

Gedling Local Development Plan

Consultation Draft: Sustainability Appraisal Scoping Report

Appendix C: Consultation Comments

May 2026

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Introduction

This document serves as a comprehensive record of the representations received and the Council's responses during the preparation of the Sustainability Appraisal. It constitutes a supporting technical document to the Gedling Local Development Plan.

The Sustainability Appraisal is a continuous and iterative process. Accordingly, the appraisal framework has been refined in tandem with the emerging Local Plan to ensure that environmental, social, and economic considerations are integrated into policy development. This appendix outlines how the representations from statutory consultation bodies, internal stakeholders and residents have been considered and, where appropriate, incorporated into the SA process. The document is structured into two parts, Part 1: Scoping Report Consultation and Part 2: Informal Consultation - Refining Policy Alternatives and Assessing Options, reflecting the iterative nature of the appraisal:

Part 1: Scoping Report Consultation

This section covers the Strategic Vision and Spatial Objectives, and the representations received when the Council sought comments on the Scoping Report alongside the Issues and Options Consultation (July-August 2025). At this stage, the focus was on the overarching vision, how housing and jobs should be distributed, and the broad spatial strategy for the Borough. Responses and the Council's response and suggested changes are identified below.

1. Plans, policies and programmes

1a. Have all plans, policies and programmes that affect the Gedling Local Development Plan been included in Section 3 and Appendix A of the Scoping Report?

Statutory Consultees

The **Environment Agency** was satisfied that key plans, policies and strategies were included within the scoping report.

Historic England noted that not all relevant plans, policies and programmes had been included within Section 3 and Appendix A of the Scoping Report. It was recommended adding key Historic England guidance documents, including Historic England Advice Note 3 and 8 (3. The Historic Environment and Site Allocations in Local Plans, 2015 and 8. Sustainability Appraisal and Strategic Environmental Assessment, 2016), Good Practice Advice in Planning 1-4 (1. The Historic Environment in Local Plans, 2015; 2. Managing Significance in Decision-Taking in the Historic Environment, 2015; 3. The Setting of Heritage Assets - 2nd Edition, 2017; and 4. Enabling Development and Heritage Assets, 2020).

It was also advised to reference Heritage Counts publications, which provide evidence on the relationship between heritage, the economy, climate change and well-being, and could assist in identifying additional sustainability issues or indicators.

Historic England recommended including the National Model Design Code under 'Achieving well-designed places' and the Gedling Borough Heritage Strategy 2018 under 'Conserving and enhancing the historic environment'. It was suggested that the Scoping Report should clarify how unknown archaeology will be considered in line with NPPF footnote 75, and that registered parks and gardens should be specifically referred to within this section.

Other Organisations

The Gedling Climate Change Group noted that the Gedling Carbon Management Strategy and Action Plan was included but does not include the recent plan approved at Cabinet on 10th July 2025. In addition it was noted that it does not include reference to the Draft UK Net Zero Carbon Standard.

1b. Please provide any comments regarding the plans, policies and programmes included in the Scoping Report.

Other Organisations

The Club Captain for **Mapperley Golf Club** referred to paragraph 3.5 and noted that a number of items listed in 'issues identified for review' were particularly pertinent to the potential development site at Mapperley Golf Course, including promoting healthy and safe communities, making effective use of land, meeting the challenge of climate change and flooding and conserving and enhancing the natural environment.

The **Gedling Climate Change Group** noted the Carbon Management Strategy and Action plan 2021-2030 had broad aspirations to achieve net zero in Gedling Borough by 2030. However, it was noted that it did not include any hard baseline data, nor set out any clear targets, actions, measures or timescales to show a clear roadmap on what needs to be done to meet the ambitions.

Council Response

Historic England's comments regarding unknown archaeology and Registered Parks and Gardens are noted. The Sustainability Appraisal report categorises unknown archaeology as a non-designated asset, and Objective 15 of the SA framework specifically seeks to preserve and enhance such heritage assets and their setting while improving public engagement. Furthermore, Registered Parks and Gardens are recognised within the SA as designated heritage assets to be conserved and enhanced.

The Environment Agency's support for the documents included is welcomed. It is agreed that the Gedling Carbon Management Strategy and Action Plan should be included, following Cabinet approval on 10th July 2025 but the draft UK Net Zero Carbon Standard should not be included as it is a draft document.

