

Consultee	Comments	Location in document
Ian McDonald (Planning Officer – Planning Policy)	Formatting (some titles are missing/need updating in contents and paragraph numbers needed throughout)	Throughout
Gedling Borough Council	Glossary or abbreviations page would be helpful	
	Figure 'x' is missing	8
	Who are the 'independent consultants'?	11
	No reference to regional level on page 13, but page 72 states regional plan remains part of the development plan (at time of writing)	13
	Third column of final row (land use) is blank	23
	'This county has 1 Natural Nature Reserve (on page 26)...' This is not mentioned in Appendix 2	(appendix 2)
	On page 27 '...4,500 listed buildings, of which almost 260 (nearly 6%) are considered to be at risk...' – are you sure it is 6%? Looking at page 87, there is no percentage provided for Grade II listed buildings and 5.8% (= 6%) is shown for Grade I or II* buildings.	27 & 87
	Conservation area, parks and gardens and Scheduled Ancient Monuments statistics on pages 27 and 87 differ.	27 & 87
	No air quality statistics given for Bassetlaw, Newark and Sherwood and Gedling on page 28 and Appendix 2.	28 & 87
	Page 31 – which is the 'only one colliery remains active'?	31
	Page 44 – consider reworking 'Protect, enhance and conserve biodiversity...'? Page 53 – consider inserting a paragraph to explain Table 7?	44 53
Rob Routledge (Planning Policy Manager) Mansfield District Council	Page 78 'Coverage has not yet been completed for Mansfield which will be part of the Greater Nottingham Report'. The Landscape Character Appraisal has been completed and as the Greater Nottingham group did not want to wait for it, it is a separate and standalone report.	78
	Page 83 'Land to the south of Mansfield (along the route of the MARR) is also earmarked for new employment sites'. It is not earmarked in any formal planning document; there are no allocations or planning permissions at present associated with it.	83
Matthew Norton (Principal Planning Officer (Policy)) and Matt Adey (Waste Strategy Manager) Newark and Sherwood District Council	The report provides a comprehensive assessment of the sustainability issues which the County Council faces in producing its Minerals and Waste Development Plan Documents. A number of minor issues have been picked up:	
	Our Green Infrastructure Strategy is now finalised (Newark and Sherwood Green Infrastructure Strategy, February 2010)	Various locations
	Newark and Sherwood Core Strategy has now been adopted (Newark and Sherwood Core Strategy, adopted March 2011)	Various locations
	New Local Transport Plans have been adopted recently (Nottingham Local Transport Plan)	Various locations

	Mentions that the county has a boundary with North East Lincolnshire Council, should be North Lincolnshire	25 (Area and Population)
	Typos 1. 'form the motorway' – 'from the motorway' 2. 'towns furth north' – 'towns further north' 3. 'as parrot of development' – 'as part of development'	25 (Transport) 29 (Flood Risk) 39 (Flooding)
	States that a gas power station is under constriction near Newark. We think that the power station is now operational	29 (Energy)
	Objective 2 - Could the indicator for municipal waste be modified or complimented to include the average reduction in the distance waste will travel (based on the impact assessment of each facility as it is proposed)?	45
	Objective 6 - To what extent is the loss of green belt a measure of protecting the landscape? Given that much mineral's activity will be occurring in the Trent Wash lands both in and outside the Green Belt would it be perhaps more appropriate to measure impacts against the Landscape Policy Zones Condition and Sensitivity Scores?	46/47
	Mention of Regional Economic Strategy – that as of April 2010 this is part of the Regional Strategy. This is indeed correct but until single Regional Strategies are produced (which will now never happen as they will be abolished by the Localism Bill) the Regional Strategies are made up of the RSS and RES. Both of which are still in existence.	74
	We are pleased that references to future growth associated with Newark's Growth Point status are included within the report and the fact that the report identifies the need to provide new waste facilities to help service this growth.	
	In terms of issues relating to Water Extraction our Core Strategy Habitat Regulation Assessment identifies this as a particular concern in relation to the SAC.	35
	The Council is concerned that although the report occasionally mentions a specific method of energy recovery and waste disposal (anaerobic digestion) for the large part it talks about incineration being the only option for energy recovery from waste. I would question the inclusion of incineration as low carbon on page 30 and in table 2 on page 38. Anaerobic digestion is not mentioned at all under waste in table 2 on page 40.	30, 38 & 40
Felicity Atkin	Generally, biodiversity and open spaces are referenced well with consideration to both protected species and habitats.	
Nottingham City Council	Objective 3 – 'Protect and enhance biodiversity at all levels' supports the Biodiversity Duty under Section 40 of the Natural Environment and Rural Communities Act. This legislation should be referenced throughout the document as it is relevant to all LA's. Any policies which come from this document should ensure that development avoids harm to green infrastructure at all opportunities.	
	Table on page 14 'Natural Environment and biodiversity' <ul style="list-style-type: none"> <li>▪ Add Natural Environment and Rural Communities Act 2006</li> <li>▪ Add Protection of Badgers Act 1992 (as amended)</li> </ul>	14

