and 20). In relation to employment land, the emphasis is upon local planning authorities use an evidence base to assess:
- the needs for land or floor space for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period,
  - the existing and future supply of land available for economic development and its sufficiency and suitability to meet the identified needs.
- (NPPF para. 160)
- 4.122 The ELFS Study Experian baseline reflects Experian's views regarding the future economic performance of different sectors of the economy at the time of their preparation in December 2014. For Ashfield it identifies that there will be significant increase in jobs but these are likely to be in non B space areas. Figure Three and Table Thirteen set out the jobs anticipated to 2033. For Ashfield the ELF Study identifies that any of these jobs will relate to construction related

sectors, health and residential care and social work<sup>32</sup>. In this context, these sectors are unlikely to give rise to requirements for employment land.

Offices	Manufacturing	Distribution	Other Non B Class Jobs	Total
2,475	-2,179	995	8,623	9,713

**Table Thirteen: Ashfield Additional Jobs 2011 – 2033 Experian Baseline**

Source: Nottingham Core HMA and Nottingham Outer HMA : Employment Land Forecasting Study 2015 Nathaniel Litchfield & Partners Table 5.1



**Figure Three: Experian Baseline Change in Jobs 2011-2033**

Source: Nottingham Core HMA and Nottingham Outer HMA : Employment Land Forecasting Study 2015 Nathaniel Litchfield & Partners Table 5.3

<sup>32</sup>Nottingham Core HMA and Nottingham Outer HMA : Employment Land Forecasting Study 2015 Nathaniel Litchfield & Partners Table 5.1, Page 84

4.123 The requirement for the allocation of employment land relates to uses within B1, B2 and B8 of The Town & Country Planning (Use Classes) Order 1987 (England) as amended. The ELFS Study identifies four scenarios for employment land:

- Experian Baseline - Projections of jobs derived from economic forecasts prepared by Experian<sup>33</sup>;
- Job Growth: D2N2, Policy On - Experian jobs but adjusts upwards to reflect jobs from set out by the Local Enterprise Partnership.
- Labour Supply - Estimating future growth of the local labour supply based on the housing requirement taken from the Strategic Housing Market Assessment.
- Past Completions - Consideration of past trends in the development of land for offices, industrial and distribution (employment land).

(Demand for Experian Baseline, Policy –On and Labour Supply reflects a requirement for net developable area.)

This results in the approximate employment land requirements set out in Table Fourteen.

	Offices	Industrial & Distribution	TOTAL
<b>Experian Baseline</b>	44,363 sq m	47.81ha	53.31 ha
Of which Hucknall	5,191sq m	10.03 ha	
<b>Policy – On</b>	44,415 sq m	53.11 ha	58.61 ha
Of which Hucknall	5,200 sq m	21.47 ha	
<b>Labour Supply</b>	48,470 sq m	54.60 ha	60.7 ha
Of which Hucknall	5,863 sq m	11.14 ha	
<b>Past Completions</b>	41,877 sq m	132.13 ha	137.36
Of which Hucknall	4,579 sq m	27.69 ha	

**Table Fourteen: Employment land Comparisons 2011 – 3033**

Source: Nottingham Core HMA and Nottingham Outer HMA : Employment Land Forecasting Study 2015 Nathaniel Litchfield & Partners Table 5.3

<sup>33</sup> Experian December 2014 quarterly release reflecting Total Workforce Jobs. ( i.e.Total number of people in employment, regardless of whether it is a full/part time)

4.124 In terms of demand, the scenarios arising from the ELF Study can be seen to form two clear alternatives:

- Land requirements based on the Experian Baseline, Policy –On and Labour Supply, which give a short range of land requirements between 53.31 ha and 60.7 ha; or
- Past completions which give a requirement of 137 ha.

In addition, looking at the supply side, there is up to 98 ha which is currently allocated under the Ashfield Local Plan Review 2002 or already has planning permission. However, there are factors which potentially reduce this supply as:

- The route of the High Speed Railway Network (HS2) Phase Two, Birmingham to Leeds, runs through Ashfield and the proposed route will go through the Castlewood employment allocation. However, it is stressed that at this time the route is not safeguarded whose purpose is to protect land from conflicting development before construction starts<sup>34</sup>.
- Under The Broxtowe Borough, Gedling Borough, Nottingham City Aligned Core Strategies, Part 1 Local Plan, the Rolls Royce site, Hucknall is identified as contributing to the employment needs of the Greater Nottingham conurbation. This is acknowledged by the Council and can be seen as either increasing the demand requirements for land in Ashfield or reducing the supply of land available to meet the specific employment land needs for Ashfield set out in the ELF Study.
- A significant element of the site at Portland Industrial Park/ Welshcroft Close is identified in the planning permission as open storage.
- The Waste Local Plan identifies employment sites as the preferred area of search for waste facilities.

4.125 The SELAA concludes that a number of sites capable of delivering employment land, which provides a supply of 129 ha<sup>35</sup> based on the estimated developable area. This can be broken down into the following:

- |                      |              |
|----------------------|--------------|
| • Kirkby-in-Ashfield | approx.40 ha |
| • Sutton in Ashfield | approx.55 ha |
| • Hucknall           | approx.34 ha |

This breaks down into the following:

- Employment allocations and planning permissions:
  - Kirkby-in-Ashfield approx.35 ha
  - Sutton in Ashfield approx.28 ha
  - Hucknall approx.35 ha

<sup>34</sup> Safeguarding directions, if adopted, will be issued to Local Planning Authorities by the Secretary of State.

<sup>35</sup> References to employment land areas in the SA reflect the estimated net deliverable area.



- New sites of the MARR Route approx. 22 ha (If Summit Park and South West Oakham was included the figure would rise to 44 ha).
- Sites off the A38 linked to the M1 approx. 9 ha.

4.126 In relation to the SELAA, no sites which can be taken forward have been put identifies in The Rurals. The ELF Study and other employment land studies have not identified a specific demand requirement for units within this area. It is considered in relation to The Rurals that the evidence indicates that:

- a) The nature of jobs is changing. With modern technology, there is an increasing trend for people to work or run businesses from their homes rather than operating from offices and units.
- b) In approximately the last 25 years the only new units brought forward in The Rurals has been through the public sector. Units have been brought forward at Cordy Lane, Underwood, and Pye Hill Road and just outside the area at Annesley Farm, Annesley. The development of these units was undertaken by the County and District councils with assistance from grants funding. Given the current financial climate it is unlikely that the public sector will bring forward units in the foreseeable future.
- c) There is a substantial question over whether the private sector is likely to bring forward employment units in this location. Policies with the Local Plan support the reuse of rural buildings or well designed new buildings of a suitable scale to the locality, which potential forms a supply of units if there is a demand.
- d) The settlements are not isolated to the same extent as parts of Derbyshire or Lincolnshire. They are relatively close to the urban settlements such as Kirkby-in-Ashfield where units and employment land is available.
- e) Allocation of employment land is likely to require a site in the Green Belt where it needs to be demonstrated by evidence that exceptional circumstances exist for the alteration of the Green Belt boundary.

4.127 On the basis of the evidence the following options were identified:

- Option 1 Labour Demand/Labour Supply on allocated sites/sites with permission – This approach identifies a demand reflecting the Experian Baseline, Policy–On and Labour Supply, with a supply based on existing allocated employment and/or sites with planning permission. Under this Option it is anticipated that up to 12,338 jobs would be created to 2033. However, of this 2,038 jobs will be within B space, which is anticipated to require approximately 60 ha of employment land. The requirements would provide reflect the demand requirements for Hucknall identified in the ELF Study.

Under this option there is approximately 99 ha of land potentially available on allocated employment sites under the Ashfield Local Plan Review 2002 and planning permissions.

- Option 2 Labour Demand/Labour Supply on allocated sites/sites with permission together with new sites off the MARR – This approach utilise a demand reflecting the Experian Baseline, Policy-On and Labour Supply, with a supply based on a mix existing allocated employment and/or sites with planning permission together with new sites identifies along the MARR. Under this Option it is anticipated that up to 12,338 jobs would be created to 2033. However, of this 2,038 jobs will be within B space. This will require approx. 60 ha of employment land. The requirements would provide reflect the demand requirements for Hucknall identified in the ELF Study.

Under this option there is approximately 120 ha of land, which is potentially available on the following:

- Employment Land allocated under the ALPR and planning permissions approximately 98 ha;
- Sites off the MARR approximately 22 ha.

- Option 3 Labour Demand/Labour Supply on allocated sites/sites with permission together with new sites linked to the M1 - To utilise a demand reflecting the Experian Baseline, Policy-On and Labour Supply, with a supply based on a mix of existing allocated employment and/or sites with planning permission together with new sites identifies along the A38 linking to Junction 28 of the M1 or a site put forward off the A608 linking to Junction 27 of the M1. Under this Option it is anticipated that up to 12,338 jobs would be created to 2033. However, of this 2,038 jobs will be within B space, which is anticipated to require approximately 60 ha of employment land. The requirements would provide reflect the demand requirements for Hucknall identified in the ELF Study.

Under this option there are 107 ha of land which are potentially available on the following:

- Employment Land allocated under the ALPR and planning permissions approximately 98 ha;
- Sites off the A38 approximately 9 ha.

- Option 4 Past Completions - To utilise the projection forward of past completion rates which means that all the sites identified in the SELAA would need to be allocated. This Option is based on past take up rates giving a land requirement of 137 ha. Dependent on whether industrial or warehouse it would require between approx. 5,523 and 8,389 jobs.

Under this option there is approximately 129 ha of land which is potentially available on the following:

- Employment Land allocated under the ALPR and planning permissions approximately 98 ha;
- Sites off the MARR approximately 22 ha;

- Sites off the A38 approximately 9 ha.

Option 5 Land Supply - This Option uses the exiting supply of allocated sites and planning permissions as a basis for allocating land. This Option reflects allocation of approximately 80 ha after taking into account the issues identified in paragraph 4.124.

### **Uncertainties and Assumptions**

4.128 In undertaking an SA of the employment spatial options, Table Fifteen, there are a number of uncertainties relating to the options proposed as:

- The SHMA and the ELF Study are based on number of projections including employment growth, labour supply and demographic changes into the future. These studies provide the best and most up-to-date evidence available.
- The exact composition of the Options in terms of specific sites is uncertain other than for Past Completions. (Past completion would require all sites identified in the SELAA to be allocated). A number of potential sites could make up Options 1, 2, 3 and 5.
- The Experian Baseline, Policy–On are based on Experian Forecasts of job growth. Labour Supply reflects the information set out by GL Hearne in relation to the SHMA.
- As is made clear in a number of employment land studies within and outside the evidence base, Past Completion do not necessary reflect trends into the future.
- The performance of the economy over the next few years will impact on how the demand for employment land going into the future.
- The supply of employment site includes assumptions regarding the developable area.
- Where planning permission has been granted it has been assumed that the permission takes into account various impacts such as flooding, health, transport and biodiversity as part of the planning process.
- Development of employment land generates jobs but these are not necessary taken by local people who live adjacent or near to the development.
- The SA is based on as assumption that the Council will work with infrastructure providers to bring forward relevant infrastructure generated from development.
- It is assumed that development will include measures to minimise flooding and the impact on water quality through SuDS.
- Specific impacts in relation to specific SA objectives such as energy efficiency will depend on a variety of factors. For example the design of a specific development, location travel choice national policy.

DRAFT

**Table Fifteen: Sustainability Appraisal of Employment Spatial Options**

SA Objectives	Commentary (Including secondary, cumulative and synergistic effects)				
	Option 1 – Demand approx. 60ha. Comprising existing employment sites and planning permissions.	Option 2 - Demand approx. 60 ha comprising a mix existing employment site plus permissions new sites off the MARR.	Option 3 – Demand approx. 60 ha, comprising a mix existing employment site plus permissions new sites off the A38.	Option 4 - Past Completions demand 137 ha, all sites allocated.	Option 5 – Land Supply comprising approx 80 ha of existing employment sites and planning permissions.
<b>1. Housing</b> - To ensure that the housing stock meets the housing needs of Ashfield.	n	n	n	-	n
<p>The choice of option is not expected to have an effect on objective 1, 2, 3 &amp; 5. The SHMA assessment identifies labour supply is not a key determinant in the level of housing demand within the District. Some of the MARR sites have been put forward for housing but they have been assessed in the SHLAA as unsuitable. In these circumstances, these options are anticipated to have a neutral effect on housing. For Option 5 it is unlikely that the vast majority of allocated employment sites could be used for housing or other alternative uses and therefore this has been identified as neutral. However, it may involve some small changes from employment to housing where the location is suitable for this purpose. In relation to Option 4 the level of demand requires the allocation of all sites in the SELAA means that there is no opportunity to determine whether some of the employments sites should be considered for alternative uses including housing. Therefore, it has been identified as a minor negative effect.</p> <p><b>Geographic Area likely to be effected – District.</b> <b>Timescale – Short, Medium and Long Term.</b></p>					
<b>2. Health</b> - To improve health and wellbeing and reduce health inequalities.	+	+	+	+	+
<p>The Options is likely to have a minor positive effect on this objective as it is considered that the provision of increase employment can have indirect health benefits. During the construction period and the increased traffic there is the potential for negative health impacts in terms of respiration. However, this impact is likely to be short term, to have a minimal impact and will be considered as part of the planning process. Options 4 has a question mark identify that it is likely to generate in commuting which may well have an increase negative impact in term s of traffic generation.</p> <p><b>Geographic Area likely to be effected – Beyond District Boundary.</b> <b>Timescale – Short, Medium and Long Term.</b></p>					
<b>3. Historic Environment</b> - To conserve and enhance Ashfield's historic environment, heritage assets and their settings.	n	-	n	-	n
<p>Commercial development has the potential to impact on the setting of historical assets. Option 1 3 and 5 are not expected to have an effect on this objective as no historic sites are effected by the employment allocations or sites have planning permission where any potential impact on historic assets has already been considered as part of the planning process..</p> <p>For Option 2 and 4 an ancient monument is situated off the MARR close to the sites put forward. However, this may be mitigated by the choice of site as some sites to the north of the MARR will have very limited impact in the context that Summit Park has planning permission. However, it will not be possible to mitigate this option by choice of site in Option 4</p> <p><b>Geographic Area likely to be effected – District.</b></p>					

SA Objectives	<b>Commentary</b> (Including secondary, cumulative and synergistic effects)					
	Option 1 – Demand approx. 60ha. Comprising existing employment sites and planning permissions.	Option 2 - Demand approx. 60 ha comprising a mix existing employment site plus permissions new sites off the MARR.	Option 3 – Demand approx. 60 ha, comprising a mix existing employment site plus permissions new sites off the A38.	Option 4 - Past Completions demand 137 ha, all sites allocated.	Option 5 – Land Supply comprising approx 80 ha of existing employment sites and planning permissions.	
	Timescale – Short, Medium and Long Term.					
<b>4. Community Safety -</b> To improve community safety, reduce crime and the fear of crime.	<b>n</b>	<b>n</b>	<b>n</b>	<b>n</b>	<b>n</b>	
	The choice of option is not expected to have an effect on this objective.  <b>Geographic Area likely to be effected – Neutral Effect.</b> <b>Timescale – Neutral Effect District. .</b>					
<b>5. Social Inclusion Deprivation -</b> To improve social inclusion and to close the gap between the most deprived areas and the rest of Ashfield.	<b>+</b>	<b>+</b> ?	<b>+</b>	<b>++</b>	<b>++</b>	
	<p>There is potential for employment sites to lead to positive effects on poverty and social exclusion, where they are located in areas most affected by deprivation. This is reflected in the potential for employment land to result in jobs, but this will depend to some degree on the nature of the jobs generated and the capacity of the local labour supply to meet the job requirements.</p> <p>For Options 1, 2, 3 and 5 sites are located within 800 m of an area which is within the 25% most deprived areas in England based on the 2010 Index of Multiple Deprivation (IMD). However for Option 2 this will depend on which sites are allocated.</p> <p>In relation to Option 4 &amp; 5 the higher level of growth provides increased opportunities for local employment in areas which may be subject to deprivation. On this basis it has been identified as a significant positive effect.</p> <p><b>Geographic Area likely to be effected – District.</b>  <b>Timescale – Short, Medium and Long Term.</b></p>					
<b>6. Biodiversity &amp; Green Infrastructure -</b> To conserve, enhance and increase biodiversity levels and Green & Blue Infrastructure	<b>n</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>n</b>	
	<p>The sites identified as potentially suitable within the SELAA do not contain, and are not in close proximity to, any nationally designated nature conservation sites. Brownfield land can have significant biodiversity value in specific cases. However, it is considered that, on balance, development of brownfield sites will help to minimise the risk of both direct and indirect effects on habitats and species. A number of the options would entail development on greenfield sites. The development of greenfield sites could have a negative effect on biodiversity but this will depend to some degree on the nature of the specific sites. For example arable land may well have limited biodiversity value. However, sites which include significant greenfield sites are assumed to result in short term disturbances to existing habitat and have been identified as a minor negative impact.</p> <p>Option 1 and 5 reflect existing employment allocations which are not anticipated to have a negative impact on biodiversity. It is recognised that the sites at Castlewood, Rolls Royce and Welsh Croft Close include local wildlife sites but as part of the planning permission this aspect as been fully considered as part of the planning process and, where necessary, mitigate measures have been agreed.</p>					

