

Greater Nottingham
Planning Partnership



Preferred Approach: Sustainability Appraisal Report Appendix C: Consultation comments

December 2022



Contents

| | |
|---|----------|
| Introduction | 3 |
| List of respondents | 3 |
| Consultation comments on the Scoping Report (July 2020)..... | 4 |
| 1. Plans, policies and programmes..... | 4 |
| 2. Baseline data | 8 |
| 3. Key sustainability issues..... | 9 |
| 4. SA Framework – SA objectives | 11 |
| 5. SA Framework 1 – Policy Criteria | 12 |
| 6. SA Framework 2 – Site Allocation Criteria..... | 13 |
| 7. SEA Directive requirements..... | 16 |
| 8. Other comments | 16 |

Introduction

This appendix summarises the consultation comments received on the Scoping Report (July 2020).

This appendix provides a list of respondents who responded to the formal consultation and summarises the comments received for each consultation question on the Scoping Report followed by the Greater Nottingham councils' response. The consultation questions are in bold in this appendix.

List of respondents

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.

Consultation comments on the Scoping Report (July 2020)

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"> An assessment of the extent to which local rights of way meet the present | <ul style="list-style-type: none"> To protect, maintain and seek to enhance the network for all lawful users | It should take account of the objectives in the | The SA Framework should take account of these needs |

| Description | Target | Implication for GN Strategic Plan | Implication for SA |
|---|--|-----------------------------------|--------------------|
| <p>and likely future needs of the public</p> <ul style="list-style-type: none"> • 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 • An assessment of the accessibility of local rights of way to blind and partially sighted people and others with mobility problems • 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. | <ul style="list-style-type: none"> • To improve access to the network for all by adopting the principle of the least restrictive option • To improve the safety and connectivity of the metalled road network with the rights of way network • 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 • To provide a revised and updated definitive map and statement • To enhance and increase community involvement in managing and improving the network, where resources allow | <p>Management Plan</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 2021;
- 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.