	<ul style="list-style-type: none"> <li>▪ Update Wildlife and Countryside Act 1981, should have (as amended) written afterwards</li> <li>▪ Amend 'seek mitigation' to 'ensure mitigation' to make this more defined</li> <li>▪ Source of information – is it appropriate to reference Breathing Space and the Biodiversity Statement 'Ambitious for Wildlife'?</li> </ul>	
	The records centre have the number of SINCs and Natural England the number of LNRs.	26
	<p>Sustainability issues table:</p> <ul style="list-style-type: none"> <li>▪ Change 'on internationally important' to 'one internationally important'</li> <li>▪ '...the country is host to...and X'. X could include water voles, white clawed crayfish, bats, lowland heathland, magnesium limestone grasslands.</li> <li>▪ Under heading of 'significance to plan' for the natural environment section, I'd recommend including pollution/leaching/deposition of minerals to the list of potential affects as these can have significant impacts on habitat quality</li> <li>▪ I am uneasy about the wording of the last column: <ul style="list-style-type: none"> <li>○ By saying that any habitat creation through waste/minerals works would contribute to the LBAP target delivery through creating additional habitat, it indicates that no habitat is lost in the first place. This should be reworded to explain that any mitigation for loss of open space should be focussed more towards identifying biodiversity gain and creating BAP habitat (where not lost initially), whereas any BAP habitat lost will be recreated where possible, however, it shouldn't have been developed in the first place.</li> <li>○ Not sure about the last sentence as this indicated that without development through minerals/waste we are unlikely to meet LBAP targets. This is misleading as there are numerous projects across the County to create, manage and restore BAP habitat.</li> </ul> </li> </ul>	34
	Table page 51 – biodiversity does have a relationship with social themes – through recreational opportunities and benefits to mental and physical health benefits.	51
	Table page 53 – soil is also relevant to fauna; although not sure why flora and fauna are included separately as this comes under biodiversity? Biodiversity should also be related to climate change and vice versa.	53
	<p>Table on national legislation page 59</p> <ul style="list-style-type: none"> <li>▪ Add (as amended) after Wildlife and Countryside Act</li> <li>▪ Add Natural Environment and Rural Communities Act 2006 and the biodiversity duty.</li> </ul>	59
	Table on local legislation page 75 – add breathing space and biodiversity position statement	75
	Heathland, page 86, the Sherwood Forest Trust will have more data on the status of lowland heathland across the County	86
	Is there potential to include Biodiversity Opportunity Mapping for the City? This will identify areas suitable for restoring/enhancing/creating habitat as well as identifying environmentally sensitive areas.	

<p>Helen Jones (Landscape)</p> <p>Nottinghamshire County Council</p>	<p>Spelling/typos:</p> <ul style="list-style-type: none"> <li>▪ Transport section – spelling ‘Nottinghamshire’</li> <li>▪ Historical and Cultural Heritage section – add ‘...key roles in the skirmishes and sieges of the civil war’</li> <li>▪ Flood Risk section – spelling ‘further north’</li> </ul>	<p>25</p> <p>26</p> <p>29</p>
	<p>Table 1, Key messages – Landscape and Countryside</p> <ul style="list-style-type: none"> <li>▪ Key message</li> </ul> <p>‘Protect and enhance local, national and internationally designated areas of landscape importance’. Once the LDFs come into force there will be no Local Landscape Designations, as the MLAs will cease to exist. There are no national or internationally designated areas of landscape importance in Nottinghamshire such as AONB or National Parks. Also at the moment the above key message conflicts with Table 2 Sustainability Issues – Landscape and countryside/Townscape which says ‘there are no officially designated sites of landscape importance’.</p> <ul style="list-style-type: none"> <li>▪ Source of information</li> </ul> <p>This should read:-</p> <p>Landscape Character Assessment – Guidance for England and Scotland, Countryside Agency 2002</p> <p>Nottinghamshire Landscape Guidelines 1997, Nottinghamshire County Council</p> <p>Nottinghamshire Landscape Character Assessment 2010, coordinated by Nottinghamshire County Council</p>	<p>17</p>
	<p>Table 4 Proposed SA Objectives, decision making criteria and proposed indicators</p> <p>Objective 6 Protect and enhance the quality and character of our townscape landscape.</p> <ul style="list-style-type: none"> <li>▪ Decision making criteria – will the plan proposal have an adverse impact on local landscape character or areas of important townscape?</li> <li>▪ Proposed indicators – Number of permitted sites judged to have an adverse impact on local landscape character/conservation areas</li> </ul> <p>How will an adverse impact on landscape character be judged? Adverse impacts would be identified in the applicant’s Landscape and Visual Impact Assessment for the proposals. But with in any one LVIA there may be many different measures of adverse effect over a timescale from construction to plus 15-20 years, and for many different receptors, how will these adverse impacts be counted?</p>	
	<p>Appendix 1</p> <ul style="list-style-type: none"> <li>▪ National level – PPS7 – key objectives/targets</li> </ul> <p>PPS7 also emphasises the importance of landscape character assessment in development planning and discourages the use of ‘local landscape designations’ (such as Mature Landscape Areas)</p> <ul style="list-style-type: none"> <li>▪ Local level – document column</li> </ul> <p>Add 2010 to Nottinghamshire LCA and state that it was coordinated by NCC (as parts were done by others)</p>	<p>65</p> <p>78</p>

