



Ashfield Local Plan  
Draft Sustainability  
Appraisal Scoping Report  
2020  
Consultation Statement

February 2020



## Review of the Local Plan Sustainability Appraisal Scoping Report Consultation Statement

1.1 The Ashfield's Scoping Report has been reviewed by Ashfield District Council to:

- bring up to date the evidence from the plans and programmes in relation, to environmental, social and economic objectives and issues contained in other plans and programmes that are relevant to the Local Plan;
- provide an up-to-date assessment of the existing broad environmental, social and economic characteristics of Ashfield;
- consider key issues and problems that the Local Plan should address in the pursuit of sustainable development;
- determine whether the SA framework and objectives need to be revised or amended;
- Ensure the approach is consistent with the National Planning Policy Framework and Planning Practice Guidance.

1.2 The Review of the Sustainability Appraisal forms part of the requirements for taking forward a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA), in relation to the Local Plan. The Review has been undertaken by adopting the approach set out in National Planning Practice Guidance on SA scoping assessments.

### Consultation Period

1.3 The consultation was undertaken from 20<sup>th</sup> December 2019 to 3<sup>rd</sup> February 2020. The purpose of the consultation was to:

- Make sure the SA is comprehensive and robust enough to support the Local Plan.
- Make sure that the assessment methodology is comprehensive.
- Advise on the appropriateness of the SA Framework.
- Advise on the appropriateness of the key sustainability issues.
- Advise on the comprehensiveness of the baseline data for Ashfield.

### Consultees

1.4 In accordance with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, the Review was forwarded to:

- Environment Agency,
- Natural England, and
- Historic England.

Regulation 12 (6) requires “Where a consultation body wishes to respond to a consultation under paragraph (5), it shall do so within the period of 5 weeks beginning with the date on which it receives the responsible authority’s invitation to engage in the consultation.”

- 1.5** In addition to the statutory consultees, the Review was sent to a number of other consultees. The consultation was set out on the Council’s website with a link from the banner on the Home Page. Information was set out on social media and an article in the local press highlight the consultation.

## Summary of the Comments/Issues Raised on the SA Scoping Report and the Councils Response

During the consultation period external organisations responded with representations/comments in relation to the Sustainability Appraisal Scoping Report. The consultation statement summarises the main issues raised, sets out the Council’s response and, where appropriate, identifies how those issues have been addressed in the final Sustainability Appraisal Scoping Report.

Respondents Name	Section of SA Review	Comment/ Summary of proposed amendment	Council response
Environment Agency		The Environment Agency commented that it was happy with the content of the SA for those matters within its remit and that the report recognises the correct plans and reports etc., where appropriate.	Support acknowledged.
Historic England	P29-31 Business Development and the Economy.	It is recommended that HE Heritage Counts information be included in the ‘Source of Message’ list and that the evidence base issues section includes reference to ‘identifying opportunities for heritage led regeneration’ or similar alternative.”	The Heritage and the Economy Heritage Counts 2019 has been reviewed and included in the Source of Message list and Appendix 1.  Table 5: Key Messages, Business Development and the Economy and the Section 4, Baseline Issues and problems have been amended to include in the issues ‘identifying opportunities for heritage led regeneration’.
Historic England	P.32 Ensuring the Vitality of Town Centres.	It is recommended that HE Heritage Counts information be included in the ‘Source of Message’ list and that the evidence base issues section includes reference to ‘identifying opportunities for heritage led regeneration’ or similar alternative.”	The Heritage and the Economy Heritage Counts 2019 has been reviewed and included in the Source of Message list and Appendix 1.  Table 5: Key Messages, Town Centres and the Section 4, Baseline Issues

