

# Broxtowe Borough, Gedling Borough and Nottingham City Sustainability Appraisal Report of the Aligned Core Strategies Publication Version

**Addendum  
May 2013**



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## Introduction

1. This report is an addendum to the Greater Nottingham (Broxtowe Borough, Gedling Borough and Nottingham City) Sustainability Appraisal Publication Version June 2012 of the Aligned Core Strategies (ACS).
2. The Planning and Compulsory Purchase Act (2004) requires Local Planning Authorities to carry out a Sustainability Appraisal of the proposals in development plan documents and to prepare a report of the findings of that appraisal. Through the SA process, the local planning authority must assess the social, economic and environmental impacts arising from the proposals within the development plan document. The Core Strategies are development plan documents and therefore have been subject to SA at each of the key stages in their preparation.
3. The Councils published a SA Report alongside the Core Strategies in June 2012.
4. The aim of this stage of the Sustainability Appraisal (SA) process is to determine whether there are likely to be any significant sustainability effects arising from the proposed amendments to the Greater Nottingham Broxtowe Borough, Gedling Borough and Nottingham City Aligned Core Strategies Publication Version June 2012 (hereafter referred to as the Core Strategies).
5. This report therefore presents the results of the appraisal of the proposed changes to the Core Strategies, including the full appraisal of a new policy (Policy A: Presumption in Favour of Sustainable Development). The report also provides a summary of comments received at the publication stage of the ACS to the SA and officer responses to those comments, plus commentary on updates to baseline data and characteristics.
6. Erewash Borough Council was part of the Publication Version of the SA when it was published in June 2012. Since then, it has submitted its Core Strategy in November 2012 and has made no proposed changes to the document. Therefore this addendum only relates to the three local authorities of Broxtowe, Gedling and Nottingham City.

## Aligned Core Strategies Submission Draft

7. The Aligned Core Strategies Submission Draft document is to be submitted to the Secretary of State in June 2013 for examination. In addition, a number of proposed modifications are to be submitted to be considered as part of the examination process. This addendum to the SA Report provides an appraisal of the amendments that the Councils are proposing. These changes can be viewed in the separate Schedule of Changes. However, the main changes proposed to the document post publication are set out below.
  - The key change is the introduction of a new policy and justification text on the 'presumption in favour of sustainable development', which the Planning Inspectorate is requesting for all Core Strategies since the publication of the National Planning Policy Framework (NPPF). It sets out a positive approach

to planning proposals with the aim of working jointly with applicants to develop acceptable schemes;

- Policy 1 'Climate Change' – minor amendments proposed to clarify how feasibility and viability within policy requirements will be assessed. Clarification of the approach to development in areas of flood risk are also proposed;
  - Policy 2 'Spatial Strategy' - proposed to be largely unchanged. Minor changes proposed are to update the anticipated levels of housing development over the plan period to reflect more recent information, changes to the retail part of the policy to better reflect the NPPF, and minor clarification on transport schemes;
  - Policy 3 'Green Belt' - no proposed changes;
  - Policy 4 'Employment Provision and Economic Development' – minor changes proposed to make the policy clearer;
  - Policy 5 'The City Centre' - proposed to be changed to clarify the approach to Primary Shopping Frontages, and the contribution historic assets make the City Centre's character, distinctiveness and economy;
  - Policy 6 'The Role of Town and Local Centres' - changes proposed to bring it into line with the NPPF;
  - Policy 7 'Regeneration' - no significant proposed changes;
  - Policy 8 'Housing Size Mix and Choice' - proposed to be changed to better reflect the City Council's approach to houses in multiple occupation;
  - Policy 9 'Gypsies, Travellers and Travelling Show People' - has no significant proposed changes.
  - Policy 10 'Design and Enhancing Local Identify' – proposed changes to ensure issues over ground conditions, such as land instability and contamination are properly considered;
  - Policy 11 'The Historic Environment' – minor changes for clarification;
  - Policy 12 'Local Services and Healthy Lifestyles'- minor changes proposed to improve policy clarity;
  - Policy 13 'Culture, Tourism and Sport' – no significant proposed changes;
  - Policy 14 'Managing Travel Demand' – proposed to be changed in line with representations from the Highways Agency and to provide further clarification.
  - Policy 15 'Transport Infrastructure Priorities' – proposed to be changed in line with representations from the Highways Agency and to provide further clarification.
  - Policy 16 'Green Infrastructure' – proposed changes to clarify the approach to development on open spaces;
  - Policy 17 'Biodiversity' – proposed changes to clarify the level of protection to be accorded to sites of biodiversity and fully reflect the NPPF;
  - Policy 18 'Infrastructure' and Policy 19 'Developer Contributions' – proposed changes to improve clarity; and
  - Changes to the Introduction, Vision and Objectives, and policy justification text reflect the changes mentioned above and provide updated information.
8. As the Core Strategies have already been the subject of SA throughout their preparation, this addendum does not reassess the whole of the Core Strategies. It should be, therefore, read in conjunction with the SA Publication Version

Report (June 2012) and the "Inclusion of the land in the vicinity of the proposed HS2 station" Addendum February 2013.

### **SA Screening Methodology**

9. The process of appraising changes to the Core Strategies involves an initial screening phase to 'scope' for those changes to policy that would be likely to have sustainability implications. In cases where sustainability implications are likely, these policies would then be carried forward for full assessment against the SA objectives. The scoping and appraisal process reported below conformed to the methodology used in previous appraisals. A detailed Sustainability Appraisal Methodology is found in the [Sustainability Appraisal Publication Version Report](#) and should be referred to for further information. A copy of the Refined Sustainability Appraisal Framework is provided in Appendix B.

### **Summary of Appraisals**

10. The SA team for the three local planning authorities undertook a sustainability appraisal workshop in December 2012 in order to assess the effect of the proposed changes to the Core Strategies. A review of the scoping exercise was then conducted by the planning policy officers group, which confirmed the results of the initial workshop. The results of the screening process can be viewed in Appendix A. In summary, the process concluded that the changes proposed to the original policies within the Core Strategies were not substantive enough to require reassessment.

### **Appraisal of additional Policy A: Presumption in favour of sustainable development**

11. Subsequent to the Core Strategies Publication version, a new policy (Policy A: Presumption in Favour of Sustainable Development) is now proposed. This policy seeks to meet the development needs of the area and is closely based on the PINs 'model' policy on the subject. A copy of Policy A is provided in Appendix C.
12. This policy (seeking to achieve social, economic and environmental benefits) should help ensure that the Core Strategies as a whole deliver sustainable development over the plan area. For the sake of consistency and in order to maintain a comprehensive approach to SA process for the Core Strategies it was decided to undertake a full Sustainability Appraisal of the new policy. Given that this policy is closely based on national policy within the NPPF, it was considered unnecessary to appraise alternative scenarios.
13. The result of the full appraisal can be viewed at Appendix D. Within the workshop it was also noted that when making assessment on any proposals reference will need to be made to all relevant policies within the plan rather than this policy alone. Therefore, although the policy on its own looks highly supportive of development, other policies will restrict or protect the impacts of development.

14. Overall the process highlighted the policy as being likely to have positive effects on all but one of the SA objectives, crime, where the impact was considered to be negligible. Given the general nature of the policy, only minor positive sustainability impacts were envisaged for most objectives. However, the emphasis within the policy towards housing and economic growth resulted in the consideration that slightly more significant positive impacts could follow for the housing, employment and economic structure objectives.

#### **Likely significant effects of the changes**

15. It is considered that the changes proposed to the Core Strategies, including the addition of new Policy A, will not have any material effect on the SA objectives beyond those set out Table 23 ('Likely significant effects') of the SA Publication Version June 2012. Table 23 details the anticipated short, medium, long, permanent, temporary secondary and cumulative/synergistic effects of the plan against each Sustainability Objective.

#### **Comments received at the Publication Version on the Sustainability Appraisal**

16. A number of comments were received on the SA at the Publication version stage of the document. Appendix E provides a summary of the joint points raise and an officer response to each. Appendix F provides a summary of the points raised on Gedling's appraisals with officer responses. Appendix G provides a summary of the points raised on Broxtowe's appraisals with officer responses. Gedling has made some very minor changes to their part of the SA detailed below as a result of some of the comments they received.

#### **Amendments to Sustainability Appraisal (Publication Version)**

##### Gedling Area

17. There are amendments that will need to be made in the light of comments received on Gedling Borough Councils appraisals and sustainability schedules in the SA Publication Version when the final SA is produced following adoption.

18. Queries were raised regarding the scores for crime, heritage and employment objectives for the low and high growth scenarios for Gedling. The scores for crime, heritage and employment objectives for the low and high growth scenarios will be amended. Ashfield District Council raised issues about potential inconsistencies with some of the SA objectives 5 (social), 8 (natural resources and flooding) and 9 (waste) objectives for Top Wighay Farm, North of Papplewick Lane, North of Redhill, East of Lambley Lane and Gedling Colliery/Chase Farm sites. The scores for objectives 5, 8 and 9 will be amended to ensure a consistent approach between the sites. Calverton Parish Council identified three Scheduled Ancient Monuments in the vicinity of Calverton which are not detailed in the SA. The sustainability schedules will be updated to refer to Scheduled Ancient Monuments and Listed Buildings in the vicinities of Calverton, Bestwood Village and Ravenshead.

19. These amendments are minor and do not change the overall sustainability results for Gedling. The minor amendments to Gedling Borough Council's

appraisals and sustainability schedules are listed in Table 1. A track change version of the amendments is shown in Appendix H.

#### Broxtowe Area

20. Broxtowe Borough Council has received several representations about its district specific part of the sustainability appraisal but none of the objections are considered substantive enough to require significant amendment to the relevant parts of the SA or affect the soundness of the Aligned Core Strategies. Minor changes have been made to the evidence base where there were factual errors, having no significant effects on the results of the appraisals, and the evidence base has been updated post Publication in order to make the current situation clear for the community. The Broxtowe specific information is included in Appendix G.

#### Nottingham Area

21. There have been no specific criticisms of the appraisals for Nottingham City.

#### **Updates to the Baseline Data and Characteristics**

22. Since the Aligned Core Strategies Publication Version was published in June 2012 some of the baseline data which sets out the spatial portrait of the plan and individual council areas has been updated. Consequently amendments have been made in the Submission draft of the ACS document for when it is submitted to the Planning Inspectorate. However, as the changes are relatively minor, instead of re-issuing all of the text within the Baseline in the SA, it is considered simpler to describe the changes within this addendum.

23. The main changes to the baseline data (much of which is repeated within the non-technical summary and Section 3 of the Publication Version SA, June 2012) relate to changes in population statistics, unemployment rates and details about the heritage assets across the plan area. None of the changes in themselves will have had a significant impact on the baseline characteristics of the area and hence the reason why it is not considered necessary to update and re-issue the SA at this point. Once the plan is adopted and the SA is finalised, these (along with any other changes) can be incorporated at that stage. To assist understanding of how the changes would impact on the current document, a track change version of the text which will be updated is shown in Appendix I.

**Sustainability Appraisal Addendum on Publication Version Document May 2013**

**Table 1: Amendments to Gedling’s appraisals and sustainability schedules**

<b>Where in SA</b>	<b>Document</b>	<b>Page No</b>	<b>Amendment</b>	<b>Reason</b>
Objective 3 (heritage) for high and low growth scenarios	SA Appendices	Page 205 Page 206	Remove minor positive for high growth scenario Add minor positive for low growth scenario	Heritage should score positively in relation to low growth scenario
	SA Report	Page 99	Amend Table 17 and paragraph 11.5 accordingly	
Objective 4 (crime) for high and low growth scenarios	SA Appendices	Page 205 Page 206 Page 207	Add minor positive for high growth scenario Add minor positive for low growth scenario Add reference to Designing out Crime standards for both scenarios	Crime to be given a score for high and low growth scenarios
	SA Report	Page 99	Amend Table 17 accordingly	
Objective 12 (employment) for low growth scenario	SA Appendices	Page 206	Correct objective 12 (employment) to include '-' (minor negative) score for low growth scenario	Correction
Objective 5 (social) for Top Wighay Farm and North of Papplewick Lane	SA Appendices	Page 208 Page 211	Add minor positive for Top Wighay Farm Add minor positive for North of Papplewick Lane	Consistent approach between sites
	SA Report	Page 102	Amend Table 18 accordingly	
Objective 8 (natural resources and flooding) for Top Wighay Farm and North of Redhill	SA Appendices	Page 208 Page 225	Increase minor negative to moderate negative for Top Wighay Farm Reduce moderate to major negative to moderate negative for North of Redhill	Consistent approach between sites
	SA Report	Page 102	Amend Table 18 accordingly	
Objective 8 (natural resources and flooding) for Gedling Colliery	SA Report	Page 102	Table 18 – correct objective 8 for Gedling Colliery from '+/---' to '---'	Correction
Objective 9 (waste) for Top Wighay Farm, North of Papplewick Lane, Gedling Colliery, North of Redhill, East of Lambley Lane, Bestwood Village, Calverton and Ravenshead	SA Appendices	Page 208 Page 211 Page 213 Page 222 Page 225 Page 216 Page 218 Page 220	Add minor negative for Top Wighay Farm Add minor negative for North of Papplewick Lane Add minor negative for Gedling Colliery Reduce moderate to major negative to minor negative for North of Redhill Reduce moderate negative to minor negative for East of Lambley Lane Add minor negative for Bestwood Village Add minor negative for Calverton Add minor negative for Ravenshead	Consistent approach between sites
	SA Report	Page 102	Amend Table 18 accordingly	
Sustainability Schedules for Bestwood Village, Calverton and Ravenshead	SA Appendices	Page 194	Update to refer to 1 Scheduled Ancient Monument and Listed Buildings in the vicinity of Bestwood Village	Additional information
		Page 195	Update to refer to 3 Scheduled Ancient Monuments and Listed Buildings in the vicinity of Calverton.	
		Page 196	Update to refer to Listed Buildings in the vicinity of Ravenshead	



24. The main changes consist of:

Population

25. Previously in the Publication Version, the Office for National Statistics (ONS) 2012 mid year estimates were used. These have now been superseded by the Office for National Statistics 2011 Census data. Amended populations for Broxtowe, Gedling and Nottingham City have therefore been inserted into the Submission draft of the ACS. These changes can be found in section 2.2 The Character of the Plan Area, 2.7 Broxtowe Spatial Portrait/Local Distinctiveness, 2.8 Gedling Spatial Portrait / Local Distinctiveness and 2.9 Nottingham City Spatial Portrait / Local Distinctiveness of the ACS.
26. At the time that the Publication Version of the SA was produced, the document also covered Erewash and so combined population figures were used within the Non-Technical Summary and main body of the text (section 3). When it is time to produce a final SA Report, it is likely that Erewash Borough Council will not be part of that document, and instead will produce its own separate SA document. Thus, the population figures shown in Appendix G of this document highlight the changes excluding Erewash, which are likely to be made once the document is updated.