SA Objectives	<b>Commentary</b> (Including secondary, cumulative and synergistic effects)					
	Option 1 – Demand approx. 60ha. Comprising existing employment sites and planning permissions.	Option 2 - Demand approx. 60 ha comprising a mix existing employment site plus permissions new sites off the MARR.	Option 3 – Demand approx. 60 ha, comprising a mix existing employment site plus permissions new sites off the A38.	Option 4 - Past Completions demand 137 ha, all sites allocated.	Option 5 – Land Supply comprising approx 80 ha of existing employment sites and planning permissions.	
	<p>Option 2 &amp; 3 - Existing employment allocations largely do not impact on biodiversity. Some sites such as Castlewood and Rolls Royce include local wildlife sites but as part of the planning permission mitigate measures have been agreed. The sites off the MARR and the M1 are greenfield sites. One of the sites off the MARR, Adj Cauldwell Woods, includes a Local Wildlife Site and potentially a protected species (White Clawed Crayfish). However, with the level of demand with for Option 2 this could be mitigated by taking alternative sites forward. Sites identified off the A38 do not direct impact on Local protected sites but are located adjacent to Local Wildlife Sites.</p> <p>In order to meet the demand requirements of 137 ha expected under this Option 4, it would be necessity to allocate all sites in the SELAA. This is significantly greater than the 60 ha identified in the other Options. A significant number of these sites would be on agricultural land which may have a negative effect on biodiversity. By necessity this Option will include sites where there are Local Wildlife Site. However, it is anticipated that mitigation measures are likely to be possible to minimise the potential impact. While the site has been identified as have a minor negative impact on biodiversity the overall impact will be in excess of the other options due to the level of sites required..</p> <p><b>Geographic Area likely to be effected – Beyond District Boundary.</b>  <b>Timescale – Short, Medium and Long Term.</b></p>					
<b>7. Landscape</b> - To protect enhance and manage the character and appearance of Ashfield's landscape /townscape, maintaining and strengthening local distinctiveness and sense of place.	n	-	-	-	n	
	<p>Option 1 and 5 - Existing allocated employment sites are located within the urban boundary as defined by the Ashfield Local Plan Review 2002 or were allocated under the Plan and have been partly developed through planning permission (Summit Park, Bentinck Colliery and Blenheim Lane). A number of these sites have already been development to some degree and therefore there is no opportunity to negative any potential impact on the landscape. In this context the landscape impact is regarded as neutral.</p> <p>Option 2 &amp; 4 - The incorporations of sites off the MARR and the A38 will have an impact on the landscape. However, the assessment of these sites means that the impact will be limited.</p> <p>NEED TO REFLECT THE LANDSCAPE ASSESSMENTS</p> <p><b>Geographic Area likely to be effected – Beyond District Boundary.</b>  <b>Timescale – Short, Medium and Long Term.</b></p>					
<b>8. Natural Resources</b> - To minimise the loss	++	--	-	--	+	



SA Objectives	<b>Commentary</b> (Including secondary, cumulative and synergistic effects)					
	Option 1 – Demand approx. 60ha. Comprising existing employment sites and planning permissions.	Option 2 - Demand approx. 60 ha comprising a mix existing employment site plus permissions new sites off the MARR.	Option 3 – Demand approx. 60 ha, comprising a mix existing employment site plus permissions new sites off the A38.	Option 4 - Past Completions demand 137 ha, all sites allocated.	Option 5 – Land Supply comprising approx 80 ha of existing employment sites and planning permissions.	
of natural resources including soils, greenfield land and the best quality agricultural land.	<p>Option 1 and 5 - The sites allocated in the Ashfield Local Plan Review 2002 were a mix of brownfield and greenfield sites. However, the vast majority of the greenfield sites have already been developed to some extent including Castlewood, Kings Mill Rd/Oddicroft Lane, Blenheim Lane, &amp; Summit Park. In this context, these options will have positive benefits in relation to SA objectives as through the choice of sites there will be not necessity to take additional greenfield sites. Comparing the supply of employment against this estimate of demand for B Class uses, reveals that there is more than sufficient employment space in reusing existing sites in quantitative terms up to 2033 and it will be necessary to look at whether some of the site may have alternative uses.</p> <p>Option 1 has been identifies a s have a significant positive effect as it relies on the identified demand in the ELF Study and would look to balance supply of employment sites using existing employment land allocations/planning permission. Therefore, the option will take forward brownfield sites. Similarly, Option 5 is considered to have a positive effect but has been given a minor positive effect as it does take forward a higher allocated supply in relation to demand from the ELF Study. However, it is anticipated it will be on brownfield sites</p> <p>Option 2 - The sites off the MARR are located on greenfield sites in the countryside and are currently utilised for agricultural. For the majority of the sites the agricultural quality of the land is not known. However, at least one of the site has Grade 3a agricultural land. The combined impact will be to have an adverse effect on soil quality. On this basis it is anticipated to have a significant negative effect.</p> <p>Option 3 - The sites off the A38 provide a significant lower area of potential development land when compared to the MARR sites. The two sites are on greenfield sites in the countryside and are currently utilised for agricultural. However, 4.5 ha of land relates to a mixed use development at Mowlands. The site is unlikely to come forward in isolation and is allocated it would be a substantial mixed use site with residential development.</p> <p>Option 4 - The necessity to allocate all sites in the SELAA means that this Option will include all sites and given the assessments on Objectives 2 and 3 would have a significant negative impact.</p> <p><b>Geographic Area likely to be effected – District.</b>  <b>Timescale – Short, Medium and Long Term.</b></p>					
<b>9. Air &amp; Noise Pollution</b> - To reduce air pollution and the proportion of the local population subject to noise pollution.	-?	-?	-?	- -	-?	
	<p>There is currently no AQMA in the district but new development is likely to result in increased car journeys. The Transport Assessment identifies there will be increased congestion regardless of the level of development but development increases the pressures on the road network. There will need to be improvements to road junctions and traffic management measures. Consequently, it can be anticipated that there will be a negative impact on greenhouse gas emissions, which are likely to increase with the number of developments.</p> <p>For all the options here is potentially limited travel choice in terms of bus or other forms of public transport. While a number of employment sites are located in the urban area many of the major employment sites have limited bus services.</p>					

SA Objectives	<b>Commentary</b> (Including secondary, cumulative and synergistic effects)					
	Option 1 – Demand approx. 60ha. Comprising existing employment sites and planning permissions.	Option 2 - Demand approx. 60 ha comprising a mix existing employment site plus permissions new sites off the MARR.	Option 3 – Demand approx. 60 ha, comprising a mix existing employment site plus permissions new sites off the A38.	Option 4 - Past Completions demand 137 ha, all sites allocated.	Option 5 – Land Supply comprising approx 80 ha of existing employment sites and planning permissions.	
	<p>Some mitigation to increased greenhouse gas emissions through technological advances in sustainable design, construction and transportation, providing continued improvements driven by national and EU policy.</p> <p>It is anticipated that there is the potential to have a negative effect for Options 1, 2, 3 and 5. However, Option 4 is likely to generate substantial in-commuting from other areas by the fact that the potential jobs for this Options does not align with the labour supply from new housing proposed. Therefore, it is anticipated this will have a significant negative effect. A question mark identifies that the effects are uncertain to some degree.</p> <p><b>Geographic Area likely to be effected – Beyond District Boundary.</b>  <b>Timescale – Short, Medium and Long Term.</b></p>					
10. Water Quality - To conserve and improve water quality and quantity.	-	-	-	-	-	
	<p>The effects of employment development on water consumption are uncertain, although there will be an overall net increase of demand as a result of new development. The Watercycle Study identifies a need to reduce water consumption but Severn Trent Water's Water Resources Management Plan 2014 2014 identifies how future water demand will be met.</p> <p>The Humber Basin Management Plans and its supporting documents identify that there are water quality issues with rivers within the District. Additional development could potentially increase the adverse impacts on, water quality. This will depend of the waste water treatment required. The Infrastructure Delivery Plan identifies that there are capacity issues at Huthwaite but improvements are being made to various other waste treatment works. This can be mitigated against through policies which ensures development is designed in a sustainable manner to be water efficient and raise water quality. This could include utilising higher BREEAM standards in relation to water.</p> <p>All options are identifies as having the potential to have an adverse impact in relation to water efficiency and water quality. Option 4 has the potential to have the greatest impact given that it sets out substantially higher level of development. However, it is not considered that this would justify a significant negative effect. On this basis the options have been identified as have a minor negative effect.</p> <p><b>Geographic Area likely to be effected – Beyond District Boundary.</b>  <b>Timescale – Short to medium term negative effect.</b> Over the longer term it is anticipated that it will be necessary to improve water quality to meet the Water Quality Directive.</p>					
11. Waste - To minimise waste and increase	-	-	-	- -	-	

SA Objectives	<b>Commentary</b> (Including secondary, cumulative and synergistic effects)					
	Option 1 – Demand approx. 60ha. Comprising existing employment sites and planning permissions.	Option 2 - Demand approx. 60 ha comprising a mix existing employment site plus permissions new sites off the MARR.	Option 3 – Demand approx. 60 ha, comprising a mix existing employment site plus permissions new sites off the A38.	Option 4 - Past Completions demand 137 ha, all sites allocated.	Option 5 – Land Supply comprising approx 80 ha of existing employment sites and planning permissions.	
the re-use and recycling of waste materials.	<p>The Waste Core strategy identifies that there is limited information on waste from commercial and industrial sources at a local level and how much is landfilled. At a national level it is anticipated that around 52% of this waste was recycled<sup>36</sup>. Therefore, business will produce waste which it is assumed will go to landfill but the specific impact may depend on arrangements for recycling and composting. In this context all option have been identified as a negative effect but given the substantial larger number of sites associated with Option 4 this has been identified as a significant negative effect.</p> <p><b>Geographic Area likely to be effected – Beyond District Boundary.</b></p> <p><b>Timescale –</b> Recycling is likely to be driven by national and EU policy over the medium to longer term and reflected in the Waste Local Plan. This will should reduce the impact over time.</p>					
<b>12. Climate Change and Flood Risk - To adapt to climate change by reducing and manage the risk of flooding and the resulting detriment to people, property and the environment.</b>	-	-	-	-	-	
	<p>The Ashfield SFRA identifies that flood risk is relatively low compared to neighbouring authorities. Flooding from water courses is anticipated to be within close proximity to rivers and watercourses. The sites at Butlers Hill and a small part of the Rolls Royce site are within Flood Zone 2 or 3. However, planning permission has been granted on these sites with a Site Specific FRA identifying appropriate flood mitigation measures. One of the sites of the MARR adjoins the Cuthill Brook, however, this is not anticipated to be a significant issue.</p> <p>Various sites will be subject to surface water flooding. However, this can be mitigated against utilising SuDS.</p> <p>No suitable new sites have been identified in Hucknall where the catchment of the River Leen is sensitive to surface water with flooding in both Hucknall and down-stream in Nottingham.</p> <p>A number of the potentially employment sites are greenfield land. This could reduce infiltration of precipitation, increasing surface runoff and the risk of flooding. However, to manage this risk, any development should be compliant with the requirements in the NPPF and achieve runoff rates consistent with existing greenfield runoff rates. This can be achieved through the use of SUDS techniques.</p> <p>All options have been assessed as having a minor negative effect on the basis of a site risk associated with most sites from surface water flooding..</p> <p><b>Geographic Area likely to be effected – Beyond District Boundary.</b></p> <p><b>Timescale – Short, Medium and Long Term.</b></p>					
<b>13. Climate Change and Energy Efficiency - To adapt to climate</b>	-	-	-	- -	-?	

<sup>36</sup> Survey of Commercial and Industrial Waste Arising, DEFRA 2010.

SA Objectives	<b>Commentary</b> (Including secondary, cumulative and synergistic effects)					
	Option 1 – Demand approx. 60ha. Comprising existing employment sites and planning permissions.	Option 2 - Demand approx. 60 ha comprising a mix existing employment site plus permissions new sites off the MARR.	Option 3 – Demand approx. 60 ha, comprising a mix existing employment site plus permissions new sites off the A38.	Option 4 - Past Completions demand 137 ha, all sites allocated.	Option 5 – Land Supply comprising approx 80 ha of existing employment sites and planning permissions.	
change by minimise energy usage and to develop Ashfield's renewable energy resource, reducing dependency on non-renewable sources.	Industry is a source of greenhouse gas emissions and therefore new development has the potential to increase this negative aspects. Omissions are also reflected in road transport. New development may involve an increase in energy usage but it also offers the opportunity to incorporate renewable energy and energy efficiency measures in new dwellings. Over the time scale of the Local Plan it is anticipated that new development will move toward achieving reducing CO2 emissions. Given the substantial larger potential development in Option 4 this has been scored higher than the other options as it is also anticipated to increase commuting into the District. However, this will be dependent on Government policy over the period of the Local Plan. Over the longer term, a drive to reduce greenhouse gas emissions through technological advances in sustainable design, construction and transportation, providing continued improvements is likely to be driven by national and EU policy.  <b>Geographic Area likely to be effected – Beyond District Boundary.</b> <b>Timescale – Anticipated to have an increasing impact over the Plan period driven by national policies and measures.</b>					
<b>14. Travel and Accessibility</b> - To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys.	-	-	-	--	-?	
	Additional employment land will generate new development and additional transport demands from both businesses and their work force. This will have a negative impact in terms of congestion although this may vary dependent on the location of site and the scope for alternative forms of travel. If the percentage of people working and living in the District increase this will reduce commuter rates to and from the District will positive effects.  Option 1, 2 and 3 - The increase to the working age population and number of jobs in the area is likely to increase the demand for transport during peak hours. This may increase congestion of roads, especially the A38 and A611 where issues are already identified in the Transport Assessment. However, given the number of B space jobs to 2033 the scale of increase is relatively small, the likelihood of it having a significant negative effect on existing congestion levels during peak hours is considered low. Some of the sites are on bus routes which provides choice of travel. The sites which link to the M1 are on bus routes, which provides choice of travel and the location of the new sites means they will link into existing bus routes. Option 5 brings forward more land allocations than the other options but reflects the current position set out in the AFLPR 2002 and planning permissions already granted. In this context it is higher that demand requirements for employment land and a question has been raise in relation to the potential impact. For Option 4 the impact is to allocating a substantially higher level of sites. By implication significantly more jobs and additional community from outside the District will result in an increase in the negative aspects in relation to this SA objective.  <b>Geographic Area likely to be effected – Beyond District Boundary.</b> <b>Timescale – The impact is anticipated to increase over time with increased congestion on the roads over the plan period.</b>					
<b>15. Employment</b> - To create high quality employment	++	++	++	++	++	