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			and problems have been amended to include in the issues 'identifying opportunities for heritage led regeneration'.
Historic England	P.33 Promote Healthy and Safe Communities.	It is recommended that HE's information on heritage and well being is included as part of the evidence base and that Bullet Point 9 is revised to read 'The development of a high quality multifunctional green infrastructure network should be promoted, identifying any opportunities for links with and enhancement of cultural heritage' or a similar alternative.	Wellbeing and the Historic Environment Threats, Issues and Opportunities for the Historic Environment 2018 (Historic England) has been reviewed and included in the Source of Message list and Appendix 1.  Table 5: Key Messages, Health and the Section 4, Baseline Issues and problems have been amended to include in the issues 'identifying any opportunities for links with and enhancement of cultural heritage'.
Historic England	P.37 Making effective use of land - Land Use.	It is recommended that Historic Landscape Characterisation is included within the Source of message section. HLC can be used to help secure good quality, well designed and sustainable places and is relevant to the scope of this consideration.	Historic Landscape Characterisation has been reviewed and included in the Source of Message list and Appendix 1.
Historic England	P.38 Making effective use of land – resources.	It is recommended that HE's information on increasing residential density in historic environments is included within the 'Source of Message' section since it is relevant to the intentions of the scope of this element of the report.	Increasing Residential Density in Historic Environments 2018 (Historic England) has been reviewed and included in the Source of Message list and Appendix 1.
Historic England	P.39 Achieving Well designed places.	It is recommended that HE's information on increasing residential density in historic environments is included within the Source of message section since it is relevant to the intentions of the scope of this element of the report. It	Increasing Residential Density in Historic Environments 2018 (Historic England) has been reviewed and included in the Source of Message list

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		is recommended that the last sentence (bracketed) is revised to include cultural heritage e.g. '(There is substantial cross over with other key messages such as housing, employment and cultural heritage).	and Appendix 1. In Issues for Ashfield, the bracketed text has been amended to read, "There is a substantial cross over with other key messages such as housing employment, biodiversity and cultural heritage".
Historic England	P.41 Meeting the challenge of climate change, flooding and coastal change.	It is recommended that HE guidance on climate change be referred to in the Source of message section.	Heritage, Climate Change and Environment (Historic England) (webpage) has been reviewed and included in the Source of Message list and Appendix 1.
Historic England	P.43-44 Flood risk.	It is recommended that HE guidance on flood risk be referred to in the Source of message section. The Plan will need to consider any impacts of watering or dewatering on buried archaeological remains.	Flooding and Historic Buildings 2015 (Historic England) has been reviewed and included in the Source of Message list and Appendix 1.
Historic England	P.46 Landscape.	It is recommended that Historic Landscape Characterisation is included within the Source of message section.	Historic Landscape Characterisation has been reviewed and included in the Source of Message list and Appendix 1.
Historic England	P.49 Conserving and enhancing the historic environment.	It is recommended that 'protection' is revised to read 'conservation' in line with NPPF terminology and heritage assets are referred too rather than historical assets. Setting does not appear in the scope and will need to be included in Plan considerations in order for NPPF requirements for the historic environment to be considered fully.	Issues for Ashfield has been amended to reflect the wording of the NPPF and to include the setting of a heritage asset. "The conservation and enhancement of Ashfield's heritage and archaeological assets and their setting."
Historic England	P.55 - Table 6 Sustainability Issues and the Local Plan - Historic built environment at	This does not fully address the requirements of the historic environment overall since it refers to built heritage only, therefore omitting buried archaeological remains which are heritage assets, and also only elements at risk. It is recommended that the Key issue is reworded to read 'Historic Environment, heritage assets and their setting'. In	The proposed amendments have been incorporated into Table 6: Sustainability Issues and the Local Plan.

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	risk.	line with this rewording the text for the 'Possible role of the Local Plan' will also need revising e.g. The Ashfield Local Plan will have an important role to play in conserving or enhancing heritage assets and their setting, including Ashfield's industrial heritage.	
Historic England	P.118 - Conserving and enhancing the historic environment - Issues and Problems.	BP1 should be revised to read 'The conservation and enhancement of Ashfield's historical and archaeological assets and their setting' in line with NPPF terminology and requirements. BP2 should be revised to read 'Four heritage assets...' instead of historic assets. BP3 requires an 's' at the end of 'asset' to read 'assets'. It would be worth considering the inclusion of town centres as part of BP4 as the scope of the report at this stage indicates a desire to strengthen the role of these moving forward. This would again highlight the synergy between heritage led regeneration and information included in HE's Heritage Counts information relating to the economy.	<p>Conserving and enhancing the historic environment – Issues and Options has been amended.</p> <ul style="list-style-type: none"> <li>• Bullet Point one sets out “The conservation and enhancement of Ashfield's historical and archaeological assets and their setting.</li> <li>• Bullet Point 2 “Four heritage assets...”</li> <li>• An additional bullet point has been included “Promote the conservation and enhance of the heritage assets within the District town centres to support the local economy.”</li> </ul>
Historic England	P.118 - Conserving and enhancing the historic environment - Potential implications of not having a new Local Plan.	BP2 could be extended to add 'so there would be no opportunity to identify possibilities to enhance the historic environment, heritage assets or their setting'. BP3 first sentence could be extended to read: National policy emphasises the importance of designated heritage assets, which are irreplaceable. It is recommended that the first sentence of BP4 be revised to read as follows: 'Potential for harm to heritage assets and setting as a result of development coming forward outside the Local Plan allocations'. The current wording uses terminology not directly associated with the consideration of heritage assets as set out in NPPF so is unclear.	Conserving and enhancing the historic environment – Potential Implication of not having a Plan. The implications have been amended to include the proposed wording.



