

Greater Nottingham  
Planning Partnership



# Preferred Approach: Sustainability Appraisal Report

## Appendix C: Consultation comments

September 2024



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# Introduction

This appendix summarises the consultation comments received on:

- The Scoping Report (July 2020), published alongside consultation on the Growth Options; and
- The Sustainability Appraisal of the Preferred Approach (December 2022).
- Consultation comments on the Strategic Distribution and Logistics Preferred Approach Sustainability Appraisal (September 2023)

This appendix provides a list of respondents who responded to both formal consultations.

It summarises the comments received followed by the Greater Nottingham councils' response.

In early 2022 there was also an informal consultation of local authority officers and the three statutory environmental bodies (Environment Agency, Historic England and Natural England) on broad policy options. This took place between the two formal consultations.

As no 'final' draft policies were consulted on during consultation on the Preferred Approach or on the Growth Options consultation, the assessment of policy options has informed the policies within the final publication Regulation 19 draft of the strategic plan.

## Lists of respondents during consultations on the Strategic Plan

The following respondents provided comments on the Scoping Report:

- Natural England;
- Historic England;
- Nottinghamshire County Council;
- Erewash Borough Council;
- Hallam Land Management (Freeths);
- The Crown Estate (Wood);
- A private individual; and
- Three private individuals in relation to area R05 South of Orston.

The following local authority officers and statutory environmental bodies provided comments during 'informal' consultation on reasonable alternative policy options.

- Parks and Green Spaces Manager, Broxtowe Borough Council
- Interim Housing Delivery Manager, Broxtowe Borough Council
- Conservation Officer, Nottingham City Council
- Biodiversity and Greenspace Policy Officer, Nottingham City Council
- Housing Officer, Nottingham City Council

- Economic Research Officer, Nottingham City Council
- Developer Contributions Practitioner, Nottinghamshire County Council
- Environmental Agency
- Conservation and Heritage Officer, Gedling Borough Council
- Head of Communities and Leisure, Gedling Borough Council
- Historic England
- Landscape Officer, Rushcliffe Borough Council
- Conservation Officer, Rushcliffe Borough Council
- Housing Officer, Rushcliffe Borough Council
- Economic Development Officer, Rushcliffe Borough Council
- Ecology and Sustainability Officer, Rushcliffe Borough Council
- Principal Planning Policy Officer, Rushcliffe Borough Council

The following respondents provided comments on the Sustainability Appraisal of the Preferred Approach (December 2022):

- Ashfield District Council
- Barratt David Wilson
- The Ceylon Tea Growers Association
- Environment Agency
- Mrs Hill & Mrs Plummer
- Historic England
- Hallam Land Management
- Harworth Group
- Hayden Lester
- Homes England and the Defence Infrastructure Organisation
- Herrick & Mattock
- Knightwood Developments Ltd
- Natural England
- Omnivale Pension Scheme and Peveril Securities
- Persimmon Homes
- Strawson Group Investments Ltd
- Trinity College

The following respondents provided comments on the Sustainability Appraisal of the Preferred Approach Strategic Distribution and Logistics Preferred Approach (September 2023)

- Environment Agency
- Historic England
- Knightwood Developments Ltd
- Peveril Securities Ltd & Omnivale Pension Scheme
- Richborough
- Wilson Bowden
- Local Resident

# Consultation comments on the Scoping Report (July 2020)

The consultation questions on the Scoping Report are in bold in this appendix. The responses from consultees are summarised beneath each question, followed by a response from the strategic plan making authorities.

## **1. Plans, policies and programmes**

- 1a. Have all plans, policies and programmes that affect the Greater Nottingham Strategic Plan been included in Section 3 and Appendix A of the Scoping Report?**
- 1b. Please provide any comments regarding the plans, policies and programmes included in the Scoping Report.**

### Comments from Natural England:-

In section 3, the review of relevant plans, policies and programmes, we consider that appropriate references have been included. We note that the government's 25-year Environment Plan – A Green Future, has been included and we would wish to ensure that the Strategy 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).

### Comments from Historic England:-

Historic England is pleased to see that 'Conserving and enhancing the historic environment' is one of the themes under which relevant plans, policies and programmes are identified from the review.

We welcome that Table 3 in Section 3 includes a relatively comprehensive list of plans, policies and programmes in relation to the historic environment. However, since the publication of the Scoping Report we note that the National Planning Policy Framework (NPPF) 2019 has been revised and Table 3 should therefore be amended to reference the latest NPPF 2021 version. We also suggest that any relevant National Policy Statements are included, in line with the advice of the NPPF at para. 35 d).

In terms of other national guidance, we suggest that reference is made to the following:-

- National Planning Practice Guidance: Historic Environment, 2019
- National Heritage Protection Plan Framework, Historic England, 2013
- Historic England Good Practice Advice Notes 1-3, 2015.

Historic England welcomes the key messages from the PPP Review, set out under the SA theme of 'Conserving and enhancing the historic environment' and we are

pleased to see that the conservation of non-designated heritage assets has been included here. However, we suggest that the first bullet point be amended to include historic landscape as well as townscape, and that the European Landscape Convention and the Nottinghamshire Historic Landscape Characterisation Project 1998-2000 both be added to the 'Source of message' column. We acknowledge the inclusion of these documents as being relevant to the theme of 'Conserving and enhancing the natural environment' but consider that historic landscapes should be specifically referenced under the historic environment theme.

We also suggest that opportunities to 'enhance or better reveal' the significance of Conservation Areas and the setting of heritage assets, are also included as key messages, in line with the guidance of the NPPF at para. 206.

We suggest that other local sources should be added to the historic environment theme including the Nottingham Heritage Strategy, the Gedling Borough Heritage Strategy (May 2018), the Heart of Nottingham Heritage Action Zone, the Derwent Valley Mills World Heritage Site Management Plan 2020-2025 and also the Interpretation Plan for the Derwent Valley Mills World Heritage Site, dated July 2011.

With regard to other themes relevant to the historic environment, we suggest that the National Model Design Code 2021 is referenced under the theme of "Achieving well designed places".

We would also like to stress that with regard to the theme of '*Meeting the challenge of Climate Change and flooding*', Historic England recognises that the historic environment sector has a role to play in tackling the climate crisis, through mitigation, adaptation and communication. Historic England has a wealth of technical guidance on this subject which can be accessed via the following link:

<https://historicengland.org.uk/content/docs/advice/technical-conservation-guidance-and-research-brochure-pdf>

#### Comments from Nottinghamshire County Council:-

Section 3 reviewing other relevant plans, policies and programmes, Table 3, under Promoting sustainable Transport should refer to the Rights of Way Management Plan 2018 - 2026 for Nottinghamshire <https://www.nottinghamshire.gov.uk/planning-and-environment/walking-cycling-and-rights-of-way/rights-of-way/rights-of-way-plan>

#### Appendix A

Nottinghamshire & Derbyshire Documents

Rights of Way Management Plan for Nottinghamshire 2018 – 2026

Nottinghamshire County council

<https://www.nottinghamshire.gov.uk/planning-and-environment/walking-cycling-and-rights-of-way/rights-of-way/rights-of-way-plan>

Description	Target	Implication for GN Strategic Plan	Implication for SA
<ul style="list-style-type: none"> <li>• An assessment of the extent to which local rights of way meet the present and likely future needs of the public</li> <li>• An assessment of the opportunities provided by local rights of way for exercise and other forms of open-air recreation and enjoyment of the authority's area</li> <li>• An assessment of the accessibility of local rights of way to blind and partially sighted people and others with mobility problems</li> <li>• A Statement of Action. This will outline strategic actions an Authority will propose to take for the management of rights of way, and for securing improvements to the network.</li> </ul>	<ul style="list-style-type: none"> <li>• To protect, maintain and seek to enhance the network for all lawful users</li> <li>• To improve access to the network for all by adopting the principle of the least restrictive option</li> <li>• To improve the safety and connectivity of the metalled road network with the rights of way network</li> <li>• To increase awareness of the network and the understanding of the wider benefits arising from its use, such as leading an active and healthy lifestyle, and making a positive contribution to the local economy</li> <li>• To provide a revised and updated definitive map and statement</li> <li>• To enhance and increase community involvement in managing and improving the network, where resources allow</li> </ul>	<p>It should take account of the objectives in the Management Plan</p>	<p>The SA Framework should take account of these needs</p>

In the light of growth and planning it should be noted that the Public Rights of Way Network is part of the full highways network and as such carries the same legislative duties and responsibilities as the adopted road network.

Public Rights of Way (RoW) are a material consideration in planning legislation and consideration should be given as to how they are or may be used in the wider strategic use of the area through a growth plan but also as a result of a specific planning application.

RoW are particularly useful in moving people between areas and form an important part of the sustainable transport network. However, the use in this way is often far in excess of the rural use that the path may currently have and consideration as to how it is managed, protected and improved is very important. RoWs have a particular status which can preclude certain users, for example cyclists have no right to use a footpath, and it can affect how RoW are treated or managed within a strategic plan. It is important to have an overview of the non-motorised use covering all the types of highway, to determine the best outcome for the objective. In all options it is recommended that contact is made with Rights of Way Team to discuss the strategic and specific issues for the RoW network at an early planning stage.

The Link to the Accessible Settlements Study for Greater Nottingham (2010) doesn't work on Page 48 of the Sustainability Appraisal Scoping Report Appendix A: Reviews of Plans, Policies and Programmes. A suggested alternative link is:

<https://www.nottinghamshireinsight.org.uk/Libraries/Document-Library/93834>

#### Comments from Hallam Land Management:-

The following documents affect the Greater Nottingham Strategic Plan and should be included in Section 3 and Appendix A of the Scoping Report:-

- The D2N2 LEP Strategic Economic Plan – Vision 2030 Strategy; and
- The East Midlands Councils East Midlands HS2 Growth Strategy.

#### **Greater Nottingham councils' response**

Comments from Historic England noted. The first bullet point for 'Conserving and enhancing the historic environment' will be amended to read "Conserve and enhance the historic landscape and townscape". The European Landscape Convention and the Nottinghamshire Historic Landscape Characterisation Project 1998-2000 will be added to the 'Source of message' column. Reference to the National Model Design Code 2021 will be referred to under 'Achieving well-designed places'. The Derwent Valley Mills World Heritage Site Management Plan 2020-2025 relates to Erewash Borough Council and as Erewash Borough Council is no longer part of the Greater Nottingham Strategic Plan it will not be added to the review of plans, policies and programmes.

The National Heritage Protection Plan Framework and the Historic England Good Practice Advice Notes 1-3 will be taken into account during the Local Plan process. The Historic England technical guidance on the climate change and flooding is noted.

Table 3 in Section 3 of the Scoping Report and Appendix A will be updated to refer to the following documents:-



- National Planning Policy Framework 2023;
- National Model Design Code 2021;
- Rights of Way Management Plan 2018 – 2026 for Nottinghamshire;
- The D2N2 LEP Strategic Economic Plan – Vision 2030 Strategy;
- The East Midlands Councils East Midlands HS2 Growth Strategy;
- Gedling Borough Heritage Strategy;
- Heart of Nottingham Heritage Action Zone; and
- Nottingham Heritage Strategy.

It is considered that there is sufficient consideration of Rights of Way through existing references to non-motorised routes including footpaths and cycle lanes.

The Link to the Accessible Settlements Study for Greater Nottingham (2010) will be updated.

## **2. Baseline data**

- 2a. Does Appendix B of the Scoping Report identify an appropriate and accurate range of relevant baseline data?**
- 2b. Please provide any comments regarding the baseline data used in the Scoping Report.**

### **Comments from Natural England:-**

In Section 4 which sets out the baseline, we acknowledge that our interests in the natural environment have been covered by this section.

### **Comments from Historic England:-**

Historic England notes that the baseline presents a fairly comprehensive background into the designated heritage assets of the Plan area. However, we recommend that non-designated heritage assets should also be referenced and these can be identified from HERs and local lists. We also note that the document does not reference the Derwent Valley Mills World Heritage Site part of which extends into Erewash District.

### **Comments from a private individual:-**

Question 2a = No.

Question 2b = As noted in the responses to the questions above [to the Growth Options consultation document], there is an inadequate analysis of existing community-level infrastructure.

## **Greater Nottingham councils' response**

Comments by Natural England noted.

Comments from Historic England noted. Reference to non-designated heritage assets will be included. The Derwent Valley Mills World Heritage Site falls within Erewash Borough Council and as Erewash Borough Council is no longer part of the Greater Nottingham Strategic Plan no reference will be made to the Derwent Valley Mills World Heritage Site.

Comments from a private individual – No change: It is considered that there is sufficient baseline data to assess existing community-level infrastructure. Further detailed assessment will be a matter for the site selection process.

### **3. Key sustainability issues**

**3a. Are the key sustainability issues identified in Section 5 of the Scoping Report correct for the council areas?**

**3b. Please identify any other sustainability issues that should be included and how these are likely to impact upon the Greater Nottingham Strategic Plan.**

#### Comments from Natural England:-

In section 5, key sustainability issues, we suggest that the table also includes the role of Greater Nottingham Plan in ensuring that a net gain in biodiversity is achieved which strengthens ecological networks and works towards the Nature Recovery Network at a strategic level. The Plan could potentially be a major influence on this topic as it will be a key document in achieving enhancements to biodiversity.

#### Comments from Historic England:-

Historic England welcomes the Key Sustainability Issue which acknowledges that 'there are a large number of heritage assets which have historic or architectural significance and should be conserved or enhanced'. However, we recommend deleting the phrase 'where possible', to ensure compliance with the NPPF, which notes that heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance (para.189).

Although the Baseline at Section 4 provides information on heritage assets included on the Heritage at Risk Register, we are concerned that Scoping Report omits to mention Heritage at Risk as a key sustainability issue.

In addition, no mention is made of the Derwent Valley Mills World Heritage Site, and any sustainability issues which may reflect the key aims and objectives of the Derwent Valley Mills World Heritage Site Management Plan 2020-2025.

Historic England also considers that other sustainability issues should be included in relation to the historic environment, such as:

- widening access to, and understanding of, heritage for a diverse and inclusive audience;

- improving the energy efficiency of historic buildings and taking into account their embodied carbon value when considering the retention and re-use, versus their replacement; the effect of traffic congestion, air quality and/or noise pollution on the historic environment;
- delivering heritage-led regeneration and supporting the vitality and viability of town centres;
- promoting heritage-based tourism; and
- encouraging traditional building and craft skills, though using the historic environment as an educational resource to help fill skills gaps.

Comments from a private individual:-

Question 3a = No.

Question 3b = As noted in the responses to the questions above [to the Growth Options consultation document], there is an inadequate analysis of existing community-level infrastructure.

Comments from Hallam Land Management:-

Response to Question 3b. The following sustainability issues should be included:-

- There is a need to ensure sufficient land is identified to meet the housing needs of the strategic area over the plan period;
- There is a need to ensure the strategy for housing growth aligns with the strategy for employment growth and to have regards to co-locating jobs and homes as part of strategic development proposals; and
- To capitalise on key economic growth drivers, including East Midlands Airport, access to high quality transport connections and access to an available workforce.

**Greater Nottingham councils' response**

Comments by Natural England noted. The table will be amended to reflect the net gain in biodiversity.

Comments by Historic England noted. The word “where possible” will be deleted and reference will be made to the Heritage at Risk, access to heritage, improving the energy efficiency of historic buildings, heritage-led regeneration, promoting heritage-based tourism and encouraging traditional building and craft skills. The Derwent Valley Mills World Heritage Site falls within Erewash Borough Council and as Erewash Borough Council is no longer part of the Greater Nottingham Strategic Plan no reference will be made to the Derwent Valley Mills World Heritage Site.

Comments by a private individual – No change: It is considered that there is sufficient analysis of existing community-level infrastructure. Section 5 refers to ensuring housing is developed in appropriate locations which would include an assessment of existing infrastructure.