Heritage

27. Heritage Assets data for Broxtowe, Gedling and Nottingham City has been updated at paragraphs 2.7.9, 2.8.4 and 2.9.7 of the Aligned Core Strategies in line with consultation comments received from English Heritage. In addition, at paragraph 2.2.8 further description is given about the amount of heritage assets within the plan area and importantly the contribution these assets make to the plan area. Changes will be made to the SA at paragraphs 3.12, 3.40, 3.67 and 3.80 when the SA is finalised in order to replicate these changes as shown in Appendix I.

Other changes

28. At Para 2.2.21 additional explanation is given on health issues (provided by Nottingham City Primary Care Trust in their consultation response to the ACS) and this will affect paragraph 3.26 of the SA which will be reworded as shown in Appendix I.
29. Economic activity and employment rates statistics for Nottingham City have been slightly amended at paragraph 2.9.11 for Nottingham City with the same change to be made to the SA at 3.84, again, this proposed change is set out in Appendix I.

## Conclusions

30. The findings set out in this addendum are summarised as follows:

- All proposed changes to the policies within the Core Strategies Publication Version were 'scoped' out as not having any substantive impact on the SA objectives.
- New policy (Policy A: Presumption in Favour of Sustainable Development) was appraised as being likely to result in a positive impact on all of the SA objectives, aside from the crime objective, where any impact was considered negligible. The housing, employment and economic structure objectives were considered likely to benefit from moderate positive impacts based upon the positive emphasis within the policy towards housing and economic growth. The wording of the policy was considered to be less explicit in relation to the other SA objectives, where minor positive impacts were anticipated.
- It is considered that the proposed changes to the Core Strategies, as appraised in this addendum, do not materially alter the conclusions in the SA Publication Version Report (June 2012).
- Apart from some very minor changes having necessarily been made to part of the appraisals within Gedling, the SA is robust and a credible Report which has been prepared in accordance with the required legislation.
- Some baseline data has been updated, instead of re-issuing the whole SA report these changes have been described above and will be incorporated within the final SA, following adoption.

## Appendix A: Screening Exercise

Policy	Do changes to the policy significantly affect likely sustainability implications?	Further SA Required	Comments
<b>Policy A: Presumption in Favour of Sustainable Development</b>	New policy.	Yes	Appraise new policy.
<b>1 Climate Change</b>	No	No	Positive change to policy 1.10 – but not considered substantive enough to require reassessment. Other changes not substantive, only affect policy/justification text wording clarification.
<b>2 Spatial Strategy</b>	No	No	Not substantive, only affects policy/justification text wording clarification.
<b>3 Green Belt</b>	No	No	No change to policy, only unsubstantive change to justification text adding further explanation.
<b>4 Employment Provision and Economic Development</b>	No	No	No change to policy, only unsubstantive change to justification text adding further explanation
<b>5 Nottingham City Centre</b>	No	No	Minor amendments to policy which do not result in substantive changes.
<b>6 The Role of Town and Local Centres</b>	No	No	Amendments to policy/justification text wording resulting in no substantive change
<b>7 Regeneration</b>	No	No	Amendments to wording resulting in no substantive change

<b>Policy</b>	<b>Do changes to the policy significantly affect likely sustainability implications?</b>	<b>Further SA Required</b>	<b>Comments</b>
<b>8 Housing Size, Mix and Choice</b>	No	No	Increased affordable housing requirements across the conurbation but this has not resulted in a change to the policy. Two alternative approaches could be put forward to meet this increased requirement of: 1) allocate more housing or 2) increase the percentage of affordable housing requirements. Scenario 1 has already been assessed at workshop 3 and is shown to be not as sustainable as the preferred approach. The other option, of increasing affordable housing requirement, is not viable and, as such, is not a reasonable alternative. The Greater Nottingham Housing Market & Economic Prospects report (2012) in the evidence base has also shown that increasing the amount of land available for housing is also not a viable alternative. In any event, planning obligations are not the only way to provide affordable housing and so increased need could be addressed through other local or central government policies/programmes.
<b>9 Gypsies, Travellers and Travelling Showpeople</b>	No	No	Only very minor change to policy text and justification. No substantive change.
<b>10 Design, the Historic Environment and Enhancing Local Identity</b>	No	No	Relatively minor change to policy on land instability and contamination. Not substantive enough change to policy to warrant reassessment
<b>11 Historic Environment</b>	No	No	Only very minor change to policy text and justification. No substantive change.
<b>12 Local Services and Healthy Lifestyles</b>	No	No	Only very minor change to policy text and justification. No substantive change.

<b>Policy</b>	<b>Do changes to the policy significantly affect likely sustainability implications?</b>	<b>Further SA Required</b>	<b>Comments</b>
<b>13 Culture, Sport and Tourism</b>	No	No	Only very minor change to policy text and justification. No substantive change.
<b>14 Managing Travel Demand</b>	No	No	Positive change to policy 14.3d) – but not considered substantive enough to require reassessment of the policy. Other changes not substantive, only affecting policy/justification text wording clarification.
<b>15 Transport Infrastructure Provision</b>	No	No	Only very minor change to policy text and justification. No substantive change.
<b>16 Green Infrastructure, Parks and Open Space</b>	No	No	Only very minor change to policy text and justification. No substantive change.
<b>17 Biodiversity</b>	No	No	The changes provide more explanation on how the policy will be used. Not substantive.
<b>18 Infrastructure</b>	No	No	Only very minor change to policy text and justification. No substantive change.
<b>19 Developer Contributions</b>	No	No	Only very minor change to policy text and justification. No substantive change.

## Appendix B: Refined Sustainability Appraisal Framework

SA Objectives	Decision Making Criteria	Indicators
<b>1. Housing</b>  <b>To ensure that the housing stock meets the housing needs of the plan areas</b>	<ul style="list-style-type: none"> <li>• Will it increase the range and affordability of housing for all social groups?</li> <li>• Will it reduce homelessness?</li> <li>• Will it reduce the number of unfit homes?</li> </ul>	Affordable housing House prices; housing affordability Homelessness Housing completions (type and size) Housing tenure LA stock declared non decent Sheltered accommodation Vacant dwellings by tenure
<b>2. Health</b>  <b>To improve health and reduce health inequalities</b>	<ul style="list-style-type: none"> <li>• Will it reduce health inequalities?</li> <li>• Will it improve access to health services?</li> <li>• Will it increase the opportunities for recreational physical activity?</li> </ul>	Adults taking part in sport Health inequalities Life expectancy at birth New/enhanced health facilities People killed/seriously injured in road accidents Teenage conception rates
<b>3. Heritage</b>  <b>To provide better opportunities for people to value and enjoy the plan areas heritage including the preservation, enhancement and promotion of the cultural and built environment (including archaeological assets).</b>	<ul style="list-style-type: none"> <li>• Will it protect historic sites</li> <li>• Will it help people to increase their participation in cultural heritage activities?</li> <li>• Will it protect/improve access to historic sites?</li> <li>• Will it protect and enhance the historical, geological and archaeological environment?</li> </ul>	Open spaced managed to green flag award standard New and enhanced open space Satisfaction with open space Museums
<b>4. Crime</b>  <b>To improve community safety, reduce crime and the fear of crime in the plan areas</b>	<ul style="list-style-type: none"> <li>• Will it reduce crime and the fear of crime?</li> <li>• Will it increase the prevalence of diversionary activities?</li> <li>• Will it contribute to a safe secure built environment through designing out crime?</li> </ul>	Crimes – by category and total Fear of crime Noise complaints
<b>5. Social</b>  <b>To promote and support the development and growth of social capital across the plan areas</b>	<ul style="list-style-type: none"> <li>• Will it protect and enhance existing cultural assets?</li> <li>• Will it improve access to, encourage engagement with and residents satisfaction in community activities?</li> <li>• Will it improve ethnic and intergenerational relations?</li> </ul>	Community centres Gains/losses of community facilities Leisure centres Libraries/mobile library stops Participation involuntary and community activities A place where people from different backgrounds get on well together Satisfaction with leisure facilities

SA Objectives	Decision Making Criteria	Indicators
<p><b>6. Environment, Biodiversity and Green Infrastructure</b></p> <p><b>To increase biodiversity levels and protect and enhance Green Infrastructure and the natural environment across the plan areas</b></p>	<ul style="list-style-type: none"> <li>• Will it help protect and improve biodiversity and avoid harm to protected species?</li> <li>• Will it help protect and improve habitats?</li> <li>• Will it increase, maintain and enhance sites designated for their nature conservation interest?</li> <li>• Will it maintain and enhance woodland cover and management?</li> <li>• Will it provide new open space?</li> <li>• Will it improve the quality of existing open space?</li> <li>• Will it encourage and protect Green Infrastructure opportunities?</li> </ul>	<p>Local/National nature reserves Local wildlife sites (Biological SINC's) SSSIs</p>
<p><b>7. Landscape</b></p> <p><b>To protect and enhance the landscape character of the plan areas, including heritage and its setting</b></p>	<ul style="list-style-type: none"> <li>• Does it respect identified landscape character?</li> </ul>	<p>Ancient woodland Conservation Areas Historic Parks and Gardens Listed Buildings/Buildings at risk/locally listed buildings Scheduled ancient monuments Woodland areas/new woodland</p>
<p><b>8. Natural Resources and Flooding</b></p> <p><b>To prudently manage the natural resources of the area including water, air quality, soils and minerals whilst also minimising the risk of flooding</b></p>	<ul style="list-style-type: none"> <li>• Will it improve water quality?</li> <li>• Will it improve air quality?</li> <li>• Will it lead to reduced consumption of raw materials?</li> <li>• Will it promote the use of sustainable design, materials and construction techniques?</li> <li>• Will it minimise Flood Risk?</li> <li>• Will it prevent the loss of high quality soils to development?</li> </ul>	<p>Greenfield land lost Carbon dioxide emissions Contaminated land Flood risk Households in Air Quality Management Areas Number of days moderate/high air pollution Employment and housing developed on PDL Density of dwellings Developments incorporating SUDS Planning applications granted contrary to advice of EA Biological/chemistry levels in rivers, canals and freshwater bodies Production of primary and secondary/recycled aggregates</p>
<p><b>9. Waste</b></p> <p><b>To minimise waste and increase the re-use and recycling of waste materials</b></p>	<ul style="list-style-type: none"> <li>• Will it reduce household and commercial waste per head?</li> <li>• Will it increase waste recovery and recycling per head?</li> <li>• Will it reduce hazardous waste?</li> <li>• Will it reduce waste in the construction industry?</li> </ul>	<p>Controlled waste produced Capacity of new waste management facilities by alternative to landfill Household waste arisings composted, land filled, recycled, used to recover energy</p>

SA Objectives	Decision Making Criteria	Indicators
<b>10. Energy and Climate Change</b>  <b>To minimise energy usage and to develop the area's renewable energy resource, reducing dependency on non-renewable sources</b>	<ul style="list-style-type: none"> <li>• Will it improve energy efficiency of new buildings?</li> <li>• Will it support the generation and use of renewable energy?</li> <li>• Will it support the development of community energy systems?</li> <li>• Will it support the development of community energy systems?</li> <li>• Will it ensure that buildings are able to deal with future changes in climate</li> </ul>	Energy use – renewables and petroleum products Energy use (gas/electricity) by end user Renewable energy capacity installed by type
<b>11. Transport</b>  <b>To make efficient use of the existing transport infrastructure, help reduce the need to travel by car, improve accessibility to jobs and services for all and to ensure that all journeys are undertaken by the most sustainable mode available</b>	<ul style="list-style-type: none"> <li>• Will it use and enhance existing transport infrastructure?</li> <li>• Will it help to develop a transport network that minimises the impact on the environment?</li> <li>• Will it reduce journeys undertaken by car by encouraging alternative modes of transport?</li> <li>• Will it increase accessibility to services and facilities?</li> </ul>	Accessibility to education sites, employment sites, health care, leisure centres, open space, shopping centres Change in road traffic mileage Development of transport infrastructure that assists car use reduction Levels of bus and light rail patronage New major non-residential development with travel plans People using car and non-car modes of travel to work Railway station usage Road traffic levels
<b>12. Employment</b>  <b>To create high quality employment opportunities</b>	<ul style="list-style-type: none"> <li>• Will it improve the diversity and quality of jobs?</li> <li>• Will it reduce unemployment?</li> <li>• Will it increase average income levels?</li> </ul>	Average annual income Benefit claimants VAT business registration rate, registrations, deregistrations Businesses per 1000 population Employment rate Jobs New floor space Shops, vacant shops Unemployment rate
<b>13. Innovation</b>  <b>To develop a strong culture of enterprise and innovation</b>	<ul style="list-style-type: none"> <li>• Will it increase levels of qualification?</li> <li>• Will it create jobs in high knowledge sectors?</li> <li>• Will it encourage graduates to live and work within the plan areas?</li> </ul>	15 year olds achieving 5 or more GCSEs at Grade A* - C 19 year olds qualified to NVQ level 2 or equivalent 21 year olds qualified to NVQ level 3 or equivalent Working age population qualifications
<b>14. Economic Structure</b>  <b>To provide the physical conditions for a modern economic structure including infrastructure to support the use of new technologies</b>	<ul style="list-style-type: none"> <li>• Will it provide land and buildings of a type required by businesses?</li> <li>• Will it improve the diversity of jobs available?</li> <li>• Will it provide the required infrastructure?</li> <li>• Will it provide business/university clusters</li> </ul>	Completed business development floorspace Land developed for employment Employment land lost Employment land allocated Profile of employment by sector



## Appendix C: New Policy (Policy A)

### **Policy A: Presumption in Favour of Sustainable Development**

- 1. A positive approach will be taken when considering development proposals reflecting the presumption in favour of sustainable development contained in the National Planning Policy Framework. The relevant Council will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.**
- 2. Planning applications that accord with the policies in the Local Plan<sup>[1]</sup> (and, where relevant, with policies in Neighbourhood Plans) will be approved without delay, unless material considerations indicate otherwise.**
- 3. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision, then planning permission will be granted unless material considerations indicate otherwise – taking into account whether:**
  - a) any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or**
  - b) specific policies in that Framework indicate that development should be restricted.**

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1. The Local Plan includes the Aligned Core Strategies and any subsequent Development Plan Documents prepared by the Councils. Until it is abolished the Regional Strategy still forms part of the Development Plan.