<p>Nick Crouch (Nature Conservation Leader)</p> <p>Nottinghamshire County Council</p>	<p>Other appraisals</p> <ul style="list-style-type: none"> <li>▪ Special Area for Conservation should read Special Area of Conservation</li> <li>▪ Suggest alternative wording: ‘...required to carry out what is known as an <del>Appropriate Assessment</del> <b>Habitats Regulations Assessment</b> under separate <del>EU</del> <b>legislation, which may lead to the need to undertake a more detailed Appropriate Assessment</b>’ (Reference to separate legislation that appears as footnote should read ‘<b>The Conservation of Habitats and Species Regulations 2010, which enact the</b> EU Council Directive 92/43/EEC on the conservation of natural habitats and wild flora and fauna).</li> </ul>	<p>7</p>
	<p>Table 1 – Key messages (Natural environment and biodiversity)</p> <ul style="list-style-type: none"> <li>▪ These are generally supported</li> <li>▪ Under 2<sup>nd</sup> bullet point, amend wording to read ‘<del>protect and enhance</del> <b>maintain, enhance and restore biodiversity and</b> the natural environment in general’</li> <li>▪ Under 3<sup>rd</sup> bullet point, amend wording to read ‘avoid damage to designated nature conservation sites and protected species <del>at all levels</del> <b>and habitats and species identified as conservation priorities</b>. Seek mitigation <b>and /or compensation</b> where damage is unavoidable’</li> <li>▪ Add bullet point about the importance of using up-to-date information (as per PPS1 and PPS9)</li> </ul>	<p>14</p>
	<p>Table 1 – Sources of information (Natural environment and biodiversity)</p> <ul style="list-style-type: none"> <li>▪ Reference to Council Directive 92/43/EEC on the conservation of natural habitats and wild fauna and flora appears twice</li> <li>▪ Reference to PPS9 should be followed by ‘(and supplement to PPS9)’</li> <li>▪ Reference to Conservation (habitats etc) Regulations 1994 should be removed as this legislation has been superseded by the Conservation of Habitats and Species Regulations 2010</li> <li>▪ Add ‘The Convention on Biological Diversity, Rio de Janeiro, 1992’</li> <li>▪ Add ‘White Paper on the Natural Environment (in prep.)’</li> <li>▪ Add ‘The new England Biodiversity Strategy (in prep.)’</li> </ul>	<p>14</p>
	<p>Table 1 – Key messages (Air quality)</p> <ul style="list-style-type: none"> <li>▪ Suggest that 1<sup>st</sup> bullet point is amended to read ‘...and the environment, <b>including sensitive habitats</b>’</li> </ul>	<p>17</p>
	<p>Table 1 – Key messages (Land use)</p> <ul style="list-style-type: none"> <li>▪ Comment: it should perhaps be recognised that previously developed land can often have high biodiversity value</li> </ul>	<p>23</p>
	<p>Key characteristics of Nottinghamshire – Natural Environment and Biodiversity</p> <p>The following amendments to this section are suggested:</p> <p>‘...due to the earlier effects of industrialisation and coal mining, <del>and more recently from</del> <b>urban expansion, intensive</b> agriculture and <b>commercial</b> forestry. Large areas of <b>semi-natural</b></p>	<p>25-26</p>



	<p>Key characteristics of Nottinghamshire – Minerals</p> <ul style="list-style-type: none"> <li>▪ Suggest alternative wording: ‘...environmentally destructive it <del>will</del> provides some of the best opportunities we have for creating new wildlife habitats needed <b>to restore our biodiversity and</b> meet <del>!Local</del> <del>!Biodiversity</del> <del>!Action</del> <del>!Plan</del> targets, especially for wetlands’</li> </ul>	30-31
	<p>Table 2 – Sustainability issue identified (natural environment and biodiversity) The following amendments to this section are suggested:</p> <p>‘Nottinghamshire has fewer internationally <del>and</del> national important sites compared to other parts of the East Midlands and England as a whole. Although there is currently only one internationally important Special Area of Conservation (SAC), <b>part of the county is also being considered as a possible Special Protection Areas (SPA) for birds, and</b> the county is host to a number of important habitats and species <del>such as Great Crested Newts and X</del>. There is also an important <b>wider</b> network of <del>wider</del> <b>habitats that fall outside these designated sites, including species-rich grasslands, woodlands and wetlands.</b> <del>Green infrastructure such as parks and gardens, woodland corridors, ponds and waterways. Part of the county is also being considered as a possible Special Protection Area for birds. Historically, however, there have been dramatic losses of many habitats, including heathland, forest and woodland and species-rich grassland habitats because of industry development, and intensive agricultural and commercial forestry, use and although some losses continue, especially as a result of a decline in traditional management techniques but these previous downward trends are now being halted and reversed, with There has been positive action to re-establish a number of habitats, including heathland habitats and additional woodland planting within Sherwood Forest as part of the Greenwood Community Forest scheme and reedbed in the Trent and Idle Valleys. Less than a quarter of the county’s locally designated nature conservation sites are known to be in positive conservation management, although the overall the condition of our statutorily designated nature conservation sites is improving but fell just short of meeting the national target of 95% of SSSIs being in favourable or recovering condition by 2010, and there has also been an increase in the number of Local Nature Reserves.’</del></p>	34
	<p>Table 2 – Significance to plan (natural environment and biodiversity)</p> <ul style="list-style-type: none"> <li>▪ Suggest alternative wording: ‘...there could be irreversible losses <del>to</del> of habitat and disturbance <b>indirect impacts</b> from dust, noise, traffic <b>and changes to hydrology.</b>’</li> </ul>	34
	<p>Table 2 – How can the plan influence this issue? (natural environment and biodiversity)</p> <ul style="list-style-type: none"> <li>▪ Suggest alternative wording: ‘...They can also ensure that appropriate mitigation <del> / or</del> compensation is put in place to offset <del>necessary</del> <b>unavoidable</b> losses and secure the creation of new habitat...’</li> </ul>	34
	<p>Table 2 – Sustainability issue identified (air quality)</p> <ul style="list-style-type: none"> <li>▪ Reference should be made to the impact of NO<sub>x</sub> emissions leading to the eutrophication of sensitive habitats.</li> </ul>	35