SA Objectives	<b>Commentary</b> (Including secondary, cumulative and synergistic effects)					
	Option 1 – Demand approx. 60ha. Comprising existing employment sites and planning permissions.	Option 2 - Demand approx. 60 ha comprising a mix existing employment site plus permissions new sites off the MARR.	Option 3 – Demand approx. 60 ha, comprising a mix existing employment site plus permissions new sites off the A38.	Option 4 - Past Completions demand 137 ha, all sites allocated.	Option 5 – Land Supply comprising approx 80 ha of existing employment sites and planning permissions.	
opportunities including opportunities for increased learn and skills to meet the needs of the District.	<p>All options would be expected to support the local economy, facilitate local businesses and inward investment and create jobs. In turn, the multiplier effect would facilitate further investment and job opportunities in the local economy. However, to some extent this would depend on job opportunities are taken by local people within Ashfield or are taken by people commuting from outside the District. It is anticipated that all options will generate significant employment and meet the options identifies in the ELF Study.</p> <p>Employment land in itself will not increase skills or education but there may be opportunities to take forward training and apprenticeship opportunities through businesses occupying the premises.</p> <p><b>Geographic Area likely to be effected – District within the context of the FEMA.</b>  <b>Timescale – Short, Medium and Long Term.</b></p>					
<b>16. Economy – To improve the efficiency, competitiveness and adaptability of the local economy.</b>	++	++	++	++	++	
	<p>All the Options will meet the NPPF emphasis on economic growth (para.19) and the development and infrastructure required in the area (para. 157). However, this has to be balanced against the existing and future supply of land available for economic development and its sufficiency and suitability to meet the identified needs (para.161).</p> <p>It is anticipated that all options will generate meet the objective of economic growth identified in the ELF Study. However, in relation to Option 4 this would result in substantial increase in the employment land allocated. In this context this has a number of potential consequences:</p> <ul style="list-style-type: none"> <li>• A large over allocation of employment sites which may have an adverse impact on the wider FEMA through an over supply of land if not taken up,</li> <li>• It would require substantially more B space jobs in Ashfield than are anticipated from the other three options. If this is the case over the developed over the Plan period this would result in a substantial increase in commuting into the District as the labour supply in the District would be out of balance with the housing supply as reflects in the SHMA.</li> </ul> <p>On this basis a question has been raised to reflect the uncertainties associated with this option.</p> <p>It is recognised that Option 5 will also lead to a moderately higher allocation of land that could be anticipated from the demand levels identified in the ELF Study other than past completions. However, the existing employment sites are already allocated and their location means that there is no ready available sustainable alternative use.</p> <p><b>Geographic Area likely to be effected –District within the context of the FEMA.</b>  <b>Timescale – Short, Medium and Long Term.</b></p>					

SA Objectives	<b>Commentary</b> (Including secondary, cumulative and synergistic effects)					
	Option 1 – Demand approx. 60ha. Comprising existing employment sites and planning permissions.	Option 2 - Demand approx. 60 ha comprising a mix existing employment site plus permissions new sites off the MARR.	Option 3 – Demand approx. 60 ha, comprising a mix existing employment site plus permissions new sites off the A38.	Option 4 - Past Completions demand 137 ha, all sites allocated.	Option 5 – Land Supply comprising approx 80 ha of existing employment sites and planning permissions.	
<b>17. Town Centres -</b> Increase the vitality and viability of Ashfield's town centres.	<b>n</b>	<b>n</b>	<b>n</b>	<b>n</b>	<b>n</b>	
	<p>The choice of option is not expected to have a direct effect on this objective in relation to B space land.</p> <p>For non B space policies national guidance identifies that a sequential test (and possibly an impact test) will apply to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. The emphasis is on town centres, then edge of centre locations and only if suitable sites are not available in town centre or edge of centres should other locations be considered.</p> <p><b>Geographic Area likely to be effected – Neutral effect.</b>  <b>Timescale – Neutral effect.</b></p>					

### **What Option to take forward?**

- 4.129 The Local Plan seeks to enhance employment provision in the District and the FEMA through the allocation of appropriate types and levels of employment land. It seeks to be in balance with housing growth, which looks to ensure that out and in commuting is not increased.
- 4.130 The NPPF recommendation that authorities “should work together with county and neighbouring authorities and with Local Enterprise Partnerships” (Para 160) to understand business needs and local demand dynamics, recognising that often this does not conform to local authority boundaries. The Council has through a number of studies including the ELF Study, the East Midlands Northern Area Employment Land Review, Ashfield & Mansfield Property Study and Experian’s Ashfield and Mansfield: Economic Analysis worked with neighbouring authorities to understand economic requirements over the wider FEMA.
- 4.131 It is necessary as part of the Local Plan makers to make an assessment of the likely change in job numbers, having regard to the growth of the working age population in the housing market area with the purpose of ensuring that there is not an increase in unmet housing need. This reflects that where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns and could reduce the resilience of local businesses. In relation to the evidence from the ELS Study, Options 1, 2 and 3 can be broadly seen to align housing requirements against labour supply. Option 5 reflects the potential employment land supply and after taken into account potential factors which will reduce the possible supply would result in an employment land supply reflecting an estimate of developable area of approximately 80 ha. As such, it is above the land requirements anticipated from demand based options but also makes an adjustment upwards to reflect past trends.
- 4.132 PAS Guidance in relation to Objectively Assessed Housing Needs identifies that on the demand side there should be a realistic prospect that the growth aimed for is achievable<sup>37</sup>. A similar approach needs to be taken in relation to employment land requirements. The level of demand from Option 4 is substantially higher than the other options and will necessitate a major increase in jobs within Ashfield which is not predicted by the ELS Study. As such it will not have any alignment with housing requirements. For a number of reasons Option 4 is not considered to be an option that should be taken forward in that:
- a) There are issues with using completion rates in isolation as in the:
- short term (5 year) trends can be overly skewed by the economic challenges. For a number of years after the recession no employment land in Ashfield on allocated sites was developed;
  - In the long term (15 year) patterns can fail to take into consideration developing/emerging trends

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<sup>37</sup>Objectively Assessed Need and Housing Targets Technical advice note, July 2015 Prepared for the Planning Advisory Service by Peter Brett Associates



Either way this can result in substantial over or under estimation of the scale and type of employment land requirements:

- b) It would require significantly more jobs within Ashfield than is predicted by Experian. While it is a predication and may not be 100% accurate the number of jobs required in relation to the past completion is considered to be unachievable.
- c) All recent employment studies have stressed that there has been a sectorial shift over time which will continue into the future. Service sector industries have grown and more traditional labour intensive manufacturing operations declined, resulting in a shift towards office based premises which require a lower land take. In Ashfield it can be recognised that the number of jobs in manufacture have declined although it remains the principal sectorial employer.
- d) Industry is increasingly footloose and it is less likely that a major employer will move into the area. It is recognised that land requirements are more likely to come from expanding local business looking to relocate within the FEMA.
- e) Technological changes have resulted in less labour intensive business operations and significantly improved space efficiencies, again impacting on land take requirements.

4.133 In relation to the supply aspect, there is 98 ha of land which is currently allocated in the ALPR and/or has planning permission. It is recognised that simply taking forward existing allocations may not be desirable as it may reflect poor location which are not demanded by the market. It is also important to recognise that there are 'market segments', that different sites are likely to appeal to different types of occupiers reflected in the location and price of employment land. For Ashfield many of the allocated sites are well located for the strategic highway network and a significant number of these sites have implemented planning permission and have already been partly developed. In terms of their quality the sites, Castlewood (Pinxton Lane) and Summit Park (South West Oakham) have been acknowledged as two of the best employment allocations in the area by the East Midlands Northern Area Employment Land Review.

4.134 The D2N2 Local Enterprise Partnership places an emphasis upon the MARR as a focus for regeneration. In terms of the FEMA this is reflected in the employment sites identified at Summit Park (Ashfield) and Lindhurst and Pleasley (Mansfield). The SA of Option 2 recognised that there will be a number of detrimental impacts of allocating land to sites off the MARR including significant negative effects in relation to natural resources and minor negative effects from historic environment, landscape. Similarly in relation to Option 3, the SA identifies there are negative effects with developing Green Field sites. For Options 1 and 5 it is anticipated that the significant advantages is that it utilised partly developed brownfield sites with no or minimal impact on greenfield sites. The necessity to allocate all land

within the SELAA in Option 4 results in a substantial number of significant negative effects.

- 4.135 The Council has used the ELF Study to determine the employment provisions to meet its aspirations set out in "Ambitions for Growth", the Local Economic Masterplan and in this context Option 1 represents the most sustainable approach in terms of the evidence on demand in relation to the potential supply from existing allocated sites and permissions. This results in an anticipated need for employment land (offices, industrial and distribution) to provide a minimum of 60 hectares of land to 2033 to support the job growth. In practical terms, the assessment of existing employment sites and planning permissions identifies that there are no other sustainable alternative uses for the allocations. They also provide for a mix of sites that will meet a range of potential different users and a number of substantial sites link into the strategic road network. Therefore, the Council has determined to take forward a strategy based on Option 5. It is acknowledged that this is likely to result in an over-supply of allocated industrial sites against the ELF Study demand options. However, the surplus of employment land provides for a flexible strategy that could accommodate needs not anticipated in the Plan and allow a rapid response to changes in economic circumstances in accordance with Paragraph 21 of the NPPF.
- 4.136 It is recognised that apart from Sherwood Park there are limited office opportunities in the District. A site at Sherwood Park has been put forward at Junction 27 of the M1 which potentially could be utilised for offices but was discounted in the SELAA. The location in question is isolated from residential areas and does not adjoin with the urban or settlement boundaries. The site is also located in the Green Belt and it is not considered that justifiable reasons have been identified to meet the requirements of the exceptions circumstances for the amendment of the Green Belt boundary identified in the NPPF para. As part of a mixed use development, Mowlands provides the opportunity to bring forward a site which potentially could be brought forward as office space within easy reach of the M1 motorway. An assessment of existing allocations identifies that for the vast majority there is unlikely to be an alternative development opportunity.
- 4.137 The SA of the "District against Area" approach identifies that from a sustainability aspect there is not considered to be substantial sustainable issues arising from any of these three different approaches. The ELF Study, sets out that in terms of the Functional Economic Market Areas (FEMA) Hucknall, is highly connected to the Core HMA and could be viewed as being located within that FEMA. Given this evidence based together with the practicality that Rolls Royce at Hucknall has planning permission for employment development (V/2013/0123) it is considered that an area approach should be adopted comprising:
- Hucknall;
  - The rest of the District.

This is reinforced by the reality that the Rolls Royce site off Hucknall By pass has planning permission and grant assistance to bring forward a 27 ha employment site (gross). In addition, the site is identified in Broxtowe, Gedling and Nottingham

Aligned Core Strategy, Local Plan Part 1, 2014 as serving the employment needs of the Greater Nottingham conurbation as a whole.

**The Council concluded that it was appropriate to proceed on the basis of Option 5 which reflects utilising appropriate sites which are allocated in the Ashfield Local Plan Review 2002 for employment purposes or which have permission to be developed for employment land.**

DRAFT

## 5.0 Sustainability Appraisal of Site Allocations

### Housing Sites

- 5.1 Providing housing for Ashfield's growing population is a key objective of the Local Plan. The Council cannot deliver housing directly but it can identify sites to accommodate anticipated new developments through the Local Plan.
- 5.2 The SA of housing sites identifies that there will be both positive and negative social, environmental and economic effects. In general terms housing has positive benefits for social and economic objectives. However, most sites have a negative effect on natural resources, relating to the necessity to develop on greenfield land. These effects are summarized below.

#### *Social Objectives*

- 5.3 *Housing* – The preferred housing sites will ensure that there are sufficient new homes to meet the objectively assessed housing needs for the district within the 15 year Plan period. Consequently, all new housing sites will have a positive effect.
- 5.4 *Health* – The location of housing will be able to influence healthier lifestyles through access to health facilities, recreation facilities and open space. Delivering new housing in close proximity to existing local services and facilities would be positive but it could also increase demand for local services and facilities. The majority of sites have a positive effect on health.
- 5.5 *Community Safety* - The effects of residential allocations on safety, crime and fear of crime will depend on factors such as the inclusion of naturally surveyed open space and lighting or the implementation of initiatives such as the shared street. However, these issues will not be influenced by the housing allocations themselves, but determined through the detailed design proposals for sites. Consequently, it is considered the effects on this objective will be negligible.
- 5.6 *Social Inclusion* – The preferred housing sites will not deliver Ashfield's identified need for affordable housing but this reflects viability issues. However, in relation to other aspects, housing sites are unlikely to have a significantly different impact on social inclusion and deprivation. The SUEs have the potential to deliver primary schools and other services.
- 5.7 *Travel & Accessibility* – Good access and access to public transport is a key sustainability objective, particularly for housing sites. The majority of sites have a positive effect on this SA objective. Where negative effects have been identified these will be mitigated by the development.

#### *Environmental Objectives*

- 5.4 *Historic Environment* - In general terms the housing allocations are not anticipated to have a direct impact on historic assets but there may be potential impacts on the setting of heritage assets, for example the Mowlands SUE will impact on the Kirkby Cross Conservation Area and a designated ancient monument and as such been

scored as having a significant negative effect. Two additional sites have scored negatively for this SA objective – Quantum Clothing and North of Kings Mill, both of which have the potential to have a negative effect on listed buildings.

- 5.5 *Biodiversity/Green Infrastructure* - None of the housing sites are anticipated to have an impact on the possible potential Special Protection Area at Sherwood Forest. Some sites will be within Risk Zones for Site of Special Scientific Interest (SSSI) but none of the sites will result in a loss of any SSSI or ancient woodland. However, there may be an impact for Local Wildlife Sites located on or adjacent to proposed housing allocations. Mitigation measures will be used to protect Local Wildlife Site, where possible.
- 5.6 In relation to green infrastructure sites would be expected to maintain access to the countryside and where appropriate facilitate access to the wider green infrastructure.
- 5.7 *Landscape* – There are no landscapes in Ashfield which have a high status of protection such as areas of Outstanding Natural Beauty. However, landscape is valued at a local level and a local landscape assessment has been undertaken.
- 5.8 Generally sites that have scored the highest with regard to the capacity to accommodate development have not been selected to be taken forward. However, the Council has decided to take forward Beck Lane in Skegby, which has scored the highest in terms of its capacity to accommodate development. This is due to the fact that many of the sites submitted to the Council have severe access constraints which creates a high risk that development would not be delivered within the 15 year Plan period. Beck Lane has fewer physical constraints and there is an extant planning permission for a football academy on the site. As such, the principle of some development on the site which will impact on the landscape has already been established. The site also lies adjacent to the MARR, which is a regeneration corridor supported by D2N2, which development on the site will help support.
- 5.1 *Natural Resources* – Most of the housing sites are on greenfield land and therefore will have scored negatively on this SA objective.
- 5.1 *Air and Noise Pollution* – There is currently no Area Quality Management Area (AQMA) in the district but new development is likely to result in increased car journeys. The Transport Assessment identifies there will be increased congestion regardless of the development is located. Consequently, it can be anticipated that there will be a negative effect on air and noise pollution.
- 5.2 *Water quality* – Effects on water quality will depend on the capacity of the sewerage treatment works to accommodate additional demand from new development. The Infrastructure Delivery Plan identifies that there is current capacity in the sewerage treatment works to meet anticipated demand other than for Huthwaite.
- 5.1 The effects of development on water consumption are uncertain, although there will be an overall net increase of demand as a result of new development. Under these circumstances it is not considered that there will be difference between sites, as all sites have the potential to conserve and improve water quality.

- 5.2 *Waste* – The Waste Core strategy identifies that there is a need to improve recycling rates as the capacity to use landfill site will expire in the near future. New dwellings will produce waste both in their construction and their occupation by households, which it is assumed will go to landfill in the short term. However, the specific impact may depend on arrangements for recycling and composting. In this context all options have been identified as a negative effect, as the location of housing will not influence the minimization of waste or the rate of recycling.
- 5.2 *Flood Risk* – No sites taken forward are located where there are flood risks from watercourses within Flood Zone 2 or 3. However, several sites are identified as having some surface water issues but this can be mitigated through the use of Sustainable Drainage Systems (SuDS) and therefore it is not anticipated that there are any issues with bring sites forward for development. Under these circumstance the impact on all sites is likely to be negligible.
- 5.3 *Energy efficiency* - New development may involve an increase in energy usage but it also offers the opportunity to incorporate renewable energy and energy efficiency measures in new dwellings. Over the time scale of the Local Plan it is anticipated that new dwellings will move toward achieving zero carbon. The preferred housing sites are not anticipate to result in any significant differences between the approaches, although the greater the number of dwellings the greater the potential for energy efficiency measures. Therefore, there is an assumption that there is a negligible effect in relation to energy efficiency for all of the sites.
- Economic Objectives*
- 5.4 *Employment* – The provision of new housing is likely to have a positive effect on access to employment opportunities, however, this will depend on the location of sites. Housing development is anticipated to provide jobs both in the construction phase and in the longer term. An increased population will generate additional jobs through servicing the needs of the additional population.
- 5.5 *Economy* - It is not anticipated that there will be any significant labour supply issues. However, locational difference has the potential to impact on the integration between labour supply and the number of new dwellings which could result in increased transport congestion and an increase in commuting into the District. The impact is likely to be negligible in the short term but rising towards the long term as the number of dwellings increases over the Plan period.
- 5.6 *Town Centres* - The provision of new housing will reflect an increasing population which has the potential to have a positive effect of the vitality and viability of existing town centres. However, in this context it is important that development is related to existing towns and settlements.