**Appendix D: Appraisal of new Policy (Policy A)**

**Policy A: Presumption in Favour of Sustainable Development (appraisal undertaken December 2012 by Greater Nottingham local planning authorities' SA team)**

															Very major/important positive
															Major positive
															Moderate to major positive
															Moderate positive
															Minor positive
1. Housing	2. Health	3. Heritage	4. Crime	5. Social	6. Environment, Biodiversity and Green Infrastructure	7. Landscape	8. Natural Resources and flooding	9. Waste	10. Energy and Climate Change	11. Transport	12. Employment	13. Innovation	14. Economic Structure	? = unknown impact No fill = negligible impact or not relevant	
															Minor negative
															Moderate negative
															Moderate to major negative
															Major negative
															Very major/important negative

SA Objectives	Policy A: Presumption in Favour of Sustainable Development	Ideas for mitigation
1. Housing	The policy is positive towards housing growth. Emphasises the need for negotiation and positive outcomes. Could result in increased approval rates. However, policy makes it clear that social and environment considerations still need to be taken into account. Policy 2 gives direction to housing growth	
2. Health	Policy does not explicitly promote health, but does outline that development must improve social and environmental conditions within the area	
3. Heritage	The policy does not explicitly harm or improve heritage. The effects of the policy will be on a site by site basis. Any proposals having an impact on heritage assets will need to take into account the social, economic and environmental impacts. Reference to Policy 11: The Historic Environment will need to be taken into account.	
4. Crime	Negligible impact on crime although social implications will need to be considered. Reference to Policy 10: Design & Enhancing Local Identity will need to be taken into account.	
5. Social	Policy includes the requirement to consider the social aspects of sustainability and should therefore promote the overall social objective when determining applications	
6. Environment, Biodiversity and Green Infrastructure	The policy is supportive of economic development, but not at any costs as environmental and social aspects also have to be taken into account. Reference to Policy 16: Green Infrastructure, Parks and Open Space & Policy 17: Biodiversity will need to be taken into account.	
7. Landscape	The policy is supportive of economic development, but not at any costs as environmental and social aspects also have to be taken into account. Reference to Policy 16: Green Infrastructure, Parks and Open Space & Policy 17: Biodiversity will need to be taken into account.	
8. Natural Resources and Flooding	The policy is supportive of economic development, but not at any costs as environmental and social aspects also have to be taken into account. Reference to Policy 1: Climate Change, Policy 16: Green Infrastructure, Parks and Open Space & Policy 17: Biodiversity will need to be taken into account.	
9. Waste	The policy promotes sustainable development and should therefore result in minimising waste. Reference to Policy 1: Climate Change will need to be taken into account as well which specifically requires waste to be minimised.	

SA Objectives	Policy A: Presumption in Favour of Sustainable Development	Ideas for mitigation
10. Energy and Climate Change	The policy promotes sustainable development and should therefore result in minimising energy usage and sustainable design in new build or refurbishment of existing housing. Reference to Policy 1: Climate Change will need to be taken into account as well which specifically requires waste to be minimised.	
11. Transport	The policy promotes sustainable development and should therefore result in development being located in sustainable locations, reducing the need to travel by private car and encouraging other more sustainable forms of transport. Policy 14 and 15 also need to be considered.	
12. Employment	The policy is positive towards economic growth. Emphasises the need for negotiation and positive outcomes. Could result in increased approval rates. However, policy makes it clear that social and environment considerations still need to be taken into account. Policy 4 gives direction to economic growth in general, although reference to Policy 2, 5 and 6 will also need to be taken into account.	
13. Innovation	The policy is positive towards economic growth. Emphasises the need for negotiation and positive outcomes. Could result in increased approval rates. However, policy makes it clear that social and environment considerations still need to be taken into account. The policy does not specifically promote innovation, but the support for employment generally should create the positive conditions to assist this objective. Reference to other policies within the plan will be required, including, policies 2, 4,5 & 6.	
14. Economic Structure	The policy is positive towards economic growth. Emphasises the need for negotiation and positive outcomes. Could result in increased approval rates. However, policy makes it clear that social and environment considerations still need to be taken into account. Policy 4 gives direction to economic growth in general, although reference to Policies 2, 5 and 6 will also need to be taken into account.	

**Appendix E: General joint comments received on the Sustainability Appraisal (not including site specific comments)**

Summary	Change Sought	Officer Response	Change Agre
SA set out the stages in the process, draw reasonable conclusions and the plan has responded to the process and findings.	None	Noted	None
NPPF reiterates that Sustainability Appraisal should be an integrated part of the plan preparation process. The SA for the Core Strategy is considered inadequate. Some signs that it has been used as a post hoc justification for decisions.	SA should be integrated part of ACS preparation process.	Paragraphs 2.25-2.33 of the SA Publication Version report sets out the various stages of the SA process showing that it has been an integral part of the plan making process. Table 2 (page 30) in the SA report also sets out in detail the key dates and describes the work that has been undertaken for the ACS.	None
<p>SA uses 14 criteria (objectives), only 4 of which are environmental. Loss of Greenfield land is only one of 80 indicators, with the same weight as teenage conception rates.</p> <p>No indication given to relative weight to be attached to each of the assessment criteria.</p>	Appropriate weighting given to criteria indicators	<p>In 2008, the Nottinghamshire SA team (all districts in Nottinghamshire, excluding Erewash in Derbyshire) created a SA Framework containing 14 objectives (criteria) based on the East Midlands Regional Plan SA Framework (which was taken from the Integrated Regional Strategy which draws together the key issues and challenges for the region). The objectives/criteria used are made up of 5 social, 5 environmental and 4 economic objectives. The 5 Environmental objectives are 1) Environmental, Biodiversity and Green Infrastructure, 2) Landscape, 3) Natural Resources and Flooding 4) Waste &amp; 5) Energy and Climate Change. The SA Framework was adapted to address other key sustainability issues in Nottinghamshire. The Greater Nottingham SA team consulted on the SA Framework at the Scoping Stage in 2009. The objectives (criteria) were adjusted as a result of feedback from consultees at the Scoping Stage, as well as the Option for Consultation stage. Paragraph 5.3 (page 57) of the SA report describes the changes made to the SA Framework as the result of comments received from Natural England and English Heritage. Both organisations did not raise any concern regarding the fact that only 4 objectives (criteria) were environmental.</p> <p>In carrying out an assessment, the SA indicators along with Decision Making Criteria are used to give pointers on issues to be considered. There is a wide range of indicators for each of the SA objectives including "Teenage conception rates" as noted by the consultee but this is only one of 80 indicators. The inclusion or omission of an individual indicator would not fundamentally change an appraisal of an objective.</p>	None

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Summary	Change Sought	Officer Response	Change Agree
		<p>Natural England's representation on the SA Publication Version report state that the SA sets out the stages in the process, draws reasonable conclusions and the ACS has responded to the process and findings. The SA Framework (as amended) has been used throughout the SA process to look at the balance of issues covered by the three SA themes; social, economic and environmental. The objectives (criteria) are linked to the indicators which will be used to measure the sustainability or progress of the Aligned Core Strategies.</p> <p>It was not considered appropriate to give one criteria greater weight than another as the SA process is looking to ensure that the ACS are balanced in sustainability terms against the three social, economic and environmental themes. Appendix 5 of A Practice Guide to SEA (2005) (page 64) states that objectives (criteria) can be expressed so that they are measurable. The achievement of objectives is measured by using indicators. Furthermore, the Appendix of A Practice Guide to SEA (2005) (page 67) states that some objectives may be more important than others and it may be worthwhile to give a rough ranking of objectives or highlight those which are judged to be particularly important (for instance because current conditions are problematic or because they are of particular concern to the public) to help focus the later stages of the SEA. In any event, the objectives/criteria are only meant to give a representation of the outcomes, ie a tool to inform the decision making process, rather than a decision making tool in its own right.</p>	
<p>Non-designated landscapes of high value not seen as a priority, loss of good quality agricultural land is not considered. These should be given more weight than factors such as crime and health were the planning benefits and costs are not proven. Education is missing from the criteria, when it is a matter routinely covered by S106 agreements or CIL.</p>	<p>Greater weight should be given to certain criteria (e.g. non-designated landscapes of high value, loss of good quality agricultural land) and wider objectives list including education.</p>	<p>It was not considered appropriate to give one criteria greater weight than another as the SA process is looking to ensure that the ACS are balanced in sustainability terms against the three sustainability themes of social, economic as well as environmental. Appendix 5 of A Practice Guide to SEA (2005) (page 64) states that objectives (criteria) can be expressed so that they are measurable. The achievement of objectives is measured by using indicators. Furthermore, the Appendix (page 67) states that some objectives may be more important than others and it may be worthwhile to give a rough ranking of objectives or highlight those which are judged to be particularly important (for instance because current conditions are problematic or because they are of particular concern to the public) to help focus the later stages of the SEA. In any event, the objectives/criteria are only meant to give a representation of the outcomes, ie a tool to inform the decision making process, rather than a decision making tool in its own right.</p>	<p>None</p>

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<b>Summary</b>	<b>Change Sought</b>	<b>Officer Response</b>	<b>Change Agree</b>
		<p>There is a specific objective/criteria on Landscape which makes up each appraisal. In addition, the indicators include greenfield loss to new development in line with the ACS and also loss of high quality soils to development – which address the concerns about the loss quality of agricultural land.</p> <p>In relation to the concerns raised about education, this issue is only one of a list of infrastructure for Councils to work on from the NPPF and so it is not considered unreasonable to include it as a sole objective in a Framework of only 14 objectives overall. Education may benefit from planning obligations but so does other infrastructure such as open space. These matters can however be considered as part of mitigation measures. Loss of high quality agricultural land was considered in the Sustainable Locations for Growth report as part of the evidence base.</p>	
The assessment of the medium growth option impacts are not precisely defined, relying on an arbitrary colour coding scheme.	Give further explanation of the medium growth option impacts.	<p>The assessment of the growth options set out in paragraphs 7.7-7.11 (pages 67-68) of the SA report should be read as a whole. The paragraphs clearly set out the impact of the three different growth options considered against all of the SA objectives.</p> <p>The colour coding is a simplified representation of the SA outcome for illustrative purposes and needs to be read alongside the text of each appraisal which sets out the findings in more detail.</p>	None
SA states the medium growth option meets the objectively assessed housing needs of the plan areas, it is not clear what this means.	Explain relationship between the objectively assess housing needs and medium growth.	<p>The medium growth option is the level of growth that is within the ACS. At paragraph 7.26 of the SA Publication Version report, it explains that this equates to the Aligned Core Strategies 'Option for Consultation' scenario of circa 52,000 dwellings (including Rushcliffe) and this roughly equates to the East Midlands RS growth figure. It is considered that this level of growth is the objectively assessed housing need for the plan area, as set out in the document and background papers (Housing Background Paper June 2012 &amp; Household Projections Background Paper June 2012). The SA measures the sustainable outcomes of each alternative option/site. Its role is not to make an assessment of the objectively assessed housing needs of the plan in its own right.</p>	None
SHLAA sites which contribute to the housing provision should also have been assessed.	Assessment of SHLAA sites that contribute to housing provision should have been carried out.	<p>Paragraphs 8.1-8.2 (page 77) of the SA Publication Version report explain the process of identifying strategic sustainable sites and locations. The SUE Study (2008) provided advice on the most suitable location or locations for the development of SUEs adjacent to the Greater Nottingham Principle Urban Area (PUA), as well as the Sub-Regional Centres of Hucknall and Ilkeston. All strategic sites identified in the SUE</p>	None

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<b>Summary</b>	<b>Change Sought</b>	<b>Officer Response</b>	<b>Change Agree</b>
		<p>Study (i.e. potentially suitable sites and potentially unsuitable sites) were appraised, as well as other sites suggested by consultees. The Sustainable Locations for Growth Study (2010) provided information on the merits and demerits of accommodating growth in the area outside the PUA. During the Issues and Options and Option for Consultation stages, consultees were given opportunities to comment on identified sites or suggest alternative sites. Further details are in the Councils' Statement of Consultation documents. It should be noted that several of the strategic sites identified in the ACS have previously been included as allocations in adopted Local Plans and are rolled forward as such (see paragraph 3.2.13 of the ACS -page 46). Paragraph 3.2.14 of the ACS explains that potential development places elsewhere in the plan area (known as strategic locations, which have been subject to assessment within the SA) will have potential sites within them to be determined through site specific Local Plans and informed by the SHLAA and this includes Key Settlements for Growth. Sustainability Appraisal will be carried out by assessing the SHLAA sites within strategic locations. It is not therefore appropriate at this stage to assess all SHLAA sites given that it is the strategic sites (over 500 homes) or strategic locations that the Core Strategy is allocating, and sites have already been identified via the SUE study, sites suggested by consultees and sites being rolled forward from the adopted Local Plans. However, SHLAA assessments were included in the evidence base.</p> <p>Subsequent Development Plan Documents that identify smaller housing sites (mainly made up of SHLAA sites) and will also be subject to a Sustainability Appraisal process.</p>	
<p>Options should be firmly anchored down by comparison to past trends, e.g. 'at trend', 'above trend' etc. Loose terminology and inconsistent usage of terms does not help analysis.</p>	<p>More consistent use of terms and explanation of those terms.</p>	<p>Instead of using the terms; 'at trend', 'above trend', alternative terms have been used of 'low', 'medium' and 'high growth' which are clearly explained within the report, including the corresponding number of houses that each growth option represents.</p> <p>It is not considered that there is inconsistent use of terms throughout the SA document. A glossary is provided within the main Aligned Core Strategy document.</p>	<p>None</p>
<p>SA states the low growth scenario would not meet the needs of the existing population, unclear as to what</p>	<p>Give explanation of how the low growth scenario</p>	<p>The assessment of the growth options set out in paragraphs 7.7-7.11 (pages 67-68) of the SA Publication Version report should be read as a</p>	<p>None</p>