	<p>Table 2 – Significance to plan (air quality)</p> <ul style="list-style-type: none"> <li>▪ Reference should be made to the impact of NO<sub>x</sub> emissions from energy recovery</li> </ul>	35
	<p>Table 3 – Proposed sustainability objectives</p> <ul style="list-style-type: none"> <li>▪ The inclusion of objective 3 is strongly supported</li> </ul>	44
	<p>Table 4 – Proposed SA objectives (etc) Objective 3 – decision making criteria</p> <ul style="list-style-type: none"> <li>▪ Suggest alternative wording: ‘Will the plan/proposal have an adverse effect on internationally, nationally, regional or locally important sites <b>or legally protected species?</b>’</li> <li>▪ Suggest alternative wording: ‘Will it affect <del>protected</del> habitats or species <del>or those</del> identified within the Local Biodiversity Action Plan (LBAP)?’</li> <li>▪ Suggest alternative wording: ‘Will it restore or <del>provide</del> <b>create</b> new habitat in line with LBAP priorities?’</li> </ul>	45-46
	<p>Table 4 – Proposed SA objectives (etc) – Objective 3 – Proposed indicators</p> <ul style="list-style-type: none"> <li>▪ Suggest alternative wording: ‘Number of developments judged to have a harmful impact on <b>legally protected species or those listed in the LBAP</b> <del>nationally and locally important habitats/species</del>’</li> <li>▪ Add: ‘Area of LBAP habitat lost to minerals/waste development’</li> </ul>	45-46
	<p>Appendix 1 – Review of Relevant Plans, Programme and Policies – International and European</p> <ul style="list-style-type: none"> <li>▪ Add: Convention on Biological Diversity plus text</li> </ul>	54-55
	<p>Appendix 1 – Review of Relevant Plans, Programmes and Policies – National</p> <ul style="list-style-type: none"> <li>▪ Under Wildlife and Countryside Act 1981 – ‘Implications for MWDF’ – text should indicate that policies should seek to protect nationally designated SSSIs and legally protected species</li> <li>▪ Reference to Conservation (habitats etc) Regulations 1994 should be removed as this legislation has been superseded by the Conservation of Habitats and Species Regulations 2010</li> <li>▪ Under Conservation of Habitats and Species Regulations 2010 – key objectives/targets – text should be added that this legislation provides a strict regime of protection for certain ‘European protected species’</li> <li>▪ Under Conservation of Habitats and Species Regulations 2010 – implications for MWDF – text should indicate that policies should protect internationally designated sites and carry out appropriate assessments of plans or projects affecting these sites, and should seek to protect European protected species</li> <li>▪ Under UK Biodiversity Action Plan – key objectives/targets – remove reference to ‘Local Action Plans’, as these are not an element of the UKBAP. Indicate that the UKBAP is a detailed action planning process targeting conservation action to priority habitats and species</li> <li>▪ Under PPS9 – key objectives/targets – perhaps the Key Principles from PPS9 should be listed (in abridged form?)</li> </ul>	59-75