Comments from Hallam Land – No change: There are existing references in Section 5 to ensuring the appropriate number of homes are delivered in appropriate locations and ensuring that sites are located in areas well served by public transport and that benefit from a range of services and employment.

#### **4. SA Framework – SA objectives**

- 4a. Do the SA objectives in the SA Framework in Section 6 of the Scoping Report adequately cover the key sustainability issues facing the council areas?**
- 4b. Please identify how the objectives should be amended, bearing in mind that the number of objectives should be manageable.**

##### **Comments from Natural England:-**

In section 6, the sustainability framework, we are pleased to note that the enhancement of green infrastructure has been included however we suggest that it is important for GI to also be linked to the promotion of healthy and safe communities.

##### **Comments from Historic England:-**

Historic England welcomes the objectives listed at 15: “Built and Historic Environment”. We are pleased to see the inclusion of non-designated heritage assets and also the inclusion for the provision of better opportunities for people to enjoy culture and heritage. However, we consider that it would be simpler for assessment purposes to split the two objectives listed under “Built and Historic Environment” into two: one relating to specifically to the historic environment and one relating to design matters/townscape character. We also consider that the historic environment could be brought into other SA objectives; for example, within objective 4. Shopping Centres, 10. Energy and Climate Change and 14: Landscape.

In relation to undertaking the assessment, Historic England notes that Table 6: SA Scoring includes the option to score policies or site allocations as having “Uncertain or no impact - ? or 0”. With regard to the historic environment, Historic England considers that the likely effects should be known, as this will be informed by appropriate evidence and assessment and, therefore, there will be no need to state ‘uncertain effects’ within the scoring.

##### **Comments from Hallam Land Management:-**

Response to Question 4b (note response related to Question 5b so has been moved accordingly).

#### **Greater Nottingham councils’ response**

Comments by Natural England noted. No change will be made to the SA objectives – there are SA objectives on health and well being, community safety and natural environment, biodiversity, green and blue infrastructure. However criteria questions for the SA objective on health and well being will be amended to refer to accessible green and blue infrastructure.

Comments by Historic England – no change to the SA objectives and to the SA scoring. It is considered that there is no need for a separate objective on design

matters/townscape character. The other SA objectives will not be amended to refer to historic environment. Regarding the SA scoring, it is considered if there is lack of information for the SA assessment then the score would be unknown thus uncertain.

## **5. SA Framework 1 – Policy Criteria**

**5a. Are the policy criteria questions in the SA Framework 1 in Section 6 of the Scoping Report appropriate?**

**5b. Please identify how the policy criteria questions should be amended.**

### **Comments from Historic England**

Whilst we are supportive of the policy criteria questions, we suggest adding some further decision-making criteria to reflect wider sustainability issues regarding the historic environment:

- *“Will it contribute to the better management of heritage assets and tackle heritage at risk?”*
- *“Will it integrate climate change mitigation and adaptation measures into the historic environment sensitively?”*
- *“Will it improve the energy efficiency of historic buildings?”*
- *“Will it re-use/retain historic buildings or fabric?”*
- *“Will it provide for increased understanding and interpretation of the historic environment?”*
- *“Will it foster heritage-led regeneration?”*
- *Will it promote heritage based sustainable tourism?”*
- *“Will it help to reduce the number of vacant buildings through adaptive re-use?”*

### **Comments from Hallam Land Management:-**

The SA objectives should be amended to include the following:-

- (under the policy criteria questions for Housing) Is the proposed site deliverable?; and
- (under the policy criteria questions for Landscape) Does it limit harm to landscape character and visual amenity?

### **Greater Nottingham councils’ response**

Comments from Historic England: the following additional questions will be added to SA objective 15 Built and Historic Environment:-

- Will it contribute to the better management of heritage assets and tackle heritage at risk?
- Will it foster heritage-led regeneration?
- Will it promote heritage based sustainable tourism?

The suggested questions relating to the climate change mitigation and adaptation measures into the historic environment sensitively and energy efficiency of historic buildings will not be included because they are already covered in SA objective 10 Energy and Climate Change. However one of the policy criteria questions for SA objective 10 Energy and Climate Change will be amended to refer to existing or historic building i.e. “Will it improve energy efficiency of new and existing or historic buildings”.

It is considered that the suggested questions relating to the re-use/retain historic buildings or fabric and the number of vacant buildings through adaptive re-use are covered by the new additional question “Will it contribute to the better management of heritage assets and tackle heritage at risk?”.

It is considered that the suggested question relating to the increased understanding and interpretation of the historic environment is covered by existing policy criteria question “Will it provide better opportunities for people to access and understand local heritage and to participate in cultural activities?”.

Comments from Hallam Land: The policy criteria questions will be used for assessing reasonable alternative options for policies and proposed policies against the SA objectives. It is considered that the existing questions are sufficient in respect of landscape. An assessment of deliverability will form part of the site specific assessments for the site selection process and is not appropriate within the SA.

SA objective 1. Housing = no change.

SA objective 14. Landscape = no change.

## **6. SA Framework 2 – Site Allocation Criteria**

**6a. Are the site allocation criteria questions in the SA Framework 2 in Section 6 of the Scoping Report appropriate?**

**6b. Please identify how the site allocation criteria questions should be amended.**

Comments from Historic England:-

Whilst we are supportive of the site allocation criteria questions, it is considered that specific reference to Heritage at Risk should be included here and again we suggest adding some further decision-making criteria to reflect wider sustainability issues regarding the historic environment:

- *“Will it contribute to the better management of heritage assets and tackle heritage at risk?”*
- *“Will it protect and conserve the Outstanding Universal Value of the DVMWHS?”*
- *“Will it integrate climate change mitigation and adaptation measures into the historic environment sensitively?”*

- *“Will it improve the energy efficiency of historic buildings?”*
- *“Will it re-use/retain historic buildings or fabric?”*
- *“Will it provide for increased understanding and interpretation of the historic environment?”*
- *“Will it alter the hydrological conditions of water-dependent heritage assets, including organic remains?”*

#### Comments from Hallam Land Management:-

Response to Question 6a + 6b). The site allocation criteria questions relating to Housing proposed in the SA Framework 2 are currently not appropriate and should be amended. The site allocation criteria is a key tool for assessing and comparing all the reasonable alternatives for the Strategic Plan and should ensure that sustainable development proposals score highly. The National Planning Policy Framework 2021 and Government policy recognises and supports the delivery of new settlements and garden villages as a key component of delivering sustainable housing growth. It is thus surprising that for housing proposals, only sites that are in or adjoining the built up area or a key settlement would be able to score major positive. The criteria therefore require amending to include reference to new settlements that adhere to garden village principles being able to score major positives.

Within the SA Framework 2 there are a number of either distance or time related criteria to existing services and facilities. New settlements and large scale urban extensions are able to deliver new services and facilities to ensure future residents have convenient access to these; it is therefore necessary for these distance and time criteria to have regard to the delivery of proposed new services and facilities as part of a strategic proposal, as well as any existing ones.

There is a need to provide criteria under the energy and climate change section of the SA Framework 2 to enable meaningful comparisons to be made when assessing reasonable alternatives.

The criteria regarding sterilising mineral resources under the section natural resources and waste management of the SA Framework 2 requires updating so that it only relates to mineral reserves that can be viably extracted.

#### Comment from The Crown Estate

The site allocation criteria for each objective should be amended to ensure that they all include thresholds or indicators, where appropriate, that will be used to assess significance on a consistent basis across strategic site options. So for example, for objective one on ‘housing’ the table should indicate how many new homes would justify a major positive score as opposed to a minor positive score. The table includes an example under local labour agreements at objective 2, where a distinction is made between agreements on projects over 50 jobs (significant positive) and under 50 jobs (minor positive).

The approach to scoring for objective 2 looks similar to objective 3 – again it is suggested that thresholds should be developed for these and other objectives, as



described above. Objective 13 on the natural environment could be based on proximity to designated sites.

The criteria for a major negative effect currently include 'results in partial or complete loss of biodiversity.' This will be difficult to assess on a consistent basis across sites.

### **Greater Nottingham councils' response**

Comments from Historic England: no change to the criteria questions.

The suggested question relating to Derwent Valley Mills World Heritage Site (i.e. "DVMWHS") will not be included because Derwent Valley Mills World Heritage Site falls within Erewash Borough Council and as Erewash Borough Council is no longer part of the Greater Nottingham Strategic Plan no reference will be made to the Derwent Valley Mills World Heritage Site.

The suggested questions relating to the climate change mitigation and adaptation measures into the historic environment sensitively and energy efficiency of historic buildings will not be included because they are already covered in SA objective 10 Energy and Climate Change. However additional site criteria question will be added for SA objective 10 Energy and Climate Change to include "Will it improve the energy efficiency of existing or historic buildings?"

It is considered that the suggested questions relating the better management of heritage assets and tackle heritage at risk, re-use/retain historic buildings or fabric, increased understanding and interpretation of the historic environment and hydrological conditions of water-dependent heritage assets, including organic remains is already covered by existing site criteria question "Will it lead to the adaptive reuse of a heritage asset?".

Comments from Hallam Land: The ability for new settlements or garden villages to deliver new services, facilities and infrastructure would be matters for the site selection process and should not be pre-determined by the SA. The site selection process will be able to identify how new settlements or garden villages can be made sustainable.

Additional questions from SA Framework 1 will be added under the Energy and Climate Change section of SA Framework 2 to allow for meaningful comparisons:-

#### Existing questions

- Will the site include provision of renewable technology?
- Is the site for a specific renewable energy?
- Is the site for the development of community energy systems?

#### Additional questions:

- Will the site ensure that buildings are able to deal with future changes in climate?
- Will the site help people adapt to climate change?

- Will the site maintain or increase the provision of ecosystem services on which local people depend, including water, food, and materials, now and under future climates?

SA Framework 2 will be updated to refer only to mineral reserves that can be viably extracted.

Comments from Crown Estate: SA Objective 1: Housing has been amended to include a strategic threshold and additional question relating to housing need. This allows for a distinction between a major positive and a minor positive.

Objective 2: Employment and Jobs and Objective 3: Economic Structure and Innovation has been amended to include a strategic threshold.

Objective 13: Natural Environment, Biodiversity, Green and Blue Infrastructure = no change. The objective is set to protect the natural environment, biodiversity, green and blue infrastructure. One of the criteria questions for Objective 5 Health and Well Being has been amended to refer to the distance and proximity to accessible green and blue infrastructure. It is considered the existing criteria questions for Objective 13 allow for environmental, biodiversity and green and blue infrastructure gains and losses to be compared between sites on a consistent basis.

## **7. SEA Directive requirements**

**7a. Does the SA Framework meet the requirements of the SEA Directive?**

**7b. Please identify why the SA Framework does not meet the requirements of the SEA Directive and how this can be rectified.**

No comments.

### **Greater Nottingham councils' response**

Noted.

## **8. Other comments**

**8a. Do you have any other comments to make about the Scoping Report?**

### **Comments from Natural England:-**

We are pleased to note that paragraph 2.18 includes reference to the possible potential Sherwood Forest Special Protection Area (SPA) and references Natural England's advice to follow a precautionary approach for these identified areas.

### **Comments from Historic England:-**

To assist with your preparation of the SA in relation to the assessment of effects of the Greater Nottingham Strategic Plan upon the historic environment we refer you to

Historic England's Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment, 2016 (HEAN8):

[Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment](#)

We also note that at present the Scoping Report does not contain any monitoring objectives and we therefore suggest that these be included in the next iteration of the SA.

Comments from Erewash Borough Council:-

Erewash Borough Council notes that the SA Framework shared with the three environmental statutory consultees (Environment Agency, Natural England and Historic England) has subsequently been amended by the Greater Nottingham Planning Partnership (GNPP) councils. As a result, the version which appears at Table 5 in the GNPP's published SA Scoping Report (July 2020) differs from the Framework used by Erewash Borough Council in its own Draft SA published back in January 2020. This divergence, both in its approach and content, demonstrates that the GNPP's SA is no longer compatible with the version being produced by Erewash Borough Council.

Comments from a private individual:-

As noted in the responses to the questions above [to the Growth Options consultation document], there is an inadequate analysis of existing community-level infrastructure.

Comments from three private individuals:-

The comments from three private individuals were in relation to area R05 South of Orston for the following SA objectives:-

SA objective 8 Transport

Question	Comments
Will it use and enhance existing transport infrastructure?	Any use of the railway is impractical, as it would require major enhancements to the existing Orston & Elton station to cope with the additional passenger load and neither of the terminating stations, Grantham and Nottingham, have the capacity to accommodate the additional passenger load.
Will it help to develop a transport network that minimise the impact on the environment?	No, as the A52 Elton junction would require extensive work to accommodate private car use from the proposed development, which would have a large, detrimental environmental impact
Will it reduce journeys undertaken by private car by encouraging alternative modes of transport?	No, The lack of public transport and lack of local facilities will increase the number journeys undertaken by private car

Question	Comments
Will it increase accessibility to services and facilities?	No, as there are no jobs or services within easy reach by foot or public transport.

#### SA objective 10 Energy and Climate Change

Question	Comments
Will it result in additional energy use?	Yes, as it will increase journeys by private car for travel to employment, amenities and leisure.
Will it support the generation and use of renewable energy?	No, as it will involve to removal of a renewable energy source, i.e. a solar farm.
Will it reduce greenhouse gas emissions or promote sequestration of carbon?	No, as it will increase private car travel and destroy a renewable energy source.
Will it increase the resilience of biodiversity to climate change?	No, as it will involve the destruction of a SSSI and at least 2 Priority Woodland Habitats, defined under Natural Environment and Rural Communities Act (2006) Section 41 habitats of principal importance. In addition, it will destroy other important habitats - hedgerows, ponds and vegetation - for wildlife, including birds, insects and mammals.
Will it maintain or increase the provision of ecosystem services on which local people depend, including water, food, and materials, now and under future climates?	No, because it will destroy prime arable land.

#### SA objective 11 Pollution and Air Quality

Question	Comments
Will it increase levels of air, noise and other types of pollution?	Yes: it will increase air pollution through the use of private cars and will introduce significant noise pollution in an area which is currently a very tranquil countryside setting and will introduce light pollution to an area that is currently relatively dark.

#### SA objective 12 Flooding and Water Quality

Question	Comments
Will it minimise or mitigate flood risk?	No, it will increase the risk of flood, due to the run-off from hard surfaced areas within the development.
Will it reduce existing levels of flood risk?	No, it will increase the risk of flood, due to the run-off from hard surfaced areas within the development.
Will it improve water quality?	No, additional run-off will inevitably enter the River Smite, adding to the pollution burden.

Question	Comments
Will it improve or help to promote water efficiency?	It is unlikely to improve or promote water efficiency: new developments do not have to include water efficiency measures such as grey water/rainwater collection and re-use and without legislation, Developers do not spend money on measures they are not forced to adopt.
Will it cause a deterioration of Water Framework Directive (WFD) status or potential of onsite watercourses?	It is likely to cause a deterioration of the WFD, due to the increased pollution load created by surface water run-off from the proposed development, both during the construction phase and the subsequent habitation phase.

### **Greater Nottingham councils' response**

Natural England = noted.

Historic England = noted.

Erewash = noted.

A private individual = Comments relating to community-level infrastructure are covered above. It is considered there is sufficient consideration to existing service and infrastructure provision within communities.

Three private individuals = assessments on reasonable alternative sites will be undertaken and the findings will be reported in the Preferred Approach Sustainability Appraisal Report. Regarding the Orston Strategic Site (R05.1PA), this site was not carried forward for assessment in the Sustainability Appraisal as it is not located adjacent to the main urban area or key settlement. As a stand-alone new settlement, it would not comply with the strategic distribution of development as set out in the Preferred Approach. The site will be kept under review and assessed if the strategic distribution of development includes stand-alone settlements.