### **Which Housing Sites?**

- 5.7 In order to help realise the Local Plan's Vision for Ashfield, the Council has proposed a Spatial Approach to housing that will seek to distribute appropriate levels of growth across the District, ensuring economic growth is supported, town centre regeneration is promoted, and communities in each of the three areas can

access new housing to meet their needs. The SA of the Housing Spatial Options (see Table Twelve) is a starting point to site selection.

- 5.8 The site selection process has followed the principles and policies of the National Planning Policy Framework (NPPF). To ensure the housing needs of the District are met within the 15 year Plan period, the Council has sought to identify sites which have the least policy and physical constraints whilst ensuring that they will deliver sustainable development.
- 5.9 The site selection process is outlined in the Housing Site Selection Technical Paper. This document utilises the evidence base, national policy and site specific information contained within the individual housing site SAs (see Appendix One and Appendix Two) to assess the deliverability and suitability of the sites submitted to the Council within the SHLAA (excluding those sites which have been discounted).

### **Employment Sites**

- 5.10 Providing jobs for Ashfield's growing community is a key objective of the Local Plan. The Council cannot deliver employment directly but it can identify sites to accommodate anticipated new developments, protect existing employment sites where appropriate, stimulate new employment developments, and bring certainty to investment and accommodate new developments at the most suitable locations through the Local Plan.
- 5.11 The ELF Study identifies a series of scenarios. To reflect the LEP's Growth Strategy and Strategic Economic Plan it is considered that the minimum demand requirement would reflect the Policy On and Land Supply scenarios.. The Policy On scenario identifies the number of jobs sets out in Table Sixteen for Ashfield and the jobs set out in Figure Four for all the authorities in the combined Nottingham Outer HMA and Nottingham Core HMA. The Policy On/Labour Supply scenarios would results in an anticipated 60 ha of developable land being required for employment space (offices, industrial and distribution) to 2033 to support the job growth and provide sufficient land for the expansion of local business and the development of new businesses in the District. However, the ELF Study includes an anticipated reduction for the requirement of B2 land reflecting a decline in manufacturing jobs.

	<b>Offices (B1 a/b)</b>	<b>Manufacturing (B1c &amp; B2)</b>	<b>Distribution (B8)</b>	<b>Other Non B Class Jobs</b>	<b>Total</b>
<b>Ashfield</b>	2,478	-1,177	797	8,626	10,724
<b>(located in Hucknall</b>	405	644	130	1,411	2,589

Table Sixteen: Ashfield Policy-on Jobs 2011 to 2033.

Source: Nottingham Core HMA and Nottingham Outer HMA : Employment Land Forecasting Study, August 2015 Nathaniel Litchfield & Partners.



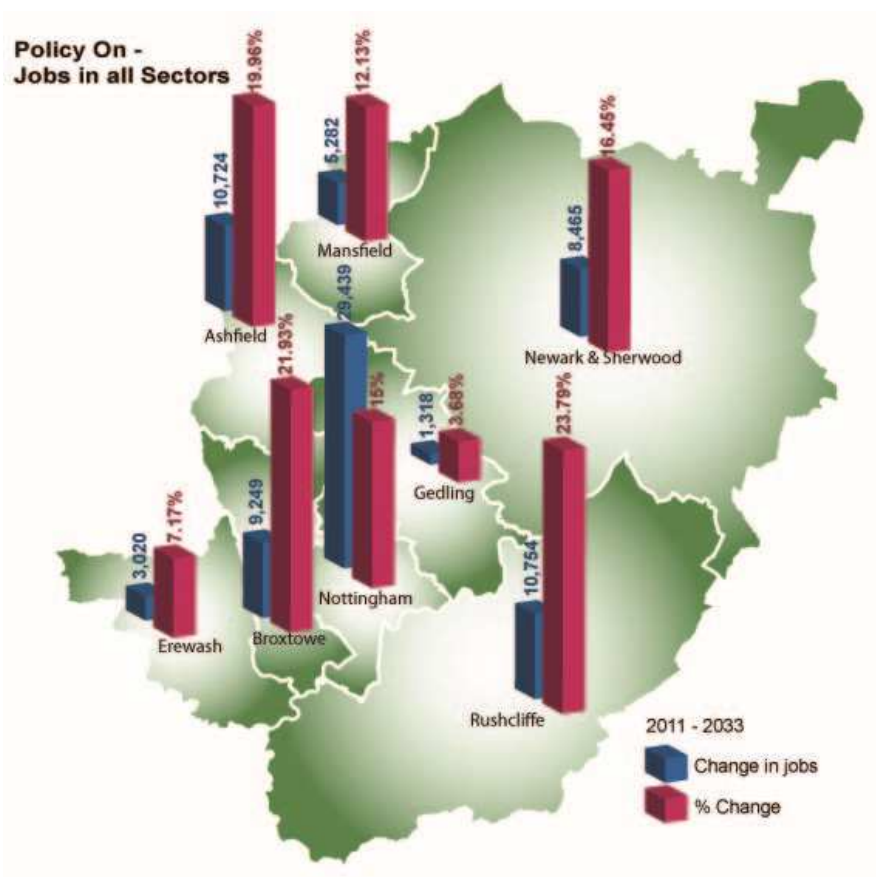


Figure ??? : Change in Jobs 2011 to 2033 Nottingham Outer HMA & Nottingham Core HMA

Source: Nottingham Core HMA and Nottingham Outer HMA : Employment Land Forecasting Study, August 2015 Nathaniel Litchfield & Partners.

5.12 The consideration of the Strategic Employment land options included a consideration of the supply of sites. In this context:

- a) A number of sites were identifies in the Strategic Employment Land Availability Assessments as being unsuitable for taking forward for a variety of reasons<sup>38</sup> and consequently no sustainability appraisal has been undertaken for these sites.
- b) In relation to employment sites an SA has not been undertaken where the sites have planning permission or an implemented planning permission,
- c) Sustainability appraisals were undertaken of the employment sites set out in Table Seventeen.

5.13 A summary of the sustainability appraisal of the employment sites is set out in Table Seventeen with the detailed assessment in Appendix Three. A SA of the sites with planning permission has not been undertaken as effectively it has already

<sup>38</sup> Table 14, Strategic Employment Land Availability Assessment, December 2015. Ashfield District Council

been determined that these sites are sustainable developments through the planning process. These sites are as follows:

- Castlewood Business Park, Pinxton Lane, Kirkby-in-Ashfield. (SELAA Ref: K1).
- Kings Mill Road East/Oddicroft Lane, Kirkby-in-Ashfield.(SELAA Ref:K3).
- Welsh Croft Close North/ Portland Industrial Estate, Kirkby-in-Ashfield.(SELAA Ref:K4).
- Park Lane Business Park, Park Lane, Kirkby-in-Ashfield. (SELAA Ref:K5)
- Oddicroft Lane, Kirkby-in-Ashfield. (Gateway 28 Business Park) (SELAA Ref:K6).
- Summit Park , North Sherwood Way, Sutton in Ashfield (SELAA Ref: S1).
- West of Fulwood Road, Huthwaite, Sutton in Ashfield. (SELAA Ref:S3).
- Rolls Royce, Watnall Rd/Hucknall By Pass, Hucknall. (SELAA Ref:H1).
- Blenheim Park, Hucknall. (SELAA Ref:H2).

**Table Seventeen: Sustainability Appraisal of Employments Sites**

	Sustainability Appraisal Objectives																
	1.Housing	2.Health	3.Historic Environment	4. Community Safety	5.Social Inclusion	6.Biodiversity/Green Infrastructure	7.Landscape	8.Natural Resources	9. Air &Noise Pollution	10.Water Quality	11. Waste	12. Flood Risk	13.Energy Efficiency	14.Travel & Accessibility	15. Employment	16.Economy	17.Town Centres
<b>HUCKNALL</b>																	
SELAA Ref H3: Butlers Hill, Hucknall	N	N	N	N	+	N	N	N	-	N	N	-	N	+	++	+	N
SELAA Ref H4: Aerial Way, Hucknall.	N	N	N	N	+	N	N	+	-	N	N	-	N	+	++	+	N
SEHLA Ref H5: A611/ Watnall Road, Hucknall.	N	N	N	N	+	N	N	-	-	N	N	-	N	+	++	+	N
SEHLAA Ref H6: Watnall Road, Hucknall	N	N	N	N	+	N	N	+	-	N	N	-	N	+	++	+	N
<b>Off A38/M1 Junction 28 KIRKBY/SUTTON</b>																	
SELAA Ref K2: Pinxton Lane, Kirkby	N	N	N	N	N	N	N	-	-	N	N	-	N	+	+	+	N
SELAA Ref K7: Mowlands, Kirkby	N	N	-	N	+	-	-	-	-	N	N	-	N	+	+	+	N
SELAA Ref S4: Fulwood Road North, Sutton	N	N	N	N	N	N	N	+	-	N	N	-	N	-	++	+	N

SELAA Ref S9: A38/West of Export Drive, Sutton.	N	N	N	N	N	-	N	N	-	N	N	-	N	+	+	+	N
<b>MARR (North Sherwood Way) KIRKBY/SUTTON</b>																	
SELAA Ref S2: South West Oakham, Sutton	N	N	N	N	N	N	N	-	-	N	N	-	N	-	++	+	N
SELAA Ref S6: Land off Hamilton Road, Sutton	N	N	N	N	N	N	-	--	-	N	N	N	N	-	++	+	N
SELAA Ref S7: Land adj Cauldwell Wood, Sutton	N	N	N	N	N	--	-	-	-	N	N	-	N	-	+	++	N
SELAA Ref S8: Hamilton Rd/Coxmoor Rd, Sutton	N	N	--	N	N	N	-	-	-	N	N	-	N	-	++	++	N
<b>KIRKBY/SUTTON</b>																	
SELAA Ref S5: Brierley Industrial Park, Sutton	N	N	N	N	+	N	N	+	-	N	N	N	N	+	++	+	N
SELAA Ref S10: Midland Rd/Station Rd, Sutton	N	N	N	N	N	N	N	-	-	N	N	-	N	+	++	+	N

5.14 In addition to the sites with planning permission, there are 14 potential employment sites in Ashfield. Effectively these sites are broken down into the following areas:

- Hucknall - 4 sites;
- A38/M1 Junction 28 Kirkby/Sutton - 4 sites;
- MARR Kirkby/Sutton - 4 sites;
- Kirkby/Sutton/ Other Site - 2 sites.

5.15 Employment sites by their nature contribute positively to employment and economy objectives. New employment sites will result in job opportunities and have the potential to result in increased opportunities for work-based learning and skills development. The significance of this effect and the impact on the local economy is correlated with the proposed size of the employment site, as larger sites will be able to offer more in terms of job numbers and opportunities.

#### Hucknall

5.16 The Rolls Royce site provides a substantial employment site which has planning permission and is anticipated to serve a wider Greater Nottingham Area in terms of employment opportunities. The four site are all relatively small in terms of land area but they are all closely located to residential areas. All four sites are either on a bus route or in the case of Butlers Hill, a tarmaced footpath and pedestrian bridge links the site to the Butlers Hill NET stop and the residential areas off Bestwood Road. There are all regarded as having potential benefits in relation to social inclusion.

5.17 From an environmental perspective the sites are largely neutral. The site on the corner of the A611 and Watnall Road has a minor negative effect as it is a greenfield site. However, the site is linked into proposed housing development as a mixed uses site as it is anticipated that when Hucknall Town FC will move to a new ground to the south of the existing site.

- 5.18 All sites are identified as having some surface water issues but part of the Butlers Hill site is located in Flood Zones 2 and 3. However, planning permission has been granted and implemented for the infrastructure which included works identified to mitigate the flood risk. On this basis it is not anticipated that there are any issues with bringing the site forward for development and the plots on the site it is being actively marketed with interest from local businesses in developing individual plots.

Off A38/M1 Junction 28 Kirkby and Sutton

- 5.19 The sites off the A38 are well located for access to the M1 motorway and therefore tend to be more attractive to the market. Castlewood Park is a major site with planning permission and there are a number of other sites of varying land areas with permission off the A38 from Common Lane to Penny Emma Way. The SA of all the other sites identifies that they provide a positive economic effect.
- 5.20 In terms of negative impacts all sites have surface water flooding but this can be mitigated against through the use of SuDS. The site off Export Drive is identified as having a minor negative effect as it is located adjacent to a Local Wildlife Site. Pinxton Lane is a greenfield site, which means that it is identified as having a minor positive effect. The site forms part of the land that is allocated under the Ashfield Local Plan Review 2002 for employment (Pinxton Lane). Part of the Pinxton Lane allocation has been developed (Castlewood Business Park). A potential issue going into the future is that the site is on the initially identified route of High Speed 2 rail link from Birmingham to Leeds which if taken forward on the route in question may negate the site being brought forward for employment.
- 5.21 The Mowlands employment site cannot be seen in isolation from the fact that it forms part of a major strategic mixed use development site. The employment site does not have any issues directly with biodiversity or the historic environment. However, it is unlikely to come forward in isolation from the housing development which effectively provides access to the site. In this context the wider mixed use site has significant negative environmental effects in relation to the historic assets in terms of the ancient monument, Kirkby Cross and the Kirkby Cross Conservation Area. It also has significant negative effects in relation to Local Wildlife Sites as access from the A38 is anticipated to be through Ashfield District Bypass Meadow, a Local Wildlife Site.

MARR (North Sherwood Way) KIRKBY/SUTTON

- 5.22 Off the MARR, Summit Park has planning permission for a gross site area of approximately 26 ha. The infrastructure to service the site has been constructed and the site is being actively marketed. The South West Oakham site is a small site of approximately 1.79 ha which forms part of the South West Oakham allocation under the Ashfield Local Plan Review 2002. It is in separate ownership but provides an opportunity for a relatively small development forming an extension to Summit Park which is located adjacent to the site.
- 5.23 The three other sites off the MARR, Hamilton Road (S6), Hamilton Road/Coxmoor Road (S8) and land adjacent to Cauldwell Wood (S7) score positively for employment and the economy. Hamilton Rd and Hamilton Road/Coxmoor Road

score significant positive effects in relation to employment as they link to residential areas, while Cauldwell Woods score a significant positive effect on the economy due to the size of the potential site. All these sites have negative environmental aspects in that:

- There are greenfield sites currently in an agricultural uses. For Hamilton Road this is a significant negative effect as part of the site is identified as Grade 2/3a agricultural land. However, it has to be acknowledged that for the other sites there is a lack of information on the agricultural grade. It is Grade 3 land but it is not known whether the sites fall within 3a or a lower subgrade.
- For Cauldwell Road there is a significant negative effect as a Local Wildlife Site is located on part of the site and there is a population of native white-clawed crayfish in the Brook, which are fully protected under UK and European legislation.
- For Hamilton Road/Coxmoor Road the site impacts on the setting of the Hamilton Hill ancient monument.
- All these sites are identified as having a moderate impact on the landscape but for all sites there are mitigation measures available to reduce the impact.

- 5.24 All sites are anticipated to have a negative effect in relation to flooding as they are undeveloped with surface water flooding identified on the sites to varying degrees. An increase in the coverage of impermeable surfaces would therefore result from development, potentially increasing flood risk although this can be mitigated through SuDS.

Sutton Other Site - 2 sites.

- 5.25 Two other small sites have had sustainability appraisals at Brierley Industrial Park and Midland Road/Station Road. The location of Brierley means that it is likely to only appeal to a local market. However, it has a number of minor positive effects in relation to social inclusion, natural resources, travel and accessibility, economy and with it link to residential areas a significant benefit for employment. Midland Road has minor negative impacts in relation to it being a greenfield site and surface water flooding issues. However, there are potentially issues in relation to significant area of materials needed to be removed off site to enable the site to be developed.

For all sites

- 5.26 Effects on water quality – The effect on water quality will depend on the capacity of existing sewage treatment works to accommodate additional demand from new development, something that cannot be determined at this stage on the basis of the location of individual employment sites. It is assumed that all development will be built to high standards of water efficiency as reflected in the Policy CC2. Consequently, a negligible effect is expected in relation to minimising the use of water resources.
- 5.27 Air and Noise Pollution – The level of air or noise pollution will vary dependent on the location and nature of the use. Issues from air quality can arise from:

- increased traffic generated by an expansion of employment site;
- The nature of the employment development for example an industrial use or office. instead of office-based)

The SA of the employment sites has assumed that a minor negative impact will arise in this context.