	<p>Appendix 2 – Review of Baseline Data</p> <ul style="list-style-type: none"> <li>▪ Under International Sites – Target/Comparison – This should perhaps read ‘no reduction’ rather than ‘no changes’?</li> <li>▪ Under National Sites – Target/Comparison – not clear why it is stated that there has been a ‘minor decrease at local level’, as the number has remained constant.</li> <li>▪ Under Local Sites – the number of LNRs is incorrect; according to my records, there were 52 LNRs in the county as of 2010 (the data on Natural England’s website list 49, but misses out five sites that are designated, includes one that isn’t, and double counts one), and 48 in 2009.</li> <li>▪ Under Status of key protected species – this should be changed to ‘status of priority species’, as this is what the data presumably refers to? In addition, improvement figures could/should be used instead of (or as well as) declining figures, along with equivalent data for priority habitats?</li> <li>▪ Under Heathland, it should perhaps be recognised that the apparent improvement in the England figures is due in large part to a better estimation of resource, rather than a real increase of 17,000ha</li> <li>▪ Other LBAP habitats could also be used as indicators, e.g. Reedbeds?</li> </ul>	85-86
Ruth Robinson (Waste Strategy and Development Officer)	Municipal waste is now defined as Local Authority Collected Waste (it is referred to as municipal throughout the document)	
Nottinghamshire County Council	Could you possibly in the source of information section but the legislation in alphabetical or date order? It is quite difficult to find what you have consulted against.	
	Under Waste, I presume you have consulted the EPA1990; however, you have not listed it under Source of information.	21
	In the 3 <sup>rd</sup> paragraph you mention that ‘with only three non-hazardous sites’, I presume you mean landfill sites, if so would you be able to add this?	32
	You mention throughout about the waste hierarchy, however you mention recycling first, is there a reason you don’t mentioned reduce first? Is this because you can’t produce facilities for reduction?	
	You mention ‘Will it reduce the cost of municipal waste treatment/disposal’. Should this not be just a general statement along the lines of reducing the cost of waste treatment/disposal, i.e. not just municipal?	45
	Number of fly tipping incidents – I’m not sure that this is a good measuring tool as you could have many small loads or one very large load, but the same quantity, it doesn’t really give a very good representation of the quantity. Maybe you could do it on size like flycapture?	45
Kathryn Hayley – Spatial Planning	Objectives 1 and 2 should be combined. Suggested wording ‘Maximise the contribution of minerals extraction and waste management to local and national economic well-being and sustainable economic development’.	45-50
Nottinghamshire County Council	Objective 3 should have some reference to geological diversity.	45-50
	Objective 4 – suggest alternative wording: ‘Promote sustainable patterns of movement and the use of more sustainable modes of transport’.	45-50

	Objective 6 – suggest additional decision making criteria ‘Will it contribute to the availability of local building materials to enable local distinctiveness to be retained in conservation projects and reflected in new development?’	45-50
	Objective 8 – Suggest alternative wording: ‘Maximise climate change mitigation and increase adaptability to climate change’. Also, add ‘...from minerals and waste activities’ to the end of the first decision making criteria.	45-50
	Objective 11 – Suggest alternative wording: ‘Promote the prudent and efficient use of materials and natural resources’ and add reference to the waste hierarchy in the decision making criteria.	45-50
	Objective 13 – suggest alternative wording: ‘Promote and improve local air quality’	45-50
	Objective 14 – suggest alternative wording: ‘Promote and improve water quality and promote efficient use of water’.	45-50
	Objective 16 – suggest alternative wording: ‘Contribute to the provision of job opportunities (for local communities)’ and amend first criteria to read ‘Will the plan/proposal help to increase <b>training and employment opportunities in Nottinghamshire?</b> ’	45-50
	Objective 17 – suggest alternative wording: ‘Protect and improve human health and quality of life’ and amend first criteria to read ‘Will the plan/proposal minimise adverse impacts of minerals and waste activity on human health...vibration <del>and</del> , visual amenity <b>and light pollution</b> ’	45-50
Nigel Lee Nottingham Friends of the Earth	We don't really have anything to add. The draft does seem to comprehensively cover all the main issues.	-