# Consultation comments on Reasonable Alternative Policy Options (February 2022)

As part of the Sustainability Appraisal process, the Councils have to consider reasonable alternatives for policy options. The Councils therefore scoped potential options and alternative approaches for the Strategic Plan based on a review of the existing Core Strategies and the issues raised as part of the Greater Nottingham Growth Options consultation undertaken in 2020 and 2021.

Where appropriate, each policy approach includes up to four options. For some of them there may be different policy options that do not reflect the list below: -

- Include no policy in the Greater Nottingham Strategic Plan
- Continue with existing Core Strategy policy in the Greater Nottingham Strategic Plan
- Continue with existing Core Strategy policy with amendments in the Greater Nottingham Strategic Plan
- Use alternative approach

A draft assessment of the options for each different topic was undertaken. Each option was assessed against the SA objectives which include policy criteria questions. The SA score against each SA objective was given to indicate whether the effect is likely to be positive, negative, no impact or uncertain.

In February 2022, the plan making authorities consulted the three statutory environmental bodies (Environment Agency, historic England and Natural England) and local authority officers on the draft assessment of these policy options.

They were split into 8 policy areas:

- Housing Issues
- Green Belt
- Regeneration and Office Development
- Historic Environment
- Local Services and Healthy Lifestyles
- Blue-Green Infrastructure and biodiversity
- Infrastructure
- Waste

Within these policy areas some have a number of sub-areas or topics, for example housing has seven including the housing requirement, affordable housing and gypsies, travellers and travelling show people. Although many only have one.

All policy areas were sent to the statutory bodies. Only pertinent policy areas were sent to individual officers within the local authorities, for example the draft assessment of Blue-Green Infrastructure and biodiversity policy options were sent to ecologists and open space officers.

Responses received are organised and summarised by policy area, see below. Responses were not received for all topic areas.

## **Housing Policy Options**

### **Topic: Housing Requirement**

#### **OPTIONS FOR APPRAISAL:**

A = Use standard method as a minimum for housing requirement. (NB this is medium growth option and may require land release from the Green Belt).

B = Reduce the amount of housing required to take account of the existing Green Belt and by considering other factors such as demographic trends and market signals. (NB this is low growth option and may not require releasing any land from the Green Belt).

C = Increase the amount of housing required by using standard method as a minimum for housing requirement plus additional buffer and by considering other factors such as future demographic trends and market signals. (NB this is high growth option and may require land release from the Green Belt).

#### **Comments**

##### **Environment Agency**

Option C would lead to an increased amount of housing, which would mean there is more likelihood of development impacting on environmental matters, such as being located in areas of flood risk. We note that mitigation is proposed for SA Objectives 12 (flood risk and water quality) and 13 (natural environment) by providing updated policies to ensure development is suitably located and any potential impacts are not causing environmental harm. Regarding SA 10 (Energy and Climate Change), we would highlight that where high growth is proposed then water efficiency measures would need to be incorporated.

SA Objective 12 – we support the mitigation proposing a new policy to ensure development is suitably located outside of the flood zones, and development doesn't impact upon water quality.

SA Objective 13 – We support the mitigation proposing new policy to protect biodiversity and green/blue infrastructure.

##### **Historic England**

Objective 15 (Build and Historic Environment) – Suggest that mitigation could include opportunities for enhancement in line with NPPF requirements (conserve, sustain, or enhance).

## **Topic: Growth Strategies**

### **OPTIONS FOR APPRAISAL:**

A = Retain the scope of the policy established under Policy 2 of the Aligned Core Strategies and Policy 3 of Rushcliffe Core Strategy which focuses development within and adjoining the Nottingham main built up area with emphasis on re-using previously developed land and increasing building densities.

B = Focus on expanding existing settlements or developing new settlements within or beyond the Green Belt.

C = Prioritise development that can protect and enhance the strategic river corridors, canal corridors, the Greenwood Community Forest and urban fringe areas, and/or prioritise other blue-green Infrastructure assets.

D = Location of new development should have regard to existing and proposed transport infrastructure

### **Comments**

#### **Environment Agency**

Option C – The Environment Agency would support any development or policies that protect and enhance these key corridors. Development that would protect and enhance key rivers would almost inevitably be located in fluvial flood zones and policies would need to ensure that development such as housing/offices etc. are located outside of these flood zones to allow an enhanced green space or buffer zone next to the river to ensure suitable biodiversity and environmental enhancements. As noted for SA12 mitigation, a suitable policy would be required. For SA13, we agree for A, B and D a suitable policy would be required to provide the protection and enhancement of biodiversity etc. C would ensure this is provided as a given and potentially might give stronger requirements for developers to follow alongside a suitably worded policy.

#### **Historic England**

The commentary here (and in similar text throughout the seven documents) refers only to listed buildings, conservation areas and locally listed buildings. It is not clear how registered Parks and Gardens, Scheduled Monuments and NPPF footnote 68 archaeology may be addressed in the SA and plan. The Plan will need to ensure policies meet NPPF requirements for the historic environment. Mitigation could include opportunities for enhancement.



## **Topic: Affordable Housing**

### **OPTIONS FOR APPRAISAL:**

A – retain the scope of the policy established under existing Policy 8 of the Aligned Core Strategies for affordable housing:

- Do not set tenure percentages in policy and defer this to Part 2 Local Plans.
- Include a broad overall % target based on either housing sub market area or a local authority level.

B – retain the scope of the policy established under existing Policy 8 of Rushcliffe Core Strategy for affordable housing: -

- Set tenure percentages in policy.
- Set affordable housing levels at a housing sub market area.

C – include a policy to set an individual affordable housing percentage target for each of the plan authorities.

### **Comment**

#### **Broxtowe – Housing Delivery Manager**

Support Option B – Retain the scope of the policy established under existing Policy 8 of Rushcliffe Core Strategy for affordable housing

#### **Rushcliffe Borough Council – Principal Housing Officer**

Objective 1 (Housing) - Why wouldn't option C provide certainty? What is the difference between B & C? In respect of A, deferring to Part 2 Local Plans would produce a policy vacuum.

## **Topic: Housing Size, Types and Tenure**

### **OPTIONS FOR APPRAISAL:**

A – retain the scope of the policy established under existing Policy 8 of the Aligned Core Strategies and Policy 8 of Rushcliffe Core Strategy but: -

- Do not have prescriptive % requirements for open market house sizes and types

B – retain the scope of the policy established under Policy 8 of the Aligned Core Strategies and Policy 8 of Rushcliffe Core Strategy and: -

- Include prescriptive % house size and type requirements for both affordable housing and open market housing.

### **Comment**

#### **Broxtowe – Housing Delivery Manager**

Support Option B – Retain the scope of the policy established under existing Policy 8 of Rushcliffe Core Strategy for affordable housing

There is no information regarding energy efficiency of new housing / affordable housing. Is this being considered elsewhere?

#### **Nottingham City Council – Housing Officer**

Option B - Does Option B offer officer discretion to alter the mix of affordable based on emerging evidence from the housing register that will be more up-to-date and responsive than the HNA?

#### **Rushcliffe Borough Council – Principal Housing Officer**

Option B would be preferred, however is a realistic aim to set size and type requirements for market housing.

## **Topic: Needs of Different Groups**

### **OPTIONS FOR APPRAISAL:**

A – retain the scope of the policy established under existing Policy 8 of the Aligned Core Strategies and Policy 8 of Rushcliffe Core Strategy and defer requirements for wheelchair accessible and adaptable homes to Part 2 Local Plans.

B – amend the policy to include a requirement for wheelchair accessible and adaptable homes

### **Comment**

#### **Broxtowe – Housing Delivery Manager**

Support Option B – Amend the policy to include a requirement for wheelchair accessible and adaptable homes.

When considering the needs of ‘different groups’, is the proposal ‘accessible’ or ‘adaptable’ standards or both? They are significantly different.

#### **Nottingham City Council – Housing Officer**

Option B – need to be clear what these standards are, even M4(3) often provide properties with a bath, we will need to specify level access showers if that is required (and would be preferred)

#### **Rushcliffe Borough Council – Principal Housing Officer**

Objective 1 (Housing) – Agree with commentary. Very important given the current demands for wheelchair housing.

**Topic: Space Standards**

**OPTIONS FOR APPRAISAL:**

A – do not include policy requirement for nationally described space standard and defer to Part 2 Local Plans.

B – include policy requirement for nationally described space standard

**Comment**

**Broxtowe – Housing Delivery Manager**

Support Option B – include policy requirement for nationally described space standard.

**Nottingham City Council – Housing Officer**

Option B – Has the viability impact of this been considered, will it reduce the number of affordable homes delivered as a result?

**Rushcliffe Borough Council – Principal Housing Officer**

Objective 1 (Housing) – Agree with commentary. Unsure whether unfit is the right term however.

## **Topic: Gypsies , Travellers and Travelling Showpeople**

### **OPTIONS FOR APPRAISAL:**

A – do not include a policy and defer to Part 2 Local Plans.

B – retain the scope of the policy established under Policy 9 of the Aligned Core Strategies and Policy 9 of Rushcliffe Core Strategy which include pitch requirement, defer any allocation of sites to Part 2 Local Plans and include a criteria based policy approach for identification of sites through planning applications.

### **Comment**

#### **Broxtowe – Housing Delivery Manager**

Support Option B – retain the scope of the policy established under Policy 9 of the Aligned Core Strategies and Policy 9 of Rushcliffe Core Strategy which include pitch requirement, defer any allocation of sites to Part 2 Local Plans and include a criteria based policy approach for identification of sites through planning applications.

#### **Historic England**

Note that it will be for the Plan to explore potential site allocations as part of the plan process. Mitigation could potentially include opportunities for enhancement of the historic environment.

#### **Nottingham City Council – Housing Officer**

Does the City have a need for boat moorings, and if so does this need to be reflected in this section?

Objective 5 (Health and Well-Being) - If Option B scores positively against Objective 6 due to access to community and educational facilities, it should also score well against objective 5 for similar reasons (access to health services and recreational open space).

#### **Rushcliffe Borough Council – Principal Housing Officer**

Objective 1 (Housing) – Agree.

## **Green Belt Policy Options**

### **TOPIC: Nottingham-Derby Green Belt**

#### **OPTIONS FOR APPRAISAL:**

A = retain the scope of the policy established under existing Policy 3 of the Aligned Core Strategies and Policy 4 of Rushcliffe Core Strategy regarding the principle of the Green Belt (including the safeguarded land).

B = retain the scope of the policy established under existing Policy 3 of the Aligned Core Strategies and Policy 4 of Rushcliffe Core Strategy regarding the principle of the Green Belt (including the safeguarded land) and review the Green Belt boundaries to meet requirements (for example strategic site allocations) and designate safeguarded land.

#### **Comment**

##### Environment Agency

The Environment Agency does not have a remit on the designation of the green belt. We do note that one of the options appears to propose larger strategic sites in areas currently designated as green belt land and that through SA12 this would have a positive impact from a flood risk perspective as development would be situated outside of the fluvial flood zones. From an Environment Agency perspective, we would support development being steered away from flood zones 2 and 3, however we understand the council has to understand and determine the impacts of proposed plans on the green belt.

##### Historic England

Objective 14 (Landscape) – If option B is pursued and agreed as part of the plan process we recommend the use of historic landscape characterisation (HLC) as part of the evidence base for any Green Belt review and particularly with regard to any concepts for sites that may come forward as the Plan progresses. We recommend this is undertaken in conjunction with HEAN 3 site assessment work.

Objective 15 (Built and Historic Environment) - We recommend the five step site assessment work as set out in HEAN 3.

## **Topic: Offsetting Losses of Green Belt**

### **OPTIONS FOR APPRAISAL:**

A = include a policy to include compensatory improvements to the environmental quality and accessibility of remaining Green Belt land where Green Belt land has been lost.

#### Historic England

In addition to information set out for this topic, we would advise that loss of heritage assets should be avoided since heritage loss is not compensatory.

## **Regeneration and Office Development Policy Options**

### **TOPIC: Regeneration and Regeneration Priorities**

#### **OPTIONS FOR APPRAISAL:**

A = Do not include a policy to identify regeneration priority areas.

B = Retain the scope of the policy established under existing Policy 7 of the Aligned Core Strategies and Policy 7 of Rushcliffe Core Strategy which promotes urban concentration with regeneration and identifies priority areas for regeneration.

C = Retain the scope of the policy established under existing Policy 7 of the Aligned Core Strategies and Policy 7 of Rushcliffe Core Strategy and prioritise development in the City Centre, Town and local centres and in areas where levels of deprivation are higher than the Plan Area average or Borough wide/City wide average only.

D = Retain the scope of the policy established under existing Policy 7 of the Aligned Core Strategies and Policy 7 of Rushcliffe Core Strategy and prioritise development in other sustainable locations such as in the vicinity of Toton and at Ratcliffe-on-Soar Power Station.

#### **Comments**

##### **Environment Agency**

This document highlights the options for regeneration and location of office space. The impacts are unknown for SA12 and in mitigation a suitable policy would be required to ensure no detrimental impact on flood risk and water quality which we would support. SA13 also highlights the opportunities regeneration can offer in the creation of new environmental enhancements. Suitable policies would need to be developed to ensure matters such as BNG are provided alongside other wider environmental enhancements. Assessment 2 relates to the location of office space and offers 4 different scenarios. For SA12 and SA13 as the impacts are unknown, there is a requirement for suitable worded policies to ensure suitable protection and enhancement from a flood risk and biodiversity perspective, which we would also support.

##### **Historic England**

We suggest that mitigation could include opportunities for enhancement in line with NPPF requirements (conserve, sustain, or enhance).

##### **Nottingham City – Economic Research Officer**

The scoring seems appropriate.

##### **Rushcliffe Borough Council – Economic Development**



Objective 2 (Employment and Jobs) – Agree with commentary, as long as this still means that ROS is acknowledged as the most significant opportunity area for this in Rushcliffe and probably the wider area and that plans are in place to support this – infrastructure etc. or is the assumption this will be separate to the local plan due to resources of EMF and EMDC?

Objective 4 (Shopping Centres) – Mitigation should refer to ensuring the use types of new developments in town centres or town centres more broadly better reflects the changing nature of our town centres e.g. leisure.

Also consider the impact of any new development on the existing uses e.g. capacity of our town centres to grow and the market/consumer that exists to support that...or not.

Also including/retaining open space in town centres.

Objective 8 (Transport) – ensure that infrastructure needs of RoS are in place to support delivery – appreciate this is partly the responsibility of the developers/businesses etc. but as we know this does not mean links with smaller towns etc. will be there.

## **TOPIC: Office Development**

### **OPTIONS FOR APPRAISAL:**

A = Retain the scope of the policy established under existing Policy 4 of the Aligned Core Strategies and Policy 5 of Rushcliffe Core Strategy which focus office development in Nottingham City Centre including Regeneration Zones, Sustainable Urban Extensions, at Toton and at the Enterprise Zone.

B = Retain the scope of the policy established under existing Policy 4 of the Aligned Core Strategies and Policy 5 of Rushcliffe Core Strategy and amend policy to focus office development in Nottingham City Centre only.

C = Retain the scope of the policy established under existing Policy 4 of the Aligned Core Strategies and Policy 5 of Rushcliffe Core Strategy and amend policy to focus office development at Sustainable Urban Extensions only.