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Historic England	P121 - Table 15: SA Objectives and Theme	SA Objective 3 is noted and welcomed.	Comments acknowledged.
Historic England	P.124 - Table 16: Proposed Matrix to be utilised by the SA. AND P,142 - Table 18: Consideration of Significance for Strategic Options and Policies - Part 3 Historic Environment.	It should be noted that any element relating to the historic environment identified as 'uncertain' as the Plan and SA progress would indicate that further consideration and analysis is required to establish whether there would be a neutral, negative or positive impact in SA terms.	Comments acknowledged. Uncertainty also relates to where there is insufficient information available (which in some cases may only come to light after plan adoption) or the relationship with the objective is dependent on how particular aspects of development are managed. This reflects that some uncertainty may remain until the full details are known at planning application stage or when further site investigation has been undertaken following planning approval.
Historic England	P.129-130 - Table 17: The Sustainability Framework  P. 142 Table 18: Consideration of Significance for Strategic Options and Policies	The scope of the SA will need to include setting in the decision making criteria to ensure the Local Plan complies with NPPF requirements for the historic environment. At present it is not mentioned. The Land Allocation Appraisal is noted, however it is recommended that HE's methodology for the consideration of site allocations in Local Plans is used as part of the Plan process. It is unclear what benefits the potential indicators would reveal. It is recommended that stronger indicators are set out in order to establish a robust scope for the Plan.	Table 17: The Sustainability Framework, Objective 3 Historic Environment Decision Making has been amended to identify the importance of setting:  "Will it conserve and/or enhance designated heritage assets, non-designated heritage assets, and their setting?" (to be replicated in Table 18 Guide Questions p. 142)  Within the land allocation appraisal section, the text recognises that the significance of an asset can also be derived from its setting (in line with the

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			<p>NPPF). However, the land allocation appraisal criteria has been reviewed and the following amendments have been implemented to provide greater clarity and ensure references are included to 'setting'.</p> <ul style="list-style-type: none"> <li>• Sites that have potential for a designated heritage asset(s) (or its setting) to be enhanced or its significance better revealed will have a significant positive effect <b>(++)</b> (e.g. through removal from an 'at risk' register or reuse of a redundant building). Sites that have this potential but to a lesser degree will have a minor positive effect <b>(+)</b></li> <li>• Sites, which have potential for a non-designated heritage asset or its setting to be enhanced, will have a minor positive effect <b>(+)</b>.</li> <li>• Sites, which are unlikely to impact on a designated or non-designated heritage asset or its setting (0).</li> <li>• Sites with potential for less than substantial harm to a designated heritage asset(s), including development in its setting, will have a minor negative effect <b>(-)</b></li> <li>• Sites which include a non-designated heritage asset or part of its setting that cannot be enhanced will have a minor negative impact <b>(-)</b>. Sites which</li> </ul>

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			<p>may have the potential for substantial harm or loss to a designated heritage asset(s), including development in its setting, will have a significant negative effect (-).</p> <p>Regarding the potential indicators, these allow a variety of changes within the historic environment to be monitored. The information is readily available and proportionate to the Local Plan. No changes are proposed.</p>
Natural England	Section 1 and Section 2	<p>Natural England considers that the background information on the report is covered in sufficient detail.</p> <p>Background information on the Local Plan history and previous SA seems appropriate and useful.</p>	Comment acknowledged.
Natural England	Section 3, Table 5: Key Message, and Appendix 1.	<p>In general Natural England considered that the report includes appropriate information within the plans and programmes however we suggest that you may want to make reference to the government's 25 year Environment Plan – A Green Future. We would wish to ensure that the local plan takes full account of the moves towards mandatory net gain and gives consideration to related initiatives such as Nature Recovery Network and Natural Capital. You may also want to refer to the Environment Bill (depending on its progress).</p>	<p>The government's 25 year environmental plan 'A Green Future: Our 25 Year Plan to Improve the Environment. 2018 is included in Appendix 1. However, it was not brought forward and identified in Table 5 Key Message. Sources of Messages in Table 5 has been amended to reflect that this was taken into account in identifying the key messages.</p> <p>The Environmental Bill was presented to Parliament on 30<sup>th</sup> January 2020.</p>