<p>Janice Bradley</p> <p>Nottinghamshire Wildlife Trust</p>	<p>Table 1 Key messages</p> <ul style="list-style-type: none"> <li>▪ Natural Environment and Biodiversity <ul style="list-style-type: none"> <li>○ Support all of these</li> <li>○ Add 'Achieve net gain in biodiversity as a result of development planning, in accordance with the principles of RRS8, PPS9 and the UKBAP'</li> <li>○ Add ' Maximise high quality biodiversity gain through good design of restoration schemes'</li> <li>○ Under sources of information for biodiversity, add 'A Living Landscape for Nottinghamshire' Nottinghamshire Wildlife Trust's new Strategic Document, 2011</li> </ul> </li>   <li>▪ Soil <ul style="list-style-type: none"> <li>○ I have substantial concerns about: 'Protect the best and most versatile agricultural land and minimise the loss of high quality land by identifying lower quality land for development wherever possible' as, by definition, this would result in a presumption in favour of development on land likely to have the highest value for biodiversity, such as post-industrial sites and habitats that have not been lost to intensive agriculture. With good soil management techniques it is possible to work and restore B and MV land satisfactorily, and also establish habitats of high biodiversity value on those soils, without compromising their ability to be used for intensive agriculture again in the future, should it become necessary.</li> </ul> </li>   <li>▪ Water <ul style="list-style-type: none"> <li>○ Support all.</li> <li>○ Add 'seek to contribute to WFD targets through restoration schemes that re-naturalise watercourses, reconnect floodplains and contribute to good ecological condition, wherever possible'</li> </ul> </li>   <li>▪ Flood Risk <p>Add 'proactively seek the restoration of landforms that will increase flood storage capacity to the benefit of downstream communities and biodiversity'</p> </li>   <li>▪ Air Quality <p>Add to first point 'Prevent and reduce the detrimental impact of emissions on human health, biodiversity, quality of life and the environment'</p> </li>   <li>▪ Climate Change <ul style="list-style-type: none"> <li>○ Support all</li> <li>○ Add 'Ensure that restoration contributes to increasing the resilience of habitats and species to climate change'</li> </ul> </li> </ul>	<p>14</p>
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	<ul style="list-style-type: none"><li>▪ Energy<ul style="list-style-type: none"><li>○ There appears to be considerable overlap between these three messages, which is disproportionate to the lack of reference to other forms of energy, particularly solar:<ol style="list-style-type: none"><li>1. 'Recognise waste as a potential source of low carbon or renewable energy'</li><li>2. 'Combustion of biomass and the recovery of energy from waste combustion is expected to play an increasingly important role in meeting the UK's energy needs'</li><li>3. 'Promote energy recovery from existing or proposed landfill sites/incineration schemes'</li></ol></li></ul></li><li>▪ Land use<p>There needs to be recognition that not all PDL is suitable for development, such as where it has developed significant biodiversity value. This needs to be specifically states as otherwise messages can be used selectively, out of context of the associated messages.</p></li></ul>	
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	<p><b>Table 2 Sustainability Issues</b></p> <ul style="list-style-type: none"> <li>▪ <b>Natural Environment and Biodiversity</b> <ul style="list-style-type: none"> <li>○ Replace the X with ‘white-clawed crayfish, water vole, nightjar, woodlark and barn owl’</li> <li>○ Significance to plan - should be high given the scale and longevity of many minerals and waste sites.</li> <li>○ How can the plan influence this issue? – By using positive planning to achieve net gain for biodiversity, and particularly the recognition that some types of habitat creation can be achieved quite easily on minerals sites that are very difficult to achieve on farmland, e.g. healthland, reedbed, so the contribution of mineral sites to achieving these habitat creation targets can be disproportionately important.</li> </ul> </li>   <li>▪ <b>Soil</b> <p>How can the plan influence this issue? – Comments as above with regard to page 14, that by directing mineral and waste development towards lower grade soils, this is more likely to lead to disproportionate losses of biodiversity. This is an apparent contradiction to the aims regarding biodiversity elsewhere in the SA. When considering restoration, it is also important to remember that today’s intensively farmed B&amp;V land was once fen, marsh, woodland etc. so restoring species-rich habitats does not preclude future use of the land for agriculture should it become necessary to do so, ie: in the face of acute food shortages.</p> </li>   <li>▪ <b>Climate change</b> <p>How can the plan influence this issue? – Consider climate change mitigation and adaptation in restoration schemes e.g. the potential of some habitats to absorb/reduce CO<sub>2</sub> and NO<sub>x</sub> and the need to link and buffer habitats to make populations of fauna more resilient to the effects of climate change.</p> </li>   <li>▪ <b>Waste</b> <p>How can the plan influence this issue? – The plan should clearly encourage smaller-scale, more local means of managing and recycling waste, and demonstrate the importance of this in future planning for waste management, rather than focussing only on a small number of large sites.</p> </li> </ul>	
	<p><b>Table 3. Proposed SA Objectives</b></p> <ul style="list-style-type: none"> <li>▪ The presence of 2 objectives relating to soil that are closely linked and overlapping, gives this issue undue emphasis, objectives 9 and 10 should be combined.</li> <li>▪ Objective 18 should be qualified: ‘...subject to other objectives above’, to make it clear that it should not be used in isolation or given undue weight.</li> </ul>	
	<p><b>Table 4. Decision making criteria</b></p> <ul style="list-style-type: none"> <li>▪ Objective 3. Proposed indicators, add ‘Area of LBAP, and UKBAP priority, habitats created as part...’. This would be beneficial as it would lead to focussed attention on restoration of the most important and scarce habitats, wherever possible. This should be reflected more strongly in the previous box ‘decision making criteria’.</li> </ul>	