D = Retain the scope of the policy established under existing Policy 4 of the Aligned Core Strategies and Policy 5 of Rushcliffe Core Strategy and amend policy to focus office development at Toton only or at Enterprise Zone only. This is combined options

### **Comments**

#### **Environment Agency**

This document highlights the options for regeneration and location of office space. The impacts are unknown for SA12 and in mitigation a suitable policy would be required to ensure no detrimental impact on flood risk and water quality which we would support. SA13 also highlights the opportunities regeneration can offer in the creation of new environmental enhancements. Suitable policies would need to be developed to ensure matters such as BNG are provided alongside other wider environmental enhancements. Assessment 2 relates to the location of office space and offers 4 different scenarios. For SA12 and SA13 as the impacts are unknown, there is a requirement for suitable worded policies to ensure suitable protection and enhancement from a flood risk and biodiversity perspective, which we would also support.

#### **Historic Environment**

We suggest that mitigation could include opportunities for enhancement in line with NPPF requirements (conserve, sustain, or enhance).

#### **Nottingham City Economic Research Officer**

The scoring seems appropriate.

## **Historic Environment Policy Options**

### **TOPIC: Historic Environment**

#### **OPTIONS FOR APPRAISAL:**

A = Retain the scope of the policy established under existing Policy 11 of the Aligned Core Strategies and Policy 11 of Rushcliffe Core Strategy on historic environment.

B = Amend policy to recognise the role of heritage led regeneration.

#### **Comment**

##### Gedling Borough Council – Conservation and Heritage Officer

Objective 2 (Employment and Jobs) – Commentary and conclusions agreed

Objective 5 (Health and Well Being) – Revise assessment of Option B against Objective 5: *“Working on heritage regeneration projects will be positive for health and well- being. These are often outside physical activities such as building repairs or landscape works helping to maintain physical and mental well- being and provide opportunities to reduce health inequalities.”* Change score from ? to + for Option B.

Objective 7 (Social Inclusion) – Add the following for Option B: *“They also provide opportunities for learning and educational needs such as heritage trails or community projects which schools can also be involved with and thereby improve access to and encourage engagement in community activities.”*

Include the following within mitigation: *“Ensure new heritage led projects including those funded by the Heritage Lottery engage with local history and residents’ groups and schools with good media coverage and promotion. This is normally a requirement of grant conditions of service.”*

Objective 8 (Transport): Locally sourced natural materials such as stone or roof slates used in vernacular architecture are harder to find and materials can often come from further away therefore increasing transport journey times.

Mitigation identified is agreed.

Objective 10 (Energy and Climate Change) – Change score from ? to + for both Options A and B. The use of natural materials in historic building repairs etc. helps reduce reliance on use of non- sustainable materials. The score may be slightly positive for both option A and B.

Option A - Traditional buildings are built of natural materials and when designated must be preserved or enhanced in an appropriate manner that sustains their character, avoiding modern equivalent non sustainable materials such as UPVC for windows, doors and gutters or concrete roof tiles. Doing this reduces additional energy use and such buildings can work equally efficiently using natural sustainable materials, not leading to increases in greenhouse gases.

The use of ground source heat pumps or water catchment would not necessarily impact an historic building, solar panels placed on the inner roof elevation unable to be seen from below may be possible.

For Option B add the following within commentary: *“These projects are controlled by good practice principles espoused by Historic England, Heritage Lottery and Local Authorities. This could involve historic window or roof repairs for example, using traditional techniques and natural materials or enabling a redundant historic building back in to use by tackling heritage at risk. This is highly sustainable, reducing the need to build new buildings or use unsustainable materials which in turn reduces greenhouse gases.”*

Objective 13 (Natural Environment, Biodiversity, Blue-Green Infrastructure) – Option B should score + rather than ?.

Commentary agreed - If works relate to natural habitats within protected landscapes then that is the correct score for option A but also for option B as the heritage lottery run projects relating to restoration of historic landscapes, parks and gardens etc.

Objective 14 (Landscape) – Commentary and scoring agreed.

Objective 15 (Built and Historic Environment) – Agree with scoring and commentary.

### Historic Environment

Objective 1 (Housing) - The commentary does not make provision for all potential assets. As such, it is not clear how registered Parks and Gardens, Scheduled Monuments and NPPF footnote 68 archaeology may be addressed in the SA and plan. The Plan will need to ensure policies meet NPPF requirements for the historic environment. Mitigation could include opportunities for enhancement.

Objective 2 (Employment and Jobs) – The draft outcomes show as positive at this time in relation to issues covered in the text, but allocation sites may have negative impact. This will need to be reviewed during the plan process and in conjunction with Objective 3 (Economic Structure and Innovation).

Objective 4 (Shopping Centres) – Due to the lack of clarity about focus on centres at this stage (growth areas unclear at present) should Option B actually show as uncertain at this point in the process? Mitigation could include specific high street/shop front/advertisement management policies or commitment to a separate SPD(s) in relation to these aspects.

Objective 5 (Health and Well Being) - The current information is welcomed. However, we would suggest that this objective is not just about open spaces and physical activity. Well being aspects also relate to urban areas and better appreciation, understanding and awareness of ones surroundings and helping one

feel grounded in one's space creating a mindset to take ownership and be proud of an area e.g. increased enjoyment and use of public realm in conservation areas.

Objective 7 (Social Inclusion) – Historic environment perspectives are not dissimilar to those set out above for Obj 5. There are links between both through a better appreciation, understanding and awareness of one's surroundings which can be fostered through a Plan.

Objective 8 (Transport) - As part of the SA and Plan evidence base we would recommend consideration of how historic landscape characterisation/historic urban surveys can inform masterplanning of an area or site. Are there opportunities to better reveal historic street patterns and connectivity as part of a scheme, to better understand and appreciate a place?

Objective 9 (Brownfield Land) - We should advise at this stage that site assessment information would need to consider any possibility of NPPF footnote 68 unknown archaeology. Also, similar to SA Obj 8, are there opportunities to better reveal historic street patterns and connectivity as part of a scheme, or retain and repurpose buildings, to better understand and appreciate a place?

Objective 10 (Energy and Climate Change) - We note the information set out for consideration and would recommend that embodied carbon also be considered e.g. repurposing existing built fabric. <https://historicengland.org.uk/research/heritage-counts/2019-carbon-in-built-environment/carbon-in-built-historic-environment/> Also the reuse of materials may be relevant here and/or for SA Obj 16. Natural environment/biodiversity links should also be identified as the Plan progresses. E.g. street tree planting for shade can offer opportunities for public realm enhancement including that of Conservation Areas.

Objective 13 (Natural Environment) - There are many opportunities for links between natural and historic environments to be considered as the Plan progresses including those relating to non-designated assets e.g. canals, waterside living and reinvigorating a canal section. There will also be synergy with health and well-being objectives. HLC and urban character studies may help inform too, e.g. urban suds schemes highlighting historic routes for better appreciation of the historic environment etc.

Objective 14 (Landscape) - HLC and historic urban survey information can inform master planning of an area or site and will be relevant to considerations as the Plan progresses.

Objective 16 (Natural Resources) - We note the information set out for consideration and would recommend that embodied carbon also be considered e.g. repurposing existing built fabric. <https://historicengland.org.uk/research/heritage-counts/2019-carbon-in-built-environment/carbon-in-built-historic-environment/> Also the reuse of materials may be relevant here.

Nottingham City Council – Conservation Officer

Objective 5 (Health and Well Being) – The mental health and wellbeing benefits of conserving the historic environment are well documented. When people feel connected to the heritage of their neighbourhoods and feel pride in their environment their quality of life can be enhanced. Bringing unused and neglected buildings and areas back into use and giving them a new lease of life can provide a huge boost in local morale and prosperity.

Objective 8 (Transport) – Heritage visitor attractions represent only a tiny fraction of heritage assets overall. Most heritage assets are privately owned and used for a whole range of different uses. The majority will be located in settlements that already have transport infrastructure. By promoting the repurposing of historic buildings in settlements for new employment, leisure, educational or residential uses, heritage led regeneration can help to significantly reduce dependence on private vehicle use. For example: by promoting ‘City living’ – i.e. new residential development on underutilised upper floors of historic buildings, we can promote the concentration of population numbers in areas where existing sustainable transport infrastructure exists.

Objective 10 (Energy and Climate Change) – Option A and Option B should both be ‘major positive.’ Heritage led regeneration presents ideal opportunities to meet these targets.

Commentary does not take into account embodied energy and carbon in existing structures. It will always be far more energy and carbon efficient to work with and adapt an existing building than to demolish and build a new structure. One of the basic principles of heritage led regeneration is to utilise assets in new and creative ways in order to avoid unnecessary waste of resources! There has also been a huge amount of research conducted by bodies such as Historic England into upgrading the thermal performance of heritage assets and integrating energy generation into heritage led schemes. This has proven that it is entirely possible to significantly improve thermal performance and generate energy whilst minimising the impact on the significance of heritage assets. Research has also been conducted into the resilience of historic buildings to changes in climate which has proven that the inherent breathability of pre C20 building fabric is more resilient to events such as flooding than modern structures.

Objective 14 (Landscape) – Heritage led regeneration projects will always start from a principle of preserving and enhancing the historic environment and the landscape character around them. They can bring major benefits by bringing underutilized land or buildings back into sustainable and productive uses consistent with their significance.

#### Rushcliffe Borough Council – Conservation Officer

Objective 2 (Employment and Jobs) – Agree with commentary.

Objective 5 (Health and Well Being) – Note the rural location of these assets – if tourism/leisure uses are to be sustainable some thought to sustainable means of access to these sites is necessary – similar to mitigation in point 8 as the issue is similar.

Objective 10 (Energy and Climate Change) – Add the following to the commentary on Option B: *“However the reuse of existing buildings and the embodied energy that went into their original construction could have significant benefits in terms of energy and climate change when considered as part of a ‘whole life’ assessment of a building rather than simply considering its ‘in use’ energy demands.”*

Add the following to mitigation: *“... or that energy used is generated in ways with the least carbon footprint.”*

*Ensuring retrofit schemes promote a ‘whole life’ carbon approach to assessing the sustainability credentials of heritage led schemes. SPAB have done some very positive research on the carbon benefits of sustainable retrofit.”*

Objective 13 (Natural Environment) – Add the following within mitigation: *“...including succession planting where the asset is or incorporates a designed landscape.”*

## **Local Services and Healthy Lifestyles Policy Options**

### **Topic: Local Services and Healthy Lifestyles**

#### **OPTIONS FOR APPRAISAL:**

A = retain the scope the policy established under existing Policy 12 of the Aligned Core Strategies and Policy 12 of Rushcliffe Core Strategy.

B = retain the scope the policy established under existing Policy 12 of the Aligned Core Strategies and Policy 12 of Rushcliffe Core Strategy and amend policy to include more extensive policy in relation to 'Healthy Lifestyles', such as enhanced access to Blue and Green Infrastructure and restrictive policies relating to hot food takeaways in proximity to local schools etc.

C = retain the scope the policy established under existing Policy 12 of the Aligned Core Strategies and Policy 12 of Rushcliffe Core Strategy and make the policy more restrictive in relation to the loss of community facilities (paragraph 3.12.8 of the Aligned Core Strategies and paragraph 3.12.8 of Rushcliffe Core Strategy define community facilities: these include, but are not restricted to: schools and nurseries, post offices, local shops in rural areas, public houses (especially in rural areas), places of worship, religious instruction and church halls, health centres, GP surgeries, dentists, community centres or halls, libraries, leisure centres and emergency services).

#### **Comment**

##### Environment Agency

Objective 13 (Natural Environment, Biodiversity, Blue-Green Infrastructure) - EA note that option B encourages the enhancement of blue/green infrastructure from the perspective of enhancing accessibility. We would support this wider understanding of the benefits blue/green infrastructure can provide which are not just linked to the environmental enhancements that can be provided, but the understanding that these can offer enhancements to people who would use them. Opportunities to promote the enhancement of blue/green infrastructure should be encouraged.

##### Gedling Borough Council

No comment

##### Historic England

The Plan will need to ensure policies meet NPPF requirements for the historic environment, and mitigation could include opportunities for enhancement.

##### Nottingham City – Biodiversity and Greenspace Policy Officer

Objective 13 (Natural Environment, Biodiversity, Blue-Green Infrastructure) – Agree with the assessment, Option B would be of greater benefit than A or C, but probably



only if it led to increased provision of greenspaces, not just increased access to existing open spaces, as this has the potential to be damaging to biodiversity if access is greater than the capacity that can be supported without disturbance to wildlife or damage to habitats.

## **Topic: Culture, Leisure and Sport**

### **OPTIONS FOR APPRAISAL:**

A = Retain the scope of the policy established through the existing Policy 13 of the Aligned Core Strategies and Policy 13 of Rushcliffe Core Strategy.

B = Retain the scope of the policy established through the existing Policy 13 of the Aligned Core Strategies and Policy 13 of Rushcliffe Core Strategy and amend policy to remove reference to facilities of national or regional importance and refer to a greater number of potential types of development e.g. tourist accommodation.

### **Comment**

#### **Gedling Borough Council**

No comment

#### **Historic England**

The Plan will need to ensure policies meet NPPF requirements for the historic environment, and mitigation could include opportunities for enhancement.

#### **Nottingham City – Biodiversity and Greenspace Policy Officer**

Objective 13 (Natural Environment, Biodiversity, Blue-Green Infrastructure) – Agree with appraisal if provision or protection of greenspace is increased.

## **Blue-Green Infrastructure and Biodiversity Net Gain Policy Options**

### **Topic: Strategic Green and Blue Infrastructure Assets**

#### **OPTIONS FOR APPRAISAL:**

A = retain scope of the policy under existing Policy 16 of the Aligned Core Strategies and Policy 16 of Rushcliffe Core Strategy based on identified Green and Blue Infrastructure corridors in the 6Cs Green Infrastructure evidence and Greater Nottingham Blue and Green Infrastructure study.

B = review existing Green and Blue Infrastructure corridors identified in the 6Cs Green Infrastructure study and Greater Nottingham Green and Blue Infrastructure study and develop a wider network than that currently identified.

#### **Comment**

##### **Broxtowe – Parks and Green Spaces Manager**

Objective 5 (Health and Well Being) – text added to commentary emphasising the creation of BGI and opportunities for recreation within both options.

Objective 6 (Community Safety) – Well designed and maintained assets will improve community safety, so the unknown conclusion of these options against this objective should be minor negative.

Objective 7 (Social Inclusion) – Both these policy options should score major positive against this objective.

Objective 10 (Energy and Climate Change) – The commentary needs expanding to cover the number of policy criteria questions it covers.

Objective 11 (Pollution and Air Quality) – Alongside active travel, BGI and new tree planting and vegetation helps improve air quality.

Objective 15 (Built and Historic Environment) – Commentary needs expanding to cover all policy criteria questions.

##### **Environment Agency**

We note that option B would look to protect, enhance and create more blue/green corridors than the current policies. We would support any opportunity to create additional habitat and environmental improvements and would be happy to see option B if the councils decided to take this forward. As highlighted within the SA, multifunctional opportunities and enhancements can be created that don't just create additional habitat but can also be designed to reduce flood risk, improve water quality etc. The design and creation of these corridors should ensure they look to provide as much multifunctional environmental enhancements as possible.

##### **Historic England**

Note the reference to designated heritage assets but, in terms of NPPF requirements for a positive approach to the historic environment in plan making, the topic commentary could equally relate to non-designated assets and the spaces and places that people use every day. There is synergy with the historic environment and the potential for opportunities to conserve and enhance.

Nottingham City – Biodiversity and Greenspace Policy Officer

Objective 13 (Natural Environment, Biodiversity, Blue-Green Infrastructure) – Option B is better (Option A should therefore be + and option B should be ++). This is because we will be working with the County Council to generate a Local Nature Recovery Strategy and an updated GI network will need to reflect this, an updated network, rather than one that is kept the same will have scope to be larger and have better protection, a better more positive outcome for biodiversity.