Comments on the Mapperley Golf Course site are noted.

References to the Carbon Management Strategy and Action Plan are noted.

Comments on the National Model Design Code are noted. Gedling Borough Council's Design Code Framework provides locally specific guidance and will inform design across the Borough.

References to the Guidance Documents and Heritage Counts publications are noted.

Changes Made

Reference will be included to the Gedling Carbon Management Strategy and Action Plan (July 2025).

Reference will be included to the Gedling Borough Heritage Strategy 2018 under 'Conserving and enhancing the historic environment' on p. 25.

Reference to the Registered Parks and Gardens will be included under 'Conserving and enhancing the historic environment' on p. 25.

Reference will be included to the following guidance documents:

- Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans (2015)
- Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment (2016)
- Historic Environment Good Practice Advice in Planning 1: The Historic Environment in Local Plans (2015)
- Historic Environment Good Practice Advice in Planning 2: Managing Significance in Decision-Taking in the Historic Environment (2015)
- Historic Environment Good Practice Advice in Planning 3: The Setting of Heritage Assets - 2nd Edition (2017)
- Historic Environment Good Practice Advice in Planning 4: Enabling Development and Heritage Assets (2020)
- Heritage Counts

2. Baseline data

2a. Does Appendix B of the Scoping Report identify an appropriate and accurate range of relevant baseline data?

Statutory Consultees

The **Environment Agency** considered that the baseline data used in the scoping report was largely relevant, accurate, comprehensive, and up to date. It was recommended that the following to Water Framework Directive (WFD) legislation should be updated:

- **Water framework directive legislation (2000) mentioned on p69** - requirement for nearly all inland and coastal waters to achieve 'good status' by 2015. **This has been updated to '2027' by the 'Water Framework Directive Regulations 2017'** update of the water framework directive, therefore should be updated, including the targets mentioned.
- **Within table on p96 – Environmental Improvement Plan 2023** – recommend including: 'achieve good ecological status for 75% of water bodies in England by 2027.' Following the target to *'improve water quality and reduce pollution from agriculture and wastewater'*.

Natural England referred to the section on Healthy & Safe Communities and advised that access to green space was an important aspect of improving health and well-being and should be considered with the benefits highlighted within Natural England's Green Infrastructure Framework. The "Green in 15" target set out in the Environmental Improvement Plan was also noted which encourages provision of green space within 15 minutes walking distance. It was noted that the Green Infrastructure Mapping Tool (within the Green Infrastructure Framework) shows where green and blue infrastructure is accessible at different scales, such as doorstep, local and neighbourhood scales using Access to Greenspace Standards (AGSt) Assessment. It was suggested that this could be used to identify communities that do not have access to greenspace at the different scales. It was also suggested utilising this tool to assess Green Infrastructure provision to ensure it is accessible and inclusive at different scales and in line with government targets.

Natural England suggested a separate section on air quality within the Baseline data as currently it falls within Climate Change and Flooding. Reference to air quality impacts from agriculture should be made noting 88% of ammonia emissions come from agriculture and that ammonia can lead to significant environmental impacts via contributing to nitrogen deposition and eutrophication. Further detail was referenced at - Emissions of air pollutants in the UK – Ammonia (NH₃) - GOV.UK

Natural England referred to the climate change section and suggested nature-based solutions for climate change should be mentioned, particularly through the implementation of local plan policies. Measures include the installation of green roofs and walls in new buildings; the provision of Sustainable Urban Drainage Systems (SuDs) and wetlands; planting of street trees; habitat creation and enhancement providing increased connectivity between fragmented areas of habitat to build up resilience to climate change and contribute to the Nature Recovery Network. Reference was made to Natural England published report on Climate Change

Adaptation Climate Change Adaptation Manual - NE751 for nature conservation and a. Nature Networks Evidence Handbook - NERR081.

Natural England also suggested that soils and their protection should be included within the baseline data. The Local Plan should have a policy for the protection of Best and Most Versatile (BMV) agricultural land. Avoiding loss of BMV land should be a priority as mitigation will not be possible on many development sites.