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			<p>However, the intensions for the Bill set out in the Queen’s speech and the Bill itself makes it clear that there are important aspects of the Bill which:</p> <ul style="list-style-type: none"> <li>• Should be reflected in the Sources of Messages in Table 5 and</li> <li>• Need to be reflected in the Local Plan policies and</li> <li>• Reinforce the objectives sets out in the SA Framework.</li> </ul> <p>Similarly it has been identified that the Agricultural Bill also places on emphasis on farmers being paid for ‘public goods’ such as new /enhance habitats and public access. Table 5 and Appendix One has been amended to reflect the Agricultural Bill proposals.</p>
Natural England	Section 3, Table 5: Key Message, and Appendix 1.	The objectives of the various plans, policies and programmes are well covered.	Comment acknowledged.
Natural England	Section 4 – Relevance of the main economic, social and environmental issues identified to the SA of the Local Plan?	Within Table 6: Sustainability Issues & the Local Plan, Natural England suggests that the section that covers the “State of SSSIs and Local Wildlife Sites and Protect and promote Biodiversity”, should be strengthened. The word “enhancement” would be preferred to “promotion” of biodiversity. The role of the LPA should also include ensuring that a net gain in biodiversity is achieved which strengthens ecological networks and works towards the Nature Recovery Network at a strategic level. It is suggested that the potential influence of the local plan on this topic would be major as local plan policies are key	<p>Table 6: sustainability Issues &amp; the Local Plan has been amended to:</p> <ul style="list-style-type: none"> <li>• include ‘enhance’ rather than protect.</li> <li>• To reflect that local plan policies will have a major role in enhancing biodiversity and green infrastructure and tackling the impact of climate change.</li> </ul>

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		documents in achieving enhancements to biodiversity. We would also suggest that “access to suitable wildlife sites” is dealt with separately within an issue, which covers green infrastructure and the provision of access to green space and countryside recreation. Climate change could also be included within the table.	The SA Framework has been amended to identify in relation to Objective 6 Biodiversity and Green Infrastructure to identify in the decision-making criteria – ‘Will it provide opportunities for people to access the natural environment?’
Natural England	Section 4 – Relevance of the main economic, social and environmental issues identified to the SA of the Local Plan.	We generally welcome the section on “Meeting The Challenge of Climate Change, and Flooding and Coastal Change (Including Water Quality)” – though we would suggest that Coastal Change need not be included in Nottinghamshire. We also suggest that the use of nature based solutions to address adverse impacts should be covered within this section for example tree planting (in the right places) and carbon sequestration (we do note that this is partly covered in the next section on the natural environment).	The reference to ‘coastal change’ reflected the NPPF 2019, Part 14 which sets out policies on meeting the challenge of climate change, flooding and coastal change. However, the comment is noted and the SA Report has been amended to remove the reference to coastal change.  An additional paragraph has been included to set out to identify role of nature based solutions. (Paragraph 4.88).
Natural England	Section 4 – Relevance of the main economic, social and environmental issues identified to the SA of the Local Plan.	We welcome the next section on the Enhancing Natural Environment and are pleased to see that the Sherwood possible potential SPA has been considered. We also welcome the content on Biodiversity Mapping Opportunities and BMV soils.	Comments acknowledged.
Natural England	Section 4 – Relevance of the main economic, social and environmental	We suggest that there should be some cross reference with the section Promote Healthy & Safe Communities regarding the topic of green infrastructure. Multi-functional green infrastructure can perform a range of functions including improved flood risk management, provision of accessible	The comments is noted. Paragraphs have been added to Section 4 to emphasize there different roles that green infrastructure including health and wellbeing, flood risk, biodiversity