Rushcliffe Borough Council – Biodiversity and Sustainability Officer

Objective 9 (Brownfield Land) – agreement with the commentary provided. Recommend for the mitigation that the words “the redevelopment” should be replaced with “appropriate redevelopment”. Recommend that additional mitigation work may be required to identify Brownfield Land that already contributes biodiversity value which should be conserved and enhanced (this would include Open Mosaic Habitats on Previously Developed Land and is included in the Urban and Post Industrial Habitat Action Plan of the Nottinghamshire Biodiversity Action Plan). Potentially option A should be scored as Minor negative, as without the proposed mitigation, sites providing biodiversity value could be lost.

Objective 10 (Energy and Climate Change) – Agree with the commentary provided, however due to the significantly smaller scope and assets considered by option A, I recommend this should be scored as minor positive. I recommend that the potential carbon sequestration potential of each option should be estimated (this would require an estimate of the amount of each main habitat type that would be developed under each option).

The resilience of biodiversity to climate change, is dependent on the diversity of the ecosystem, the size of the ecosystem and its connectivity to other similar ecosystems, this could be partially modelled under the methodology used to create the opportunity mapping used by Nottinghamshire Biodiversity Action Group, it may be worth considering using this modelling to answer the question if the option will increase resilience.

Objective 13 (Natural Environment, Biodiversity, Blue-Green Infrastructure) – Agree with the commentary provided, however due to the significantly smaller scope and assets considered by option A, I recommend this should be scored as minor positive.

Rushcliffe Borough Council – Landscape and Tree Officer

Objective 5 (Health and Well Being) – Support the commentary however does the scoring reflect the greater positive impact of Option B. Score A + rather than ++.

## **TOPIC: STRATEGIC ALLOCATIONS AND POLICIES (green space and tree planting)**

### **OPTIONS FOR APPRAISAL:**

A – Include a policy to encourage larger gardens, wider tree lined streets, community orchards, requirement for more green space etc.

B – include a policy to set targets for % increase in tree canopy cover for each authority

### **Comment**

#### Broxtowe – Parks and Green Spaces Manager

Objective 6 (Community Safety) – High quality open spaces with good tree planting are better used are more self-policed.

Objective 7 (Social Inclusion) – Regarding Option B, tree cover can provide educational needs (outdoor classroom).

Objective 10 (Energy and Climate Change) – Commentary should be expanded to cover all criteria.

Objective 11 (Pollution and Air Quality) – Commentary needs to be more detailed as the commentary on Strategic Green and Blue Infrastructure Assets.

Objective 12 (Flooding and Water Quality) – Commentary needs to be more detailed as the commentary on Strategic Green and Blue Infrastructure Assets.

Objective 13 (Natural Environment, Biodiversity, Blue-Green Infrastructure) - Commentary needs to be more detailed as the commentary on Strategic Green and Blue Infrastructure Assets.

#### Environment Agency

The main aims of this assessment are around the creation of more green space and an increase in the planting of trees within strategic allocations. Whilst not directly the Environment Agency's remit we would support opportunities for developments to provide more green space, which would also include blue and green infrastructure. These blue/green spaces, as well as offering residents/employees places to walk and enjoy can then also be designed to provide wider environmental enhancement opportunities (as mentioned in response to i) above). For example, Suds ponds can be designed to go further than policy requirements and look to reduce surface water flows off the sites. They can be designed to create more habitat for wildlife as well as looking at opportunities to improve water quality. Where development is proposed within flood zones, we would encourage development is kept outside of flood zones 2 and 3 and where blue /green spaces are maintained or created, they should look to provide multifunctional environmental enhancements such as options to reduce flood risk alongside the creation of wildlife habitat.

## Historic England

Suggest uncertain outcomes for both options at this stage in relation to SA Obj 15 historic environment issues rather than the neutral impact identified. For example, tree planting in an area of land that has, historically, been open and allows intervisibility between assets could potentially be harmful to the setting of heritage assets. For example, tree roots could damage unknown buried assets (NPPF footnote 68). There is also potential for enhancement of the historic environment.

## Nottingham City – Biodiversity and Greenspace Policy Officer

Objective 13 (Natural Environment, Biodiversity, Blue-Green Infrastructure) – Option A is far more likely to deliver benefits for biodiversity. Option A is therefore ++ and Option B is + or perhaps even (?) uncertain. Option B for a % increase in tree planting assumes that tree planting is the only measure that benefits biodiversity when this is far from true, many other habitats are of value and larger more well connected open spaces can be of far greater benefit. Tree planting may also, in some instances, have a damaging effect if trees are planting in inappropriate places, such as instead of priority habitats and other valuable spaces.

## Rushcliffe Borough Council – Biodiversity and Sustainability Officer

Objective 9 (Brownfield Land) – Option A would reduce the efficiency use of land, but would be likely to improve biodiversity, I therefore recommend that the scoring should be Uncertain (?). I recommend the comment should be altered accordingly.

I am in agreement with the scoring for option B

Objective 10 (Energy and Climate Change) – Agree with the scoring and comments provided. The sequestration potential can be estimated from the predicted area of tree cover. Please see the comments on resilience above.

Objective 13 (Natural Environment, Biodiversity, Blue-Green Infrastructure) – Agree with the scoring and comments provided.

## Rushcliffe Borough Council – Landscape and Tree Officer

Option B is likely to create work identifying the existing canopy cover for each authority, perhaps not a bad thing, but something to be considered. It also needs to be considered alongside landscape character.

Objective 10 (Energy and Climate Change) – Add the following within commentary: Deciduous trees can cool building in summer reducing the need for air conditioning and allowing solar gain in winter.

Objective 5 (Health and Well Being) – Amend commentary as follows: ~~It is unclear whether either option would have an impact on health and well-being.~~ Setting a net biodiversity requirement may provide new open space or food growing opportunities but this is not clear. There are numerous studies that living in proximity to open

spaces and having access to nature enhances physical and mental wellbeing, an increase in net gain should help facilitate this.



## **TOPIC: BIODIVERSITY NET GAINS**

### **OPTIONS FOR APPRAISAL:**

A – retain scope of the policy established under existing Policy 17 of the Aligned Core Strategies and Policy 17 of Rushcliffe Core Strategy which do not specify a biodiversity net gain amount.

B – review existing policies and set 10% biodiversity net gain amount to future proof plan against Environment Bill and allow Local Plan Part 2's the option to set higher % biodiversity net gain amount.

### **Comment**

#### Broxtowe – Parks and Green Spaces Manager

Objective 10 (Energy and Climate Change) – The commentary seems limited.

Objective 11 (Pollution and Air Quality) – Tree planting will improve air quality.

#### Environment Agency

We would support option B that mandates the minimum requirement of 10% BNG being set within the Core Strategies. The Environment Bill has now received Royal Assent and therefore a minimum of 10% BNG will now be required for development. We would encourage councils to go further than 10% as this is a minimum requirement. The Core Strategies could be used to set this higher ambition but if the councils feel this would be better set within their Part 2 Local Plans then we would also support this. The councils could consider whether the core strategies can have an ambition within them to ask developers to look at higher amounts of BNG above 10% and to justify where they only aim to provide a minimum of 10%.

#### Historic England

Suggest this is uncertain for the historic environment at this stage of the process. There is potential for synergy between the historic environment and biodiversity net gain through potential enhancement opportunities, but there is also the potential for harm to heritage assets.

#### Nottingham City – Biodiversity and Greenspace Policy Officer

Objective 13 (Natural Environment, Biodiversity, Blue-Green Infrastructure) – I would initially agree that Option A is + and Option B is ++. However, the Environment Bill has already been passed and therefore changing the policy is not 'futureproofing', but is essential for us to deliver what the Environment Act is going to be mandating. Therefore, in light of this I would argue that Option A is – and Option B is ++.

Also query some of the other assessments under appraisal of this policy option (including particularly SA objectives 5, 11, 12 and 14). Delivering a minimum 10% net gain (or hopefully more % in some instances), will drive the LPAs and private

markets to create more, and more diverse, greenspace and put a greater emphasis on the importance of this provision. This will have a positive knock-on effect onto people's wider well-being, and many other environmental services that open and greenspace and biodiversity provide such as reducing air and water pollution, helping alleviate flooding, providing more open space within the landscape.

Rushcliffe Borough Council – Biodiversity and Sustainability Officer

Objective 9 (Brownfield Land) - Agree with the scoring and comments provided.

Objective 10 (Energy and Climate Change) – Agree with the scoring and comments provided. It is unclear what impact Biodiversity Net Gain may have on carbon sequestration as this is independent of biodiversity value, small areas of high biodiversity quality habitat may sequester less carbon than large areas of low biodiversity quality habitat, however small areas of high biodiversity quality habitat may meet BNG requirements.

Objective 13 (Natural Environment, Biodiversity, Blue-Green Infrastructure) – Agree with the scoring and comments provided. BNG will not necessarily be publicly assessable open green space, nor will it necessarily provide woodland.

## **Infrastructure Policy Options**

### **Topic: Priorities for Development-Funded infrastructure**

#### **OPTIONS FOR APPRAISAL:**

A = retain the scope of the policy established under existing Policy 18 of the Aligned Core Strategies and Policy 18 of Rushcliffe Core Strategy on infrastructure requirements, including relating to transport infrastructure, public transport, health, education and open space, which are identified within the Infrastructure Delivery Plan.

B = retain the scope of the policy established under existing Policy 18 of the Aligned Core Strategies and Policy 18 of Rushcliffe Core Strategy and amend policy to also set out funding mechanisms for key infrastructure required which will include transport infrastructure, public transport, health, education, open space and training and employment measures (i.e. merge with existing Policy 19 of the Aligned Core Strategies and Policy 19 of Rushcliffe Core Strategy on developer contributions).

#### **Comment**

##### **Environment Agency**

We would support any opportunities to expand funding mechanisms to help provide funding for a wider variety of infrastructure, including blue/green infrastructure and flood risk infrastructure. We agree with the assessment that by expanding the requirements the opportunities to protect and enhance these type of infrastructure is increased.

##### **Historic England**

Objective 15 – Suggest this is uncertain for the historic environment at this stage of the process. The Plan could identify allocation sites which include potential enhancement opportunities, but there may also the potential for harm to heritage assets.

##### **Nottinghamshire County Council - Developer Contributions Practitioner**

They support the general scoring of the two options against the policy criteria. Also agree that an integrated policy as described in Option B that sets out both the infrastructure required and the funding mechanism that will enable its delivery will provide a greater level of certainty that the infrastructure will be delivered, thereby helping to achieve the SA objectives.

Objective 7 (Social Inclusion) – Option B provides opportunity to identify the major education requirements and stipulate the chosen funding mechanism for their delivery (e.g. s106 obligations or the CIL); this will provide greater certainty that new educational facilities will be appropriately funded, for both the local authority and for prospective developers. It may also provide the Council with the opportunity to identify where in-kind obligations (namely land) will be necessary to support new

schools, either as part of a single urban extension or deriving from several sites within a locality. It could thereby allow for more holistic approaches to education infrastructure delivery.

Objective 8 (Transport) – Option B provides scope to establish which facilitates would be delivered through planning conditions and which should be met through financial contributions. In many cases the LHA will seek localised improvements through conditions but there may be facilitates, such as public transport services, as well as strategic infrastructure arising as a result of cumulative growth, that would be more efficiently delivered through developer contributions. Consideration of this within the policy would help to ensure that a range of travel options are accommodated and that consideration is given to both strategic needs and localised improvements.

Rushcliffe Borough Council – Principal Planning Policy Officer

Option B - This option is really option A repeated. The Key Infrastructure required and funding mechanisms required are already contained within existing core strategies, through a combination of policy and Appendix B of the ACS or Appendix C of the Rushcliffe Core Strategy.

Policy Options and Implications for Waste

No comments received.

# **Consultation comments on the Preferred Approach Sustainability Appraisal (December 2022)**

All comments on the Sustainability Appraisal of the Greater Nottingham Strategic Plan: Preferred Approach are summarised within the table below. Individual responses from the Greater Nottingham Councils are provided against each representation.

Respondent	Summary of Comments	Greater Nottingham Councils' Response
Ashfield District Council	<p>There is a requirement under the Strategic Environmental Assessment Regulations to consider reasonable alternatives. Given the amount of development at Hucknall, both in Ashfield and proposed in Gedling, an alternative consideration in the SA should have been the implication of not including Hucknall as a sub-regional centre which can accommodate more development. As such Ashfield District Council considered that it has not been demonstrated that there are no reasonable alternatives to expanding the Top Wighay Site for housing.</p>	<p>SA of PA looked at the growth strategy options (at Stage B2). It considered different strategies for the distribution of development, including focussing on the main built area, expanding existing settlements (Hucknall is a Sub Regional Centre), focusing on blue and green infrastructure, or transport infrastructure.</p> <p>Informed by the SA, the Preferred Approach identifies a settlement hierarchy of the directing development primarily within the main built up area, then adjacent to the Sub Regional Centre of Hucknall and finally Key Settlements.</p> <p>At stages B3 and B4 the SA looked at the Preferred Approach itself, including the strategy and settlement hierarchy and the sites themselves.</p>
Barratt David Wilson	<p><b>Appraisal of housing distribution options</b></p> <p>In terms of options A-C (appraisal of housing distribution), BDW considers that although Option A ranked highly against the SA criteria (city meeting need plus 35% uplift), there are a number of advantages to delivering housing under Option B (Rushcliffe, Gedling and Broxtowe meeting the City's unmet need).</p> <p><b>Land south of Wheatcroft Island</b></p>	<p><b>Appraisal of housing distribution options</b></p> <p>The SA recognises that a major positive for Option B is that Broxtowe and Rushcliffe districts would further exceed their own housing targets, increasing the range and affordability of new housing for all social groups. Gedling would be able to fully meet their own housing target and possibly beyond. It therefore scored well against the SA's housing objective.</p> <p>There remains however a considerable amount of uncertainty, given that the locations of this development within these borough's is unknown.</p> <p><b>Land south of Wheatcroft Island</b></p>

Respondent	Summary of Comments	Greater Nottingham Councils' Response
	<p>They highlight that their proposal will address unknown effects on objectives relate to retail, health and well-being and community safety.</p> <p>Furthermore, the scored negatively in red against transport is incorrect as the site is located adjacent the A52 which forms part of the strategic highway. It is also adjacent to the MUA, where there is excellent public transport bus provision that could be extended to the site.</p>	<p>The SA cannot assess sites on the basis that development will achieve the SA objectives, as the benefits of development cannot be assured. Rather it appraises sites as they are currently, considering their location and environmental conditions against the objectives.</p> <p>The information submitted by the landowner can however inform the mitigation measures identified. For example, the provision of a Local Centre (identified in the masterplan) should be included as mitigation that would resolve the uncertainty against Objective 4.</p> <p>This applies to the appraisal of the site against the transport objective, where in this case a number of mitigation measures are identified to address the existing paucity of public transport and active travel infrastructure.</p>
Ceylon Tea Growers Association	<p><b>Appraisal of housing distribution options</b></p> <p>It is considered that Option B is more in line with the NPPF and would assist in addressing unmet need and historic housing shortfalls.</p> <p><b>Appraisal of Land East of Tollerton</b></p> <p>Under the SA's traffic light system of scoring Land East of Tollerton scores 'Amber'. The justification for Amber rather than Green was as a result of Tollerton not being identified as a Key Settlement. Tollerton has the characteristics to be a Key</p>	<p><b>Appraisal of housing distribution options</b></p> <p>Noted, however as a reasonable alternative options, Options A and C have been appraised against the SA's objectives.</p> <p><b>Appraisal of Land East of Tollerton</b></p> <p>In determining which sites are reasonable alternatives for assessment, the SA has not assessed those sites that would not comply with the strategic distribution of development as set out in the Preferred Approach. This distribution and other reasonable alternative strategies were assessed at Stage B2. Should the overarching</p>