Other Organisations

The **Gedling Climate Change Group** noted that the Carbon Management Strategy and Action plan 2021-2030 has broad aspirations to achieve net zero in Gedling Borough by 2030. However, it does not include any hard baseline data nor does it set out any clear targets, actions, measures or timescales to show a clear roadmap on what needs to be done to meet the ambitions. No baseline data for high quality communications and well designed places.

2b. Please provide any comments regarding the baseline data used in the Scoping Report.

Other Organisations

The Club Captain for **Mapperley Golf Club** referred to paragraph 4.31 (healthy and safe communities) and noted that Mapperley Golf Club provides a space where a large number of people across a wide demographic benefit from getting exercise. In relation to paragraphs 4.31 – 4.41 (Transport) it was noted that the existing road infrastructure near Mapperley Golf Club is already very busy with Woodborough Road / Plains Road being one of the main routes in and out of Nottingham City Centre with a high volume of traffic.

The Gedling Climate Change Group noted that the Government has commissioned a detailed assessment of electricity use, demand, generation and carbon emissions through commissioning Local Area Energy Plans (LEAPs). It was noted that work undertaken by Mott McDonald will provide important and useful data which will assist Gedling Borough in prioritising how to reduce carbon emissions across Gedling. The report should be added to the data set when available.

Council Response

The amendments suggested by the Environment Agency are welcomed.

The comments regarding access to Green Space are noted and it is considered that this is already addressed through sustainability assessments and the use of the digital connectivity tool launched in July 2025 by the Department for Transport and MHCLG <https://www.gov.uk/guidance/connectivity-tool>. The tool considers Output Areas across England and Wales and provides a standard way to consider connectivity to education, leisure and community, health, shopping, residential and workplaces by four modes of transport – walking, cycling, public transport and driving.

It is considered that air quality is more logically included within the Climate Change section than the Baseline data section.

The suggested Natural England references will be added to the baseline data.

It is not considered necessary to include a policy for the protection of Best and Most Versatile (BMV) agricultural land as this matter is covered by the NPPF.

Comments on the Council's Carbon Management Strategy and Action plan 2021-2030 are noted. The suggestion that the Mott McDonald assessment of electricity use, demand, generation and carbon emissions is added to the data set when available is noted.

Changes Made

Reference will be included to the following documents:-

- Natural England report on Climate Change Adaptation Climate Change Adaptation Manual - NE751.
- Natural England Evidence Handbook Nature Networks Evidence Handbook - NERR081

Amendments as follows:-

- Update the reference to the water framework directive legislation (2000) mentioned on p69 to refer to '2027' under the 'Water Framework Directive Regulations 2017', including the targets mentioned.
- Amend the table on p96 – Environmental Improvement Plan 2023 to include 'achieve good ecological status for 75% of water bodies in England by 2027.' Following the target to '*improve water quality and reduce pollution from agriculture and wastewater*'.

3. Key sustainability issues

3a. Are the key sustainability issues identified in Section 5 of the Scoping Report correct for the Council area?

Statutory Consultees

Historic England agreed with the key sustainability issues identified in Section 5 of the Scoping Report. It was noted that while the Green Belt will not be included within the SA Framework, it will be addressed separately through the Plan process, including site selection. The inclusion of sections relating to heritage assets and character/sense of place was welcomed.

Landowners/Developers/Agents

Mark Jackson Planning on behalf of WC Martin Trust, promoters of sites off Steeles Way/Orchard Rise and Catfoot Lane, Lambley considered that additional

sustainability issues should be included and how these are likely to impact upon the Gedling Local Development Plan. (No further information was provided).

Other Organisations

The **Gedling Climate Change Group** considered that risk assessment and subsequent mitigations in relation to flooding was limited. It was noted that UK GBC have identified Nottingham and Nottinghamshire as at risk of overheating and wildfires and there is limited risk assessment and subsequent mitigations identified. There should be more detail on improving energy efficiency and reducing carbon emissions.

3b. Please identify any other sustainability issues that should be included and how these are likely to impact upon the Gedling Local Development Plan.