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	issues identified to the SA of the Local Plan.	green space, climate change adaptation and biodiversity enhancement.	and climate change. Similarly, climate change will be reduced by a number of different aspects, which are anticipated to be reflected in the Local Plan policies. (Par 4.47 & 4.72)
Natural England	<p>Section 5 SA Framework objectives, guide questions and range of environmental, social and economic topics</p> <p>Table 17: The Sustainability Framework</p> <p>Table 18: Consideration of Significance for Strategic Options and Policies</p>	<p>The objectives appear to cover most of NEs concerns with the Natural Environment.</p> <p>You may want to consider the use of the following with respect to nature base solutions for climate change: Will the action/policy:</p> <ol style="list-style-type: none"> <li>1. Reduce greenhouse gas emissions or promote sequestration of carbon?</li> <li>2. Continue to be viable for a range of plausible future climate scenarios?</li> <li>3. Increase the resilience of biodiversity to climate change?</li> <li>4. Help people adapt to climate change?</li> <li>5. Maintain or enhance the biodiversity of a region, now and under future climates?</li> <li>6. Maintain or increase the provision of ecosystem services on which local people depend, including water, food, and materials, now and under future climates?</li> <li>7. Lead to the displacement of emissions to another location?</li> </ol>	<p>Comment acknowledged.</p> <p>Table 17: The SA Framework has been amended to identify in relation to the following:</p> <ul style="list-style-type: none"> <li>• Objective 6: Biodiversity and Green Infrastructure to identify in the decision making criteria – <ul style="list-style-type: none"> <li>➤ ‘Will it conserve and enhance biodiversity taking into account the impacts of climate change?’</li> <li>➤ Will it promote carbon sequestration?</li> </ul> </li> <li>• Objective 12: Climate Change and Flood Risk to identify in the decision making criteria – Will it support mitigation and adaption measures that increase biodiversity resilience?</li> </ul> <p>(to be replicated in Table 18 Guide Questions)</p>
Natural England	General	The review of the SA objectives and the revised SA Framework is considered to meet the requirements of the SEA Directive and the National Planning Practice	Support acknowledged.

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		Guidance.	
The Coal Authority	General	The Coal Authority has reviewed the Sustainability Appraisal Scoping Report and has no specific comments to make.	The response is noted.
Avison Young on behalf of National Grid	General	Avison Young has review the SA Scoping Report on behalf of National Grid and have no comments to make in response to the consultation.	The response is noted.
Teversal, Stanton Hill & Skegby Neighbourhood Forum	Not identified by the response.	General – lack of emphasis on climate change. SA should reflect the Government committed that greenhouse gas emissions in the UK will be cut to almost zero by 2050. It is essential that the sustainability strengths and weaknesses of ADC's plans to meet this target be adequately tested in the Sustainability Appraisal.	The Forum's concerns on climate change are noted. The SA Framework considers climate change mitigation and adaption. This is specifically identified in Climate Change and Flood Risk and Climate Change and Energy Efficiency (which have specific SA Framework Objectives) but climate change will also be a consideration in relation to a number of other aspects including: <ul style="list-style-type: none"> <li>• Diversity &amp; green Infrastructure;</li> <li>• Natural resources;</li> <li>• Air &amp; noise pollutions;</li> <li>• Water quality;</li> <li>• Waste;</li> <li>• Travel &amp; Accessibility;</li> <li>• Employment;</li> <li>• Town centres.</li> </ul>
Teversal, Stanton Hill & Skegby Neighbourhood Forum.	SA Environmental Criteria.	Site allocations - The distance to public services and public transport needs to be half that set out in the Appraisal. Services and bus stops should be no more than a 400m walk to reduce car use. These criteria should be applied to developments of any size. The availability of public transport needs to be quantified.	The distances set out in relation to land allocations relates to a number of the SA objectives set out in the SA Framework. The various distances utilised reflect a number of sources. These include: <ul style="list-style-type: none"> <li>• 800m distance is based off</li> </ul>

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			<p>guidance provided in Institute of Highways &amp; Transport (2000) Guidelines for Providing for Journeys and the Chartered Institution of Highways &amp; Transportation (2015) Foot and Planning for Walking.</p> <ul style="list-style-type: none"> <li>• 2,000m is derived from Planning Policy Guidance 13: Transport (PPG13) (DETR, 2001, para 75) provided basis of 2km distance. However, in 2012 PPG13 was withdrawn and replaced with the NPPF. WYG (2015) provided updated analysis - 85<sup>th</sup> percentile analysis of walking distances National Travel Survey data (2002 – 2012) confirms 2km for East Midlands.</li> <li>• 5,000m – PPG13 cited 5km as a trip distance where some substitution of car journey with public transport could be made. Repeated in Nottinghamshire County Council (2010) Guidance on the Preparation of Travel Plans.</li> </ul> <p>Given the evidence base for the distances it is considered appropriate to retain the various distances set out in the SA Framework in relation to objectives on Health, Social Inclusion Deprivation, Travel &amp; Accessibility and Employment.</p>
Teversal, Stanton Hill & Skegby	Not identified by	<ul style="list-style-type: none"> <li>• Design new dwellings - New dwellings should meet the</li> </ul>	The comments are noted.



