

Report of Consultation on the Sustainability Appraisal Scoping Report (October 2013)

The Sustainability Appraisal Scoping Report was consulted on alongside the Issues and Options stage of the Local Planning Document during 8 week period in October and December 2013. The key issues raised from the consultation are summarised here.

Plans, Policies and Programmes

Comments

The Scoping Report asked whether all plans, policies and programmes that affect the Local Planning Document had been included in the Scoping Report. 12 respondents considered the Scoping Report had included all plans, policies and programmes and 7 respondents disagreed.

The Environment Agency raised the following points:-

- In relation to flooding, reference should be included to the River Leen & Daybrook Strategic Flood Risk Assessment. A cross boundary approach to flood risk management is required to ensure that major development in Gedling Borough does not adversely impact on flooding elsewhere.
- Request that reference should be included to:-
 - Benefits of Green Infrastructure report by Forest Research (October 2010); and
 - Planning for a healthy environment - good practice for green infrastructure and biodiversity by the Town & Country Planning Association and The Wildlife Trusts (July 2012).
- In relation to water, reference should be made to the Lower Trent and Erewash Catchment Abstraction Management Strategy (CAMS) which provides a framework for resource availability assessment to produce a licensing strategy to help manage water resources sustainably and the Severn Trent Water's Water Resource Management Plan which highlights how water provision will be met into the future.

English Heritage were concerned that no references were made to documents in relation to historic environment considerations and requested that reference be made to the Nottinghamshire Historic Landscape Characterisation Project.

Natural England would like to see the following documents included:-

- Natural Environment and Rural Communities Act 2006;
- Wildlife and Countryside Act (as amended) 1981;
- Conservation of Habitats and Species Regulations 2010; and
- 6Cs Green Infrastructure Study.

Natural England also suggested that National Character Areas (NCAs) were included. NCAs divide England into 159 distinct natural areas. Each is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and

economic activity. Their boundaries follow natural lines in the landscape rather than administrative boundaries. The NCAs that fall within Gedling District include Sherwood NCA 49 and the Trent and Belvoir Vales NCA 48.

Severn Trent Water Ltd commented that the possible impact on Source Protection Zones should be included.

Gedling Borough Council's Scientific Officer commented that the Council's Contaminated Land Strategy (2006) should be included (the 2013 revision is available but not yet published).

Council response

The Council agrees that the following documents should be added to the list of the plan, policies and programmes:-

- River Leen and Daybrook Strategic Flood Risk Assessment (2008)
- Forest Research's Benefits of green infrastructure (2010)
- Planning for a healthy environment - good practice for green infrastructure and biodiversity (July 2012)
- Nottinghamshire Historic Landscape Characterisation Project
- Natural Environment and Rural Communities Act 2006
- The Wildlife and Countryside Act (as amended) 1981
- Conservation of Habitats and Species Regulations 2010
- 6Cs Green Infrastructure Study
- National Character Areas (NCAs)
- Contaminated Land Strategy (2006)

The Environment Agency's Lower Trent and Erewash Catchment Abstraction Management Strategy (CAMS) relates to a licensing strategy to help manage water resources sustainably and the Council considers this is not relevant for the SA appraisal and does not need to be included.

The Environment Agency defines Source Protection Zones (SPZs) for 2000 groundwater sources such as wells, boreholes and springs used for public drinking water supply. The Source Protection Zones will be included in the SA Framework.

Baseline Data

Comments

The Scoping Report asked whether an appropriate and accurate range of relevant baseline data had been identified. 12 respondents thought the Scoping Report has identified an appropriate and accurate range of relevant baseline data and 6 respondents disagreed.

The Environment Agency referred to the following information that may be useful for the Sustainability Appraisal work: permitted waste management facilities; national

fly-tipping database; abstraction licence information; Water Framework Directive ecological status of water bodies; and protected and invasive species.

English Heritage felt that no further information has been given regarding non-designated heritage assets. They welcomed the historic environment attributes under paragraphs 4.6-4.8 (in Section 4 of the Scoping Report) but felt this could be expanded to further set out more on the general historic environment character of the area and that further baseline information was required.

Natural England was satisfied with the paragraphs regarding protected nature conservation sites and local landscapes in the Built and Natural Environment section (in Section 4 of the Scoping Report). However they felt that the section should also make reference to geodiversity conservation, soils, agricultural land and Green Infrastructure. Accessibility to open spaces and its relationship to health and well-being issues should also be mentioned in the Social / Community Issues section.

Council response

The permitted waste management facilities relate to the national level and will therefore not be added to the baseline data. Fly-tipping data is provided at the local planning authority level and will be added to the baseline data. The Council is in process of requesting the following information from the Environment Agency: abstraction licence information; WFD ecological status of water bodies; and protected and invasive species. When received the Council will review the information and add to the baseline data where appropriate.

Information regarding the historic environment character of the Borough, non-designated assets, geodiversity conservation, soils, agricultural land, Green Infrastructure and accessibility to open space will, where appropriate, be incorporated in the Scoping Report. Further information (if any) will be added to baseline data.

Key Sustainability Issues

Comments

The Scoping Report asked whether the key sustainability issues identified in Section 5 of the Scoping Report were correct for Gedling Borough. 11 respondents thought the key sustainability issues identified in Section 5 of the Scoping Report were correct and 7 respondents disagreed.