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<b>Summary</b>	<b>Change Sought</b>	<b>Officer Response</b>	<b>Change Agre</b>
this means.	would not meet the needs of the existing population.	whole and sets out the impact of the three different growth options considered against all of the SA objectives. In particular paragraph 7.11 sets out the impact of the low growth option and how this would not meet the needs of the local population (using the 208 based household projections) and that out migration would be likely as there would be insufficient housing.	
The appraisal of individual sites is cursory in the extreme. Example quoted of an appraisal of a site in Gedling. Top Wighay, a Greenfield site, is not seen as having serious consequences on any of the four environmental indicators. Similarly for development at Calverton. SA was not produced alongside site selection and has been 'retrofitted' to suit the ACS.	More consistency on site assessments.	<p>A number of workshops have been carried out throughout the SA process. Paragraphs 2.29-2.33 (page 37) of the SA Publication Version report describe the SA process. Workshop 1 consisted of planning officers and other stakeholders with SA expertise, for example, a transport and accessibility planner and an ecologist. Workshop 2 involved a wider group of people, including external bodies to ensure there was a balance of environmental, economic and social views. Workshop 3 again involved a cross section of professional officers from different organisations including Derbyshire County Council and the Environment Agency. While individual Councils took the same approach to appraise their sites and settlements, using the SA Framework and advice from other stakeholders, it is acknowledged that there are differences between the assessments done by each Council. It was considered that the SA process would be more robust if officers with local knowledge were involved in the appraisal process. This is considered to be a strength, giving more credible results. As a consequence, comparison between sites within different Council areas is less straight forward than might otherwise be the case, however overall the results are generally consistent.</p> <p>It should also be noted that the SA is just part of the plan making process, and should not be seen as the only reason to choose or disregard a possible alternative options or site. Much wider issues also have a role to play in determining the choice of sites and these need to be taken into account, including the extensive evidence base.</p> <p>It was not considered appropriate to give one criteria greater weight than another as the SA process is looking to ensure that the ACS is balanced in sustainability terms against the three social, economic and environmental themes. Appendix 5 of A Practice Guide to SEA (2005) (page 64) states that objectives (criteria) can be expressed so that they are measurable. The achievement of objectives is measured by using indicators. Furthermore, the Appendix of A Practice Guide to SEA (2005)</p>	None

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<b>Summary</b>	<b>Change Sought</b>	<b>Officer Response</b>	<b>Change Agree</b>
		(page 67) states that some objectives may be more important than others and it may be worthwhile to give a rough ranking of objectives or highlight those which are judged to be particularly important (for instance because current conditions are problematic or because they are of particular concern to the public) to help focus the later stages of the SEA. In any event, the objectives/ criteria are only meant to give a representation of the outcomes, ie a tool to inform the decision making process, rather than a decision making tool in its own right.	
SA establishes broad preference for urban concentration at Greater Nottingham level whilst reporting ACS decision to allow flexibility for individual councils to ignore PUA / non PUA split.	Provide assessment of the more flexible approach to PUA/Non PUA.	Paragraphs 7.20-23 (page 71) of the SA Publication Version report specifically examine the impact of going for different spatial strategies including the proposed strategy of urban concentration with regeneration and an alternative more dispersed development strategy.	None
No environmental assessment of potential impact of a plan that has no phasing policy to ensure that sites are delivered sequentially.	Consideration of options that would allow development to be phased sequentially.	The plan does not have a phasing policy. The reason for this is that a variety of sites need to be available across the plan area for development to meet both the short term and long term requirements for the plan area. To include a phasing policy would slow housing delivery and therefore not accord with government policy. It cannot therefore be a 'reasonable alternative option' and a SA appraisal of this is not required.	None
Include a key with every assessment matrix.	Provide a key for each assessment matrix.	Disagree as unnecessary.	None
Text in SA provides little explanation to facilitate a comparison between sites. Colour-coded tables worthless.	Greater transparency in the decision-making process; providing clear means of comparing options that is directly linked to evidence. Consistent approach to all sites appraised.	Tables are a form of graphic exposition as accepted by our nationally recognised consultant, and used in adopted Core Strategies. SA is a distinct process that allows users to help come to conclusions and does not need to repeat the rest of the evidence base. Individual Councils took the same approach to appraise their sites and settlements, using the SA Framework and advice from other interested parties.	None
The team that carried out the appraisal was largely made up of officers preparing ACS. A more objective assessment would have been made if the appraisal had been carried out by consultants, a team of officers from other departments advised by consultants or a team made up of officers and members of parish councils.	More independent officers/experts to produce the SA.	Paragraph 2.20 (page 14) of A Practice Guide to SEA (2005) states that the Directive does not prescribe who is to carry out an SEA, but normally it is the task of the Responsible Authority, i.e. the body which prepares and/or adopts the plan. Paragraph 2.21 (page 14) states that it is helpful to involve people, either within the Responsible Authority or outside, who are not directly concerned in producing the plan or programme and can contribute expertise or a detached and independent view. Paragraphs 2.29-2.33 (page 37) of the SA Publication Version report describe the SA process (workshop 1 consisted of planning officers and other stakeholders	None

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Summary	Change Sought	Officer Response	Change Agree
		<p>with SA expertise, for example, a transport and accessibility planner and an ecologist. Workshop 2 involved a wider group of people to ensure there was a balance of environmental, economic and social views . Workshop 3 again involved a cross section of professional officers from different organisations including Derbyshire County Council and the Environment Agency.</p> <p>Those involved in producing the SA were not directly involved in policy word drafting but it was also important that officers who know the issues and sites were also involved to ensure credible assessments could be made.</p> <p>The approach of the Councils has been subject to a legal compliance check with a nationally recognised SA Consultancy (Levett-Therivel).</p>	
<p>Not had an opportunity to examine and make representations on assessments on the prospective Sherwood Forest Special Protection Area.</p>	<p>Assessments on the prospective Sherwood Forest Special Protection Area should be made available for public consultation.</p>	<p>In September 2010, a screening of the ACS Option for Consultation was completed and a potential significant effect of an area of land that may be designated in the future as a European site was identified. Paragraphs 2.11-2.16 of the SA Publication Version report (pages 33-34) explain the situation. During the HRA assessment, the councils have been working closing with nature conservation body Natural England. This accords with Regulation 102 (2) of The Conservation of Habitats and Species Regulations (2010) which states "The plan-making authority must for the purposes of the assessment consult the appropriate nature conservation body and have regard to any representations made by that body within such reasonable time as the authority specify". Regulation 102 (3) states that the councils "must also, if they consider it appropriate, take the opinion of the general public, and if they do so, they must take such steps for that purpose as they consider appropriate". The combined HRA documents were publicly available at the Publication stage.</p>	<p>None</p>
<p>Does not calculate brownfield / greenfield balance that will result from the growth proposals and not in conformity with paragraph 17 of the NPPF.</p>	<p>Calculate brownfield/greenfield split arising from proposals.</p>	<p>Given that a significant level of development is expected on sites not allocated in the ACS it is not possible at this stage to produce a % split between brownfield and greenfield development.</p> <p>The whole strategy is based on urban concentration with regeneration including the allocation of large areas of brownfield sites. However, a mix of housing sites needs to be available including sites that can come forward early within the plan period which include Greenfield sites to accord with Government guidance.</p> <p>There is not a brownfield target set out within NPPF.</p>	<p>None</p>

**Appendix F: Gedling Borough’s specific comments received on the Sustainability Appraisal**

**Spatial Strategy**

Summary	Change Sought	Officer Response	Change Agree
<p>SA does not provide accurate assessment of sustainability of sites in Gedling, in particular Top Wighay Farm, North of Papplewick Lane, Gedling Colliery/Chase Farm, Gedling Colliery/Chase Farm and Mapperley Golf Course, Redhill and East of Lambley Lane</p> <p>SA has not demonstrated there are no alternative sites.</p>	<p>Need to demonstrate there are no alternative sites.</p>	<p>Paragraphs 8.1-8.2 (page 77) of the SA Publication Version report explain the process of identifying strategic sustainable sites and locations. The SUE Study (2008) provided advice on the most suitable location or locations for the development of SUEs adjacent to the PUA, as well as the Sub-Regional Centre of Hucknall. All strategic sites identified in the SUE Study (i.e. potentially suitable sites and potentially unsuitable sites) were appraised, as well as other sites suggested by consultees. The Sustainable Locations for Growth Study (2010) provided information on the merits and demerits of accommodating growth in the area outside the PUA. During the Issues and Options and Option for Consultation stages, consultees were given opportunities to comment on identified sites or suggest alternative sites. Further details are in the Gedling Borough’s Statement of Consultation document.</p> <p>It should be noted that several of the strategic sites identified in the ACS have previously been included as allocations in adopted Local Plans and are rolled forwards as such (see paragraph 3.2.13 of the ACS) or were designated as safeguarded land for future development.</p> <p>The sustainability of the overarching strategy, the strategic sites which have been allocated and the strategic locations have all been assessed as part of the SA process. Alternatives to each of these have also been assessed. Sites which do not fall within one of these categories due to size do not need to be assessed as part of the SA on the Aligned Core Strategies but will be considered by SA on future site allocation DPDs.</p>	<p>None</p>
<p>Paragraph 11.6 in SA report. Paragraph provide ‘broad brush’ justification of why the ACS growth option for Gedling has been selected. Emphasis placed on why other two scenarios rejected rather than justifying the favourable option. Page 207 in SA appendices only details the high and low growth scenarios.</p>	<p>More details on ACS growth option and justify why this is favourable.</p>	<p>The findings of the appraisals of the ACS growth option are summarised in paragraphs 11.7-11.37 (pages 100-108) of the SA Publication Version report (and detailed appraisals are in the SA appendices). Paragraphs 11.4 and 11.5 look at high and low growth scenarios for comparison purposes.</p>	<p>None</p>

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<b>Summary</b>	<b>Change Sought</b>	<b>Officer Response</b>	<b>Change Agree</b>
Table 24. No social implications identified for any of the growth options considered. ACS scenario would result in increased demand and investment which could contribute toward increased provision of facilities. Social implications directly link to health objective but direct links between two objectives have not been drawn upon in the assessment.	Re-consider social implications for growth options.	The appraisals for the strategic sites and key settlements for growth refer to section 106 agreements to ensure appropriate community facilities are provided to support new development and also access to existing services/facilities.	None
Health implications predominantly assessed on affordable housing provision rather than correlating with indicators identified in Table 24.	Assess health implications against indicators identified in Table 24.	The provision of new and existing health facilities should be in close proximity to new housing. If there are fewer affordable homes built, this may cause impact on people's health and well being. The indicators listed in Table 24 (pages 137-139) will be used to measure the progress of the Aligned Core Strategy.	None
Table 17 in SA report. Crime is not given a score for both high growth and low growth scenarios but scored positively for the medium growth option. No written justification to account for positive score.	Re-consider crime implications for growth scenarios.	Noted. The requirement for all new development to be built according to Designing Out Crime standards will be noted in the appraisals for low and high scenarios (pages 205-207 of SA Appendices). However this would not change the overall conclusions for Gedling.	Add reference Designing Out Crime standard in SA appendices.
In Table 17, heritage should score most positively in relation to low growth scenario as this would most limit detrimental development of sites with heritage value.	Heritage should be scored positive for low growth scenario.	Noted. The appraisal (pages 206-207 of SA Appendices) states high growth scenario would require more sites which may mean more sensitive sites to be developed and low growth scenario would enable greater choice on sites to be developed. However this would not change the overall conclusion of the appraisal of the low growth scenario for Gedling.	Remove minor positive for high growth scenario and add minor positive for low growth scenario.
Page 206 in SA Appendix demonstrates no impact for objective 12 (employment) for low growth scenario but Table 17 in SA report gives employment +/- score.	Ensure consistent assessment matrices in SA report and SA appendices.	Agree.	SA Appendix – amend to include '-' (minor negative) score for low growth scenario.
Page 207 in SA Appendix states there will be more energy demand and a greater volume of traffic for objective 10 (energy and climate change) for high growth scenario but Table 17 in SA report scores transport + with respect to the same objective. Score conflicts with the accompanying text.	Ensure consistent assessment matrices in SA report and SA appendices.	Disagree. Table 17 (page 99) scores transport +/- (more negative than positive).	None

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<b>Summary</b>	<b>Change Sought</b>	<b>Officer Response</b>	<b>Change Agree</b>
Page 207 in SA Appendix states negative impact on objective 2 (health) for low growth scenario but Table 17 in SA reports scores this objective positively +.	Ensure consistent assessment matrices in SA report and SA appendices.	Consultee misunderstood the wording “negative health impact” on page 207. For high growth scenario there should be greater provision of new affordable housing with associated health benefits. In comparison to the low growth scenario, there would be fewer affordable homes which may cause impact on people’s health and well being. For the low growth scenario, some affordable houses will be built which will have benefits for people (a positive) but the benefits would not be as much as the high growth scenario.	None
Paragraph 11.5 in SA report regarding low growth option would negatively impact housing is not reflected in the assessment matrix (page 206 in SA Appendix).	Ensure consistent assessment matrices in SA report and SA appendices.	Paragraph 11.4 (pages 99-100) of the SA Publication Version report sets the appraisal for the high growth scenario. As paragraph 11.5 (page 100) states, houses will be built but fewer for the low growth scenario.	None
Lack of consistency regarding the assessments relating to Objective 2, 8, 9 and 11. Issues such as access/proximity to transport, health and Nottingham facilities have been omitted or not consistently appraised. Homes built to higher standards/opportunities for renewal energy has not been taken into account in some assessment.	Need for consistent approach between sites.	Objectives 2 and 11. Disagree. Assessments of health, transport and education have been explored through the Infrastructure Delivery Plan outside the SA appraisals (see Appendix A of the Aligned Core Strategies).  Objectives 8 and 9. Noted.	Amend objectives 8 a 9.

**North of Hucknall**

<b>Summary</b>	<b>Change Sought</b>	<b>Officer Response</b>	<b>Change Agree</b>
Asessment against objectives 1 (housing) and 2 (health) has not taken into account the impact on health services to the north of Hucknall and future requirements are not specified. Air and water quality affected by future development has not been taken into account in the assessment of health, nor has stress brought about by traffic congestion and poor health/wellbeing relating to social exclusion (transport).	Re-consider health implications to the north of Hucknall.	The SA Framework does not include stress as one of the decision making criteria.  For health services, contributions will be agreed as part of S106/CIL discussions and information on the capacity of local health facilities is awaited from Nottinghamshire PCT. Paragraph 4.2.20 (page 60) of the SUE study indicates that Top Wighay Farm would be better linked to Hucknall Town Centre if an extension to the NET was provided. This point is acknowledged but much wider issues (for the Top Wighay Farm site these include viability of the NET extension and availability of alternative sites) also have a role to play in determining the choice of sites and these need to be taken into account, including the extensive evidence base. Nottinghamshire County Highway and modelling work confirm the site can be developed for 1000	None
Disagree that the effects of development will not have implications. SUE study indicates Top Wighay site would not be suitable unless extension to the NET tramline into this area. Poor access to public transport creates social exclusion. No evidence in IDP regarding	Re-consider transport implications to the north of Hucknall.		