- 5.28 Energy efficiency - New development may involve an increase in energy consumption, however, new buildings also offer the opportunity to include energy efficient measures. This will depend on the nature of the use and the design of any building or process. Therefore, there is an assumption that there is a negligible effect in relation to energy efficiency for all of the sites.
- 5.29 Waste – Commercial and industrial businesses generate waste. The Waste Core Strategy identifies that there is limited information regarding waste derived from commercial and industrial premises. However, it sets a target for recycling or composting of 70% of commercial and industrial by 2025. The impact on waste including recycling will depend on the nature of the use, which is not known at this time. Therefore, it has been assumed for sites that the impact on waste is neutral.
- 5.30 In terms of social objectives the impact of employment sites is fairly limited. A number of the sites, particularly in Hucknall but also at Mowlands have the potential to have a minor positive effect in relation to social exclusion as new employment opportunities would be focussed in and around the more deprived areas of the District. Employment sites are not expected to have any effect on health or the provision of housing stock and this is reflected in a neutral impact.

### **Which Sites?**

- 5.31 The employment spatial options identified that Option 5 was to be taken forward. This Option was based on the existing supply of employment allocations and sites with planning permissions. These sites provide a range of sites in terms of quality and location, catering for a variety of different occupiers needs. A number of the sites have been partly developed and/or have planning permission. In considering what sites to take forward:
- a) Sites have not been allocated if it is considered they have little prospect of being developed;
  - b) There is considered to be no realistic alternative uses to a site;
  - c) Whether there was a possibility that a site could sustainably be utilised for housing purposes without a detrimental impact on the land anticipated to meet the employment land needs going into the future.
- 5.32 Table Eighteen sets out the proposed employment allocated in the Ashfield Local Plan Preferred Approach. The approach taken forward has the benefit of not taking forward greenfield sites where, as Table Seventeen illustrates, there are a number of negative environmental effects. The exception to this is Mowlands. A

number of significant negative environmental effects were identified in relation to Mowlands. Nevertheless, this is proposed to be allocated as:

- a) It is an integral part of the Mowlands site set out as part of the Housing Spatial Option.
- b) The Promoter has submitted an Employment Land Study by Innes England (Commercial Property Agents) that identifies that the allocation is well suited for the provision of Offices within Class B1(a) similar to The Village Office Scheme at Junction 28. Other than Sherwood Park, there is a limited supply of offices within the District.
- c) It is anticipated that mitigation works will be undertaken as part of any application to reduce the impact on the Local Wildlife Sites.

Local Plan Allocation No	Site	Anticipated developable area
	<b>Hucknall</b>	
PJ2-Ha	Aerial Way/Watnall Road	0.83
PJ2-Hb	Butlers Hill	2.38
PJ2-Hc	Blenheim Lane Industrial Estate	6.40
PJ2-Hd	Rolls Royce, Hucknall By-Pass Road <sup>a</sup>	23.50
HA3MU	Hucknall Town Football Club, Watnall Road	0.6
	<b>Sutton &amp; Kirkby</b>	
<b>A38/M1 Junction 28</b>		
PJ2-Sa	West of Fulwood	4.80
PJ2-Sb	Fulwood Road North	1.36
PJ2-Ka	Kings Mill/Penny Emma Way	1.70
PJ2-Kd	Oddicroft Lane	5.37
PJ2-Ke	Castlewood Business Park, Pinxton Lane	16.67
PJ2-Kf	Pinxton Lane/A38	6.30
PJ2-Kg	Mowlands	4.50
<b>MARR</b>		
PJ2-Sd	Summit Park, North Sherwood Way	19.48
PJ2-Se	South West Oakham, Hamilton Way	1.52
<b>Other</b>		



PJ2-Sc	Brierley Industrial Park	1.20
PJ2-Kb	Park Lane Industrial Estate	1.95
PJ2-Kc	Portland Industrial Park/Welshcroft Close	3.40

**Table Eighteen: Local Plan Preferred Approach Allocations Employment Sites**

Notes

- a) Rolls Royce, Watnall Road forms part of a mixed use development comprising housing and employment.
- b) The areas identified above reflect the estimated developable area for each site.

DRAFT

## 6.0 Sustainability Appraisal of Policies

- 6.1 The NPPF set out the overarching theme for planning in relation to sustainable development. These requirements have been taken forward in the Local Plan Vision, Strategic objectives, strategic policies and area policies. In turn these have influenced the development management policies that support the provisions of the NPPF and the Strategic policies.
- 6.2 The Tables for each section shows a summary of the sustainability appraisals of the strategic policies (including area policies) and development management policies forming the Council preferred approach to the Local Plan. The selection of alternatives and the drafting of policy content has been informed by a selective review of “best practice”, internal and external discussions, comments of statutory consultees, members of the public and councillors. This includes consideration by councillors through the Local Plan Steering Group. The Council has been out to consultation on The Local Plan Preferred Approach September 2012 and the Local Plan Publication 2013. Comments received from specific consultation bodies<sup>39</sup> and general consultation bodies including members of the public have also been taken into account in bringing the policies forward<sup>40</sup>. Consequently, the DMP reflect the policies initially brought forward in the Local Plan Preferred Approach September 2012. However, they have been amended to reflect comments received and changes arising from case law and policies clarified other sources such as planning practice guidance. A number of new DMP are set out in the Local Plan reflecting emerging issues.
- 6.3 In considering which policy to bring forward the following were considered:
- To what extent a potential alternative approach would be in meeting the identified objectives and decision making criteria in the sustainability appraisal framework;
  - To what extent a potential alternative approach would effectively implement national planning policy;
  - To what extent it would deliver the council’s corporate objectives, where relevant;
  - To what extent a potential alternative approach would ensure effective and efficient management of development to meet local needs and priorities and address the issues and problems set out in the SA Scoping Report;
  - To what extent an alternative approach could be placing an unreasonable requirement or cost on an applicants or developer.
- 6.4 Policies have been considered along with any reasonable alternatives. It also identifies why there are no reasonable alternatives to some of the policy options. The SA of the Strategic Policies and DMP and reasonable alternatives are set out in Appendix Four. The SA sets out a significance score against each SA objectives together with commentary. It summarises the positives, negatives and uncertainties together with a final conclusion regarding the Policy proposed and any alternatives.

<sup>39</sup> Defined in The Town & Country Planning (Local Planning)(England) Regulation 2012

<sup>40</sup> Ashfield District Council Local Plan Statement of Consultation, July 2013

Certain policy proposals were not appraised for one or more of the following reasons:

- the likely effects of the alternatives have already been covered by the appraisal of the alternative Spatial Options and would lead to needless duplication;
- the alternative was considered not to be 'reasonable' as it would be contrary to guidance at the national level set out in the NPPF;
- not enough detail was provided to inform a worthwhile appraisal;
- national or other strategic policy or guidance prevents the consideration of alternatives.

6.5 The NPPF identifies that there are three dimensions to sustainable development: economic, social and environmental. It provides that these dimensions give rise to a number of roles for planning:

- **an economic role** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- **a social role** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- **an environmental role** – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

It is acknowledged that these roles are mutually dependent but the range of spatial objectives in the Local Plan, reflect these dimensions and this is also reflected in the development management policies. The SA has appraised Spatial Policies and DM policies by these dimensions rather than individually. This approach looks to ensure that interactions between policies have been identified. The dimension of each of the Sustainability Appraisal Objectives is set out in Table Six of the Scoping Report<sup>41</sup> and is identified within the Sustainability Framework.

### **Uncertainties and Assumptions**

6.6 There are a number of uncertainties and assumptions relating to the policies proposed as:

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<sup>41</sup> Sustainability Appraisal Scoping Report, June 2015

- c impacts in relation to specific SA objectives such as ene  
end on a variety of factors. For example the design of a s  
oment, location travel choice national policy.
- ## C POLICIES
- een sets out a summary of the SA of the Strategic Policies  
areas policies. In the Local Plan these are identifies in th  
:
- e Policies,  
icies: Hucknall,  
icies Sutton in Ashfield and Kirkby-in-Ashfield,  
icies: Selston, Jacksdale, Bagthorpe and Underwood.

## STRATEGIC POLICIES

6.7 Table Nineteen sets out a summary of the SA of the Strategic Policies which also includes the areas policies. In the Local Plan these are identifies in the Local Plan Chapters as:

- Strategic Policies,
- Area Policies: Hucknall,
- Area Policies Sutton in Ashfield and Kirkby-in-Ashfield,
- Area Policies: Selston, Jacksdale, Bagthorpe and Underwood.

## Table Nineteen: Sustainability Appraisal of Strategic and Area Policies

[illegible]

	Sustainability Appraisal Objectives																
	1.Housing	2.Health	3.Historic Environment	4. Community Safety	5.Social Inclusion	6.Biodiversity/Green Infrastructure	7.Landscape	8.Natural Resources	9. Air &Noise Pollution	10.Water Quality	11. Waste	12. Flood Risk	13.Energy Efficiency	14.Travel & Accessibility	15. Employment	16.Economy	17.Town Centres
Policy HA1: Hucknall Town Centre	++	+	+	+	+	N	+	N	N	N	N	N	N	N	+	+	++
Policy HA2: Hucknall Economy and Jobs	N	+	N	N	+	N	N	++	-	-	-	+	-	--	++	++	N
Policy HA4: Hucknall's Green Infrastructure	N	+	N	N	N	++	++	+	N	N	N	+	N	+	N	N	N
Policy SKA1: Sutton and Kirkby Town Centres	++	+	+	+	+	N	+	N	N	N	N	N	N	N	+	+	++
Policy SKA2: Sutton and Kirkby-Economy and Jobs	N	+	N	N	+	N	N	++	-	-	-	-	-	--	++	++	N
Policy SKA4: Sutton & Kirkby Green Infra.	N	+	N	N	N	++	++	+	N	N	N	+	N	+	N	N	N
Policy RAP1: The Rurals Economy and Jobs	N	+	N	N	N	+	++	++	N	N	N	N	N	N	+	+	N
Policy RA4: Rurals Green Infrastructure	N	+	N	N	N	++	++	+	N	N	N	+	N	+	N	N	N

6.8 No SAs have been undertaken of Hucknall Housing Growth Policy HAP3, Kirkby and Sutton Housing Growth Policy SKAP3 or Selston, Jacksdale, Bagthorpe and Underwood Housing Growth Policy RAP2 as the policies allocates sites. Therefore, it reflects the SA undertaken of the Housing Spatial Growth Option together with the SA of the individual housing set out in Appendix One and Appendix Two and the Housing Site Selection Technical Paper.

6.9 Policy SP1 reflects a broad policy which incorporates the Planning Inspectorates model policy include a policy on sustainable development. It provides a general policy against which all development proposals will be assessed irrespective of land use. It outlines the basic criteria which all development proposals must satisfy. As the policy reflects the NPPF's presumption in favour of sustainable development, the policy is expected to lead to positive effects on all SA objectives. However, in

the context that it is a policy that cuts across the whole of the Plan rather than related to specific SA objectives, a view has been taken that it should be reflected in a minor positive effect on SA objectives. It is acknowledged that a view could be taken that as the objective of Planning is to achieve sustainable development as set out in NPPF para 6<sup>42</sup> it could be scored as a strong positive impact. The policy puts an emphasis on emphasises the importance of not conflicting with neighbouring uses on the importance of contributing towards energy and water efficiency and has been identified as a significant positive effect on these objectives. The policy emphasises the importance of comprehensive development, ensuring that appropriate supporting infrastructure is provided with development. The Planning Inspectorates model clauses cover the basic sustainable development aspects. However, Policy SP1 is considered to add value to the policy approach by adding clarify specific requirements that any development will need to satisfying if it is to receive permission.

6.10 An overarching strategic policy is set out in Policy SP2. It links with and interprets the local plan's spatial strategy and vision. It contains policies which set a context for more detail development management policies and site allocations. A key element of this is the District's housing requirement for the Plan period, derived from the Objectively Assessed Housing Need for the District, as required by paragraph 47 of the NPPF. It also presented the District's employment land requirements, in line with paragraph 20 of the NPPF. Collectively these two elements of the policy set the context for housing and employment allocations for the plan period, which will be key to delivering the vision. It is anticipated to have a significant effects in relation to:

- Housing - Informed by the Strategic Housing Market Assessment (2015), the policy presents the District's housing target for the plan period (2015 to 2033) which will help meet the housing needs of the District. An emphasis is placed on the creation of high quality, sustainable design, The policy also supports the housing needs of travellers, enabling the identification and approval of appropriate pitches or plots to meet their needs identified through a needs assessment.
- Health – It provides a strategic overview that supports and encourages future developments to promote and enable residents and users to be active and lead healthier lifestyles. The policy also seeks to ensure that health and community facilities are protected and enhanced.
- Economy and Employment - The Strategic approach outlined within the policy reiterates the Plan's vision related to enhancing the District's economy with the seeking to *developing a sustainable, diverse and resilient economy reducing low wages and improving skills levels in order to narrow the difference between District and national figures*. The policy goes on to provide specific support for indigenous business growth, business start-up and business expansion. This in turn will help strengthen the District's economy by drawing inward investment

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<sup>42</sup> NPPF Para 6 "The purpose of the planning system is to contribute to the achievement of sustainable development. The policies in paragraphs 18 to 219, taken as a whole, constitute the Government's view of what sustainable development in England means in practice for the planning system.

and increasing job opportunities for residents. The policy also highlighted the importance of high speed broadband and technologies in supporting this investment.

- 6.11 A number of minor positive effects are identified in relations to other social dimensions (social inclusion travel and transport) and environment dimensions (historic environment, biodiversity, landscape, flood risk, travel and accessibility and town centres. However, it recognises that the level of housing will necessitate greenfield sites being developed as the supply of brownfield sites is limited with consequential negative effects in relation to natural resources.
- 6.12 Whilst Paragraph 23 of the NPPF highlights that local planning authorities should define a network and hierarchy of centres that is resilient to anticipated future economic changes, it does not outline a requirement to have a settlement hierarchy. The lack of settlement hierarchy would provide developers with more freedom on where they could seek development opportunities and the subsequent benefits of future development related to the local economy, housing delivery and jobs may still occur. However, the SA analysis identifies that a Settlement hierarchy will deliver the most sustainable approach to realising the vision. Policy S3 contains a hierarchy of Ashfield's town centres and settlements which complement each other. This has significant positive benefits in relation to housing identify the main towns of Hucknall, Sutton and Kirkby as providing the areas that are anticipated to be able to accommodate the largest scale of growth with more limited opportunities in named settlements. The Policy also has significant positive effects in relation to the town centres as it will help support the vitality and viability of the three town centres building on existing services and facilities within these centres. Although it is not anticipated to have a significant positive effects, by steering a large proportion of future development towards the most sustainable and assessable settlements, the policy will facilitate travel choice encourage the use of non-car based journeys and where appropriate contribute to enhancement to the transport infrastructure.
- 6.13 Whilst the settlement hierarchy will guide the majority of development towards the existing urban areas, there are anticipated to be negative impacts on a number of environmental objectives. To meet the level of housing identified by the Objectively Assessed Housing needs it will necessitate building on greenfield land. This will have an adverse effect on natural resources but also, dependent on which sites need to be taken forward for development, has the potential to have a negative impact on biodiversity and local landscapes.
- 6.14 Taken together the three strategic policies are anticipated to have a largely positive impact on most of the economic. Social and environmental objectives. However, there will be a minor negative impact in relation to natural resources , biodiversity and landscapes.
- 6.15 Area policies are set out for Hucknall, Sutton and Kirkby and The Rurals. As these policies look at the same themes it is not surprising that from a SA aspect they can be seen to have similar anticipated effects. The SA of the policies in relation to housing and the economy have to be seen in the context of the SA of respective Spatial Options. The Spatial options have informed what level of sites and the broad areas where employment and housing sites are required.