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Neighbourhood Forum	the response.	<p>highest construction standards particularly as regards thermal efficiency. Similar standards should be applied to new commercial buildings.</p> <ul style="list-style-type: none"> <li>• Design &amp; construction - Developers should be required to provide quantifiable evidence that carbon emitted during construction will be recovered over a period.</li> <li>• Existing Buildings – empty buildings should be brought back into use. This would help preserve greenfield sites and reduce carbon imprint.</li> <li>• Regeneration: <ul style="list-style-type: none"> <li>➢ References to regeneration are found a number of times without any proposals that are likely to have a significant impact and we expect specific measures proposed together with a plan of action.</li> <li>➢ There is insufficient emphasis on the need for good transport links to enable residents of deprived areas to access the jobs and training that would help reduce the level of deprivation.</li> <li>➢ While there is a reference to the town centre master plans, there is little reference to the need to develop a similar strategy and seek funding for outlying settlements for example Stanton Hill.</li> </ul> </li> <li>• Alternative Energy: <ul style="list-style-type: none"> <li>➢ Wind turbines are controversial close to residential areas but could be installed near to industrial and commercial sites and along major roads</li> <li>➢ Policy to encourage the installation of vehicle charging points across the District in public car parks and commercial units.</li> </ul> </li> <li>• Air quality: <ul style="list-style-type: none"> <li>➢ Whilst air quality is referred to, emissions overall are not mentioned.</li> <li>➢ A strategy to facilitate and encourage the switch to electric vehicles together with specific proposals to create a comprehensive off-road network of cycle</li> </ul> </li> </ul>	<p>The response identifies various aspects in relation to taking the Local Plan forward placing an emphasis on the impact of climate change. These aspects of the response do not propose any specific amendments to sections of the Report, the baseline or the SA Framework. Therefore, no changes to the Scoping Report have been arising from these aspects of the response.</p>

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		<p>and footpaths throughout the area would reduce vehicle use and improve air quality.</p> <ul style="list-style-type: none"> <li>➤ Concerned with the expected deterioration in air quality resulting from the major construction works related to HS2.</li> <li>• Tree cover - Supports Ashfield DC's target of planting 1,000 trees. The target should be a target to doubling tree cover during the Local Plan period.</li> </ul>	
Gladman	Not identified by the response.	<ul style="list-style-type: none"> <li>• Emphasised that the Council should: <ul style="list-style-type: none"> <li>➤ Ensure that the results of the SA process clearly justify its policy choices.</li> <li>➤ In undertaking a comparative and equal assessment of each reasonable alternative, the Council's decision making and scoring should be robust, justified and transparent.</li> </ul> </li> <li>• SA should be a fundamental part of the plan preparation process and should help to inform the decisions made by the Council.</li> <li>• The Council must take account of all reasonable alternatives when assessing and selecting their preferred policy choices.</li> <li>• It is integral that each reasonable alternative is assessed to the same degree of detail as the authority's preferred option.</li> <li>• Gladman highlight the importance that the issues surrounding housing delivery and need are resolved through the emerging Local Plan.</li> <li>• If the Council is unable to meet its housing needs in full, stressed it will be necessary to engage with neighbouring authorities across Greater Nottinghamshire to ensure housing and employment needs are addressed.</li> </ul>	<p>The comments are noted. The response identify the approach to sustainability appraisal that should be adopted in taken the Local Plan forward.</p> <p>The response does not propose any specific amendments to sections of the Report, the baseline or the SA Framework. Therefore, no change to the Scoping Report has been made arising from the response.</p>
Severn Trent Water Ltd		Severn Trent have no specific comments to make at this time on the Scoping Report, but set out general advice statement on sewerage strategy, surface water and sewer	The response is noted.