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<b>Summary</b>	<b>Change Sought</b>	<b>Officer Response</b>	<b>Change Agree</b>
public transport schemes at Top Wighay (i.e. no mention of Top Wighay Farm in Tables 8.3, 8.4 and 8.5 of IDP).		<p>dwelling without a NET extension.</p> <p>The appraisals for Top Wighay Farm and North of Papplewick Lane state that Hucknall has good transport links. Appendix A of the ACS refers to planning permission granted for two junctions from A611/Wighay Road. It also states that an integrated transport/ walking and cycling package will be required including potential link buses to Hucknall NET/train station. A Transport Assessment will be required as part of a planning application and contributions will be agreed as part of S106/CIL discussions.</p>	
Gedling's Transport Study Phase 1 assessment fails to provide level of detail required to enable GBC to make accurate assessment of suitability of Top Wighay Farm and North of Papplewick Lane sites.	Assessment should be informed by the final detailed Transport Study.	<p>Table 8.9 of the IDP states that public transport is not identified as a major constraint to delivery for the Top Wighay Farm site so it is not included in Tables 8.3, 8.4 and 8.5.</p>	
Social implications relating to traffic congestion if no planned improvements to highway network in this area. Negative effect on quality of the life for local residents. Little evidence to show how highway network will be improved to accommodate the additional traffic. Increase in vehicles by the Rolls Royce development have not been taken into account.	Re-consider social implications due to highway issues in the north of Hucknall.	<p>The final Transport Modelling is now available and does not change the results of the appraisals for these two sites.</p> <p>The Rolls Royce site has been taken into account in the Transport Modelling work.</p>	
No plans for new schools will cause social implications for Hucknall. Negative effect on quality of life of existing and future Hucknall residents due to lack of capacity at schools. Sites are located a distance from the schools which will add to traffic congestion.	Re-consider social implications due to lack of new school provision in the north of Hucknall.	<p>For school capacity, County Education have confirmed that new primary school should be provided for each site and there is capacity to expand existing secondary schools.</p>	
Disagree with SA assessment as proposed sites to the north of Hucknall will have detrimental impact on highway network in this area. Impact on objective 11 (transport).	Re-consider transport implications to the north of Hucknall.		
Paragraph 13.33. Public transport improvements take priority over public improvement schemes a flawed approach to planning for growth to north of Hucknall. Public highway already under significant pressure from existing development (Moor Road junction in Bulwell).	Re-consider transport implications to the north of Hucknall.		

**Sustainability Appraisal Addendum on Publication Version Document May 2013**

<b>Summary</b>	<b>Change Sought</b>	<b>Officer Response</b>	<b>Change Agree</b>
SA does not demonstrate how proposals for Papplewick Lane and Top Wighay Farm meet objectives relating to the economy; community health, social and community need; and protection enhancement of the natural, built or historic environment. The site summaries refer to supporting services in Hucknall but how is this sustainable as they are already over stretched. There is insufficient evidence that the necessary assessments of the impact on health, transport and education have been fully explored.	More evidence needed to show impacts of North of Papplewick Lane and Top Wighay Farm sites can be addressed.	Assessments of health, transport and education have been explored through the Infrastructure Delivery Plan outside the SA appraisals (see Appendix A of the Aligned Core Strategies).  Assessment has been undertaken at strategic level to demonstrate that opportunity exists to address the impact of development, but more detailed assessments will be undertaken to identify the precise mitigation that is appropriate.	None
Inconsistencies in the appraisal of potential sites. There are other sites located within or adjacent to the urban area of Gedling which appear to score better on sustainability.	Allocate urban sites that score well in the SA.	Paragraphs 11.24-11.25 (page 105) of the SA Publication Version report explains the situation with the Access Road for Gedling Colliery/Chase Farm site. There are reasons why other urban sites should not come forward in the ACS which are explained in the report. See paragraph 11.27 for Gedling Colliery/Chase Farm/Mapperley Golf, paragraph 11.20 for North of Redhill site and paragraph 11.22 for East of Lambley Lane site.  It should also be noted that the SA is just part of the plan making process, and should not be seen as the only reason to choose or disregard a possible alternative option or site. Much wider issues also have a role to play in determining the choices of sites and these need to be taken into account, including the extensive evidence base.	None

**Top Wighay Farm**

<b>Summary</b>	<b>Change Sought</b>	<b>Officer Response</b>	<b>Change Agree</b>
Assessment of Top Wighay Farm site against objective 1 (housing) is not accurate as density should accord with the character of this area.	Re-consider housing implications for Top Wighay Farm site.	Objective 1 in the SA Framework does not include density as one of the decision making criteria.	Amend object 9.



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<b>Summary</b>	<b>Change Sought</b>	<b>Officer Response</b>	<b>Change Agree</b>
Assessment of Top Wighay Farm site against objective 2 (health) has not taken into account the impact on health services. IDP is unclear about requirement of health services relating to this site. Implications for health of existing and future residents. Air and water quality affected by future development has not been taken into account in the assessment of health. Traffic congestion will impact on health and wellbeing. Social exclusion resulting from poor access to public transport will impact on health/wellbeing of local residents.	Re-consider impact on health services, air/water quality and traffic affected by development at Top Wighay Farms site. IDP to provide health services required.	For health services, contributions will be agreed as part of S106/CIL discussions and information on the capacity of local health facilities is awaited from Nottinghamshire PCT.  The appraisal for Top Wighay Farm states that Hucknall has good transport links. Appendix A of the ACS refers to planning permission granted for two junctions from A611/Wighay Road. It also states that an integrated transport/ walking and cycling package will be required including potential link buses to Hucknall NET/train station. A Transport Assessment will be required as part of a planning application and contributions will be agreed as part of S106/CIL discussions. The final Transport Modelling is now available and does not change the results of the appraisal.	
Disagree with assessment of Top Wighay Farm site against objectives 5 (social) and 11 (transport). Poor access to public transport creates social exclusion. Gedling's Transport Study Phase 1 assessment provides insufficient detail. Social implications arising from traffic congestion if no planned improvements to highway network in this area. Increase in vehicles by the Rolls Royce development has not been taken into account. No plans for new schools will cause social implications.	Re-consider social and transport implications for North of Papplewick Lane site. Gedling's final detailed Transport Study to provide detailed assessment. IDP to provide evidence regarding public transport scheme. Account to be taken of Rolls Royce site.	The Rolls Royce site has been taken into account in the Transport Modelling work.  Loss of high quality agricultural land was considered in the Sustainable Locations for Growth report as part of the evidence base.  Objective 9 – noted. However, this does not change the overall conclusion of the appraisal.	
For assessment of Top Wighay Farm site against Objective 8 (natural resources and flooding), natural resources scored better than expected. Grade 2 Agricultural land have not been taken into account.	Refer to Grade 2 Agricultural land at Top Wighay Farm site.	Objective 10 in the SA Framework does not include traffic as one of the decision making criteria.	
Assessment of Top Wighay Farm site against objective 9 (waste) is inconsistent when compared with North of Redhill site. Both sites would generate similar amount of household waste and should have similar scores.	Need consistent approach regarding waste implications for Top Wighay Farm site and Redhill site.	Objectives 12 and 14 – the SA objectives look at whether the site will create employment opportunities and economic structure. The Employment Background Paper (2012) states Top Wighay Farm site is a prime employment location for industrial and warehousing development. The report also states that there is potential for office provision in and around Hucknall, with the Rolls Royce site forming a major strategic site.	
Assessment of Top Wighay Farm site against objective 10 (energy) is inaccurate as increase in traffic have not been taken into account.	Re-consider implications due to increase in traffic caused by Top Wighay Farm site.	It should also be noted that the SA is just part of the plan making process, and should not be seen as the only reason to choose or disregard a possible alternative option or site. Much wider issues also	

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<b>Summary</b>	<b>Change Sought</b>	<b>Officer Response</b>	<b>Change Agree</b>
SA does not clarify how allocation of Top Wighay Farm site will affect any future employment expansion at Rolls Royce. Impact on objective 12 (employment).	Refer to how Rolls Royce site will be affected by development at Top Wighay Farm site.	have a role to play in determining the choices of sites and these need to be taken into account, including the extensive evidence base.	
Assessment of Top Wighay Farm site against objective 14 (economic structure) scores highly due to proximity to M1. Unclear how this will impact on future expansion of employment facilities at Rolls Royce.	Refer to how future expansion at Rolls Royce site will be affected by development at Top Wighay Farm site.		

**North of Papplewick Lane**

<b>Summary</b>	<b>Change Sought</b>	<b>Officer Response</b>	<b>Change Agree</b>
Assessment of North of Papplewick Lane against objective 1 (housing) is not accurate as density should accord with the character of this area.	Re-consider housing implications for North of Papplewick Lane site.	Objective 1 in the SA Framework does not include density as one of the decision making criteria.	None
Assessment of North of Papplewick Lane site against objective 2 (health) has not taken into account the impact on health services. IDP is unclear about requirement of health services relating to this site. Implications for health of existing and future residents. Air and water quality affected by future development has not been taken into account in the assessment of health. Traffic congestion will impact on health and wellbeing. Social exclusion resulting from poor access to public transport will impact on health/wellbeing of local residents.	Re-consider impact on health services, air/water quality and traffic affected by development at North of Papplewick Lane site. IDP to provide health services required.	For health services, contributions will be agreed as part of S106/CIL discussions and information on the capacity of local health facilities is awaited from Nottinghamshire PCT.  The appraisal for North of Papplewick Lane states that Hucknall has good transport links. It also states that an integrated transport/ walking and cycling package will be required including potential link buses to Hucknall NET/train station. A Transport Assessment will be required as part of a planning application and contributions will be agreed as part of S106/CIL discussions. The final Transport Modelling is now available and does not change the results of the appraisal.	

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<b>Summary</b>	<b>Change Sought</b>	<b>Officer Response</b>	<b>Change Agree</b>
Disagree with assessment of North of Papplewick Lane site against objectives 5 (social) and 11 (transport). Poor access to public transport creates social exclusion. Gedling's Transport Study Phase 1 assessment provides insufficient detail. Social implications arising from traffic congestion if no planned improvements to highway network in this area. Increase in vehicles by the Rolls Royce development has not been taken into account. No plans for new schools will cause social implications.	Re-consider social and transport implications for North of Papplewick Lane site. Gedling's final detailed Transport Study to provide detailed assessment. IDP to provide evidence regarding public transport scheme. Account to be taken of Rolls Royce site.	The Rolls Royce site has been taken into account in the Transport Modelling work.  Objective 8 – the appraisal for other site e.g. Gedling Colliery/Chase Farm (on pages 213-215) states that the impact of building on site could possibly increase flood risk in the area prone to flooding downstream. The appraisal for North of Papplewick Lane (on pages 211-212) acknowledges the north-eastern part of the site possibly affected by flooding. However, this does not change the overall conclusion for North of Papplewick Lane site.	
Assessment of North of Papplewick Lane against objective 8 (natural resources and flooding) is not consistent with other sites. North east of the site within flood zone 2. Other sites have similar impact on natural resources but not in flood zone and score worse.	Need for consistent approach between sites. North east of the site within Flood Zone 2.	Objective 10 in the SA Framework does not include traffic as one of the decision making criteria.  It should also be noted that the SA is just part of the plan making process, and should not be seen as the only reason to choose or disregard a possible alternative option or site. Much wider issues also have a role to play in determining the choices of sites and these need to be taken into account, including the extensive evidence base.	
Assessment of North of Papplewick Lane site against objective 10 (energy) is inaccurate as increase in traffic has not been taken into account.	Re-consider implications due to increase in traffic caused by North of Papplewick Lane site.		
Assessment of North of Papplewick Lane site against objective 11 (transport) should reflect fact that no plans to extend car park at Hucknall Station and this will restrict number of users of the NET.	Re-consider transport implications affected by North of Papplewick Lane site.		

**Gedling Colliery/Chase Farm**

<b>Summary</b>	<b>Change Sought</b>	<b>Officer Response</b>	<b>Change Agree</b>
Unclear why Gedling Colliery/Chase Farm scores same as Top Wighay Farm against objective 1 (housing) as it would enable GBC to deliver more dwellings and achieve the objectives of ACS by regenerating this area.	Need for consistent approach between sites.  Score moderate positive for objective 10 for	Objective 1 – the numbers of dwellings for both Top Wighay Farm (1,000) and Gedling Colliery/Chase Farm (1,120) are similar thus the scores are the same.  Objective 8 – the appraisal for Gedling Colliery/Chase Farm (on pages	None

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<b>Summary</b>	<b>Change Sought</b>	<b>Officer Response</b>	<b>Change Agree</b>
Assessment of Gedling Colliery/Chase Farm sites scores 3 more + than North of Papplewick Lane and Top Wighay Farm sites. Better health benefits, good access to existing GP services, existing urban area, closer to Nottingham sites, better access to major services and facilities.	Gedling Colliery/Chase Farm site.	213-215) states that the impact of building on site could possibly increase flood risk in the area prone to flooding downstream. The appraisal for North of Papplewick Lane (on pages 211-212) acknowledges the north-eastern part of the site possibly affected by flooding.  Loss of high quality agricultural land was considered in the Sustainable Locations for Growth report as part of the evidence base.  Objective 10 – disagree.  There are no realistic alternatives to Gedling Access Road (as advised by County Highways).	
Unclear why Gedling Colliery/Chase Farm site scores less well than the sites to north of Hucknall against objective 8 (natural resources and flooding). Sites to north of Hucknall will have similar affect as there will be an increase of 1600 dwellings in one area. Grade 2 agricultural land not been taken into account. North of Papplewick Lane is partly in floodzone 2.			
Score for Gedling Colliery/Chase Farm against objective 10 (energy) is too low. Would expect to see at least a moderate positive as development brief seeks 10% target for renewable energy or 10% reduction in carbon emissions.			
Gedling Colliery/Chase Farm scores better against objective 11 (transport) than Top Wighay Farm or North of Papplewick Lane. Site is closer to Nottingham and opportunities to provide public transport service to city centre have been overlooked. GBC have not explored alternative options to the proposed GAR.			