Landowners/Developers/Agents

Mark Jackson Planning on behalf of WC Martin Trust, promoters of sites off Steeles Way/Orchard Rise and Catfoot Lane, Lambley, suggested new housing should be located in a planned way that supports economic growth and is of a sufficiently high standard to improve quality of life. The need to create sustainable places where people want to live, work and live well within a community. The need to enable housing growth and plan for a mix of accommodation to suit all household types was highlighted. The need to support economic development in the rural areas was raised as well as the requirement to address forecast deficits in particular school places and health provision. The need to safeguard existing community facilities and services and ensure the timely delivery of new facilities to meet needs arising from new development was also noted. Reference was also made to the need to ensure that new development is adaptable to the effects of climate change and whether the current Green Belt boundaries should be revised given the limited available previously developed land and grey belt. Consideration should also be given to the identification of grey belt land that does not strongly contribute to the core purposes of the Green Belt.

Other Organisations

The **Gedling Climate Change Group** referred to their response to 3a. These key areas should be threaded through the Gedling Local Development Plan and should be mitigated through best practice planning, design and innovation.

Council Response

The comment that additional sustainability issues should be included is noted but additions have not been suggested. The request for more detail on improving energy efficiency is too detailed for the scoping report. The suggestions by Mark Jackson Planning are noted but the matters raised will be addressed through the site selection process and are not a matter for the scoping report.

Changes Made

None.

4. SA Framework – SA objectives

4a. Do the SA objectives in the SA Framework in Section 6 of the Scoping Report adequately cover the key sustainability issues facing the Council area?

Statutory Consultees

The **Environment Agency** considered that the objectives, targets and assessment criteria are in large part clear, measurable and identify the key issues within the Environment Agency's remit. The following is recommended:

Table 8: SA Framework 2 – Site Allocation Criteria, under section 13. Natural Environment, Biodiversity and Blue-Green Infrastructure - add more detail on aquatic ecosystems and watercourses. For example 'minor/major negative' – results in potential WFD deterioration of watercourse. Equally in the 'major positive' column, a mention of 'de-culverting watercourses to improve aquatic habitats' could be included.

Natural England welcomed the SA Framework and considered that their interests in the natural environment were accounted for.

Historic England agreed that the SA objectives adequately address the key sustainability issues within the Borough and welcomed SA Objective 15 relating to the built and historic environment.

Landowners/Developers/Agents

Mark Jackson Planning on behalf of WC Martin Trust, promoters of sites off Steeles Way/Orchard Rise and Catfoot Lane, Lambley considered that the key sustainability issues were not adequately covered.

Other Organisations

The **Gedling Climate Change Group** considered that the Housing objective should distinguish between new build and older housing stock as the issues and challenges of making each sustainable are different and require separate plans to retrofit older houses with more sustainable solutions. Energy and Climate change should also be threaded through as a key component of some other objectives. For example, living in poorly insulated housing will affect residents' health and wellbeing and be very expensive.

4b. Please identify how the objectives should be amended, bearing in mind that the number of objectives should be manageable.

Landowners/Developers/Agents

Mark Jackson Planning on behalf of WC Martin Trust, promoters of sites off Steeles Way/Orchard Rise and Catfoot Lane, Lambley suggested that objectives should be amended to support the vitality of rural centres.

Other Organisations

The Gedling Climate Change Group suggested that a separate objective be included to reduce waste including plastics and single use plastics and encouraging a sustainable reuse and recycle culture. An example of where this has worked was provided: [How Derry and Strabane Council created a zero waste circular economy strategy | Local action](#)

Council Response

Broad support from the Environment Agency and Natural England is welcomed.

The Environment Agency's recommendation that more detail is added to Table 8: SA Framework 2 – Site Allocation Criteria, under section 13. Natural Environment, Biodiversity and Blue-Green Infrastructure is acknowledged.

The comment that sustainability issues are not adequately covered is noted but no amendments are suggested. The retrofitting of existing properties is not a matter for the local plan and is covered by Building Regulations.

Regarding the suggestion that objectives should support the vitality of rural centres, this matter will be addressed through the site selection. It is considered that the suggestion that objectives should address waste reduction including single use plastics is too detailed for the scoping report.

Changes Made

Amend table 8: SA Framework 2 – Site Allocation Criteria, under section 13. Natural Environment, Biodiversity and Blue-Green Infrastructure. For 'minor/major negative' add 'results in potential WFD deterioration of watercourse'. In the 'major positive' column, add 'de-culverting watercourses to improve aquatic habitats'.