English Heritage were concerned that there was no explicit reference to the conservation and enhancement of heritage assets in Table 5. They noted the broad references to conservation and enhancement of local character in Table 5 but suggested that a further row to consider sustainability issues should be added.

Severn Trent Water Ltd commented that the possible impact on the Source Protection Zones could be included.

Gedling Borough Council's Scientific Officer felt that the impact of poor air quality on the health of the population of Gedling should be included under Built and Natural Environment. A reference was made to the figure in the Public Health Outcomes Framework indicator for "Fraction of mortality attributable to particulate air pollution" which indicates that 5.5% (approx. 1 in 20) of deaths in Gedling are attributable to air pollution¹.

Council response

The sustainability issues table will be amended to incorporate air quality and the conservation and enhancement of heritage assets.

The Environment Agency defines Source Protection Zones (SPZs) for 2000 groundwater sources such as wells, boreholes and springs used for public drinking water supply. The Source Protection Zones will be included in the SA Framework.

SA Framework (SA Objectives, Decision Making Criteria and Site Specific Questions)

Comments

The Scoping Report asked whether the Sustainability Appraisal objectives adequately covered the key sustainability issues facing Gedling Borough. 13 respondents thought the SA objectives adequately covered the key sustainability issues facing Gedling Borough and 4 respondents disagreed.

The Scoping Report asked whether the decision making criteria in the SA Framework were appropriate. 11 respondents thought they were appropriate and 5 respondents disagreed.

The Scoping Report asked whether the site specific questions in the SA Framework were appropriate. 10 respondents thought they were appropriate and 4 respondents disagreed.

The Environment Agency raised the following comments:-

- SA objective 6: Environment, Biodiversity and Green Infrastructure. The site specific question criteria should consider if new habitat is being created i.e. net biodiversity gain.
- SA objective 8: Natural Resources and Flooding. The SA objective clearly states an intention to prudently manage water as a natural resource. However there are no decision making criteria to address this and water conservation in all new developments is important in overall terms of water demand. A stand-alone flood risk Sustainability Objective should be included with appropriate wording in line with the National Planning Policy Framework.

¹ <http://www.phoutcomes.info/public-health-outcomes-framework#gid/1000043/pat/6/ati/101/page/0/par/E12000004/are/E07000173>

- SA objective 9: Waste. The decision making criteria could consider the number of fly-tipping incidents.

English Heritage raised concern that the site specific questions included a single question for the historic environment. The question was restricted only to whether the development would result in loss or harm and there were no questions with regard to non-designated heritage assets or the enhancement of heritage assets. It was viewed that no indication was given within the document as to how site allocations would be assessed and evaluated in response to these questions (i.e. whether by desk based assessment or onsite site evaluation). Impacts on setting were considered more than just visual, setting can be affected by noise, pollution and other means.

Gedling Borough Council's Scientific Officer suggested SA objective 2: Health should include a question on levels of air pollution and whether the air quality effects of the development could be offset or mitigated.

Severn Trent Water Ltd suggested inclusion of a question as to whether the site could cause harm to the Source Protection Zone.

Council response

The comments of Environment Agency, English Heritage, Severn Trent Water Ltd and the Borough Scientific Officer will be incorporated in the SA Framework. Changes will include:-

- SA Objective 3: Heritage to include additional questions
- SA objective 6. Environment, Biodiversity and Green Infrastructure to include question on net biodiversity gain
- SA Objective 8. Natural Resources and Flooding to include questions on Source Protection Zone, water conservation and air pollution and remove reference to flooding
- A new stand-alone SA Objective on flooding will be created

The Council considers the number of fly-tipping incidents is not relevant for the SA appraisal and will not be included in the SA Framework.

SEA Directive Requirements

Comments

The Scoping Report asked whether the Scoping Report and the SA Framework meet the requirements of the SEA Directive. 10 respondents thought the Scoping Report and the SA Framework met the requirements of the SEA Directive and 3 respondents disagreed.

English Heritage felt the Scoping Report fell short of the requirements of the SEA Directive and recommended some amendments in relation to the historic

environment plans, policies, programmes, baseline, sustainability issues, site specific questions and assessment in order to meet the requirements. English Heritage made reference to their guidance (“Strategic Environmental Assessment, Sustainability Appraisal and The Historic Environment (2013)”) which provides further information on how this can be achieved.

Council response

Amendments will be made to the Scoping Report to address the comments raised by English Heritage:-

- Nottinghamshire Historic Landscape Characterisation Project will be added to the list of the plan, policies and programmes
- Information regarding the historic environment character of the Borough will be incorporated in the Scoping Report
- Further information on historic environment (if any) will be added to baseline data
- Sustainability issues table will be amended to incorporate air quality and the conservation and enhancement of heritage assets
- SA Objective 3: Heritage in the SA Framework to include additional questions

Equality Impact Assessment

Comments

The Scoping Report asked whether all sources of information regarding the protected equality characteristics had been identified in Appendix 2 of the Scoping Report. 10 respondents thought all sources of information regarding the protected equality characteristics had been identified in Appendix 2 of the Scoping Report and 2 respondents disagreed.

The Scoping Report also asked whether issues had been correctly identified in Section 2 of the Scoping Report. 9 respondents agreed with the issues identified and 2 respondents disagreed. No comments were provided in relation to this question.

Council response

No recommended changes.