**Gedling Colliery/Chase Farm/Mapperley Golf Course**

<b>Summary</b>	<b>Change Sought</b>	<b>Officer Response</b>	<b>Change Agree</b>
Unclear why Gedling Colliery/Chase Farm/Mapperley Golf Course site has been rejected as more sustainable than Top Wighay Farm or North of Papplewick Lane.	Need for consistent approach between sites and demonstrate why Gedling Colliery/Chase Farm/Mapperley Golf Course site has been rejected.	Although the site scores better against some objectives compared with the Hucknall sites, paragraph 11.27 (page 105) of the SA Publication Version report clearly states that the site was rejected because it was “marginally viable but unlikely to be deliverable”.  It should also be noted that the SA is just part of the plan making process, and should not be seen as the only reason to choose or disregard a possible alternative option or site. Much wider issues also	None
Gedling Colliery/Chase Farm/Mapperley Golf Course site scores the same as Top Wighay Farm against objection 1 (housing) but would deliver nearly twice the amount of dwellings.			

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<b>Summary</b>	<b>Change Sought</b>	<b>Officer Response</b>	<b>Change Agree</b>
Gedling Colliery/Chase Farm/Mapperley Golf Course site scores better against objective 2 (health) than the two sites to north of Hucknall. Unclear why this site has been rejected.	Refer to potential to improve green infrastructure and biodiversity at Gedling Colliery/Chase Farm/Mapperley Golf Course site.  Landscape score should recognise improvements at Gedling Colliery.	have a role to play in determining the choices of sites and these need to be taken into account, including the extensive evidence base.  Objectives 6 and 7 – although the site has potential to improve green infrastructure, biodiversity and the environment and landscape (on the former Colliery), there would also be a significant loss through the loss of the existing golf course, mature trees, network of footpaths and local wildlife as a result of the development.  Objective 8 – the appraisals for all sites mentions air quality and water quality affected. However the appraisal for Gedling Colliery/Chase Farm/Mapperley Golf scores negative against objective 8 due to the impacts of the new Gedling Access Road which be needed to support development in this location. No new road of this scale is needed for Top Wighay Farm and North of Papplewick Lane.	
Gedling Colliery/Chase Farm/Mapperley Golf Course site scores better against objective 5 (social) than the two sites to north of Hucknall. Unclear why this site has been rejected.			
Gedling Colliery/Chase Farm/Mapperley Golf Course site has potential to improve green infrastructure, biodiversity and the environment. Not reflected in scoring for objective 6 (environment, biodiversity and green infrastructure).			
Gedling Colliery/Chase Farm/Mapperley Golf Course site scores negative against objective 7 (landscape) due to loss of golf course yet there are opportunities to improve landscape at Gedling Colliery. Unclear why there are no positive marks to take account of this.			
Gedling Colliery/Chase Farm/Mapperley Golf Course site scored negative against objective 8 (natural resources and flooding). Yet the reasons are very similar to Top Wighay Farm and North of Papplewick Lane yet they have scored.			

**North of Redhill**

<b>Summary</b>	<b>Change Sought</b>	<b>Officer Response</b>	<b>Change Agree</b>
Page 188 indicates North of Redhill/New Farm site is far more sustainable than Top Wighay Farm or North of Papplewick Lane i.e. better access to existing services and Nottingham. Unclear why this site has not been chosen.	Need for consistent approach between sites and demonstrate why North of Redhill/New Farm site has been rejected.	Paragraphs 11.19-11.21 (page 104) of the SA Publication Version report clearly states that the site was rejected because it would be “difficult to deliver without significant highway improvements” and “no solutions are likely to be forthcoming in the plan period”. Discussions have been ongoing for many years and no solutions have been put forward that would allow the site to be accessed.  It should also be noted that the SA is just part of the plan making process, and should not be seen as the only reason to choose or disregard a possible alternative option or site. Much wider issues also	Amend object 5 to record mi positive for To Wighay Farm and North of Papplewick Lc sites.  Amend object 8 to record
North of Redhill/New Farm site scores well against objective 1 (housing) as expected.			
North of Redhill/New Farm site is inconsistent with Top Wighay Farm and North of Papplewick Lane. Social benefits appear to be much better than the sites in			

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<b>Summary</b>	<b>Change Sought</b>	<b>Officer Response</b>	<b>Change Agree</b>
Hucknall. Impact on objective 5 (social).		have a role to play in determining the choices of sites and these need to be taken into account, including the extensive evidence base.	moderate negative for T Wighay Farm and North of Redhill sites.  Amend object 9 to record mi negative for T Wighay Farm, North of Papplewick Lane, Gedling Colliery, North Redhil and Ea of Lambley La sites.
North of Redhill/New Farm site is inconsistent with Top Wighay Farm and North of Papplewick Lane, especially given the flooding issues of the North of Papplewick Lane site. Impact on objective 8 (natural environment and flooding).		Objectives 5, 8 and 9 – noted. However, this does not change the conclusion of the appraisals.	
North of Redhill/New Farm site is inconsistent with Top Wighay Farm site. Both sites would generate similar amount of household waste and should have similar scores. Impact on objective 9 (waste).		Objective 11 – appraisals for TWF and NPL state the sites have quite good transport links e.g. tram and Hucknall station which are alternatives to the car. North of Redhill’s appraisal states “uncertainties over potential to promote alternatives to the car” thus the negative scoring.	
North of Redhill/New Farm site has scored much worse than Top Wighay Farm or North of Papplewick Lane yet the only reason cited is to ‘uncertainty’ regarding the provision of a bus service and a bus lane (page 223 SA Appendices). Major transport issues relating to Top Wighay Farm and no clear plans for mitigation. Impact on objective 11 (transport).			

**East of Lambley Lane**

<b>Summary</b>	<b>Change Sought</b>	<b>Officer Response</b>	<b>Change Agree</b>
Unclear why East of Lambley Lane site has been rejected as scores well on most objectives apart from objective 7 (landscape).	Need for consistent approach between sites and demonstrate why East of Lambley site has been rejected.	Paragraph 11.22 (page 104) of the SA Publication Version report clearly states that the site was not given further consideration because it would be “difficult to justify development on this site in landscape and Green Belt terms”.	None
Unclear why East of Lambley Lane site has scored worse than the sites in Hucknall which are not well integrated into the PUA and would have a significant impact on existing public transport services. Impact on objective 11 (transport).		It should also be noted that the SA is just part of the plan making process, and should not be seen as the only reason to choose or disregard a possible alternative option or site. Much wider issues also have a role to play in determining the choices of sites and these need to be taken into account, including the extensive evidence base.  Objective 11 – appraisals for Top Wighay Farm and North Papplewick Lane sites state that the sites are on edge of Hucknall which have good transport links e.g. tram and Hucknall station.	

**Calverton**

<b>Summary</b>	<b>Change Sought</b>	<b>Officer Response</b>	<b>Change Agree</b>
Objects to development at Calverton. Not enough consultation with residents of Calverton. Highways issues, impact on doctors surgery, schools and sewerage, lack of retail facilities to cope with new houses. Build near Hucknall because they have better transport links, shopping facilities and schools. Calverton will become a small town.	Do not build at Calverton and build elsewhere e.g. near Hucknall.	Calverton's appraisal (pages 218-219 of SA Appendices) refers to the issues raised by consultees.  Issues also addressed in the context of the Aligned Core Strategies.	None
Objects to development at Calverton. Insufficient consultation carried out. SA minimises impact of proposals on infrastructure (schools, roads, health services), biodiversity. Loss of agricultural land and rural nature of village. Green Belt land should be preserved and development spread more evenly through the Borough.	Reduce housing numbers in Calverton. Use brownfield land and empty homes before green belt. Spread development more evenly.		
Objects to development at Calverton. Increase size of village by 50% will impact on local services/facilities. Census 2011 population statistics suggest population in GBC area not increasing as quickly as in other districts. Building companies having difficulty selling existing housing stock. Future projected number of students at Colonel Frank Seely does not take into account of proposed houses.	Allocate fewer dwellings on more sites (and less at Calverton).		
Calverton ranks as fourth largest site in Greater Nottingham in terms of proposed dwelling numbers (Table 5.3, IDP). Background information detailing the decision-making process is not available.	Greater transparency in the decision-making process; providing clear means of comparing options that is directly linked to evidence.	Paragraphs 8.1-8.2 (page 77) and Section 11 (pages 99-108) of the SA Publication Version report explain the process of identifying strategic sustainable sites and locations in Gedling Borough.	None
Three Scheduled Ancient Monuments in the vicinity of Calverton are not detailed in the SA but are noted in the Tribal Report 2010.	Refer to three Scheduled Ancient Monuments at Calverton in the SA.	Noted. However, this does not change the conclusion of the appraisal.	Update to refer to 3 Schedule Ancient Monuments in the vicinity of Calverton.

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<b>Summary</b>	<b>Change Sought</b>	<b>Officer Response</b>	<b>Change Agree</b>
Decision to escalate Calverton's housing numbers took place after all three SA workshops had been held. At unspecified date, an additional appraisal was conducted after Gedling Colliery/Chase Farm option was not feasible and SA does not contain adequate assessment of Calverton's ability to accommodate a huge increase in houses.	Provide details of all possible alternatives at the point when Gedling Colliery/Chase Farm option was considered unachievable.	When it became clear that the Gedling Colliery/Chase Farm site could not be delivered the SHLAA was used to identify alternative sites. Sites which accorded with the strategy of urban concentration were variously not suitable, available or achievable. Therefore other sites needed to be considered. Consideration was first given to sites adjoining the sub-regional centre of Hucknall and then to sites in or adjacent to the key settlements identified for growth. Paragraphs 11.35 (page 107) of the SA Publication Version explains that, following the decision relating to the Gedling Colliery/Chase Farm site, further appraisal was undertaken which confirmed that Calverton has the potential to sustain new growth of the scale identified in the Publication Version.	None

**Ravenshead**

<b>Summary</b>	<b>Change Sought</b>	<b>Officer Response</b>	<b>Change Agree</b>
Objects to development at Ravenshead. Impact on Green Belt and spoil character of the village, highways issues, considerable 'infilling' in Ravenshead in recent years. Occupants of new developments outside Ravenshead e.g. former Newstead Hospital and Harlow Wood sites use Ravenshead facilities and contribute to parking problems.	Build on brownfield sites and consideration should be given to building blocks of flats. Development should not go ahead where parking facilities are already overstretched.	Ravenshead's appraisal (pages 220-221 of SA Appendices) refers to the issues raised by consultee.  Issues also addressed in the context of the Aligned Core Strategies.	None



## **Appendix G: Broxtowe Borough's specific comments received on the Sustainability Appraisal**

### 1. Whether the SA for Broxtowe Borough is appropriate?

Paragraphs 8.1-8.2 of the SA Publication Version report explain the process of identifying strategic sustainable sites and locations. The Sustainable Urban Extensions (SUEs) Study (2008) provided advice on the most suitable location or locations for the development of SUEs adjacent to the Principal Urban Area (PUA), as well as the Sub-Regional Centres of Hucknall and Ilkeston. All strategic sites identified in the SUE Study (i.e. potentially suitable sites and potentially unsuitable sites) were appraised, as well as other sites suggested by consultees. The Sustainable Locations for Growth Study (2010) provided information on the pros and cons of accommodating growth in different areas outside the PUA. During the Issues & Options and Option for Consultation stages, consultees were given opportunities to comment on identified sites or suggest alternative sites. Further details can be found in the Borough Councils' Statement of Consultation document.

The sustainability of the overarching strategy, the strategic sites which have been allocated and the strategic locations have all been assessed as part of the SA process. Alternatives to each of these have also been assessed. Sites which do not fall under one of these categories due to size do not need to be assessed as part of the SA on the Aligned Core Strategies.

The findings of the appraisals of the ACS growth option are summarised in paragraphs 9.1-9.42 of the SA Publication Version report. Paragraphs 9.4 and 9.5 looked at high and low growth scenarios for comparison purposes.

With regard to the Toton site only three examples of alleged inconsistency are given by the promoters of this site. The Council does not agree that these examples demonstrate any inconsistency. However, in any case (and as Signet themselves appear to recognise at paragraph 6.58 of their representations), it is the role of the examination to establish whether the Sustainability Appraisal has been undertaken in a 'sound' way, not "to undertake a forensic analysis of all the individual assessments".

The Council strongly disagrees that it has "misrepresented" the credentials of the Toton site. In terms of employment the Toton site amounts to an extension to one of the most affluent parts of Broxtowe Borough, whereas Field Farm is located mainly in one of the most deprived wards relative to Broxtowe (Stapleford North). There are several employers within walking distance of the Field Farm site and a town centre in need of enhancement (Policy 6 of the ACS). It is acknowledged that the Field Farm site does not have employment provision proposed on the site but residential development here is likely to support existing employers both in the town centre of Stapleford and elsewhere in the town where such support is much needed. Toton has employment provision proposed on site, but there are not the same advantages in terms of the likelihood of residents at Toton supporting existing businesses in Stapleford given the increased difficulty in accessing the town centre of Stapleford from the Toton site, particularly on foot or bike given the busy roads/ junctions in

particular crossing the A52. Section 6 of Signet's representations indicates that they take a somewhat more 'positive' approach to some of the inevitable consequences of development than Broxtowe do. For example, Signet consider that there would be no adverse impact on the landscape at Toton, partly because "there will only be a loss of arable farm land", whereas Broxtowe's appraisals assume that development of greenfield land will have some adverse effect on the landscape. Similarly, Signet considers that there would be a minor positive effect on 'heritage', partly because the open space "will aspire to green flag standard", whereas Broxtowe treat this as a neutral effect on enjoyment of "the cultural and built environment". While both approaches are legitimate, it is not appropriate to compare a score for a site assessed using Signet's approach with a score for another site assessed using Broxtowe's approach. If all sites and locations were assessed using Signet's approach, all sites and locations would be likely to be given a higher score, however the order of preference of the sites would be likely to be unchanged. Broxtowe's assessment already indicates that the Toton site is more 'sustainable' than all others except the Severn Trent / Boots site. It is notable that on no objective do Signet's score and Broxtowe's score differ by more than a single point, and that there are no cases of Signet scoring a positive where Broxtowe score a negative, or vice versa. This strongly indicates that there is no fundamental difference in the relative assessment of the sites between Signet and Broxtowe.

Both Brinsley and Awworth are assessed in the Tribal Sustainable Locations for growth report as suitable for medium growth. The amount of new development proposed for both of these settlements is appropriate to their scale and function and will be expected to provide support for existing services in each village. Villages of this size clearly do not have the same range of services as in the main built up area of Nottingham (or the larger settlements of Eastwood and Kimberley) but that point is reflected in the SA, and in the much lower amount of new homes for these settlements over the Core Strategy period. SABHRE are correct in that the bus service in Brinsley is not 'frequent' but this has no material bearing on the assessment of the village.