5. SA Framework 1 – Policy Criteria

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

Statutory Consultees

Historic England recommended that the Council expand the scope of the Sustainability Appraisal to include additional considerations related to the historic environment.

Other Organisations

The Gedling Climate Change Group suggested that the housing objective - should distinguish between new build and older housing stock as the issues and challenges of making each sustainable are different and require separate plans to retrofit older houses with more sustainable solutions. Energy and Climate change should also be threaded through as a key component of some other objectives.

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

Statutory Consultees

Historic England recommended that the scope be extended to include reference to the efficiency of existing built stock. It was advised that this could be included under SA Objective (SAO) 10 - Energy and Climate Change at Bullet Point 2 with revised wording to read "Will it improve energy efficiency of **existing and** new buildings?" Relating to SAO 12 – Flooding and Water Quality, Historic England advised that the scope of the SA would need to be sufficient to consider watering or dewatering impacts on buried remains as a result of development proposals. The policy criteria questions proposed under SAO 15 - Built and Historic Environment were welcomed.

Other Organisations

The Gedling Climate Change Group suggested that the plan should reflect an objective to reduce the number of older poorly insulated homes in the Borough and including targets, measures and timescales.

Council Response

The comment that additional considerations related to the historic environment should be included is noted, but additions have not been suggested regarding the advice in relation to SAO 12.

Comment on the energy efficiency of existing buildings is noted but the role of the local plan is for new development. Building Regulations and Future Homes Standards cover the energy efficiency performance targets for existing buildings.

Comments on the retrofitting of older properties are noted but the role of the Local Plan is to plan for new growth. Building Regulations and Future Homes Standards cover the renovation of existing stock with Part L setting out minimum energy efficiency performance targets for buildings, airtightness requirements and improved insulation standards.

Changes Made

No change.

6. SA Framework 2 – Site Allocation Criteria

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

Statutory Consultees

Historic England noted that some columns in the SA Framework 2, Section 6 of the Scoping Report, were blank for certain criteria questions, which they expect will be completed as the Plan and SA work progress.

Landowners/Developers/Agents

Mark Jackson Planning on behalf of WC Martin Trust, promoters of sites off Steeles Way/Orchard Rise and Catfoot Lane, Lambley considered that questions were not appropriate.

Other Organisations

The Gedling Climate Change Group suggested that the questions for Employment and Jobs should identify if the site will provide appropriate jobs to meet the demand of the green industries, such as renewable technology, sustainable new builds and retrofitting housing. It should also identify whether the site will provide jobs above the minimum wage. For Economic Structure and Innovation, questions should establish if the site will generate electricity via solar panels, will it be energy efficient/ well insulated? Questions should identify flooding risk of all sites allocated and how these will be mitigated through long term planning.

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

Statutory Consultees

Historic England supported the site allocation criteria and assessment methodology but recommended further targeted assessment following Historic Environment Advice Note 3. This should be added as an SA addendum or separate paper to strengthen the plan's positive approach to the historic environment, in line with NPPF requirements.

Landowners/Developers/Agents

Mark Jackson Planning on behalf of WC Martin Trust, promoters of sites off Steeles Way/Orchard Rise and Catfoot Lane, Lambley, suggested questions for Objective 1 should ask whether appropriate mix of housing will be provided to meet local needs and whether sufficient opportunities for open space provision will be provided.

Bellway Homes Limited (promoting land at Oxton Road/Flatts Lane and also south of Oxton Road, Calverton) suggested a key policy criteria question for SA Objective 1: Housing should be, "does the policy provide a suitable mix and tenure of housing, including affordable homes and homes suitable for first-time buyers?". Given the projected increase in population, this addition will ensure that allocations are

assessed not only on the quantity of housing delivered, but also on their capacity to meet the diverse needs of the local population.

Other Organisations

The Gedling Climate Change Group referred to their response to 6a.

Council Response

Historic England's observation regarding the blank criteria in SA Framework 2, Section 6, is acknowledged. These blanks remain because certain criteria are not expected to produce meaningful outcomes and therefore have been intentionally left unfilled and will remain unchanged.

The recommendation for further targeted assessment following the Historic Environment Advice Note 3 is noted but no amendments are suggested. The site allocation criteria and assessment methodology are considered sufficient, as supported by Historic England.