Respondent	Summary of Comments	Greater Nottingham Councils' Response
	<p>Settlement and even as an 'Other Settlement' it is sustainable and capable of delivering low levels of growth.</p> <p>The Sustainability Appraisal that supported the Part 2 RBC Local Plan (2019) appraised four growth options for Tollerton. The low, medium and high growth options had comparable results to other settlements at the third tier that do have additional allocations. The settlement overall performs comparably to other third tier settlements, with a more positive benefit identified in terms of Transport due to the proximity of the main urban area and better public transport opportunities.</p>	<p>strategy change and development is directed towards other settlements, 'amber' sites such as this one may be assessed.</p> <p>A separate review of key settlements has been undertaken.</p> <p>Regarding the SA of the RBC's Local Plan Part 2, the decision to allocate land at 'third' tier settlements was made in the context of RBC not having a five year supply of deliverable homes. This is no longer the case and the Preferred Approach has refocused delivery of the housing requirement towards the main urban area and Key Settlements.</p>
Environment Agency	<p>The EA provided detailed feedback on the Sustainability Appraisal Scoping Opinion in February 2022.</p> <p>These are still deemed valid and at present we have no further comments to add than those already provided in February 2022. The EA expect to be in a position to give more detailed feedback once Appendix A and Appendix B have been made available at the final Publication draft stage.</p> <p>The EA provided their previous comments for completeness.</p>	<p>EA's comments on the SA Scoping Opinion are included in this Appendix.</p> <p>Appendix C of the Preferred Approach SA did not include these comments as policy options (included within the SA Scoping Opinion) were not consulted at the Preferred Approach consultation.</p> <p>The site specific comments have been considered by each authority and updates have been made within the site specific appraisals.</p>

Respondent	Summary of Comments	Greater Nottingham Councils' Response
	<p>In addition, the EA supplied comments on the preferred sites and the reasonable alternative sites previously and have no further comments to make in this regard.</p> <p>The latest comments on specific sites can be viewed in our main response to the Greater Nottingham Strategic Plan Preferred Approach document which have been issued alongside this response. The majority have planning permission and no further commentary is provided. However, the following comments on other sites where made by the EA:</p> <p><b>Chetwynd Barracks</b>  Given the previous use of the site as an army barracks there is a possibility that land contamination may be present. The site is situated on a secondary aquifer and care needs to be taken to protect the groundwater resource. Given Chetwynd's current and previous use future development will need to demonstrate that contamination risks will be adequately addressed through the course of the development. Guidance on managing risks from land contamination can be found at <u><a href="#">Land contamination risk management (LCRM) - GOV.UK (www.gov.uk)</a></u></p> <p><b>Broad Marsh</b>  The site lies primarily within flood zone 1 with a small section of the red line boundary located</p>	

Respondent	Summary of Comments	Greater Nottingham Councils' Response
	<p>within flood zone 2. Any development proposed within FZ2 the LPA should apply National Flood Risk Standing Advice (NFRSA).</p> <p><b>Stanton Tip - Hempsill Vale</b>  Given the previous use of the site there is a possibility that land contamination may be present. It will need to demonstrate that contamination risks will be adequately addressed through the course of the development. Guidance on managing risks from land contamination can be found at <u>Land contamination risk management (LCRM) - GOV.UK (www.gov.uk)</u></p> <p><b>East of Gamston/North of Tollerton</b>  Given the sites former/current use as an airfield there is a possibility that land contamination may be present. The site is situated on a secondary aquifer and care needs to be taken to protect the groundwater resource. Given the current and previous use future development will need to demonstrate that contamination risks will be adequately addressed through the course of the development. Guidance on managing risks from land contamination can be found at <u>Land contamination risk management (LCRM) - GOV.UK (www.gov.uk)</u></p> <p><b>Ratcliffe on Soar Power Station</b>  The EA have recently supplied detailed comments in relation to the Local Development order under</p>	

Respondent	Summary of Comments	Greater Nottingham Councils' Response
	application reference 22/01339/LDO. Our comments can be viewed on the Rushcliffe Borough Council planning portal	
Hallam Land Management Limited	<p><b>Appraisal of growth strategy options</b></p> <p>It is not clear from the SA Report why Option B was discounted from any further consideration, and with it all new settlement sites.</p> <p>The two options taken forward have more major positives than the expanded and new settlement option and so before the wider strategy is considered, the expanded and new settlement option is discounted.</p> <p>The SA does not therefore consider the implications of locating significant employment development at the Ratcliffe on Soar Power Station without any complementary housing development. This is despite the transport objective including the objective to help reduce the need to travel by car and improve accessibility to jobs.</p> <p>R15.2PA is not therefore appraised even though it is clear the potential benefits of this site are understood by the assessors, but the in principle decision to discount new settlements at an earlier stage in the SA process prevents this site even being appraised.</p>	<p><b>Appraisal of growth strategy options</b></p> <p>The SA of the Greater Nottingham Strategic Plan is being undertaken in stages, firstly it considers the strategic alternatives, looking specifically at housing requirement, growth strategy, housing distribution and office development. Then it assesses policies/sites that accord with the chosen strategy.</p> <p>As recognised the growth strategy option taken forward has more positives, indicating that the decision to discount new settlements within the Preferred Approach is the more strategically sustainable. Informed by the SA and other evidence, this strategy was selected by the plan making authorities as the Preferred Approach.</p> <p>Following this, the SA of the Preferred Approach should not look at sites that do not comply with the preferred growth strategy. These are no longer reasonable alternatives.</p> <p>It should be noted that the SA doesn't discount options, rather it assesses the reasonable alternatives, informing the policy approaches. In this case indicating that a new settlement is less sustainable and that new settlements are not reasonable alternatives.</p>

Respondent	Summary of Comments	Greater Nottingham Councils' Response
	<p>The failure to assess this site is a significant issue which needs to be addressed through the final sustainability appraisal.</p>	<p>Para 4.17 to 4.21 has however been amended to underscore the sustainability benefits of the chosen growth strategy.</p> <p>Section 6 (Appraisal of Sites) now refers to Stage B2 assessments in order to emphasise the sustainability of the chosen approach.</p>
<p>Harworth Group</p>	<p><b>Housing requirement appraisal</b> Support the appraisals of Objective 1 (Housing) and strongly consider that a single strategic scale site adjoining the built up area that provides housing that would make a significant contribution to the housing need would be the most sustainable approach to take.</p> <p>In respect of the three options for assessing the SA against the housing requirement Option C should be used. This factors in the increase in the amount of housing required by using the Standard Method as a minimum for the housing requirement plus the buffer and by considering future demographic trends and market signals. It is recognised that this is a high growth option that will require land to be released from the Green Belt.</p> <p><b>Appraisal of housing distribution options</b> Although Option A ranked highly against the SA criteria, we consider that there are a number of advantages to delivering housing under Option B and the scoring weight could have been applied higher to the housing category for this option. Land</p>	<p><b>Housing requirement appraisal options</b> Noted.</p> <p>Noted, however Preferred Approach uses the Standard Method as the starting point for determining housing need in Greater Nottingham.</p> <p><b>Appraisal of housing distribution options</b> An increased scoring weight cannot be applied.</p>

Respondent	Summary of Comments	Greater Nottingham Councils' Response
	<p>constraints within the main built up area of Nottingham for the scale and size of site needed means that there is not the availability of sites for strategic housing purposes. As previously discussed Nottingham City Centre cannot meet its own housing need with the 35% uplift and there are reasonable strong alternatives in Green Belt locations on the edge of sustainable settlements such as Tollerton.</p> <p><b>Rushcliffe Appendix</b> Under the SA's traffic light system of scoring Land East of Tollerton scores 'Amber' (ref: R11.2PA). The justification for Amber rather than Green was as a result of Tollerton not being identified as a Key Settlement. It is our contention that Tollerton has the characteristics to be a Key Settlement and even as an Other Settlement is sustainable and capable of delivering high levels of growth.</p>	<p><b>Rushcliffe Appendix</b> In determining which sites are reasonable alternatives for assessment, the SA has not assessed those sites that would not comply with the strategic distribution of development as set out in the Preferred Approach. This distribution and other reasonable alternative strategies were assessed at Stage B2. Should the overarching strategy change and development is directed towards other settlements, 'amber' sites such as this one may be assessed.</p> <p>A separate review of key settlements has been undertaken.</p>
Hayden Lester	<p>Regarding site Land off Oxton Road (G06.1PA) it is considered two of sustainability appraisal scores need amending.</p> <p>Economic Structure and Innovation. The inclusion of a Food Store (highlighted in the May 2022 SHLAA response for G665/G1073) has not been considered in the sustainability appraisal. 0 score requires changing to + minor positive.</p>	<p>The appraisal has been reviewed but it is considered that the scoring should remain unchanged based on the SA framework questions. The commentary has been updated to reflect that part of the site is brownfield.</p>

Respondent	Summary of Comments	Greater Nottingham Councils' Response
	<p>Brownfield Land. 1.3ha of the site is registered as Brownfield Land on the Brownfield register, so the score needs correcting to minor negative 'Site is on predominantly greenfield land' not 'Site is on greenfield land'.</p>	
<p>Herrick &amp; Mattock</p>	<p><b>SA Framework 2 – Site criteria questions</b></p> <p><b>SA objective 2 (employment and jobs)</b></p> <p>Where sites would score highly against this criterion would be in relation to:</p> <ul style="list-style-type: none"> <li>• Providing a strategic level of jobs (500+) in and adjoining the built up area of key settlements.</li> <li>• Provides new jobs opportunities in areas of deprivation.</li> </ul> <p>We suggest further consideration is given within the SA for Objective 2 to include scoring against the proximity and access to the strategic highway network. This would directly reflect the requirements of the operators/stakeholders within the market, as evidenced by the Nottinghamshire Core &amp; Outer HMA Logistics Study produced by Icen. This would enable strong strategic sites to come forward in more sustainable locations if this criteria was embellished further.</p> <p>It is also suggested sustainable transport connections to employment sites should included for scoring as part of this objective alongside and</p>	<p><b>SA Objective 2 (employment and jobs)</b></p> <p>Operational requirements of the logistics sector, including access to the strategic road network, are addressed within other evidence. In line with wider environmental objectives, the SA's Transport Objective focusses on sustainable forms of transportation including access to public transport and other services. This will assist decision makers identify the most sustainable locations for logistics.</p> <p>Including access to the strategic highway network as a criteria for logistics developments within the employment objective may result in more unsustainable patterns of employment land provision.</p> <p>There is no need to duplicate access to public transport within the employment objective. Levels of public transport provision and proximity to 'hubs' is reflected in the individual assessments.</p>

Respondent	Summary of Comments	Greater Nottingham Councils' Response
	<p>the level of public transport provision that serves the location. This inclusion would aid in understanding where key public transport hubs are within the HMA and ensure proposed strategic employment sites are considered in proximity to these locations.</p> <p><b>SA objective 3 (economic structure and innovation)</b> Criteria in relation to should include:</p> <ul style="list-style-type: none"> <li>• Single site provides a strategic level of employment on 5+ Ha or more or 20,000+ sqm or more in and adjoining the built up area of key settlements.</li> </ul> <p>We consider provisions should be made within the criteria for Objective 3 to scoring of sites which support decarbonation in line with economic innovation as these two elements are closely interlinked. For example, this would enable strategic sites to be considered where strong sustainability credentials are demonstrated or there is the ability to harness low-carbon technologies.</p> <p>We also consider a key criteria should include scoring around where there is the opportunity for adaptable office/industrial/logistics facilities to be integrated. This would ensure future adaptability to enable and sustain a modern economic structure which can continually innovate to changing and growing technologies.</p>	<p><b>SA objective 3 (economic structure and innovation)</b> The SA, when determining reasonable alternatives, has determined which employment sites are to be assessed. Therefore, there is no requirement to score sites according to their size. Only whether they provide physical conditions for a modern economic structure. As stated previously the location is not a determining factor when assessing a site against this objective.</p> <p>The appraisal of site's potential to support decarbonisation is considered against Objective 10. Energy and Climate Change.</p> <p>Adaptability cannot be assessed within the SA of sites, as this only considers locational issues and implications of any environmental constraints. Adaptability would be considered within policies, including site specific policies, or within subsequent planning applications.</p>



Respondent	Summary of Comments	Greater Nottingham Councils' Response
	<p><b>Appraisal of growth strategy options</b>            In relation to the provision of strategic B8 logistic sites Option A presents issues. The requirements of strategic logistics and land constraints within the main built up area of Nottingham means that there is not the availability of sites.</p> <p>Access to B8 sites is critical both in the form of the proximity to the strategic highway network but also in the form of public transport infrastructure provision. Option D supports this consideration as any site proposals would need to take this into consideration.</p> <p>Option C also recognises the importance of blue-green infrastructure. Due to the required B8 sites within the HMA needing to be of large scale in order to meet market demand, this increases the opportunity to provide for and deliver blue-green infrastructure of a meaningful scale to make a positive environmental impact.</p>	<p><b>Appraisal of growth strategy options</b></p> <p>Noted – It is recognised that Strategic Logistics require specific locations that may not conform with the selected growth strategy, given their scale and accessibility requirements.</p> <p>Separate work has been undertaken to identify those reasonable alternative strategic logistics sites. And they have been assessed independently from other employment sites in the SA. Each has been assessed consistently against the objectives in order to identify sustainability.</p>
Homes England and Defence Infrastructure Organisation	Homes England and the Defence Infrastructure Organisation welcome the generally positive scoring of the Barracks. They state that the outline planning application will reach more positive conclusions on certain matters. They are unclear why the Appraisal says that the development will have a 'major negative' effect on pollution and air quality. By delivering a development where journeys can be undertaken on foot, by bicycle or	<p>The site is located within the Nottingham Urban Area agglomeration zone. However, it is uncertain whether the site is likely to impact an area of poor quality.</p> <p>Requirements to deliver active travel and public transport infrastructure is included in the mitigation against effects on Objective 11.</p>

Respondent	Summary of Comments	Greater Nottingham Councils' Response
	<p>by public transport, the effects of development on air quality will be managed. They also do not agree that any part of the site comprises of Grade 2 Agricultural Land and consider that the entirety of the site is classified as 'urban'.</p>	<p>References to Grade 2 Agricultural Land have been removed from the appraisal of the site against Objective 16.</p>
<p>Mrs Hill &amp; Mrs Plummer</p>	<p><b>SA Framework 2</b></p> <p><b>SA objective 2 (employment and jobs) and SA objective 3 (economic structure and innovation)</b></p> <p>See comments from Herrick and Mattock</p>	<p>See response to comments by Herrick and Mattock</p>
<p>Historic England</p>	<p><b>SA Framework</b> HE support the specific objective for the historic environment and an objective for landscape character. We welcome the amendments in Table 3, on page 22.</p> <p><b>Appraisals on options for preferred approach</b> We note in Section 4 that the majority of tables have an '?' an uncertain outcome for Objective 15 and that makes it difficult for us to assess the impacts.</p> <p><b>Site appraisal on Top of Wighay Farm (Gedling)</b> Table 16 the site assessment for Gedling sets out Top Wighay Farm as scoring a 'green' outcome, on page 71. However, we do not consider that appropriate assessment has been undertaken in</p>	<p><b>SA Framework</b> Noted</p> <p><b>Appraisals on options for preferred approach</b> The conclusion that the effects of the strategic options on the Built and Historic Environment are unknown reflects the broad nature of these appraisals and the fact that effects on this objective will depend on subsequent site selection decisions.</p> <p><b>Site appraisal on Top Wighay Farm</b> The SA identifies those sites which are reasonable alternatives. The 'Green' outcomes reflect the decision that the site is a reasonable alternative. The sites at Top Wighay Farm have been carried forward for a more</p>