	<ul style="list-style-type: none"> <li>Objective 8. Both the 'decision making criteria' and 'proposed indicators' sections need to reflect the need to mitigate for and become more resilient to climate change from a biodiversity perspective. So e.g. 'will it help to increase the resilience of flora and fauna to climate change?' and 'Reduction in CO<sub>2</sub> through restored habitats' and 'Degree of habitat buffering and linkage'.</li> </ul>	
	<p>Table 5. Relationship between SA objectives and themes</p> <ul style="list-style-type: none"> <li>Objective 3. Surely this objective has both social and economic relationships? A high quality, wildlife-rich landscape contributes substantially to health and wellbeing outcomes, tourism, informal recreation etc.</li> <li>Objective 6. High quality landscapes and townscapes also contribute to positive economic outcomes</li> <li>Objective 17. Poor human health and poor quality of life has a real economic cost to individuals and society.</li> </ul>	
	<p>Table 6. Internal compatibility of SA objectives</p> <ul style="list-style-type: none"> <li>Objectives 3 and 9/10 have clear links, as described above, and could be fundamentally incompatible, so I disagree with this assessment.</li> <li>Ditto 3 and 18 can be incompatible with regard to the biodiversity value of some PDL, as described above.</li> <li>Ditto 3 and 16 can be incompatible under certain circumstances.</li> </ul>	
	<p>Table 7. Relationship between SEA and SA objectives SEA biodiversity topic – add SA objectives 6,7,8,10,13,14,16,18.</p>	
Shlomo Downen	It is our understanding that the legal obligation to 'plan out' the unintended production of persistent organic pollutants (POPs) rests with the waste planning authorities. As such the SA should address this matter.	
PAIN	PAIN strongly believes that references to promoting and encouraging 'efficient efw' should be accompanied, for the avoidance of doubt, by explicit references to discouraging inefficient efw.	
	Whilst PAIN recognises the need to provide 'adequate' waste management infrastructure, we feel that the SA should make explicit reference to the need to avoid over-provision of disposal and recovery capacity.	
	An explicit reference to the One Planet Living goal, enshrined in Waste Strategy 2007, should be included in the SA (to take into account legislative and policy drivers when anticipating future waste arisings)	
	The SA should reflect the RSS stated objective of 'exceeding Government targets for recycling and composing, with the objective to bring all parts of the Region up to the levels of current best practice'.	
	There is a reference to the East Midlands Regional Strategy guidance on waste volumes. This relies on outdated waste trends and it is important to revisit these figures as per the 2007 East Midlands Regional Assembly Waste Monitoring Report.	72
	The statement that waste is 'a potential source of low carbon or renewable energy' should be accompanied by a sentence that explicitly recognises that some waste streams, such as plastics,	22-23

	cannot be described as providing potential for either. The SA report should therefore explicitly acknowledge that some waste streams are potential sources of high carbon, non-renewable energy.	
	In the energy section mention should be made of the December 2010 Electricity Market Reform Consultation Document and the associated illustrative decarbonisation benchmark for energy generation/grid carbon intensity of 100g CO2/kWh in 2030 (para11).	
	PAIN continues to refute the notion that 'Nottinghamshire produces around 4 million tonnes of municipal, commercial and industrial and construction and demolition waste a year'. PAIN maintains that reductions are not attributable only to the recession and that landfill capacity should be reassessed to show greater than 5-10 years remaining capacity.	31
	PAIN suggests that table 4 should include an indicator (objective 8) relating to CO2 per kwh generated.	47
	Table 4, objective 11 should allow for more 'per stream thinking' and the following should be added as an indicator: 'Increase in the types of material being collected for recycling/reuse' and something relating to reducing recycling/sorting facility rejects.	
	Table 5, objective 3 scopes 'Protect and enhance biodiversity at all levels' out of being considered a social issues PAIN believes that protecting and enhancing biodiversity should be considered a social, as well as an environmental issue.	51
	In relation to the implications of the Directive 2008/98/EC on waste, PAIN notes the requirement to produce a waste reduction (minimisation) plan and to minimise waste arisings – this emphasis on reducing waste arisings should be reflected in the SA scoping report.	

<p>Naomi Wing (Planning Liaison Technical Specialist) Environment Agency</p>	<p>Additional plans, policies and programmes, Appendix 1</p> <p>Water</p> <ul style="list-style-type: none"> <li>▪ Water Resource Management Plan, Severn Trent Water, 2010</li> <li>▪ Soar Catchment Abstraction Management Strategy, Environment Agency, 2006</li> <li>▪ River Basin Management Plan Humber River Basin District, Environment Agency, 2009</li> <li>▪ Greater Nottingham and Ashfield Outline Water Cycle Study, Entec, coordinated by Gedling Borough Council, 2010</li> </ul> <p>Flood Risk</p> <ul style="list-style-type: none"> <li>▪ National Flood &amp; Coastal Erosion Risk Management Strategy for England, Environment Agency, 2011</li> <li>▪ Nottingham Surface Water Management Plan, Nottingham City Council</li> </ul> <p>Land Use</p> <ul style="list-style-type: none"> <li>▪ Groundwater Protection: Policy and Practice (GP3), Environment Agency</li> </ul> <p>Waste</p> <ul style="list-style-type: none"> <li>▪ Waste (England and Wales) Regulations 2011</li> </ul>	<p>54-84</p>
	<p>Section 4 - baseline information and characteristics of Nottinghamshire Where values are quoted in the text, the source of the data should be referenced where possible</p>	
	<p>Section 5 – Sustainability issues We ask that the last sentence of the flooding sustainability issue is amended to read as follows: 'All new development should also be designed to withstand possible flood impacts <b>and where possible reduce overall flood risk by making space for water and through the layout and form of development</b>'</p>	<p>39</p>
	<p>Section 6 &amp; Appendix entitled Review of Baseline Data We welcome the proposal to include river quality as a decision-making criteria and indicator of the sustainability of the MWDF. However, the indicator and targets on page 88 relate to the General Quality Assessment (GQA) way of measuring river quality, which looked at the chemical and biological quality of rivers. The GQA method has now been superseded by the EU Water Framework Directive, which came into force in 2000 and was transposed into UK law by The Water Environment (Water Framework Directive) (England and Wales) Regulations, 2003.</p> <p>The aim of the Water Framework Directive is for water bodies to achieve good ecological status by 2015 unless the water body had been heavily modified by human impact whereby the objective is to achieve good ecological potential by 2027. The Water Framework Directive also required that there is no deterioration in the ecological status of water bodies.</p>	