The comment that the questions are not appropriate is noted but no alternatives have been suggested.

Whether a site will provide jobs above the minimum wage is not a matter for the local plan. Flood risk will be considered through the site selection process.

Whether a site delivers an appropriate mix will be determined on a site by site basis at the application stage. A standard formula relates to the provision of open space.

Changes Made

None.

7. SEA Directive requirements

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

Statutory Consultees

Historic England confirmed that the SA Framework meets the requirements of the Strategic Environmental Assessment (SEA) Directive.

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

No comments received.

Council Response

Historic England's confirmation that the SA Framework meets the requirements of the SEA Directive is acknowledged.

Changes Made

None.

8. Other comments

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

Statutory Consultees

The **Environment Agency** provided a detailed update on the development of a River Leen Strategy commencing in September 2025 and which is programmed to take between 2 and 3 years to complete. Building on discussions taking place with Nottingham City, the Environment Agency suggest working with Gedling Borough Council to support the Local Plan and Strategy development simultaneously.

Historic Environment suggested expanding the historic environment section (paragraphs 4.56 to 4.58) to better reflect Gedling Borough's heritage beyond statutory functions. It was recommended considering the 2018 Gedling Borough Heritage Strategy to incorporate language that highlights local distinctiveness, which could also strengthen connections with other Sustainability Appraisal objectives like natural environment, climate change, health, and design.

Other Organisations

The Club Captain for Mapperley Golf Club referred to paragraphs 2.16-2.19 and noted the importance of undertaking an Habitat Regulations Assessment. It was considered important to undertake an appropriate assessment of habitat for the Mapperley Golf Course site if it is being considered as a development site. Reference was also made to paragraphs 2.23-2.24 and the importance of undertaking an Health Impact Assessment, also especially important to undertake for the Mapperley Golf Course site given the significant impact on physical and well being of a number of people who currently use the facilities.

The Gedling Climate Change Group referred to the statement on Energy and Climate Change – "To minimise energy usage and to develop low carbon energy resource and encourage nature-based solutions to climate change. This is assessed as Uncertain as the impact of development is dependent upon opportunities for

either renewable energy provision or energy efficiency measures or nature-based solutions.” It was noted that all new housing should be energy efficient and sustainable and that all new developments have opportunities for either renewable energy provision or energy efficiency measures or nature-based solutions. It was considered that the Scoping Report should reflect the wider ambitions of the Council and seek to create mitigations via planning standards.

It was considered encouraging to see the conclusion that the SA Framework needs to include objectives relating to reducing carbon emissions and that the Gedling Local Development Plan should include policies to minimise energy use. These were viewed both strong and clear statements, however the impact of this will depend on a strong carbon reduction plan with clear targets, actions, measures and timescales.

The inclusion of the Gedling Borough Council Design Code Framework (2024) was supported. However, it concludes that the Gedling Local Development Plan should ONLY give consideration to the Design Code Framework and reflect the priorities embedded within the Framework. It was viewed that ‘Reflecting the priorities’ is much weaker than saying that The Gedling Local Development Plan should include policies to ensure the Design Code Framework is met and reflect the ambitious strategies set out by the Council in relation to Climate Change.

It was considered that the Local Plan needs to set out clearly how the devolution white paper may impact the plan in coming years and the rationale and impact of Gedling Borough Council’s preference to align with North Nottinghamshire.

Council Response

The suggestion to expand the historic environment section using the Gedling Borough Heritage Strategy is noted. However, at this stage, the current scope of the SA is considered sufficient to meet the plan’s requirements and effectively address heritage considerations alongside other sustainability objectives.

A Habitat Regulations Assessment and Health Impact Assessment will be prepared to support the publication draft Gedling Local Development Plan. It is considered that the Scoping Report already reflects the wider ambitions of the Council. Comments regarding the inclusion of objectives to reduce carbon emissions and policies to minimise energy use are welcomed. The implications of the devolution white paper and the impact of Gedling Borough Council’s preference to align with North Nottinghamshire is not a matter for the SA Scoping Report.

The proposed suggestion of working in partnership with the Environment Agency on the River Leen Strategy is welcomed.

Despite the impact of devolution being unclear government have confirmed that local authorities should continue with their plan making despite the uncertainty.