Respondent	Summary of Comments	Greater Nottingham Councils' Response
	<p>order to ascertain what score this site should achieve.</p> <p>Historic England has concerns regarding the proposed extension at this site given its potential impact on the Grade II* Annesley Hall Registered Park and Garden and associated historic landscape and relationship with other assets in this setting. We would require sight of a Heritage Impact Assessment in order to fully understand how this proposed development may impact the significance of this heritage asset, including its setting. Further, we are concerned about the potential cumulative impact considering the proposed site allocations within the Ashfield Local Plan across the border and would recommend that we have a meeting with both parties to assess how these proposed allocations will affect the significance of this heritage asset, including its setting. We note the initial assessment information within the Site Selection Report Appendix B, page 15, which sets out the presence of this proposed allocation in the setting of Annesley and associated assets. However, we do not consider it is a sound approach to propose the site for allocation at this time and rely on the heritage policy during the planning application stage. The principle of development is being established through the Local Plan, and as such the appropriate evidence should be available to justify its inclusion. We</p>	<p>detailed appraisal in the SA, where they have been appraised against Objective 15. See page Appendix F.</p> <p>The assessment of effects upon the Built and Historic Environment identifies Annesley Hall Park and Gardens as a potential constraint. It refers to the Preferred Approach Heritage Assets Assessment (2022) which states: - <i>Annesley Hall, Park and Gardens – There are no clear views from publicly accessible areas of the Park and Garden towards the site due to dense and mature vegetation. Views from the site are limited to the upper parts of vegetation on the edge of the Historic Park. There is no known historic association or function between the site and the historic Park and Garden. However, the introduction of modern built form on the northern and western parts of the site close to the south-east boundary of the Park would result in a moderate impact on its wider setting.</i></p> <p>As mitigation it states: <i>Annesley Hall, Park and Garden – consider the inclusion of a suitably landscaped wooded buffer around the north and western boundary of the site (including along the A611 in this vicinity).</i></p> <p>Allocation of this site does not rely on the heritage policy.</p>

Respondent	Summary of Comments	Greater Nottingham Councils' Response
	<p>consider that further assessment is required before the judgement on page 16 can be asserted.</p> <p><b>Site appraisal on Ratcliff on Soar Power Station (Rushcliffe)</b>  We further note that in Table 22, on page 83, the assessment for Ratcliffe on Soar Power Station is also listed as 'green', yet we do not consider that sufficient assessment has been undertaken at this time.</p> <p>Historic England has been party to the discussions regarding this site and the Local Development Order. Please find our comments attached as an addendum to this document, as they remain valid within this consultation. Additionally, there is very limited assessment information available to date, aside from a brief mention in the Site Selection Report Appendix D, page 133.</p>	<p><b>Site appraisal on Ratcliff on Soar Power Station (Rushcliffe)</b>  The SA identifies those sites which are reasonable alternatives. The 'Green' outcomes reflect the decision that the site is a reasonable alternative. The Radcliffe on Soar site has been carried forward for a more detailed appraisal in the SA, where they have been appraised against Objective 15.</p>
Knightwood Developments Ltd	<p><b>SA Framework 2</b></p> <p><b>SA objective 2 (employment and jobs) and SA objective 3 (economic structure and innovation)</b></p> <p>See comments from Herrick and Mattock</p> <p>Knightwood Developments also commented that the strategic scale of development required for logistics and market changes post-Covid have not</p>	<p><b>SA objective 2 (employment and jobs) and SA objective 3 (economic structure and innovation)</b></p> <p>See response to comments by Herrick and Mattock</p> <p>The need for strategic logistics is addressed within other evidence. The SA has assessed reasonable alternative sites for strategic logistics.</p> <p><b>Reasonable alternative RBC-EMP-07 Land South of A52, Whatton (Rushcliffe)</b></p>

Respondent	Summary of Comments	Greater Nottingham Councils' Response
	<p>been considered - undermines the GNSP's approach to the site selection.</p> <p><b>Reasonable alternative RBC-EMP-07 Land South of A52, Whatton (Rushcliffe)</b></p> <p>The site scores well against the assessed criteria with only 3 out of 16 scoring major negative as per the SA criteria. The site is recognised as unsuitable for housing development however referring back to the Objectives set out within the SA, it supports the identified criteria of Objective 2 and 3 which shows the suitability of the site for employment purposes. The site would have the ability incorporate blue-green infrastructure and therefore this supports the environmental growth objectives as expressed through Growth Option C of the SA and has strong existing connections to the bus and local rail network in line with Growth Option D. Thoughtful and considerate design will enable objectives surrounding biodiversity to be met, boosting the overall suitability of the site.</p>	<p>The landowner's comments on the site's performance against SA objectives and the Growth Options are noted.</p> <p>The inclusion of considerate design that enables objectives surrounding biodiversity to be met, boosting the overall suitability of the site is included within the mitigation.</p>
Natural England	Natural England welcomes the inclusion for SA Objective 5 regarding accessibility to green and blue infrastructure.	<p>Noted.</p> <p>Previous comments on Scoping Report are also included within final Appendix C.</p> <p>Appendix C of the Preferred Approach SA did not include these comments as policy options (included within the SA Scoping Opinion) were not consulted at the Preferred Approach consultation.</p>

Respondent	Summary of Comments	Greater Nottingham Councils' Response
Omnivale Pension Scheme and Peveril Securities	<p><b>SA Framework 2</b></p> <p><b>SA objective 2 (employment and jobs) and SA objective 3 (economic structure and innovation)</b></p> <p>See comments from Herrick and Mattock</p> <p><b>Appraisal of East of Nuthall</b></p> <p>Omnivale Pension Scheme and Peveril Securities refer to the site East of Nuthall (B05.1PA). They state that, if this site was allocated for logistics it would better support the identified criteria and strengthen the suitability of the site further in terms of Objective 2 and 3 which under the current Housing designation it scores nothing.</p>	<p><b>SA objective 2 (employment and jobs) and SA objective 3 (economic structure and innovation)</b></p> <p>See response to comments by Herrick and Mattock</p> <p><b>Appraisal of East of Nuthall</b></p> <p>The site has been assessed separately for logistics.</p>

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<p>Persimmon Homes</p>	<p><b>Reasonable alternatives</b>            Persimmon object to the Sustainability Appraisal. The most significant of these areas of non-compliance are as follows:</p> <ol style="list-style-type: none"> <li>1. The reasons for selecting the preferred land use allocations and the rejection of alternatives is not given, nor is the Council's site selection process in doing so.</li> <li>2. For there to be compliance with the SEA Directive, the SA should identify the reasonable alternatives to the proposed policies and why they were not considered to be the best option. The Greater Nottingham SA only describes the assessment of alternative sites and does not set out why they were not considered to be the best option.</li> <li>3. If alternatives are ruled out prior to publication does happen, the environmental report accompanying the draft plan must refer to, summarise or repeat the reasons that were given for rejecting the alternatives at the time when they were ruled out and those reasons must still be valid.</li> </ol> <p><b>Site Assessment Changes</b>            We have noted substantive changes in the assessment of sites across the separate SA's against the same evidence base, with no</p>	<p><b>Reasonable alternatives</b>            The SA explains why reasonable alternatives have been discounted – covered at the start of each Site Assessment Appendix.</p> <ol style="list-style-type: none"> <li>1. The reason for selecting the reasonable alternatives is given at the start of each LPA site assessment.</li> <li>2. Strategic options (which inform the preferred approach) and site options are all set out in the SA             Sites were discounted as reasonable alternatives where they did not comply with the preceding assessment strategic options and the selected preferred approach.</li> <li>3. The decisions and selection of the preferred strategy and sites are still valid.</li> </ol> <p><b>Site Assessment Changes</b>            The preceding SA (which accompanied the Issues and Options) did not contain site assessments. This is the first SA that has appraised sites.</p>

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	<p>explanation for such changes. Therefore, the Plan will be unsound because it will not have been positively prepared, will not be justified, will not be effective, and will not be consistent with national policy.</p> <p><b>Land off Oxton Road</b> The specific assessment findings for Land off Oxton Road do not support the Council's conclusions that the land forms a non-strategic role and is only capable of consideration as part of subsequent Part 2 Local Plans. In relation to housing objectives the site could provide significant positive effects. The site also achieves the same assessment for effects in relation to sustainable transport and landscape. Critically, however, there is nothing in the SA process to distinguish the status of safeguarded land where these effects had previously been considered as part of the potential role in meeting future needs.</p> <p><b>Appraisal of housing distribution options</b> For the assessment of 'housing distribution' options at Stage B2 (as a component of the preferred approach) there is no scenario which considers the effects of Gedling failing to make provision in accordance with minimum annual local housing need within the Strategic Plan. There is also no consideration given to the approach to distributing unmet needs, if undertaken, or the</p>	<p><b>Land off Oxton Road</b> Comments regarding this site are noted.</p> <p>Whether a site is safeguarded land is not a concern within the SA.</p> <p><b>Appraisal of housing distribution options</b> Sufficient land will be allocated through future plan preparation. This includes replacing the homes previously proposed at Teal Close. This will be tested through examination.</p> <p>Regarding the uncertainty regarding delivery, this will also be tested through examination. The Councils have robustly justified the housing requirement and the supply, including</p>



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	<p>implications for the removal of the proposed Green Belt site at Teal Close prior to consultation.</p> <p>Option A, in relation to meeting full LHN plus the urban uplift in Nottingham also takes no account of the uncertainty of proposed delivery and the risks of non-delivery and reliance on unidentified sites. This should reduce the significant positive effects for housing attributed to this Option.</p> <p>Furthermore, what is fundamentally lacking from the SA of distribution options is whether the inclusion of sites to meet LHN in full, and potentially contribute towards unmet needs, in Gedling Borough such as our client's land at Oxton Road would result in a different range of effects.</p> <p>The positive effects for both Options A and C in Table 8 of the Main SA Report are markedly overstated, and understated for Option B which is the only distribution option capable of achieving significant positive effects towards housing delivery.</p>	<p>within Nottingham City itself. This is set out within the evidence base.</p> <p>Supply in Gelding will comprise allocations identified within Local Plan Part 2. As occurred within the extant Local Plan. Whilst the land at Oxton Road could contribute, it is determined that this will be determined through the Part 2 Plan. There is no requirement in the GN Strategic Plan to identify sites that meet Gedling's housing need in full.</p> <p>The inclusion of Oxton Road and others to meet the housing need in full is unlikely to change the appraisal of options A, B or C.</p> <p>The positive scores for options A and C reflect the sustainability of located development within the main urban area, rather than dispersing the City's unmet need within the Boroughs.</p>

Respondent	Summary of Comments	Greater Nottingham Councils' Response
<p>Strawson Group Investments Ltd</p>	<p><b>Appraisal of housing requirement options</b>  We support the approach taken against Objective 1 and strongly consider that a single strategic scale site adjoining the built up area that provides housing that would make a significant contribution to the housing need would be the most sustainable approach to take.</p> <p>In respect of the three options for assessing the SA against the housing requirement Option C should be used. This factors in the increase in the amount of housing required by using the Standard Method as a minimum for the housing requirement plus the buffer and by considering future demographic trends and market signals. It is recognised that this is a high growth option that will require land to be released from the Green Belt.</p> <p><b>Housing distribution appraisal</b>  Although Option A ranked highly against the SA criteria, we consider that there are a number of advantages to delivering housing under Option B and the scoring weight could have been applied higher to the housing category for this option. Land constraints within the main built up area of Nottingham for the scale and size of site needed means that there is not the availability of sites for strategic housing purposes. As previously discussed, Nottingham City Centre cannot meet its own housing need with the 35% uplift and there are reasonable strong alternatives in Green Belt</p>	<p><b>Appraisal of housing requirement options</b>  Comments on Objective 1 are noted.</p> <p>Option A (with the standard method is the starting point) is identified as having a major positive effect against the housing objective. This is set out in the SA. For the plan it has been decided there is no reason to depart from the standard method so this is the starting point for determining housing need in the Greater Nottingham.</p> <p><b>Housing distribution appraisal</b>  As Option B would deliver the housing need it already scored major positive (++) against the housing objective. This cannot be increased.</p> <p>The plan is supported by evidence which establishes the capacity of Nottingham City to meet its own need. This justifies the shortfall against its housing need and a lower housing requirement. As Option B proposes to meet this unmet need, it scores a maximum major positive (++).</p> <p>For the Greater Nottingham Strategic Plan, it has been decided that Nottingham City Council will meet as much of</p>

Respondent	Summary of Comments	Greater Nottingham Councils' Response
	<p>locations on the edge of sustainable settlements such as Trowell.</p> <p><b>Broxtowe appendix</b> Land North of Trowell - The Sustainability Appraisal specifically singles out landscape as a constraint. There is reference to the Greater Nottingham Growth Study identifying an amber sensitivity. The area is perceived to have a rural context, with elements of scenic quality. There is also a concern of perceived coalescence with Cossall and Ilkeston. The Study does however identify the part of the area adjoining Trowell as most suitable and suggests development is kept below the ridgeline to reduce risk of perceived sprawl.</p> <p>An illustrative masterplan was provided during consultation on the Growth Options, which specifically addressed this perceived landscape impact by limited development to below the ridgeline and proposing landscaping to further reinforce the boundary to the north. This reduction in developable area reduces the scale of housing deliverable but not to the extent that it wouldn't remain strategic in scale.</p>	<p>the 35% uplift as possible and any unmet need will not be redistributed to Broxtowe, Gedling and Rushcliffe Borough Councils. However, housing targets have been increased for the other three authorities above the standard method figure.</p> <p><b>Broxtowe appendix</b> The SA cannot assess sites on the basis that development will achieve the SA objectives, as the benefits of development cannot be assured. Rather it appraises sites as they are currently, considering their location and environmental conditions against the objectives.</p> <p>The information submitted by the landowner can however inform the mitigation measures identified. In this case, limiting development below the ridgeline and landscaping to reinforce the northern boundary (identified in the masterplan) has been included as mitigation that would help resolve the uncertainty against Objective 14.</p>

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Trinity College	<p>'Transport' - conclusions would have been even more favourable had the assessment recognised the proposed on-site delivery of employment uses, shops, a primary school and open space as well as the contribution that the site would make in terms of delivering a new park and ride facility. It is also noted that evidence has been provided to the Partnership by our client outlining the highways impact and potential mitigation measures – this information demonstrates that the proposal is acceptable from a highways perspective.</p> <p>'Flooding and Water Quality' – the site is noted to be within Flood Risk Zone 1, but there are areas at risk from surface water flooding. Information has been submitted to the Partnership which demonstrates that the site could be brought forward without resulting in harm. It is further noted that the reduction of the site area proposed for development as part of this representation further reduces flood risk associated with the site.</p> <p>'Natural Environment, Biodiversity, Blue and Green Infrastructure' – the summary text fails to recognise the scale of the site and that it is predominantly in use as agricultural land as part of its analysis (meaning that it has a low biodiversity value). Development of our client's site represents an opportunity to undertake significant habitat creation and secure biodiversity gain, and can build on the existing provision located on adjacent land in order</p>	<p>The SA appraisal assesses the site in its current use and context, this includes accessibility to existing employment, shops and services. Provision of these facilities on site is therefore identified as mitigation. Assessing the site's as they currently are, rather than what they could be after development ensures a consistent approach to their appraisal.</p> <p>Flooding - noted that a reduction in the site area would further reduce flood risk associated with the site.</p> <p>Nat Env - already noted that the current use of the site is agricultural land. The justification for the natural environment score is that the site contains and is adjacent to trees protected by Tree Preservation Orders. Development on site would result in the loss of existing trees and hedgerows. Updated masterplan shows that playing fields/outdoor amenity space are proposed. Unclear whether existing trees and hedgerows would be lost. No change to score.</p>

Respondent	Summary of Comments	Greater Nottingham Councils' Response
	<p>to establish a green infrastructure network in this general area.</p> <p>'Natural Resources and Waste Management' – no commentary was provided on this criterion and so it is unclear why a negative score was identified.</p> <p>'Landscape' – our client acknowledges that there are landscaping constraints effecting the site. The representation is supported by a masterplan which has reduced the extent of built-form so that it does not extend north of the A60 roundabout. This is a smaller site than has previously been reviewed by the Partnership and would reduce perceived landscape harm (addressing concerns in relation to this criteria).</p> <p>'Built and Historic Environment' - on a similar basis to landscape, the extent of the built area being promoted has been reduced in the masterplan. This has drawn built form further away from Bestwood Pumping. Landscape buffers have been included to Bestwood Lodge and the submitted masterplan illustrates that enhancements can be made to re-enforce the general planting surrounding the Lodge.</p> <p>Our client therefore considers that the Sustainability Appraisal Assessment work did not accurately consider all available information on the suitability of sites.</p>	<p>Nat resources - The reasons for the negative score for natural resources is because the site is classified as grades 2, 3, 3a and 3b but also an area has not been surveyed. The score reflects that it is not known whether the unsurveyed area is not best and most versatile and that development on site would likely increase household waste per head.</p> <p>Landscape - it is acknowledged that Landscape constraints affect the site but the masterplan reduces the extent of built form to south of the A60 roundabout, which would reduce perceived landscape harm. Whilst a landscape and visual briefing note has been provided, a full landscape character assessment has not been undertaken. The mitigation column has been amended to confirm that a smaller site may reduce landscape harm. No change to the score.</p> <p>Build environment - the mitigation column already notes that a reduced site area would minimize impact on Bestwood Lodge and Papplewick Pumping Station.</p>

# **Consultation comments on the Strategic Distribution and Logistics Preferred Approach Sustainability Appraisal (September 2023)**

All comments on the Sustainability Appraisal of the Greater Nottingham Strategic Plan: Strategic Distribution and Logistics Preferred Approach are summarised within the table below. Individual responses from the Greater Nottingham Councils are provided against each representation.