- 6.16 The town centre policies for Hucknall and Sutton/Kirkby aligns with the requirements of NPPF paragraph 23, recognising the importance vibrant and viable town centres play in creating sustainable communities. In doing so it supports appropriate use diversification within the town centre, recognises the importance of high quality design and historic assets, links to the town centre masterplan and allocates a town centre boundary with accompanying primary and secondary frontages. This gives rise to positive effects in relation to housing, with the potential for residential development and change of use in the town centres. The primary role of the policies is to improve the vitality and viability of the town centres and therefore they are anticipated to have a significant positive effect. The Policies are also expected to have positive impacts in terms of historic environment and townscape. For Hucknall there are the links to Byron and the Victoria architecture, for Sutton there is a newly created conservation area for part of the town centre. No negative effects have been identified in relation to Policies HA1 and SKA1.
- 6.17 In terms of the economy and employment for Hucknall and Kirkby and Sutton Policy HA2 and Policy SKA2, economy and jobs unsurprisingly are identified as having significant positive effects as well as minor positive effects in relation to health and social inclusion. Significant positive effects are also identified in relation to Natural Resources. This arises as no new greenfield sites are identified for development for employment purposes. Proposed employment sites reflect existing allocated employment sites and planning permissions which are located within the urban boundary, as defined by the Ashfield Local Plan Review 2002, or on already partly developed industrial sites.
- 6.18 As the Policy looks to meet the job requirements set out in the ELF Study, 10,724 jobs to 2033 it is recognised that this has the potential to have a significant negative effect on the local road network and by implication a negative effect on air pollution. Ashfield Transport Assessment identifies there will be increased congestion regardless of the level of development but development increases the pressures on the road network. There will need to be improvements to road junctions and traffic management measures reflecting these additional demands. It will vary dependent on the location of a specific employment site. However, there is potentially limited travel choice in terms of bus or other forms of public transport.
- 6.19 The effects of employment development on water consumption are uncertain, although there will be an overall net increase of demand as a result of new development. All options having the potential to have a minor adverse impact in relation to water efficiency and water quality. Business will produce waste, which it is assumed will go to landfill but the specific impact may depend on arrangements for recycling and composting. In this context both these SA objectives have been identified as a minor negative impact.
- 6.20 In relation to flooding there is a difference between flooding in Hucknall and Sutton and Kirkby. In Hucknall development has the potential to make a minor positive effect. The catchment of the River Leen is sensitive to surface water with flooding in both Hucknall and down-stream in Nottingham. Development of brownfield site would be expected to reduce run-off rates to greenfield rates & would be expected to utilise SuDS. In this context development has the potential to reduce flood risk.

For Kirkby and Sutton flooding is not anticipated to be a substantive issue in relation to employment allocations. However, unlike Huckanll a substantive risk has not been identified and run-off rates will be required to be at brownfield sites or less. Sites may be subject to surface water flooding and consequently have been identified as a minor negative but this can be mitigated through the use of SuDS

- 6.21 It is recognised that for The Rurals the Policy RAP1 does not have the same level of positive impact in terms of the economy. Minor positive effects are identifies in relation to employment, economy reflecting the more limited economic activity of the area. However, any employment allocation would have been on greenfield sites, consequently there are significant positive effects in terms of landscape and natural resources.
- 6.22 The benefits from the green infrastructure policies HA4, SKA4 and RAP4 all relate to the environmental and social dimensions. The policies look to enhance Strategic Corridors and Green Networks identified in the Green Infrastructure and Biodiversity Technical Paper. Through there application, the policies will help increase the green infrastructure network across the District, which in turn will help prevent habitat and wildlife corridor fragmentation; and help protect the District's biodiversity. Consequently these have significant positive effects in relation biodiversity and landscape. A more limited positive effect is expected in relation to flood risk, on-site green spaces and the enhancement green infrastructure may aid with water run-off and/or retention to help mitigate the effects of flood on properties. Similarly a more limited positive effect can be seen in relation to travel and accessibility, green infrastructure corridors are expected to be multi-functional, offering cycle and pedestrian routes as an alternative choice to travel by car. In turn this has positive impacts for health through more healthy lifestyles. No negative effects have been identifies in relation to these policies.

### Reasonable Alternatives

- 6.23 Table Twenty below identifies the Strategic Policies and Area Policies approaches along with the reasonable alternatives considered together with the reason if no alternatives were identified.

**Table Twenty: Strategic Policy and Area Policy Options**

Policy Options	Reasonable alternatives considered	Justification for no alternatives
<p>Policy SP1: Sustainable Development Principles</p> <p><i>The policy reflects the NPPF's presumption in favour of sustainable development. It also provides a general policy against which all development proposals will be assessed irrespective of land use. It outlines the basic criteria which all development proposals must satisfy.</i></p>	Alternative Option 1 – PINS Model Clause	
Policy S2: Overall Strategy for Growth	None	Alternative options for the Local Plan's Spatial Strategy have been developed by the Council

<p><i>Policy S2 is an overarching strategic policy that links with and interprets the local plan's spatial strategy and vision.</i></p>		<p>and assessed through the Sustainability Appraisal and on their ability to align with the Local Plan's vision. The resulting preferred Spatial Strategy has led to Policy S2, which is a broad policy representation of the Spatial Strategy. As such, for this SA no alternative options has been considered because the potential alternatives have already been considered and SA through the spatial options.</p>
<p>Policy S3: Settlement and Town Centre Hierarchy</p> <p><i>Policy S3 contains a hierarchy of Ashfield's town centres. Sets out an overall Settlement Hierarchy for the District</i></p>	<p>Alternative policy option: No Settlement Hierarchy</p>	
<p>Policy HA1: Hucknall Town Centre</p> <p><i>Policy HA1 aligns with the requirements of NPPF paragraph 23, recognising the importance vibrant and viable town centres play in creating sustainable communities.</i></p>	<p>Less prescriptive policy - all new development should support the vitality and viability of Hucknall Town Centre</p>	
<p>Policy HA2: Hucknall Economy and Jobs</p> <p><i>Sets out employment allocations, identifies locally significant business areas and support for economic development. It provides a 'positive' approach to delivery of employment sites building on paragraphs 18 to 22 of NPPF.</i></p>	<ul style="list-style-type: none"> <li>• Alternative Option 1 less allocated sites in Hucknall.</li> <li>• Alternative Option 2 - not to identify Locally Significant Business Areas.</li> <li>• Alternative Option 3 - Reflect demand for Hucknall in the rest of the District.</li> <li>• Alternative Option 4: Employment locations defined by the market.</li> </ul>	
<p>Policy HA4: Hucknall's Green Infrastructure</p> <p><i>The Policy aligns with the requirements of National Planning Policy Framework paragraph 114, setting out the strategic green routes, spaces and networks that future development will be able to help create, protect, enhance and manage in and around Hucknall.</i></p>	<p>Rely on the NPPF</p>	<p>The NPPF (paragraph 114) states that 'Local planning authorities should set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.'</p>
<p>Policy SKA1: Sutton and Kirkby Town Centres</p> <p><i>The Policy aligns with the requirements of NPPF paragraph 23, recognising the importance vibrant</i></p>	<p>Less prescriptive policy - all new development should support the vitality and viability of Sutton and Kirkby Town Centres</p>	

<i>and viable town centres play in creating sustainable communities.</i>		
<p>Policy SKAP2: Sutton-in-Ashfield and Kirkby-in-Ashfield Economy and Jobs</p> <p><i>Sets out employment allocations, identifies locally significant business areas and support for economic development. It provides a 'positive' approach to delivery of employment sites building on paragraphs 18 to 22 of NPPF.</i></p>	<ul style="list-style-type: none"> <li>Alternative Option 1: Additional employment allocations in Hucknall, less in Sutton &amp; Kirkby.</li> <li>Alternative Option 2: Policy amended not to identify any significant employment areas.</li> <li>Alternative Option 3: Employment locations defined by the market</li> </ul>	
<p>Policy SKA4: Sutton and Kirkby's Green Infrastructure</p> <p><i>The Policy aligns with the requirements of National Planning Policy Framework paragraph 114, setting out the strategic green routes, spaces and networks that future development will be able to help create, protect, enhance and manage in and around Sutton and Kirkby.</i></p>	Rely on the NPPF	The NPPF (paragraph 114) states that 'Local planning authorities should set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.'
<p>Policy RAP1: Selston, Jacksdale, Bagthorpe and Underwood Economy and Jobs</p> <p><i>The Policy protects exiting employment sites and business from transferring into alternative uses. The Policy and the Alternative Options look to promote tourism and to adopt a supportive approach to business growth in the villages which is reflective of the requirements in the NPPF para. 28..</i></p>	<ul style="list-style-type: none"> <li>Alternative Option 1: Allocate employment sites in the Rural Area.</li> <li>Alternative Option 2: Not to protect employment sites in the Rural Area.</li> </ul>	
<p>Policy RA4: Rurals Green Infrastructure</p> <p><i>The Policy aligns with the requirements of National Planning Policy Framework paragraph 114, setting out the strategic green routes, spaces and networks that future development will be able to help create, protect, enhance and manage in and around The Rurals.</i></p>	Rely on the NPPF	The NPPF (paragraph 114) states that 'Local planning authorities should set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.'

## DEVELOPMENT MANAGEMENT POLICIES - ENVIRONMENT

6.24 Table Twenty One sets out a summary of the SA of the DMP that have an environmental dimension. In the Local Plan these are identified in the Local Plan Chapters as:

- Adapting to Climate Change,
- Protecting and Enhancing the Environment,
- Contributing to Successful Development:
  - SD7: Contaminated Land and Unstable Land
  - SD8: Environmental Protection

**Table Twenty One: Sustainability Appraisal of Environment DMP**

	Sustainability Appraisal Objectives																
	1. Housing	2. Health	3. Historic Environment	4. Community Safety	5. Social Inclusion	6. Biodiversity/Green Infrastructure	7. Landscape	8. Natural Resources	9. Air & Noise Pollution	10. Water Quality	11. Waste	12. Flood Risk	13. Energy Efficiency	14. Travel & Accessibility	15. Employment	16. Economy	17. Town Centres
<b>Adapting to Climate Change</b>																	
<b>Policy CC1: Energy Use, Renewables &amp; Low Carbon Generation</b>	+	+	-	N	N	+	-	N	+	N	N	N	++	N	N	N	N
<b>Policy CC2: Water Resource Management</b>	+	+	N	N	+	++	N	+	N	++	+	+	+	N	N	+	N
<b>Policy CC3: Flood Risk</b>	+	+	N	N	N	+	N	+	N	++	N	++	N	N	+	+	+
																	?
<b>Protecting and Enhancing the Environment</b>																	
<b>EV1: Green Belt</b>	N	+	+	N	N	+	+	++	N	N	N	N	N	+	N	N	N
<b>EV2: Countryside</b>	N	+	+	N	N	+	+	++	N	N	N	N	N	+	+	N	N
<b>EV3: Reuse of Buildings in the Green Belt and Countryside</b>	N	N	+	N	N	N	+	N	N	N	N	N	N	-	+	N	N
<b>EV4: Green Infrastructure,</b>	N	+	N	N	N	++	++	+	+	+	N	+	+	+	N	N	N

	Sustainability Appraisal Objectives																
	1. Housing	2. Health	3. Historic Environment	4. Community Safety	5. Social Inclusion	6. Biodiversity/Green Infrastructure	7. Landscape	8. Natural Resources	9. Air & Noise Pollution	10. Water Quality	11. Waste	12. Flood Risk	13. Energy Efficiency	14. Travel & Accessibility	15. Employment	16. Economy	17. Town Centres
<b>Biodiversity and Geodiversity</b>																	
<b>EV5: Protection of Green Spaces and Recreational Facilities</b>	N	+	+	N	+	++	++	+	N	N	N	N	N	N	N	N	N
<b>EV6: Trees, Woodlands and Hedgerows</b>	N	+	+	N	N	++	++	N	+	+	N	+	N	N	N	N	N
<b>EV7: Provision and Protection of Allotments</b>	N	+	N	N	+	+	N	++	N	N	N	N	N	N	N	N	N
<b>EV8: Equestrian &amp; Rural Land Use Development</b>	N	+	N	N	N	-	-	-	N	-	-	N	N	N	+	+	N
<b>EV9: Agricultural Land Quality</b>	-	N	N	N	N	+	+	++	N	?	N	+	N	N	-	-	N
<b>EV10: The Historic Environment</b>	N	+	++	N	N	+	++	N	N	N	N	N	N	N	N	N	+
<b>EV11: Protection and Enhancement of Landscape Character</b>	N	+	++	N	N	++	++	+	N	N	N	N	N	N	N	N	N
<b>Contributing to Successful Development</b>																	
<b>SD7: Contaminated Land and Unstable Land</b>	N	++	N	N	N	+	+	++	N	+	N	N	N	N	N	+	N
<b>SD8: Environmental Protection</b>	N	++	+	N	N	++	+	N	++	N	N	N	N	N	-	-	N

### *Environmental objectives*

- 6.25 The sixteen policy options relating to the natural environment are likely to have mainly positive effects on the environmental SA objectives. This reflects that they are generally looking to protect specific elements of the natural environment. This can be seen in policies such as protection of green spaces, agricultural land quality and open space. It can also be seen that there is a cross over between a number of these policies. For example, Policy EV6 Trees, woodlands and hedgerows will have positive impacts in relation to a number of other environmental policies including landscape (significantly positive) and historic environment, air and noise pollution, water quality and flood risk (minor positive).

- 6.26 Significant positive effects can be seen when the DMP specifically related to what the SA Objective is looking to achieve. This can be seen in relation to energy efficiency, water resource management, flood risk, green infrastructure and biodiversity, historic environment, landscape character and environmental protection where there is a direct relationship. For example Policy SD8 looks to minimise air, noise and light pollution. Consequently, it is likely to have a significant positive effect on the Air and Noise pollution SA Objective. Similarly, in relation to Policy EV11 Protection and enhancement of landscape character will have significant positive impacts for the Landscape SA.
- 6.27 The majority of natural environment policies are likely to have indirect, minor positive effects on biodiversity (Policy EV4). This reflects the potential restrictions on development that would arise from these policies. The exceptions to this relate to equestrian development (Policy EV8) which is identified as a minor negative effect. The policy ensures that the development is appropriate in size and scale and minimises the impact of the development on biodiversity. However, dependent on the size of the buildings and associated surfaces and other forms of structures there is the potential to have a negative impact on biodiversity.
- 6.28 Minor negative effects are identified in relation to the following policies:
- Policy CC1 Energy Efficiency in relation to the historic environment. The policy will seek to ensure the District's historic environment and its settings are not harmed / impacted as a result of such development. However, there remains the potential that the carbon reduction benefits may outweigh the potential harm to a heritage asset. In relation to landscape, there remains the potential for certain energy infrastructure to have a negative impact on the District's landscape, where the energy benefits are considered sufficient to outweigh the impact on the landscape.
  - For equestrian development, Policy EV8 minor negative aspects are identified in relation to a number of SA objectives including, biodiversity, landscape, natural resources, water quality and waste. However, the impact will be dependent on the location and nature of the development. The Policy looks to ensure that any negative effects are minimised if permission is to be granted.
- 6.29 Uncertain effects are identified in relation to Policy CC3, flood risk in relation to town centres. Flood risk is minimal for Kirkby-in-Ashfield and Sutton in Ashfield and looks to be in isolation from Hucknall the Policy would be regarded as having a positive impact in these areas. However, the Baker Lane Brook is culverted through Hucknall town centre and is classified as a main river. It has the potential to flood parts of the town centre. The sequential test directs retail and leisure development to town centres or edge of centres and this has to be balanced against the potential flood risk. However, retail is classified as a less vulnerable use. Uncertain effects are also identified in relation to employment and the economy.
- 6.30 By specifically seeking to protect designated heritage assets including conservation areas, listed buildings, historic parks and gardens, scheduled monuments and local



lists the Policy (EV10) will have a significant positive effects on the historic environment SA.

#### *Social Objectives*

- 6.31 The nature of the policies which look to protect the natural environment are not likely to impact to on social objectives. The exception is health. Significant positive effects have been identified in relation to contaminated land and environmental protection. There are a number of minor positive effects related to health lifestyles with access to open space, the countryside, landscape, trees, allotments and other SA objectives having beneficial impacts on health.
- 6.32 The retention of the Green Belt is not considered to have any negative impacts. The Policy protects the Green Belt from inappropriate development, except in very special circumstances. Housing is not identified in the National Planning Policy Framework as appropriate development, therefore this policy will have a negative effect on the delivery of housing within parts of the District designated as Green Belt. However, the Green Belt boundary has been amended, where necessary, in the Local Plan in order to meet the housing need for the District, and therefore further housing would not be required in the Green Belt, as such a neutral score has been identified. A similar approach has been adopted in relation to the Countryside (Policy EV2).
- 6.33 Policy EV9 Agricultural Land is anticipated to have negative impacts in relation to housing and employment/economy by potentially restricting housing and other forms of commercial/industrial development. The limited nature of flood risk in Ashfield from watercourses is such as it does not have a negative effect by significantly restricting where housing can be located. It ensures that surface water is taken into account and mitigated against and is regarded as having a minor positive effect on housing in that it should ensure that more vulnerable land uses such as housing, are not subject to flood risk.
- 6.34 The Reuse of Buildings in the Green Belt and Countryside (Policy EV3) is identified as a minor negative effect on Travel and Accessibility as buildings in the Green Belt and Countryside are often not well located to local services, schools, employment opportunities and public transport. Consequently, re-development of these buildings may lead to an increase in car dependant journeys.
- 6.35 Other policies have the potential to prevent housing development dependent on their designation but this is not anticipated to have a significant impact on the supply of housing provided that a five year housing supply is identified and maintained through the Local Plan.