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		flooding, water quality, water supply, and water efficiency.	
Highways England	Strategic Road Network (SRN)	In relation to the SRN, Highways England noted that it is stated that development close to M1 J27 has the potential to encourage car use and increase congestion, particularly around Sherwood Business Park. We note that the impacts of growth on the highway network will be considered when deciding upon development allocations and policies will promote sustainable travel. At this stage, Highways England had no further comments.	Comments are noted.
Mr.J.Collins & Mr.B.Parker	Generally	The response refers through out to a specific site that has been submitted as part of the Strategic Housing and Employment Land Availability Assessment.	The Scoping Report sets out the baseline and SA Framework to addressing the sustainability of the Local Plan, policies and sites. In itself, it does not seek to consider aspects of individual sites.
Mr.J.Collins & Mr.B.Parker	Section 1  Page 13	Acknowledgement that the plan needs to consider all reasonable alternatives  Supports that key issues and problems that the Local Plan should address in the interests of sustainable development” and to the recognition of “a duty to reduce (and where possible eliminate) any negative impacts.”	Support acknowledged.  Support acknowledged.
Mr.J.Collins & Mr.B.Parker	Section 2  Page 14  Page 19  Page 23	Emphasises the importance of considering reasonable alternatives.  Support to a commitment to ‘Sustainable Development’. Draw particular attention to an obligation on the Council to “make effective use of land”.  Response supports Green Belt policy. Stress that the Local Plan should examine Green Belt Boundaries and where	Support acknowledged.  Comment acknowledged.  The Scoping Report includes the consideration of the Green Belt under

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		anomalies exist, address them. It sets out that the Council should make a clear commitment to do this in the Scoping Report.	the landscape objective. The Council will consider the requirements for any amendments to Green Belt boundaries or potentially the remove of proposed sites from the Green Belt as part of the Local Plan and its evidence base.
Mr.J.Collins & Mr.B.Parker	<p>Section 3 Page 26, para 2.21</p> <p>Page 27, Table 5</p> <p>Page 28/29, Table 5 &amp; Page 38/39 :</p> <p>Page 33, Table 5</p> <p>Page 35.</p>	<p>Particular support is given to the stated commitment: “It is considered that the Green Belt should be taken into account particularly as it is a significant factor in considering the reasonable alternatives and arriving at an appropriate strategy.”</p> <p>Key Messages “sufficient housing of a type and tenure to meet specific needs”, should include, in accordance with NPPF guidance, to provide a choice of sites both in location and size.</p> <p>The Council, in its Scoping Report and the Local Plan process, should <u>prioritise</u> development on brownfield sites before considering the release of green field sites.</p> <p>Key messages Support for emphasis on high quality multi functional green infrastructure and assessable cycle networks.</p> <p>Particular support for the Council’s stated commitment to “Ensure that new development has good access to facilities (but would prefer it to say ‘community facilities and services’) and alternative means of travel” (but would request the addition of “giving access to a choice of</p>	<p>Support acknowledged.</p> <p>Table 5 has been amended to include reference to a choice and mix of sites.</p> <p>The Scoping Report considers previously developed land in Objective 8, Natural Resources. The emphasis is giving priority to developing brownfield sites subject to the requirements of other policy aspects and the sustainability appraisal.</p> <p>Support acknowledge.</p> <p>Comments noted but it is not consider that the issues from the evidence base need to be further elaborated.</p>

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	<p>Page 37/38/39</p> <p>Page 45/46.</p>	<p>destinations for employment, shopping, health care and recreation).</p> <p>Support for the stated implications and resulting Issues arising from the need to “make effective use of land” and contamination issues. Amendment proposes to ‘identify sites or land where effective use is not being made and where changes to current planning policy are required to enable and encourage effective use.’</p> <p>We strongly support the stated commitment to “Conserve and enhance the natural environment and protect the Green Belt”. However, this should not be applied to small sections of currently designated Green Belt such as the former Beacon Farm site, which no longer fulfil the purposes for which Green Belt was designated. Suggested a number of amendments to key messages:</p> <ul style="list-style-type: none"> <li>• “Wherever possible and appropriate, these spaces should be made accessible to encourage an interaction with and respect for the natural environment”.</li> <li>• “Open up access to, enhance and utilize urban greenspace including that associated with potential development sites”.</li> <li>• “Regeneration is required”.</li> </ul>	<p>Comments noted but it is not consider that the issues from the evidence base need to be further elaborated.</p> <p>Comments noted but it is not consider that the issues from the evidence base need to be further elaborated.</p>
Mr.J.Collins & Mr.B.Parker	Consultation Question 3	The Council should commit to identifying ‘problem sites’. These are sites where significant environmental problems exist which could appropriately be addressed and rectified by targeted Local Plan policies and proposals.	Comments noted.
Mr.J.Collins & Mr.B.Parker	Section 4	<p>Para 4.2 Support the approach but requests the addition of environmental problems across the District to assist in developing alternatives.</p> <p>Various general comments are made regarding this section.</p>	<p>The paragraph reflects a broad approach which includes the environment, community and economy. No changes are proposed.</p> <p>It is considered that the baseline has</p>