Assessments of health, transport and education have been explored through the Infrastructure Delivery Plan outside the SA appraisals (see Appendix A of the Aligned Core Strategies).

It should also be noted that the SA is just part of the plan making process, and should not be seen as the only reason to choose or disregard a possible alternative option or site. In particular the issue of the lesser impact on the Green Belt when compared to alternatives is highly material in the decision to allocate Field Farm. See the separate Green Belt background paper for a full explanation. Much wider issues also have a role to play in determining the choices of sites and these need to be taken into account, including the extensive evidence base.

The site at Toton for a residential led development was included in the councils' assessment of potential growth locations and within the sustainability appraisal but not included in the Publication Version of the Core Strategy as the site was not

required to be allocated for housing and Field Farm was considered to have a better prospect of early delivery and has less impact on the Green Belt. However, on 28<sup>th</sup> January 2013 the Government announced its preferred route for HS2 from Birmingham to Leeds and that land at Toton Sidings is the preferred location for a hub station to serve the East Midlands. The Council's consider that there are opportunities for enhanced accessibility and sustainability associated with HS2 and in particular potential enhanced links to supporting local and national infrastructure. As a result of this, Broxtowe has taken the step of revisiting Toton as a possible strategic location for growth and from 18<sup>th</sup> February to 3<sup>rd</sup> April 2013 undertook further public consultation on including Toton as a 'strategic location' within the Core Strategy.

There remain a number of uncertainties which need to be resolved before any site specific allocation is made for development in this location. This includes confirmation of the station location, access arrangements, the extension of the NET route through the site, any additional infrastructure requirements for the HS2 station, and/or NET, and the appropriate mix of uses on the site with a particular emphasis on maximising the potential economic benefit that a HS2 station will bring. This does not rule out an element of residential development, but following the necessary strategic steer in the Core Strategy, this does require detailed consideration of the appropriate mix of uses which can properly be done through the Broxtowe Site allocations DPD.

The result of this is that development at Toton and Field Farm as the two most sustainable green belt sites in Broxtowe Borough are included in the Core Strategy and it remains the appropriate response to allocate Field Farm and to identify Toton as a strategic location for growth.

It is considered that there is nothing in the SA that is significantly erroneous. Apart from disagreements about 'scores' for particular criteria (which are, inevitably, a matter of judgement and which are justified in the SA), objector's main point is that there are some inconsistencies between the summary table and the appendix. There are some amendments that will need to be made when the final SA Report is produced following adoption. Sustainability appraisal is about significance and no changes made with respect to the comments would lead to different recommendations arising from the SA. A site at Toton/Stapleford remains the most sustainable option of the non-brownfield sites, with Field Farm next, and then other greenfield options.

**Appendix H: Gedling's amendments to Sustainability Appraisal**

The following table is used for the various sustainability appraisals that have been undertaken and the colour coding.

+++	Very major / important positive
++	Moderate to major positive
+	Minor to moderate positive
+/-	Minor positive and minor negative
?	Unknown impact
	Negligible impact / not relevant
+/-	Minor positive and minor negative
-	Minor to moderate negative
--	Moderate to major negative
---	Very major / important negative

**Table 17: Summary Sustainability Appraisal of Gedling Housing Growth Options**

	1. Housing	2. Health	3. Heritage	4. Crime	5. Social	6. Environment, Biodiversity and Green Infrastructures	7. Landscape	8. Natural Resources and Flooding	9. Waste	10. Energy and Climate Change	11. Transport	12. Employment	13. Innovation	14. Economic Structure
High growth (9,250)	+++	+	+	+		-	-	-	-	+	+/-	+/-		+
ACS growth (7,250)	++	+	+	+		+/-	-	-		+	+/-	+		
Low growth (5,250)	+	+	+	+		+/-	-	-				-		-

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11.5 The lower growth option (5,250 dwellings) would provide less housing in the Borough which would mean the impact on development in the rural area would be less and hence the lower negative scores in terms of environment, biodiversity and Green Infrastructure, landscape, natural resources and flooding. The lower growth option would lead to an increase of housing but may not lead to an increase in affordable homes. As there is a close correlation between housing and health, fewer affordable homes may cause an impact on people's health and well being. In terms of employment, the lower growth option may constrain the labour force (in particular the construction industry) and not allow for an expansion of the economic structure in Gedling.

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Table 18: Summary Sustainability Appraisal of Gedling's Sites and Settlements

	1. Housing	2. Health	3. Heritage	4. Crime	5. Social	6. Environment, Biodiversity and Green Infrastructures	7. Landscape	8. Natural Resources and Flooding	9. Waste	10. Energy and Climate Change	11. Transport	12. Employment	13. Innovation	14. Economic Structure
<b>Sustainable Urban Extensions</b>														
Top Wighay Farm (1000 homes/employ)	++	+	+	+	±	+/-	-	+/-	--		+/-	+		+?
North of Papplewick Lane (600 dwellings)	+	+		+	±	+/-	-?	-	--		+/-			
North of Redhill (900-1300 dwellings)	++	+	+	+	+	-		-	-	+	-			
East of Lambley Lane (smaller site)	++	+	+	+	+	-	---	-	-	+	-			
<b>Sites in or adjoining the existing built up area of Nottingham</b>														
Gedling Colliery/ Chase Farm (1120 homes/employ)	++	++	-	+	+	+/-	-	---	--	+?	-	+		
Gedling Colliery/ Chase Farm & M Golf Course (1900 homes)	++	++	-		+	+/-	-	--	-		+/-	+		+
<b>Key settlements identified for growth</b>														
Bestwood (up to 600 homes)	++	+	+	+	+	+/-		-		+	+/-			
Calverton (up to 1600 homes)	++	+	+	+	+	-		-		+	+/-			
Ravenshead (up to 500 homes)	++	+	+	+		-		-		+	+/-	-		
Burton Joyce				+	+			--	-	+	+			
Lambley				+				-	-	+	-			
Linby				+				-	-	+	-			
Newstead			+	+	+	+		-	-	+				
Papplewick				+					-	+	-			
Stoke Bardolph				+				---	-	+	--			
Woodborough				+				---	-	+	--			

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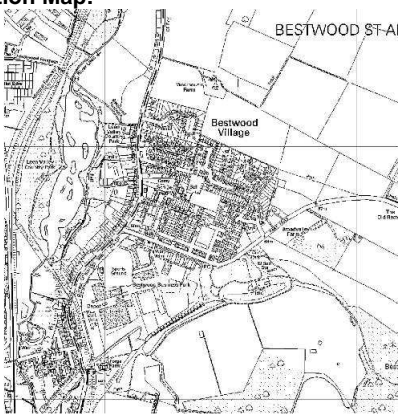
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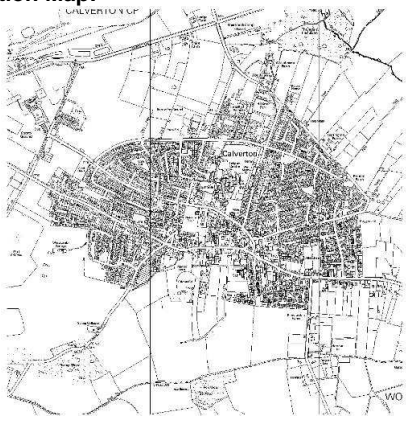
Settlements and sites shaded in grey were appraised but a specific housing figure has not been included in the Aligned Core Strategies. See key on page 23.

**Bestwood Village**

Details		Location Map: 
Settlement Name:	Bestwood Village	
ACS Reference:	Policy 2.3(c)(i)	
Location:	West of the Borough	
Local Authority:	Gedling Borough Council	
Direction for Growth:	North, Northeast and East (from Sustainable Locations for Growth 2010)	
SA Map Site ref:	G7	
Assumed Capacity:	Up to 600 dwellings	
Environmental Characteristics		
Flood Risk:	No flood risk	
Open Space network:	Existing open space within the village	
SSSI:	No SSSI	
Bio SINC:	Bio SINC within 50M of the village	
Local Nature Reserves:	No Local Nature Reserves	
TPOs:	Protected trees within and around the village	
Ancient Woodland:	No Ancient Woodland	
Air quality:	No Air Quality Management Areas	
Green Belt:	Green Belt outside the village	
Greenwood Community Forest:	Village within Greenwood Community Forest	
Historic Characteristics		
Listed Buildings:	Listed Buildings in vicinity of the village	
Conservation Areas:	1 Conservation Area within the village	
Registered Parks & Gardens:	No Registered Parks and Gardens	
Scheduled Ancient Monuments:	1 Scheduled Ancient Monument in the vicinity of the village	
Accessibility Characteristics		
Distance to nearest bus/NET stops:	Bus routes 141 and 228.	
Distance to nearest schools:	1 primary school (Hawthorne Primary School) in the village.	
Distance to nearest GP surgeries:	No GP surgeries in the village.	
Distance to nearest retail facilities:	Post Office (Park Road) in the village.	
Distance to nearest community facilities:	Bestwood Social Club (Park Road) in the village.	

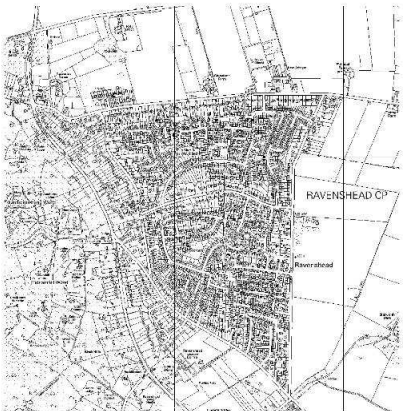
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**Calverton**

Details		Location Map: 
Settlement Name:	Calverton	
ACS Reference:	Policy 2.3(c)(ii)	
Location:	East of the Borough	
Local Authority:	Gedling Borough Council	
Direction for Growth:	Northwest, West, Southwest, South and East (from Sustainable Locations for Growth 2010)	
SA Map Site ref:	G8	
Assumed Capacity:	Up to 1,600 dwellings	
Environmental Characteristics		
Flood Risk:	No flood risk	
Open Space network:	Existing open space within the village	
SSSI:	No SSSI	
Bio SINCs:	No Bio SINCs	
Local Nature Reserves:	No Local Nature Reserves	
TPOs:	Protected trees within and around the village	
Ancient Woodland:	No Ancient Woodland	
Air quality:	No Air Quality Management Areas	
Green Belt:	Green Belt outside the village	
Greenwood Community Forest:	Village within Greenwood Community Forest	
Historic Characteristics		
Listed Buildings:	<del>1</del> Listed Buildings in the vicinity of the village	
Conservation Areas:	1 Conservation Area within the village	
Registered Parks & Gardens:	No Registered Parks and Gardens	
Scheduled Ancient Monuments:	<del>3</del> Scheduled Ancient Monuments in the vicinity of the village	
Accessibility Characteristics		
Distance to nearest bus/NET stops:	Bus routes 7, 7.1, CC and S8.	
Distance to nearest schools:	2 primary schools (St Wilfrid's CofE Primary School and Manor Park Infant School) and 1 secondary school (Sir John Sherbrooke Junior School) in the village	
Distance to nearest GP surgeries:	GP surgery (The Calverton Practice) in the village. There is also a dentist surgery in the village.	
Distance to nearest retail facilities:	St Wilfrids Square shopping centre, including a supermarket. Retail units and Public Houses on Bonner Lane, Collyer Road and Main Street.	
Distance to nearest community facilities:	Calverton Leisure Centre and a library in the village.	

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## Ravenshead

Details		Location Map: 
Settlement Name:	Ravenshead	
ACS Reference:	Policy 2.3(c)(iii)	
Location:	North of the Borough	
Local Authority:	Gedling Borough Council	
Direction for Growth:	North and South (from Sustainable Locations for Growth 2010)	
SA Map Site ref:	G9	
Assumed Capacity:	Up to 500 dwellings	
Environmental Characteristics		
Flood Risk:	No flood risk	
Open Space network:	Existing open space within the village	
SSSI:	No SSSI	
Bio SINC:	Bio SINC within 50M of the village	
Local Nature Reserves:	No Local Nature Reserves	
TPO:	Protected trees within and around the village	
Ancient Woodland:	Ancient Woodland within 50M of the village	
Air quality:	No Air Quality Management Areas	
Green Belt:	Green Belt outside the village	
Greenwood Community Forest:	Village within Greenwood Community Forest	
Historic Characteristics		
Listed Buildings:	Listed Buildings in the vicinity of the village	
Conservation Areas:	No Conservation Area	
Registered Parks & Gardens:	Registered Parks and Gardens within 50M of the village	
Scheduled Ancient Monuments:	No Scheduled Ancient Monuments	
Accessibility Characteristics		
Distance to nearest bus/NET stops:	Bus routes 141 and 145	
Distance to nearest schools:	2 primary schools in the village	
Distance to nearest GP surgeries:	GP surgery in the village.	
Distance to nearest retail facilities:	Small shopping centre, including a supermarket. Post Office in the village.	
Distance to nearest community facilities:	A leisure centre and a library in the village.	

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Gedling Borough Council – High growth (9,250 dwellings) = +2,000 additional dwellings

																		Very major/important positive
																		Major positive
																		Moderate to major positive
																		Moderate positive
																		Minor positive
1. Housing	2. Health	3. Heritage	4. Crime	5. Social	6. Environment, Biodiversity and Green Infrastructure	7. Landscape	8. Natural Resources and flooding	9. Waste	10. Energy and Climate Change	11. Transport	12. Employment	13. Innovation	14. Economic Structure	? = unknown impact No fill = negligible impact or not relevant				
																		Minor negative
																		Moderate negative
																		Moderate to major negative
																		Major negative
																		Very major/important negative

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SA Objectives	Gedling – high growth (9,250 dwellings)	Gedling – low growth (5,250 dwellings)
1. Housing	Major positive. Will lead to an increase of affordable housing.	Will lead to an increase of housing but might not lead to increase in affordable homes.
2. Health	Greater provision of new affordable housing with associated health benefits.	Fewer houses are built in the future = negative health impacts.
3. Heritage	More sites will be required so may require more sensitive sites to be developed.	Low growth scenario would enable greater choice on sites to be developed.
4. Crime	<u>Will be designed to Designing out Crime standards.</u>	<u>Will be designed to Designing out Crime standards.</u>
5. Social		
6. Environment, Biodiversity and Green Infrastructure	As scenario would require a greater size/number of sites, increased pressure may be placed in and around urban area as well as rural area, especially the villages.	Less impact (compared to high growth scenario) on releasing sites in rural area, especially the villages.
7. Landscape	As above.	As above.
8. Natural Resources and Flooding	Increased risk and less ability to control water quality.	As above.
9. Waste	More people = more waste, more new homes = more construction waste.	
10. Energy and Climate Change	High growth scenario = More people = more energy demand. Other aspects of development would impact on climate change e.g. extra traffic.	
11. Transport	High growth scenario = more people = more cars and more trip generation. New public transport schemes more viable on larger housing developments.	Not providing enough homes so would not allow for in-migration so people unable to move to live in Gedling = longer commuting times.
12. Employment	Negatives = may lead to higher unemployment if not enough employment opportunities provided to meet the increase in population. Positives = more homes = more jobs in construction. More homes = more money being spent on economy.	Lower levels of growth would constrain labour force.
13. Innovation		
14. Economic Structure	Will allow economy to expand in Gedling.	Would not contribute a significant positive to expand in Gedling.