#### *Economic objectives*

- 6.36 Indirect, minor negative effects are identified in relation to agricultural land as it is anticipated to potentially restricting commercial/industrial development. The environmental protection policy also has a negative effect as it is a restrictive policy and could restrict employment development or alternative industrial uses in certain areas.

## Reasonable Alternatives

6.37 Table Twenty Two below identifies the DMP approaches along with the reasonable alternatives considered, together with the reason if no alternatives were identified.

**Table Twenty Two: Development Management Policy Options – Environment**

Policy Options	Reasonable alternatives considered	Justification for no alternatives
<b>Adapting to Climate Change</b>		
<b>Energy Use, Renewables &amp; Low Carbon Generation</b> <i>Sets out a policy including criteria on promoting energy from renewable and low carbon sources.</i>	None	<p>Consistent with paras 93 - 98 of NPPF.</p> <ul style="list-style-type: none"> <li>•NPPF requires planning authorities 'to adopt proactive strategies to mitigate and adapt to climate change' and 'have a positive strategy to promote energy from renewable and low carbon sources';</li> <li>•Planning Practice Guidance paragraph 033 and The Written Ministerial Statement (made on 18 June 2015) 'when considering applications for wind energy development, local planning authorities should (subject to the transitional arrangement) only grant planning permission if: the development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan'.</li> </ul> <p>Therefore, it is considered the only option is to have a relevant policy within the Local Plan.</p>
<b>Water Resource Management</b> <i>The Policy looks to ensure that water quality is maintained or improved and ensure that water usage is reduced.</i> <i>The policy is consistent with NPPF para 9, para 109, para 156 and para 165.</i>	Alternative option is to not include the water efficiency provisions.	
<b>Flood Risk –</b> <i>Looks to ensure that flood risks to people, and property is minimised.</i>		<p>Consistent with NPPF para 99 - 104.</p> <p>NPPF para 100 states that "Local Plans should develop policies to manage flood risk from all sources, Consequently, to have no policy is not an option.</p>
<b>Protecting and Enhancing the Environment</b>		
<b>EV1: Green Belt</b>		<p>The Policy needs to be fully consistent with Green Belt provisions within NPPF Para ??? to para ??.</p>
<b>EV2: Countryside</b> <i>Policy seeking to protect and enhance countryside and valued landscapes.</i> <i>Consistent with para 17 bullet point 5 and para 113 of NPPF.</i>	Alternative option is to have a less prescriptive policy.	

<b>EV3: Reuse of Buildings in the Green Belt and Countryside</b>  <i>Offer more detail on criteria that will be used to consider proposals for new housing in the Countryside. Builds on NPPF para 55.</i>	Alternative option is to have a less prescriptive policy.	
<b>EV4: Green Infrastructure, Biodiversity and Geodiversity</b>  <i>Sets out a policy for the delivery, protection and enhancement of green infrastructure biodiversity and geological conservation.</i>	<i>Alternative is to have no policy and rely on NPPF para 113.</i>	This is not considered to be a reasonable alternative as the NPPF (paragraph 113) states that 'Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged.'
<b>EV5: Protection of Green Spaces and Recreational Facilities</b>  <i>Seeks to ensure that recreational and green space is protected. Identifies criteria where development may be acceptable.</i>	Alternative is to have no policy and rely on NPPF para 70.	This is not considered to be a reasonable alternative as the NPPF (paragraph 70) encourages local planning authorities 'To deliver social, recreational and cultural facilities and services the community needs, planning policies and decisions should: plan positively for the provision and use of shared spaces, community facilities and other local services to enhance the sustainability of communities and residential environments;.....'
<b>EV6: Trees, Woodlands and Hedgerows</b>	Alternative Option is to rely on the NPPF.	This is not considered to be a reasonable alternative as the NPPF would not provide a clear policy framework against which planning applications may be considered.
<b>EV7: Provision and Protection of Allotments.</b>  <i>Sets out a policy for the provision and protection of allotments</i>	Alternative Option is to have no policy to protect allotments.	
<b>EV8: Equestrian and Rural Land Use Development</b>  Provides a set of criteria to be considered in relation to equestrian and other rural land uses. It includes taking account of the land available, scale, cumulative effects, and impact from waste materials	Alternative Option is not to have a specific policy but to rely on the Green Belt and Countryside Policies.	
<b>EV9: Agricultural Land Quality</b>  <i>Policy seeking to protect best and most versatile agricultural land (when assessed against all options and wider benefits that may accrue from development.</i>	Alternative option is to rely on the NPPF.	The Policy is consistent with para 112 of NPPF.
<b>EV10: The Historic Environment</b>  <i>Policy seeking to protect and enhance listed buildings and their settings. In accordance with para 129 - 141 of NPPF.</i>  <i>Policy seeking to sustain and enhance conservation areas and their settings. In accordance with para 126 - 129 of NPPF.</i>	Alternative option is to rely on the NPPF.	It is not considered that there is a reasonable alternative as the NPPF as the Policy is considered to be necessary as it reflects the requirements of the NPPF para 126 - 141.

<p><i>Policy seeking to protect and enhance historic landscapes, parks and gardens and their settings. In accordance with para 129 - 141 of NPPF.</i></p> <p><i>Policy seeking to protect Scheduled Monuments and other important archaeological sites. In accordance with para 129 - 141 of NPPF.</i></p> <p><i>Policy allow for Locally protected heritage assets (a local list)</i></p>		
<p><b>EV11: Protection and Enhancement of Landscape Character</b> <i>Policy seeking to protect and enhance valued landscapes. Consistent with para 109 of NPPF. To replace adopted Local Plan Policy.</i></p>	Alternative option is to rely on the NPPF.	It is not considered that there is a reasonable alternative as the paragraph 113 states that 'Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged.'
<p><b>Contributing to Successful Development</b></p>		
<p><b>SD7: Contaminated Land and Unstable Land</b> <i>Policy seeking to address the impact of contaminated land / hazardous substances on development or caused by development. In accordance with para 190, 111 para.120, 121 and 122 of NPPF.</i></p>	Alternative option is to rely on the NPPF.	To rely on the NPPF and Planning Practice Guidance (Land affected by contamination & Land Stability) together with established good practice guidance. However, this is not considered to be an acceptable alternative as the NPPF implies that the Local Plan should have policies covering this issue particular given that Ashfield has a history of coal mining.
<p><b>SD8: Environmental Protection</b> <i>Policy seeking to address the impact of pollution on development or caused by development. The policy seeks to minimise pollution in accordance with para 110, 123, 124 and 125 of NPPF.</i></p>	<p>Alternative Option One Rely on national policy and other legislation.</p> <p>Alternative Option Two - Short general policy on pollution.</p>	

## DEVELOPMENT MANAGEMENT POLICIES - ECONOMY

6.38 Table Twenty Three sets out a summary of the SA of the DMP that have an economic dimension. In the Local Plan these are identifies in the Local Plan Chapters as

- Providing Jobs,
- Shopping,
- Contributing to Successful Development: Policy SD6 – Telecommunications.

### Table Twenty Three: Sustainability Appraisal of Economic DMP

[illegible]

#### *Environmental objectives*

- 6.39 The majority of economy DMP are unlikely to be effected by environmental objectives as the policies relate to the type of employment use, the use of employment sites, and the information required to support with applications. Unlikely the Area Policy they do not have a direct impact on the location of new development which may well have a negative impact on environmental receptors.
- 6.40 Both Policy PJ3 Rural Business Development and Policy EV4 Agricultural Development has been identified has have a number of minor negative effects in relation to the natural environment. The location means that this may increase the use of the car (Travel SA). The development of the rural economy both through conversion of existing buildings and well-designed new buildings or through farm expansion or diversification could potentially disturb biodiversity and have a negative effect on natural resources. However, the impact would be expected to be minimised by mitigation measures in policies.
- 6.41 Education (PolicyPJ5) can be anticipated to have a minor negative effect or in the case of natural resources a significant positive effect where new schools are required as part of a development or combination of development. By necessity housing sites will impact on greenfield land and by implication new schools will have a similar impact.
- 6.42 The four DMP relating to town centre developments are unlikely to effect a number of the environmental objectives as they do not seek to direct new development or extensions to particular sensitive locations that could be effected. Policies to restrict out of centre retail provision will help protect the District's town and local centres which are considered to be less reliant on the car and offer a variety of facilities. Policy SH1 has significant positive effects in relation to town centres and the economy. The other policies have a minor positive effect as they are not anticipated to have the same level of impact given the nature of the location or the specifics of the policy impact.
- 6.43 Minor negative effects are identifies for Polices SH" Local shopping centres and Policy SH3, food drink and evening economy in relation to waste and particular the potential for increase waste.
- 6.44 For telecommunications, the Policy (SD6) seeks to ensure that a flexible approach, is adopted. It ensuring that the location and appearance of telecommunication equipment is acceptable and blends into the surrounding landscape while taking into account public concerns. The Policy also ensures that, as far as possible, without acting as a major impediment to bringing forward communications infrastructure, it minimises the impact on environmentally sensitive areas or heritage asset.

#### *Social objectives*

- 6.45 Employment related DMP are not anticipated to have a significant effect on social objectives. The provision of employment can have indirect health benefits, which is regarded as a minor positive as well as having benefits in relation to social inclusion. Similar the flexibility of allowing permit change of use of employment sites in certain

circumstances, which a site may be brought forward for housing. As has been identified above, rural locations can have a negative impact on travel.

- 6.46 Shopping policies are anticipated to have positive effects in relation to travel and accessibility SA objective as they maximise the opportunity for travel choice to town centres. There is a more limited positive effect in relation to health, social inclusion and housing. For housing, the policy support housing development in the town centre which will add to the vitality and viability of Ashfield's town centres.

*Economic objectives*

- 6.47 Given that the policies relate to employment uses there is a wider variety of effects on the economic objectives. However, the context is provided by Policy PJ1 which emphasises that economic development should be given significant weight. However, it clarifies that infrastructure requirements, regeneration, promotion of skills and removal of barriers to employment need to be taken into account when considering application. Significant positive effects are identified in relation to all the policies within "Providing Jobs".
- 6.48 The employment land policy (Policy PJ2) helps to ensure an adequate supply of employment land is retained / delivered. It does allow for some flexibility reflecting a lack of demand or environmental issues. However, in order to ensure future job opportunity and allowing for the growth of new and existing businesses it is important that the loss of employment land is avoided, unless fully justified, for the long term benefit of the economy. The Government has allowed for changes through the Permitted Development regime, but it is not anticipated that as it currently stands it will have a major impact in Ashfield.
- 6.49 The Policy PJ3 support economic development in the rural areas of the District within the rural settlements, which are of a scale appropriate to the area and accommodated by the transport network (in line with paragraph 28 of the NPPF). The agricultural policy (PJ4) allow flexibility for agricultural and land use businesses, including diversification, while taking account of environmental objectives. It allows agricultural or rural land use development in the countryside provided that it meets criteria relating to size, scale and siting. It has the potential to offer minor benefits in relation to protecting the landscape as a criteria base policy will prevent development that will have a harmful effect on the character and openness of the countryside.
- 6.50 Education standards are a substantial issues within Ashfield. This is reflects in Policy PJ5 which sets out a requirement to support education and training within the District including the provision of new primary schools as part of a developed or contributions towards existing schools.
- 6.51 In relation to economy, the "Shopping" policies are intended, to bolster the town centre first approach and thereby maintain and enhance the retail function of the three towns in Ashfield, as well as local centres and neighbourhood parades. Policy SH1 in particular is likely to offer benefits in relation to supporting existing business structures and businesses as well as meeting daily needs without causing undue environmental problems and unsustainable car borne travel. Policies SH2, SH3 and SH4 are anticipated to have a minor positive effect given the nature of the location



or the specifics of the policy impact. However, policies in relation to new shopfronts and the evening economy are anticipated to make a positive contribution towards sustainability.

- 6.52 The Telecommunications Policy provides support for communication infrastructure which significant positive impacts in relation to the local economy and social inclusion.

### Reasonable Alternatives

- 6.53 Table Twenty Four below identifies the DMP approaches along with the reasonable alternatives considered, together with the reason if no alternatives were identified.

**Table Twenty Four: Development Management Policy Options - Economy**

Policy Options	Reasonable alternatives considered	Justification for no alternatives
<b>Providing Jobs</b>		
<b>PJ1: Business and Economic Development</b> <i>Emphasises that economic development should be given significant weight and identifies the economic factors that will taken into account in the planning process in supporting economic development.</i>	None.	Policy reflects provisions of the NPPF with its emphasis on economic growth.
<b>PJ2: Business and Employment Development Sites</b> <i>Identifies Locally Significant Business Areas but would allow for alternative uses on other employment sites where it is established there is a lack of demand or environmental issues.</i>  Protection of key employment land – alternative uses on poor quality employment sites. (Flexible to reflect NPPF). Builds on NPPF para 22.	Alternative Option 1: No Locally Significant Business Areas identified. Alternative Option 2: No protection for employment sites.	
<b>PJ3: Rural Business Development</b> <i>Supports economic development in the rural areas of the District with the rural settlements, which are of a scale appropriate to the area and accommodated by the transport network. Builds on para 28 of NPPF.</i>	Alternative option is to allow economic development in the countryside.	
<b>PJ4: Agricultural, Forestry or Horticultural Development, &amp; Farm Diversification</b> The Policy looks to address those issues where planning permission is required for agricultural, forestry or	The alternative option is not to have a specific policy but to rely on the provisions of Policy EV1 Green Belt, Policy EV2 Countryside together with other	

horticultural development. Builds on NPPF in para. 28 which identifies a requirement to promote the development and diversification of agricultural and other land based rural businesses and the Policy sets out criteria for decision making in this context.	policies within the Local Plan which cover specific issues.	
<b>PJ5: Education, Skills and Training</b> <i>Policy sets out a requirement to support education and training within the District as low education standards are identified as an issue in the District. Reflects NPPF para 71.</i>	Not to have a specific policy on education skills and training.	
<b>Shopping</b>		
<b>SH1: Retail, Leisure and Commercial Development Principles and Town Centre Uses</b> <i>Role and function (primary and secondary frontages) for town centres – in conjunction with ‘designations’ on Policies Map. Policy offsets out guidance on the retail, leisure and commercial developments. Impact assessments and sequential test and out of centre retailing looking to ensure that the vitality / viability of centres is protected.</i>	Alternative Option: Rely upon the NPPF	Consistent with para 23 to para 27 of NPPF.
<b>SH2: Local Shopping Centres, Shopping Parades and Single Shops</b> <i>Policy SH2 looks to encourage the retention of old and creation of new retail units within local communities.</i>	Rely on the NPPF.	This is not considered to be a reasonable alternative as the NPPF focuses upon the community aspect, rather than the retail element, outside of town centres. This policy brings it together in a clear, concise manner.
<b>SH3: Food, Drink and the Evening Economy</b> <i>The Policy support the evening economy, but looking to controlling hot food take aways in unsuitable locations.</i>	Rely on the NPPF.	Brought forward as a local policy to support the evening economy, but also looking at the health aspects by controlling the spread of hot food take-aways in unsuitable locations.
<b>SH4: Shopfronts</b> <i>Securing attractive town centres by considering design of frontages to create a more attractive environment.</i>	None	Brought forward as a local policy. The alternative would not to have a policy
<b>Contributing to Successful Development</b>		
<b>SD6: Telecommunications</b> <i>Policy seeking to guide telecommunications development</i>	Have a less restrictive policy in respect of location in relation to	.



Occupation, Flats and Bedsits																	
Contributing to Successful Development																	
SD2: Amenity	+	+	N	++	+	N	+	N	+	+	N	N	N	N	N	N	N
SD12: Provision and Protection of Health and Community Facilities	+	++	N	N	+	N	N	N	N	N	N	N	N	+	N	+	N
SD13: Crime and Fear of Crime	N	++	N	++	N	N	N	N	N	N	N	N	N	N	N	N	++

#### *Environmental objectives*

- 6.55 The majority of social DMP are unlikely to be effected by environmental objectives as the policies relate to the type of housing mix, housing density, affordable housing and similar aspects. Unlikely the Area Housing Policies they do not have a direct impact on the location of new development which may well have a negative impact on environmental receptors.
- 6.56 The impact on the environmental objectives depends to a large degree on the nature of the policy. The requirement for open space provide for provision or enhancement of green space/infrastructure which is a significant positive effect, minor positive effects are identified in relation to landscape water quality and flood risk reflecting the relationship between design of new open space assets and the utilisation of SUDs.
- 6.57 The effects of these policy on the landscape and historic environment is also anticipated to be positive due to the criteria relating to the protection and enhancement of the landscape and townscape and the protection of the historic environment. The Policy on Multiple occupation (Policy HG6) could have a minor negative effect, as high concentrations of such conversions could result in the townscape being affected by high concentrations of parked cars, and increased amounts of bins outside properties, as well as a greater chance of their being negative effects on heritage features such as Conservation Areas.
- 6.58 Most of the policies (other than open space) will not affect water quality or flooding. Policies relating to gypsies (HG1) affordable housing (HG2) and Housing mix (HG4) are identified as have a minor negative impact in relation to air and noise pollution.