Respondent	Summary of Comments	Greater Nottingham Councils' Response
Environment Agency	<p><b>Former Bennerley Coal Disposal Point</b>  The Environment Agency state that, in respect of BBC-L01, large parts of the site are at risk of flooding from the Gilt Brook and River Erewash. The south-western part of the site is within Flood Zone 3b (functional floodplain) and only essential infrastructure and water compatible development should be located in this part of the site. They advise that, as the site straddles the Gilt Brook, which is an ordinary watercourse, the applicant should consult the Lead Local Flood Authority. Additionally, due to the interaction with the larger River Erewash, the applicant should develop a hydraulic model for the Gilt Brook to ensure flood risk is fully understood. They advise that a sequential approach should be taken to the site layout by directing development to the areas of lowest flood risk. They state that the re-development of this brownfield site presents an opportunity to reduce flood risk downstream and the applicant should explore opportunities to reduce flood risk to the wider catchment where possible.</p> <p><b>Ratcliffe on Soar Power Station</b>  The Environment Agency reiterated that the proposed allocation is largely within flood zone 1 and the impacts on the main river flood zones are minimal. They stated that any future application</p>	<p>Former Bennerley Coal Disposal Point – noted comments by the Environment Agency and additional mitigation text has been added to refer to the need to develop a hydraulic model and to apply a sequential approach to the site layout to direct development to areas of lowest flood risk. The issues raised would be considered as part of the layout of the site and as part of a future planning application.</p> <p>Ratcliffe on Soar Power Station – noted comments by the Environment Agency.</p> <p>Nottingham Gateway – noted comments by the Environment Agency. Issues raised would need to be addressed as part of a future planning application.</p> <p>BBC-L02a Gilt Hill (smaller site) and BBC-L02b Gilt Hill (larger site) – Additional text added to refer to the need to apply a sequential approach to the site layout to direct development to areas of lowest flood risk.</p> <p>Comments are noted in respect of the other sites.</p> <p>Fisheries, Biodiversity and Geomorphology: The comments are noted. For BBC-L02a Gilt Hill (smaller site) and BBC-L02b Gilt Hill (larger site), mitigation text has been added to objective 13 to refer to providing a buffer zone to the Gilt Brook to help protect water vole. For BBC-L04 Land at Kimberley Eastwood Bye Pass mitigation text added to objective 13 to refer to protecting and</p>

Respondent	Summary of Comments	Greater Nottingham Councils' Response
	<p>must demonstrate that contamination risks can be addressed/managed through the course of the development.</p> <p><b>Reasonable Alternative Sites</b></p> <ul style="list-style-type: none"> <li>BBC-L02a Gilt Hill (smaller site) and BBC-L02b Gilt Hill (larger site) – The western edge of the site bounds the Gilt Brook which is designated as an <i>ordinary watercourse</i> and therefore the Lead Local Flood Authority would need to be consulted. The area around the Gilt Brook also falls within Flood Zone 3 so any proposals should take a sequential approach to site layout by directing development to the areas of lowest flood risk within the site boundary.</li> </ul> <p>BBC-L04 Land at Kimberley Eastwood Bye Pass, BBC-L05 Land at Low Wood Road, Nuthall, BBC-L06 Land at New Farm Nuthall, BBC-L08 Land to the south-east of M1 junction 26, Nuthall – The sites are all located in Flood Zone 1.</p> <ul style="list-style-type: none"> <li>Nottingham Gateway (RBC-L02) - The Environment Agency commented that an area of the site to the west of the A453 is at risk of flooding from the River Trent and recommended that if the site was taken forward development within this area should be avoided where</li> </ul>	<p>enhancing the Local Wildlife Sites through biodiversity net gain.</p> <p>Comments relating to groundwater and contaminated land have been noted. Matters raised would need to be addressed as part of a future planning application.</p>



Respondent	Summary of Comments	Greater Nottingham Councils' Response
	<p>possible. They suggested that the watercourses present within the site offer opportunities for biodiversity net gain and ecological enhancements. They stated that any future application must demonstrate that contamination risks can be addressed/managed through the course of the development.</p> <p>In respect of Fisheries, Biodiversity and Geomorphology, the Environment Agency state that based on biodiversity value and risk of damage to important/protected habitats or species, their preference as an alternative would be either BBC-L04 Land at Kimberley Eastwood Bye Pass or BBC-L08 Land to the south-east of M1 junction 26, Nuthall, provided that the ancient woodland was retained in the latter, as an irreplaceable habitat. After this Gilt Hill (site a) or Nottingham Gateway would be preferred.</p> <ul style="list-style-type: none"> <li>• BBC-L02a Gilt Hill (smaller site) and BBC-L02b Gilt Hill (larger site) – There are historic protected species records of water vole on the Gilt Brook, which borders the site. Whilst this is not a statutory main river, they would like to see a minimum of 8m undeveloped buffer zone, ideally 10m to avoid encroachment and help protect the water vole which might still be present. They advise that site A would be selected in preference to site B to protect water</li> </ul>	

Respondent	Summary of Comments	Greater Nottingham Councils' Response
	<p>voles possibly being abundant more upstream adjacent to site B and site A being located further away from the SSSI site Sledder wood. Site A also does not border as many LWS's as site B or include deciduous woodland within the proposed development boundary as site B does, which is protected under the NERC Act 2006.</p> <ul style="list-style-type: none"> <li data-bbox="454 596 1173 1187">• BBC-L04 Land at Kimberley Eastwood Bye Pass – There are no statutory main rivers or watercourses are present within this site boundary and no protected species records that the Environment Agency leads on within the boundary or nearby. However other protected species records exist nearby. Part of verge wood LWS is included within the site boundary, so they would encourage this habit be retained as part of designs, as well as the deciduous woodland to the south of the site, protected under the NERC Act 2006 and near to another ancient woodland site. There is opportunity to enhance the LWS through biodiversity net gain.</li> </ul> <p>The remaining sites, whilst some have no watercourse within them, they either boarder or include SSSI sites or LWS's within the development boundary. Therefore, particularly</p>	

Respondent	Summary of Comments	Greater Nottingham Councils' Response
	<p>those that are adjacent to SSSI sites are likely incur some impact to their ecological value and are therefore less preferable as selected alternative sites.</p> <ul style="list-style-type: none"> <li>• BBC-L05 Land at Low Wood Road, Nuthall – Despite no statutory main rivers occurring within the site boundary or any other watercourses, the location is directly adjacent to important habitats such as the Sellers Wood SSSI, ancient woodlands and LWS. This is in unfavourable recovering condition. Low Wood LWS has also partly been included within the boundary. Other LWS boarder or are near to the proposed site as well as deciduous woodland protected under the NERC Act 2006.</li> <li>• BBC-L06 Land at New Farm Nuthall – Despite there being no statutory main rivers or watercourses directly within the site, there is a watercourse inhabited by the protected species white clawed crayfish which are sensitive to water quality. This location also borders Bulwell Wood SSSI, Bulwell wood and pond LWS and Bulwell Wood ancient woodland. There is therefore likely impact to these protected sites, unless careful design and biodiversity net gain can</li> </ul>	

Respondent	Summary of Comments	Greater Nottingham Councils' Response
	<p>be considered to improve the part of the site that is in unfavourable declining condition. This site is also adjacent to important habitats such as the Sellers Wood SSSI, ancient woodlands and LWS, which is in unfavourable recovering condition.</p> <ul style="list-style-type: none"> <li>• BBC-L08 Land to the south-east of M1 junction 26, Nuthall – There are no statutory main rivers or watercourses directly within the site or protected species that the Environment Agency lead on. However, there is an ancient woodland site located within the site boundary 'M1 woodland LWS'. If this site was selected as a preferred alternative, then they would advise that the ancient woodland be retained.</li> </ul> <p>The Environment Agency commented that an area of the site to the west of the A453 is at risk of flooding from the River Trent and recommended that if the site was taken forward development within this area should be avoided where possible. They suggested that the watercourses present within the site offer opportunities for biodiversity net gain and ecological enhancements. They stated that any future application must demonstrate that contamination risks can be addressed/managed through the course of the development.</p>	

Respondent	Summary of Comments	Greater Nottingham Councils' Response
	<p>In respect of groundwater and contaminated land, the Environment Agency provides “high level” comments. Some of these sites are considered “brownfield sites” in the sense that they are associated with current or historic uses which have or had the potential to cause contamination or pollution. Therefore, in the event of future development proposals, applications must demonstrate that contamination risks can be addressed / managed through the course of development in accordance with NPPF paragraphs 174 and 183. All land contamination assessments must be produced in accordance with the online guidance <a href="#">Land Contamination: Risk Management (LCRM)</a>.</p> <p>Site proposals will also need to carefully consider pollution prevention measures within their surface water drainage solutions. This is especially the case for several of the “Reasonable alternative” sites which are located on bedrock which is classified as a principal aquifer. Principal aquifers provide significant quantities of drinking water, and water for business needs. They may also support rivers, lakes and wetlands.</p>	
Historic England	<p><b>Former Bennerley Coal Disposal Point</b>  Historic England note that the site that scored the worst for the historic environment is BBC-L01 Former Bennerley Coal Disposal Point, yet this has</p>	<p>Further heritage assessment work has been undertaken in respect of the Former Bennerley Coal Disposal Point. The Site Selection Document explains why this site has been selected. The impact on the built and historic environment</p>

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	<p>been progressed by the Council as a preferred site. They request to understand if there are other sites that could be taken forward that do not have the same level of harm for the historic environment. There are several sites that scored as an uncertain '?' against the historic environment and it would be useful to understand what the SA implications are so that an informed decision on sustainability can be undertaken. They note paragraph 38 that sets out that there is a possibility to reduce harm to heritage through avoidance/ mitigation measures. They state that there is a need to undertake a heritage assessment to assess the level of harm to the significance of heritage assets, including their setting, and if there are appropriate avoidance/ mitigation measures to reduce the harm. This information would be required to assess if the judgement is appropriate.</p>	<p>for other sites would depend on the layout and amount of development and therefore it is considered that the impact is uncertain, although it is noted that avoidance and mitigation measures would need to be identified if they were identified as preferred sites.</p>
<p>Knightwood Developments Ltd</p>	<p><b>Former Bennerley Coal Disposal Point</b>            Knightwood Developments Limited state that, out of the 16 SA objectives, the Bennerley Coal Disposal Point only scores positively on 7, whereas the site scores negatively, or the impact is not known, on 8 of the identified criteria. They consider that, out of those which it has been negatively assessed, these are fairly high/significant impacts and they are of the view that this fundamentally calls into question the overall suitability of the site to be put forward as a proposed allocation.</p>	<p>The comments are noted. The SA informs which sites are selected to be taken forward but does not determine this.</p>

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<p>Peeveril Securities Ltd &amp; Omnivale Pension Scheme</p>	<p><b>Former Bennerley Coal Disposal Point</b>  Peeveril Securities Limited &amp; Omnivale Pension Scheme question the SA assessment in relation to BBC-L01 Former Bennerley Coal Disposal Point. They highlight flooding which has taken place on the site.</p> <p><b>Land at Low Wood Road, Nuthall</b>  Peeveril Securities Limited &amp; Omnivale Pension Scheme raise concerns regarding the scoring and consider that the assessment in respect of the energy and climate and the pollution objectives should be changed to 'Positive' effects. They also consider that scoring related to natural environment and landscape should be revisited, referring to the site characteristics, the potential to provide new routes and green corridors through the site and the mitigation measures such as landscaping which could be provided.</p>	<p>Former Bennerley Coal Disposal Point – The comments are noted.</p> <p>Land at Low Wood Road, Nuthall – It is considered that until further details are provided in respect of low carbon measures and solutions to climate change, the scoring for objective 10 would remain uncertain. It is considered that development in this location is likely to have an adverse impact on landscape character although it is noted that mitigation measures may reduce this impact. The scoring therefore remains unchanged.</p>
<p>Richborough</p>	<p><b>Former Bennerley Coal Disposal Point</b>  Richborough state that, out of the 16 SA objectives, the Bennerley Coal Disposal Point only scores positively on 7, whereas the site scores negatively, or the impact is not known, on 8 of the identified criteria. They consider that, out of those which it has been negatively assessed, these are fairly high/significant impacts and they are of the view that this fundamentally calls into question the overall suitability of the site to be put forward as a proposed allocation.</p>	<p>The comments are noted.</p>

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Wilson Bowden	<p><b>Land at New Farm, Nuthall</b> Wilson Bowden made comments in relation to the assessment of site BBC-L06. They highlight that the development could contribute to highway improvements at Junction 26, a further assessment of agricultural land classification would be undertaken, the part of the site in the NO2 Agglomeration Zone could be removed, mitigation could be provided in respect of ecology and the groundwater flood risk data is queried.</p>	<p>The comments related to highway improvements and agricultural land classification are noted. Mitigation text has been added to objective 11 to avoid the NO2 agglomeration zone but the scoring has not changed. There is existing mitigation text related to ecology, including a reference to Biodiversity Net Gain. It has been identified that the site is at low risk of flooding.</p>
Local Resident	<p><b>Former Bennerley Coal Disposal Point</b> A resident suggests that, in respect of BBC-L01, mitigation text should be added to ensure that the D2N2 LCWIP gets updated to incorporate plans for timely delivery of good-quality cycle-routes between the Bennerley site and all the settlements, within a 5-mile radius, where employees are likely to live.</p> <p><b>Ratcliffe on Soar Power Station</b> It was also suggested that the mitigation text for the Power Station should cover active travel, and require D2N2 and North West Leicestershire to update their infrastructure plans to incorporate delivery of cycle routes between the Power Station and settlements within a 5 minute radius.</p>	<p>Former Bennerley Coal Disposal Point – Specific reference to active travel has been added as a mitigation measure to the transport objective.</p> <p>Ratcliffe on Soar Power Station – the mitigation already covers active travel. The Councils cannot require other organisations to update their plans/strategies.</p>