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			been covered in detail in the in the Scoping Report and the SA Framework reflects the various aspects raised in terms of the policy and programmes and sustainability issues identified.
Mr.J.Collins & Mr.B.Parker	Consultation Question 5	Proposed that more prominence is given to the role of the Local Plan in improving the physical environment, which is further elaborated in the response.	Section 4 set out the baseline for Ashfield. Various aspects are identified including brownfield land. The matters raised are considered to be reflected in the objectives of the SA Scoping Report.
Mr.J.Collins & Mr.B.Parker	Consultation Question 5, 6 & 7	The economic, social and environmental issues identified are identified as relevant but the response raised the important of reviewing Green Belt boundaries, the identification and resolution of problem sites and a commitment by the Council to a 'Brownfield First' approach.	The SA Scoping Report reflects that the Green Belt should be taken into account as part of the sustainability appraisal. The SA Framework set out the basis of an assessment of the sustainability aspects of the Plan, including sites. The Local Plan will reflect, if necessary, the requirement to review Green Belt boundaries and consider the approach to problem sites. The SA will inform the Council's decision making on these aspects. However, any decision on these aspects has to be seen in the context of the provisions of the National Planning Policy Framework, Planning Practice Guidance, the evidence base, and policies and site allocations in the Local Plan.
Mr.J.Collins & Mr.B.Parker	Consultation Question 8	The response provides qualified support subject to the points already raised.	The Council response to the matters raised is set out above.

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Mr.J.Collins & Mr.B.Parker	Consultation Question 9	The response stresses that it has raised important issues with regard to 'problem sites', brownfield sites and the Green Belt which we trust will receive careful consideration in a report to the appropriate committee and that in the spirit of meaningful consultation, this will subsequently be made public together with the minutes arising.	The Council response to the matters raised is set out above.
Selston Parish Council	Consultation Question 2	<p>Should there be a section specifically highlighting the new information and approaches in this Scoping Report, to illustrate how this will affect the differences in the development of the new Local Plan?</p> <p>The need for a more specific outline of an approach to Green Belt, addressing the five purposes of Green Belt.</p> <p>Raises that Green Belt was considered against a detailed Analysis of Green Belt sites.</p> <p>Proposes that SA should set out the Full five purposes of the Green Belt</p> <p>Question over Best Agricultural Land and its relationship with Green Belt.</p>	<p>The Scoping Report reflects the review of current plan and programmes, identification of key issues and a revised sustainability Framework. The SA Framework has been updated to reflect this evidence but there is a significant cross over with the 2015 Scoping Report. Amendments to the 2019 include taking into account Green Belt and an additional Table 18: Consideration of Significance for Strategic Options and Policies to clarify this aspect of the SA approach.</p> <p>The Strategic Green Belt Review (SGBR) and its supporting appendices form part of the evidence base for the emerging Local Plan.</p> <p>Para 2.19 of the Scoping Report has been amended to set out in full the five purposes served by the Green belt set out in the NPPF paragraph 134.</p> <p>Best Agriculture is subject to grades according to the aspects set out in Table 14 on page 107 of the Sa Report, which relates to the quality of soils for growing crops. It is</p>

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			independent of the five purposes of the Green Belt.
Selston Parish Council	Consultation Question 5	<p>The main economic, social and environmental issues identified are relevant, but we would welcome further contextualisation for the Rurals/Selston Parish, which is different by nature from the rest of (largely urban) Ashfield. Concern regarding over development and the lack of supporting facilities and services.</p> <p>We would welcome it if the phrase on page 36 could be amended to "... particularly around Sherwood Business Park and impacting also on roads in Selston Parish" and if the same amendment could be made in all concluding paragraphs referring to development around Junction 27.</p>	<p>Additional text has been provide in Section 4 to sets out a summary of the characteristics of the villages of Selston, Jacksdale and Underwood with a reference to the information set out in the Neighbourhood Plan.</p> <p>The Issues for Ashfield has been amended to include additional text "Development close to the M1 motorway at Junction 27 has the potential to encourage car use and increase congestion, particularly around Sherwood Business Park and the roads to the west and east of Junction 27. " This reflects the potential to reflect additional traffic on both sides of the Junction.</p>
Ashfield District Council	Table 5 Key Message Sustainable Appraisal	The wording the draft report reflect the NPPF 2012.	Sustainable Development has been amended to update the wording to reflect the NPPD 2019 with its emphasis on objectives and the definition of sustainable appraisal.
Ashfield District Council	Paragraph 2.11	NPPF refers to objectives not dimensions.	Amended to update the wording to reflect the NPPD 2019.