#### *Social objectives*

- 6.59 As a number of the policies relate to social objectives it is not surprising that there have either significant positive effects or minor positive effects in relation to housing, health, social inclusion and travel and accessibility. Amenity (Policy SD2) and Crime and fear of crime (SD13) have significant positive effects in relation to health and community development and in the case of crime, town centres. In the latter case this reflects that the policy focuses on major developments and on A3, A4, A5, C2 & C4 uses, elements of which are often associated with town centres. By its appropriate application the policy should help support the vitality and viability of the

District's town centres by ensuring the potential for crime often associated with particular uses are considered and appropriately managed. This in turn should help reduce the potential for negative impact on surrounding uses and users.

6.60 Because of the nature of the housing policies, the majority are expected to have a significant positive effect on the housing SA objective. The criteria to be included in the policies will help to ensure that an appropriate range of housing, designed and sited to high standards, is available in the District. The housing density policy helps deliver housing while protecting from overdevelopment and the negative impacts this can bring.

6.61 The introduction of a criteria based policy for considering proposals for new gypsy and traveller accommodation provides an alternative delivery mechanism to site allocations. Economic objectives

#### *Economic Objectives*

6.62 Most of the policy options relating to housing are unlikely to have an effect on economic objectives due to the nature of the policies. Policy HG2, Affordable Housing and Policy SD12, Provision and Protection of Health and Community Facilities are anticipated to have a minor positive impact. Provision of affordable housing would enable young people to remain in the District stimulating economic growth. The health sector is anticipated to be an increasing source of jobs in Ashfield and expanding health and community facilities will lead to the improvement of infrastructure within an area to support development.

#### **Reasonable Alternatives**

6.63 Table Twenty Six below identifies the DMP approaches along with the reasonable alternatives considered, together with the reason if no alternatives were identified.

**Table Twenty Six: Development Management Policy Options - Social**

<b>Policy Options</b>	<b>Reasonable alternatives considered</b>	<b>Justification for no alternatives</b>
<b>Providing Homes</b>		
<b>HG1: Gypsies, Travellers and Travelling Show people</b>  <i>Policy seeking to offer detailed guidance on G&amp;T sites. Policy could set out design and access criteria against which proposals will be judged</i>	None	The PPTS para. 11 (policy B) requires that Local Planning Authorities should set criteria to guide land supply allocations, and where there is no identified need, criteria –based policies should be included in Local Plans to provide a basis for decisions where applications come forward. This is restated in paragraph 24 (Policy H). Consequently, to have no policy is not an option.
<b>Affordable Housing</b>  <i>Looks at the look at mix &amp; tenure to provide more detail on needs and delivery solution. Also look whether financial contributions are possible.</i>	Alternative Option: Standardised Affordable Housing requirement across the District at a lower level of 10% and a site threshold of 10 dwellings. Options ruled out	

	<ul style="list-style-type: none"> <li>Higher percentage not considered as not financially viable.</li> <li>Rural exceptions policy</li> </ul>	
<b>HG3: Public Open Space in New Residential Development</b>  <i>Policy seeking to provide support for, and guidance for specific housing schemes in the provision of open space.</i>	No local policy rely on NPPF	Consistent with para 73 of NPPF.
<b>HG4 Housing Mix</b>  <i>Housing mix should seek to meet identified needs including older persons and other specialist needs. The SHMA details housing mixes. Compliance with NPPF (para 50)</i>	Alternative Option: A less prescriptive policy, excluding requirement for Nationally Described Space Standard	
<b>HG5: Housing Density</b>  <i>The Policy sets out the council's approach to housing density as required by NPPF paragraph 47.</i>	Alternative Option 1: More prescriptive policy with 3 levels of minimum density requirement (30dph/ 34dph/ 40dph) related to distance from key transport nodes and town centres.	
<b>HG6: Conversions to Houses in Multiple Occupation, Flats and Bedsits</b>  <i>The Policy considers the impact of conversions on the character of an area and or amenity (for example parking problems)</i>	Alternative Option: No policy – Rely on Design SPD and NPPF Part 7	
<b>Contributing to Successful Development</b>		
<b>SD2: Amenity</b>  <i>Sets out criteria to safeguards conditions for users and occupiers of adjoin or nearby properties.</i>		It is not considered that there is a reasonable alternative as the NPPF (para. 58 & 59) states that the local plan should develop robust and comprehensive policies that set out the quality of development that will be expected.
<b>SD12: Provision and Protection of Health and Community Facilities</b>  <i>Intends to ensure that there is supporting community infrastructure in relation to new development encouraging the co-location of education, health and community facilities where possible. The Policy provides for new development to contributions towards new health and community facilities, where appropriate. Builds on para 70 of NPPF.</i>	Not to protect health or community facilities.	
<b>SD13: Crime and Fear of Crime</b>	Rely on NPPF paragraph 69	

<p><i>The policy builds on the national policy detailed within paragraph 69 of the NPPF, providing more detailed requirements for major developments and proposals in A3, A4, A5, C2 &amp; C4 uses. Support the work of the Community Safety Partnership,</i></p>		
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## DEVELOPMENT MANAGEMENT POLICIES – CONTRIBUTING TO SUCCESSFUL DEVELOPMENT

6.64 Table Twenty Seven sets out a summary of the SA of the DMP that cut across the three sustainable development dimensions in the Local Plan these are identifies in the Local Plan Chapters as Contributing to Successful Development. It includes:

- SD1: Design Considerations for Development,
- SD3: Recycling and Refuse Provision in New Development,
- SD4: Infrastructure Provision and Developer Contributions,
- SD5: Assessing Viability,
- SD9: Traffic Management and Highway Safety,
- SD10: Parking,
- SD11: Advertisements.

6.65 These are considered to address specific elements of development which do not directly link together as a logical group to broadly assess their Social, Environmental and Economic effects. As such, the analysis below highlights broad effects for each policy (SD4 & SD5 done together).



**Table Twenty Seven: Sustainability Appraisal of Other DMP**

	Sustainability Appraisal Objectives																
	1.Housing	2.Health	3.Historic Environment	4. Community Safety	5.Social Inclusion	6.Biodiversity/Green Infrastructure	7.Landscape	8.Natural Resources	9. Air &Noise Pollution	10.Water Quality	11. Waste	12. Flood Risk	13.Energy Efficiency	14.Travel & Accessibility	15. Employment	16.Economy	17.Town Centres
<b>SD1: Design Considerations for Development</b>	++	+	++	++	N	+	++	N	N	N	N	+	+	+	N	N	+
<b>SD3: Recycling and Refuse Provision in New Development</b>	+	N	N	N	N	N	+	N	N	N	++	N	+	N	N	N	N
<b>SD4: Infrastructure Provision and Developer Contributions</b>	++	++	N	N	++	++	+	N	?	N	N	+	N	++	++	++	+
<b>SD5: Assessing Viability</b>	++	?	N	N	?	N	N	N	N	?	N	N	N	?	?	?	?
<b>SD9: Traffic Management and Highway Safety</b>	+	+	N	N	N	N	N	N	+	N	N	N	+	++	N	+	+
<b>SD10: Parking</b>	+	N	N	N	N	N	N	N	N	N	N	N	N	N	N	+	+
<b>SD11: Advertisements</b>	N	N	+	N	N	N	+	N	N	N	N	N	N	N	N	N	+

#### SD1: Design Considerations for Development

##### *Environmental objectives*

- 6.66 Policy SD1 is likely to have a positive effect on environmental objectives. The policy will be used to ensure that the once the principle of development has been considered by other policies, the design of the proposed development seeks to minimise its impact on its surroundings by applying design standards and mitigation that will ensure a proposal aligns with the character of its surroundings and minimises its impact on the environment.

##### *Social objectives*

- 6.67 Policy SD1 is anticipated to have positive effect on elements of the SA's social objectives, ensuring standards such as Secure by Design and acknowledged urban design principles are applied to developments. This will help ensure proposes create safe, accessible, high quality environments the communities want to engage with an uses, whilst reducing the potential for, and fear of crime.



*Economic objectives*

- 6.68 The policy is not anticipated to have a direct effect on employment or the economy, but through its application it is considered that the District's built environment can be enhanced. This in turn will help support the regeneration of the town centres, attracting users, visitors and investors.

Policy SD3: Recycling and Refuse Provision in New Development

*Environmental objectives*

- 6.69 The policy is not considered to have a direct effect on biodiversity or pollution, but its primary role is to promote the reduction, re-use and recycling of waste. As such is considered to have a positive effect on waste objectives, energy efficiency linked to the re-use and recycling of waste; and the urban landscape through the appropriate design of waste storage areas.

*Social objectives*

- 6.70 The policy is not considered to have any direct impact on the SA's social objectives. However, as a minor consideration the policy may help create more attractive built environments that may lead to social enhancements.

*Economic objectives*

- 6.71 The policy is not considered to have a direct effect on the SA's economic objectives. The policy is considered to have a minor positive effect on housing, through its design elements, which in turn could help support economic growth.

Policy SD4: Infrastructure Provision and Developer Contributions; and SD5: Assessing Viability

*Environmental objectives*

- 6.72 Policies SD4 and SD5 collectively helps to assess the viability of a given development proposal and the subsequent potential developer contributions that may be secured to help mitigate the infrastructure impacts of development. Whilst the policies are not considered to have any direct effect on environmental objectives such as natural resources, pollution or waste, the policies have the potential to help deliver green infrastructure, landscape and flood risk enhancements through developer contributions and new infrastructure.

*Social objectives*

- 6.73 The policies are considered to have a significant positive effect on the SA's social objectives, particular in relation to housing, through the provision of supporting infrastructure and ensuring where viable, appropriate affordable housing can be secured, linked to policy HG2. The delivery / provision of appropriate health and education related infrastructure, is considered to also have positive social effects for the District.

*Economic objectives*

- 6.74 The policies, particularly SD4, is considered to have a positive effects on economic objectives, where contributions leads to improved education facilities, which will aid skills and employability and in turn the economy. The delivery of appropriate

infrastructure to support new development, will also have positive effects on the economy, ensuring development is appropriately support by transport, education, health and green infrastructure. The policies could also aid the regeneration of the District's town centres through public realm enhancements secured through the policies.

#### SD9: Traffic Management and Highway Safety

##### *Environmental objectives*

- 6.75 The primary role of the policy is to guide the design of highway schemes and promote sustainable travel. As such, it is not considered to have a direct effect on the majority of the SA's environmental objectives. But through the promotion of sustainable travel, it is considered that the policy could result in positive effects on air pollution and energy efficiency, through a reduction in carbon emissions and encourage active travel.

##### *Social objectives*

- 6.76 Through the promotion of sustainable travel and well-designed streets that enable active travel to take place, the policy is considered to have a positive effect on health and could aid social inclusion by improve mobility through walking and cycling. The policy is not considered to have a direct effect on the other SA social objectives.

##### *Economic objectives*

- 6.77 Policy SD9 is considered to have a positive effect on the SA's economic objectives. Through the creation of a well-connected public transport network and the efficient flow of traffic, the district will support existing businesses and become more attractive to inward investors. Effective, well designed roads, footpaths and spaces will also help support the District's town centre and help create high quality residential communities that will support the local economy.

#### SD10: Parking

##### *Environmental objectives*

- 6.78 The policy is not considered to have a direct effect on the SA's environmental objectives. Through the creation of well-designed car parking, there may be a potential benefit to the environmental quality of residential, town centre and employment environments.

##### *Social objectives*

- 6.79 The policy is not considered to have a direct effect on the SA's social objectives.

##### *Economic objectives*

- 6.80 The policy seeks to ensure that a sufficient amount of well-designed car parking provision is provided by a development proposal. As such, it is considered the policy will have a minor positive effect on the SA's economic objectives, by ensuring sufficient parking is provided to support the use; and the design of the parking is well designed and integrated into the surrounding environment. Successfully applied, this could help enhance the townscape of the District's town centres, and in turn their vitality and viability.

## SD11: Advertisements

### *Environmental objectives*

- 6.81 Policy SD11 seeks to ensure that advertising systems used and installed are appropriately located and design to not have a detrimental impact on their host building and/or surroundings. The policy is not considered to have a direct effect on the SA's environmental objectives, with the exception of the historic environment and landscape. It is considered the policy will have minor positive effect on both these objectives, ensure that neither the District's build heritage nor its landscape is negatively affected by the installation of advertisements.

### *Social objectives*

- 6.82 The policy is not considered to have a direct effect on any of the SA's social objectives.

### *Economy objectives*

- 6.83 It is considered that policy SD11 will have a minor positive effect on the SA's town centre objective, as it will help ensure advertisements do not have a negative impact on the street-scene of the District's centres. This in turn will help support the regeneration of the centres and aspirations to draw investment in to them.

### **Reasonable Alternatives**

- 6.84 Table Twenty Eight below identifies the DMP approaches along with the reasonable alternatives considered, together with the reason if no alternatives were identified.

**Table Twenty Eight: Development Management Policy Options**

<b>Policy Options</b>	<b>Reasonable alternatives considered</b>	<b>Justification for no alternatives</b>
<b>SD1: Design Considerations for Development</b> <i>Policy is intended to provide guidance on design parameters to secure high quality design and layouts on all new housing and other forms of developments. Consistent with paras 56 - 66 of NPPF.</i>	Rely upon the National Planning Policy Framework.  Apply a more prescriptive approach to design.	
<b>SD3: Recycling and Refuse Provision in New Development</b> <i>The Policy emphasis the factors to facilitates the design and layout of development in relation to waste collection in order to further the objective of the Waste Local Plan to increase recycling rates.</i>	Not to have a policy.	
<b>SD4: Infrastructure Provision and Developer Contributions</b> <i>Policy seeking to secure contributions towards necessary infrastructure. In accordance with</i>	Considers the option of taking forward s106 or alternatively through a CIL	

CIL regulations and paras 174 – 177 & 203 – 206 of NPPF.		
<b>SD5: Assessing Viability</b> <i>The Policy clarifies, in broad terms, the requirements for assessing viability of a development as viability has the potential to be effected by the level of Section 106 contributions being sought which are a development cost in relation to making the development acceptable in planning terms.</i>	None.	The alternative would not to have a policy and rely on Planning Practice Guidance. However, the NPPF does not address how viability should be assessed. The Policy is linked to Policy SD4 and is consistent with CIL regulations and paras 174 – 177 & 203 – 206 of NPPF.
<b>SD9: Traffic Management and Highway Safety</b> <i>Policy seeking to set criteria for identified schemes / transport solutions in light of para 32 of the NPPF. Used to secure adequate contributions to mitigate additional demands on the transport infrastructure.</i>	None.	This is not considered to be a reasonable alternative as the NPPF focuses upon traffic management and highway safety in less detail.
<b>SD10: Parking</b> <i>Policy seeking to update parking standards – both in the adopted Local Plan and 6c's Highways Transportation design Guide in light of para 39 of the NPPF.</i>	To consider maximum or minimum parking standards.	
<b>SD11: Advertisements</b> <i>Sets out criteria for considering applications for adverts.</i>	None.	This is not considered to be a reasonable alternative as the NPPF focuses upon advertisements in less detail.

## **7.0 Next Steps**

- 7.1 This is a Draft Sustainability Appraisal Report which accompanies the Local Plan Preferred Approach. The process of assessing the Local Plan policies and site allocations will continue after the results of this public consultation stage have been taken into account. The results of the public consultation will inform the Local Plan going forward.
- 7.2 The Local Plan Publication Stage will be brought forward with the full SA Report of the Local Plan. This will also include any additional appraisal work in relation to any significant amendments that may be made to the emerging Local Plan.
- 7.3 Both the SA and the SEA require monitoring of the significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before such damage is caused) and the significant effects where there is uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be taken. The Sustainability Framework identifies potential indicators but additional work will be necessary. Indicators for monitoring potential significant sustainability effects arising from the implementation of the Local Plan will be developed at subsequent stages of the Local Plan preparation.