Gedling Borough Council – Top Wighay Farm (1,000 homes and employment development)

															Very major/important positive
															Major positive
															Moderate to major positive
															Moderate positive
															Minor positive
1. Housing	2. Health	3. Heritage	4. Crime	5. Social	6. Environment, Biodiversity and Green Infrastructure	7. Landscape	8. Natural Resources and flooding	9. Waste	10. Energy and Climate Change	11. Transport	12. Employment	13. Innovation	14. Economic Structure	? = unknown impact No fill = negligible impact or not relevant	
															Minor negative
															Moderate negative
															Moderate to major negative
															Major negative
															Very major/important negative

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Gedling Borough Council – North of Papplewick Lane (600 homes)

																Very major/important positive
																Major positive
																Moderate to major positive
																Moderate positive
																Minor positive
1. Housing	2. Health	3. Heritage	4. Crime	5. Social	6. Environment, Biodiversity and Green Infrastructure	7. Landscape	8. Natural Resources and flooding	9. Waste	10. Energy and Climate Change	11. Transport	12. Employment	13. Innovation	14. Economic Structure	? = unknown impact No fill = negligible impact or not relevant		
					?	?										Minor negative
																Moderate negative
																Moderate to major negative
																Major negative
																Very major/important negative

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Gedling Borough Council – Gedling Colliery/Chase Farm site

															Very major/important positive
															Major positive
															Moderate to major positive
															Moderate positive
									?						Minor positive
1. Housing	2. Health	3. Heritage	4. Crime	5. Social	6. Environment, Biodiversity and Green Infrastructure	7. Landscape	8. Natural Resources and flooding	9. Waste	10. Energy and Climate Change	11. Transport	12. Employment	13. Innovation	14. Economic Structure	? = unknown impact No fill = negligible impact or not relevant	
															Minor negative
															Moderate negative
															Moderate to major negative
															Major negative
															Very major/important negative

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Gedling Borough Council – Bestwood Village (up to 600 homes)

															Very major/important positive
															Major positive
															Moderate to major positive
															Moderate positive
															Minor positive
1. Housing	2. Health	3. Heritage	4. Crime	5. Social	6. Environment, Biodiversity and Green Infrastructure	7. Landscape	8. Natural Resources and flooding	9. Waste	10. Energy and Climate Change	11. Transport	12. Employment	13. Innovation	14. Economic Structure	? = unknown impact No fill = negligible impact or not relevant	
															Minor negative
															Moderate negative
															Moderate to major negative
															Major negative
															Very major/important negative

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Gedling Borough Council – Calverton (up to 1,600 homes)

															Very major/important positive
															Major positive
															Moderate to major positive
															Moderate positive
															Minor positive
1. Housing	2. Health	3. Heritage	4. Crime	5. Social	6. Environment, Biodiversity and Green Infrastructure	7. Landscape	8. Natural Resources and flooding	9. Waste	10. Energy and Climate Change	11. Transport	12. Employment	13. Innovation	14. Economic Structure	? = unknown impact No fill = negligible impact or not relevant	
															Minor negative
															Moderate negative
															Moderate to major negative
															Major negative
															Very major/important negative

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Gedling Borough Council – Ravenshead (up to 500 homes)

																Very major/important positive
																Major positive
																Moderate to major positive
																Moderate positive
																Minor positive
1. Housing	2. Health	3. Heritage	4. Crime	5. Social	6. Environment, Biodiversity and Green Infrastructure	7. Landscape	8. Natural Resources and flooding	9. Waste	10. Energy and Climate Change	11. Transport	12. Employment	13. Innovation	14. Economic Structure	? = unknown impact No fill = negligible impact or not relevant		
																Minor negative
																Moderate negative
																Moderate to major negative
																Major negative
																Very major/important negative

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Gedling Borough Council – Rejected Sustainable Urban Extension (North of Redhill)

															Very major/important positive
															Major positive
															Moderate to major positive
															Moderate positive
															Minor positive
1. Housing	2. Health	3. Heritage	4. Crime	5. Social	6. Biodiversity and Green Infrastructure	7. Environment and Landscape	8. Natural Resources and flooding	9. Waste	10. Energy	11. Transport	12. Employment	13. Innovation	14. Economic Structure	? = unknown impact No fill = negligible impact or not relevant	
															Minor negative
															Moderate negative
															Moderate to major negative
															Major negative
															Very major/important negative

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Gedling Borough Council – Rejected Sustainable Urban Extension (East Of Lambley Lane)

															Very major/important positive
															Major positive
															Moderate to major positive
															Moderate positive
															Minor positive
1. Housing	2. Health	3. Heritage	4. Crime	5. Social	6. Biodiversity and Green Infrastructure	7. Environment and Landscape	8. Natural Resources and flooding	9. Waste	10. Energy	11. Transport	12. Employment	13. Innovation	14. Economic Structure	? = unknown impact No fill = negligible impact or not relevant	
															Minor negative
															Moderate negative
															Moderate to major negative
															Major negative
															Very major/important negative

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## Appendix I: Amendments to Section 3: Baseline Data & Characteristics

### Baseline and Key Issues for the Plan Areas

#### Spatial Portrait

xxvi The three local authorities of Broxtowe, Gedling and Nottingham making up the plan areas have a population of 640,800 (Greater Nottingham including Erewash, Rushcliffe and Hucknall has a population of 784,000). The plan areas include the City Centre, the built up parts of the three authorities and their surrounding rural areas. It is centrally located within England, and lies close to Derby and Leicester with important and complementary economic linkages between the cities.

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#### Population Trends

xxxi. The population of the area rose by 42,300 (8.7%), between 2001 and 2010 (52,300 or 7.1% within Greater Nottingham) due to natural growth in the population, people living longer, international migration, and the growth in student numbers. Children and people aged 45 to 69 are particularly “under-represented”. The percentage of the population who are aged 65 and over is projected to rise from 15% in 2010 to about 19% in 2028.

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### Greater Nottingham Spatial Portrait / Local Distinctiveness

3.6 The three local authorities of Broxtowe, Gedling and Nottingham making up the plan areas have a population of 640,800 (Greater Nottingham including Erewash, Rushcliffe and Hucknall has a population of 784,000). The plan areas includes the City Centre, the built up parts of the three authorities and their surrounding rural areas.

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#### Economy and Employment

3.11 Economic activity and employment rates in the plan areas are relatively low – 72% of people of working-age are economically active and 65% in employment (74% and 68% respectively for Greater Nottingham), compared with 76% and 70% nationally. This is partly due to the large number of students, but there are also challenges in terms of skills and qualifications, which need to be addressed if the economy is to become more service based and knowledge orientated.

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#### Culture

3.12 The area has an excellent and improving cultural offer, with nationally recognised facilities, such as the world class sporting venues, a range of theatres, Capital FM Arena, the new Nottingham Contemporary and Art Exchange galleries, and the Broadway independent cinema and film centre. Tourism, focussed around Robin Hood, Byron and DH Lawrence, is also a central element of the cultural offer, which has an important role for towns such as Eastwood. There are a range of

heritage assets which reflect the history of the plan area from the medieval period through to the industrialisation of the Victorian era. These have created a historic environment which has helped shape the area and contributed to the quality of life, local distinctiveness and sense of place. These assets include a wealth of Listed Buildings, Conservation Areas, Scheduled Ancient Monuments, Registered Parks and Gardens along with other assets including those yet to be identified. Work is needed to protect, preserve and enhance them especially those which are deemed to be 'at risk'. The area is also the home of several nationally important sports facilities, including the National Ice Centre and Notts County Football Ground, and with Trent Bridge Cricket Ground, the Nottingham Forest Football Ground, and the National Watersports Centre in Rushcliffe being readily accessible.

**Deleted:** There are a wealth of listed buildings, conservation areas, scheduled ancient monuments, and registered historic parks and gardens, which all contribute to its quality of life, local distinctiveness and sense of place.

### **Population Trends**

3.13 The population of the area rose by 49,000 (8.2%), between 2001 and 2010 (53,100 or 7.2% within Greater Nottingham) due to natural growth in the population, people living longer, international migration, and the growth in student numbers. If the proposed housing figures are delivered, it is estimated that it will have a population of 687,000 in 2028, (830,000 for Greater Nottingham), an increase of around 7% (7% for Greater Nottingham). The two universities result in the area having a high proportion of its population aged 18 to 29 compared with England as a whole, and lower proportions in other age-groups. Children and people aged 45 to 69 are particularly "under-represented". Overall, an ageing population is projected, but not to the same extent as nationally. The percentage of the population who are aged 65 and over is projected to rise from 15% in 2010 to about 19% in 2028.

### **Health**

3.26 A similar geographical pattern is reflected in the health of the population, most graphically illustrated through average life expectancy. Broxtowe, Erewash and Gedling all have life expectancy above the national average. However, there are parts of the plan area, particularly Nottingham City where there are significant gaps in life expectancy between the most and least deprived communities, ranging in some cases up to ten years. Deprivation also means that, on average, life expectancy in Nottingham is three years less than in England (which is 78.2 years at birth). The causes of that lower life expectancy are due in the main to a higher than average prevalence of three diseases; cardiovascular heart disease, cancer and chronic obstructive pulmonary disease (lung disease). Lifestyle risk factors contribute to all of these. Smoking, low levels of exercise, obesity, high alcohol consumption and poor mental wellbeing also contribute to ill health.

### Broxtowe Spatial Portrait / Local Distinctiveness

#### Spatial Issues

3.32 Broxtowe has a population of 109,500 (2011 census) and covers an area of some 31 square miles. It is characterised by a more urban south with the separate settlements of Attenborough, Chilwell, Beeston, Bramcote, Stapleford, Toton and part of Trowell together comprising over 60% of the borough's population and forming part of the western side of the built up area of Greater Nottingham.

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3.40 In the borough there are 151 Listed Buildings (6 Grade I, 9 Grade II\* and 136 Grade II), 6 Scheduled Ancient Monuments, 15 Conservation Areas, 10 SSSIs and 143 other Sites of Importance to Nature Conservation (SINCs). However, some of these heritage assets are at risk, with 3 Listed Buildings, 1 Scheduled Ancient Monument and 4 Conservation Areas included on the national Heritage at Risk Register).

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Deleted: 144 listed buildings, 15 conservation areas, 7 ancient monuments, 10 SSSIs and 140 other Sites of Importance to Nature Conservation (SINCs)

### Gedling Spatial Portrait / Local Distinctiveness

#### Spatial Issues

3.62 Gedling Borough covers 130 square kilometres and is a mix of urban and rural with around 80% of 113,500<sup>1</sup> residents living in the Greater Nottingham suburbs of Arnold and Carlton. It is bordered by the city of Nottingham as well as other towns, including Hucknall and Kirby to the west and Mansfield to the North. To the east lies the rural part of Newark and Sherwood District and a number of smaller villages. The southern boundary between Gedling Borough and Rushcliffe Borough is formed by the River Trent.

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3.67 A number of areas in Gedling Borough have a strong sense of heritage especially in the rural areas where six of the villages have Conservation Areas. Newstead Abbey park, once home to Lord Byron, includes a number of heritage assets such as the Grade I Listed Abbey and Boundary Wall and is a major feature in the North of the Borough. There are 188 Listed Buildings in the Borough (6 Grade I, 15 Grade II\* and 167 Grade II), 9 Scheduled Ancient Monuments and 4 Registered Parks and Gardens. However some of these heritage assets are at risk, with 3 Listed Buildings (including Newstead Abbey) and 1 Scheduled Ancient Monument included on the national Heritage at Risk register.

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### Nottingham City Spatial Portrait / Local Distinctiveness

#### Spatial Issues

3.74 Nottingham City is one of the eight Core Cities in England. The City is a very compact and high-density urban area, with a population of 305,700 and an area of only 7,461 hectares. Mainly due to its tight boundary, Nottingham has developed at a higher density than many

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<sup>1</sup> Office for National Statistics mid-year population estimate 2010

other towns and Cities, and has developed very strong links and relationships with numerous surrounding settlements and rural areas. Nottingham serves as a strategic centre, attracting people from a wide catchment well beyond its administrative area to access a variety of economic, transport, cultural, and health services and facilities. Many of the suburbs which form part of the built-up area are located in the surrounding Districts and Boroughs.

3.80 Nottingham has a large number of Listed Buildings (9 Grade I, 31 Grade II\*, and over 700 Grade II), and 31 Conservation Areas. There are 8 Local Nature Reserves (LNR) totalling 140.1ha, 64 SINCs and 3 SSSIs in the City. There is a large variety of open spaces, and in 2011 there were 15 Green Flag awarded sites across the City. There are extensive areas of open space at Nottingham University campus and Wollaton Park, both within the City. Some open spaces are under-used or of lesser quality, often found within the large estates.

3.84 Unemployment in the city was 13,598 (6.1%) in December 2011, a rate which increased in the past two years but declined steadily since the beginning of 2012. This compares poorly with 3.1% for the rest of the plan areas (Broxtowe & Gedling). Between July 2011 and June 2012, only 60% of 16-64 year old people living in the City were in employment. This figure is affected by the number of students, but, even allowing for this, it is low compared to 73.1% for the rest of the plan areas. Addressing employment and skills issues remains a priority, particularly in better equipping the population in the more deprived areas of the City to benefit from the growth and opportunities. Established international businesses such as Experian, Capital One, and sectoral clusters such as BioCity ensure a competitive and strong position in attracting new inward investment, as does the 'Science City' designation which recognises Nottingham's potential to see further high-value employment and economic growth, particularly associated with the Enterprise Zone at the Boots campus, MediPark and Nottingham Science Park.

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