Changes Made

None.

Part 2: Informal Consultations: Refining Policy Alternatives and Assessing Options

This part of the document records the feedback from two distinct periods of informal technical engagement with statutory bodies and internal specialists. The first phase, undertaken in **December 2025**, focused on the Reasonable Alternatives for Policy Options. This involved refining previous assessments and testing different policy directions. The second phase, conducted in **March 2026**, involved a comparative analysis of all available policy options against the SA objectives and allowed the Council to compare how different choices performed against one another, predict their potential outcome and ensure the final Plan is based on the most sustainable path forward.

The Council engaged with statutory bodies, such as the Environment Agency and Natural England, as well as internal specialists ranging from Ecology and Heritage to Public Health and Economic Growth. This section includes the representations and the Council's response to the feedback received during this refinement of alternative policy approaches. Stakeholder representations and the Council's response and proposed changes are identified below.

Gedling Borough Council, Development Management (Conservation Officer) noted that they agree with the findings and strongly endorse the inclusion of a policy on the historic environment. They also support referencing the specific benefits of heritage-led regeneration.

The Council Response was to note the support. It was confirmed that the Publication draft Local Policy recognizes the benefits of heritage-led regeneration.

Changes made: None required; policy already aligns with the representation.

Gedling Borough Council, Food, Health and Housing noted that the document is comprehensive but highlighted that since the majority of housing stock is already in place, it is vital that extensions and renovations are completed sustainably. They further observed that the document does not fully address emissions from transportation and energy infrastructure, though they noted these may be resolved by a wider societal shift to clean energy.

The Council Response was to note that the Sustainability Appraisal already recognizes the importance of carbon dioxide emissions contributing to climate change. The framework includes objectives to reduce these emissions and ensures new development can adapt to climate change effects.

Changes made: No change; policy already aligns with the representation.

The Environment Agency noted that the potential options for climate change seem reasonable and suggested that "Option 3 - amend policy" is the most likely route for water efficiency. They recommended specific policies for watercourse buffer zones (10m minimum), the discouragement of culverting, and the adoption of the optional higher National Housing Standard for water consumption (110 litres per person per day).

The Council Response was to note the detailed feedback. The Council determined that no further changes were required at this time as the Environment Agency's comments had been incorporated into the process at an earlier stage.

Changes made: No change; policy already aligns with the representation.

Gedling Borough Council, Development Management (Ecology Officer) noted that the Council must seek opportunities to comply with the Biodiversity Duty across all wider aspects of policy, not just those specifically related to biodiversity. This includes exploring biodiversity enhancement opportunities, such as the creation of Biodiversity Net Gain (BNG) habitat banks, and ensuring policies are in place to conserve site features and strengthen ecological networks. They also suggested incorporating access to nature into healthy lifestyle policies to support physical and mental wellbeing, referencing Natural England's 'Green Infrastructure Framework' and emphasized the need to consider the priorities and measures within the new Nottinghamshire Local Nature Recovery Strategy.

The Council Response was to note the requirement to adhere to the Biodiversity Duty and the Local Nature Recovery Strategy.

Changes made: No change; as access to nature is covered in relevant policies and Sustainability Appraisal and the emerging plan already recognise the points raised. Additionally, policy alternative option assessments were subject to minor amendments to reflect the technical refinements suggested.

Gedling Borough Council, Scientific Officer noted that they are keen to ensure that air quality, land/soil quality, noise, and environmental pollution remain key considerations in the new plan. They specifically requested that Option 2 of the Vision and Spatial Objectives be considered moving forward and suggested minor tweaks to policy assessment scores.

The Council Response was to note the request. The Council confirmed that the current SA framework already covers all the environmental pollution points raised.

Changes made: The assessments of policy alternative options were subject to minor amendments to reflect the technical refinements suggested.

Gedling Borough Council, Leisure and Wellbeing noted that the Council's Leisure Strategy 2025 and the Playing Pitch and Outdoor Sport Strategy 2023 should inform the Appraisal. They highlighted several strategic outcomes, including inclusive leisure provision and the protection of playing pitches, and suggested these relate to various sections of the SA, including healthy lifestyles and green belt offsetting.

The Council Response was to note the strategic reference documents provided.

Changes made: No change.