	<p>The current ecological status and objectives for each water body in Nottinghamshire is reported in Annex B of the Humber River Basin Management Plan and further information is available on What's in Your Backyard on the Environment Agency's website. Annex C of the Humber River Basin Management Plan contains specific actions for mining and quarrying which include the following specific action relevant to the Nottinghamshire Minerals and Waste Planning Authority: 'River side gravel pit operation to be modified wherever possible in collaboration with gravel companies and in agreement with local authorities to include river restoration as part of works. For example, the On Trent and Central Rivers Initiatives link wetlands through strategic restoration of sand and gravel quarries to establish a north-south corridor for species'.</p>	
	<p>Table of proposed sustainability objectives SA objective 13 seeks to 'minimise' impacts, whereas SA objective 14 seeks to 'limit' impacts. This difference in terminology may be queried and require clarification.</p>	44
	<p>Table of Sustainability Appraisal Objectives, decision making criteria and proposed indicators The decision making criteria for objective 11 'Will it promote sustainable waste management' may attract queries as to what is meant by 'sustainable waste management'. Also, consideration should be given to adding 'amount of waste disposed of' as a proposed indicator as well as an indicator relating to waste arisings.</p>	45-50
	<p>Table showing the relationship between SA objectives and SA themes The outcomes are limited to compatible and incompatible. We suggest the use of a similar set of outcomes as that in the table for 'internal compatibility of SA objectives' (page 52) to give a more accurate description of the relationships.</p>	51
<p>Elizabeth Newman (Lead Adviser, Land Use Operations)  Natural England</p>	<p>We are pleased that both the potential negative and positive impacts of minerals extraction on the natural environment have been recognised in the document.</p> <p>We are pleased that the plan aims to minimise any negative impact on biodiversity and will promote opportunities to improve green infrastructure and contribute to Local Biodiversity Action Plan (LBAP) targets.</p> <p>Minerals sites can provide some of the best opportunities for creating new wildlife habitats, especially for wetlands. New sites developed through well designed and managed restoration schemes can strengthen local green infrastructure, offering multiple benefits including; opportunities for recreation and amenity for local communities, enhancing landscape character and providing flood mitigation.</p> <p>Natural England believes it is important for spatial planning to recognise and strengthen the links between the elements of sustainable development, and the intrinsic role that the natural environment plays in health, wellbeing, education and increasing the attractiveness of an area for economic development.</p> <p>Significant projects and initiatives are currently under way in the Trent Valley areas, such as the</p>	

	<p>Trend Vale Landscape Partnership, that aims to enhance landscape character and improve biodiversity. The predicted major transfer of production of aggregates from the Idle Valley to the Trent Valley in the next tens years will need to be carefully managed to minimise adverse effects on the environmental quality of the area.</p>	
	<p>We consider the review of relevant plans, programmes and policies is comprehensive and has covered all the related issues.</p> <p>We welcome the reference to the 6Cs Green Infrastructure Strategy and to the European Landscape (ELC)</p> <p>We believe the Nottinghamshire Landscape Character Assessment was reviewed in 2009 and we recommend that reference is made to the updated LCA.</p>	
	<p>We consider that the baseline data provides an accurate reflection of the current state of the county's natural environment and the exiting pressures have been identified correctly.</p>	
	<p>We support the proposed sustainability objectives, in particular objectives 3,4,6,8,10,11,12,13,14,17,18 which relate to Natural England's interests. We consider the decision making-criteria and suggested indicators to be appropriate to the relevant environmental issues.</p>	
	<p>In some parts of Nottinghamshire the background levels of nitrogen deposition are already exceeding the recommended critical levels and therefore we believe the SA should assess the impact of the Minerals and Waste policies on sites which are sensitive to the impacts of air quality for example heathland habitats; Rainworth Heath SSSI, Strawberry Hill Heath SSSI and Birklands West and Ollerton Corner SSSI. Locations for facilities should be selected away from the designated sites or should be subject to rigorous scrutiny for the potential air pollution impacts.</p>	
	<p>We are pleased that your Authority has taken account of the current issue involving land in the Sherwood Forest area, which may or may not in the future become a potential Special Protection Area (SPA). Natural England suggest that as part of a risk-based approach to forward planning and decision-making, development plans and proposals are accompanied by an additional and robust assessment of the likely impacts arising from the proposals on breeding nightjar and woodlark in the Sherwood Forest.</p>	
Ann Plackett (Regional Planner)	<p>Key messages</p> <ul style="list-style-type: none"> <li>▪ The setting of heritage assets should also be considered. Under the heading 'implications for the SA Framework', the considerations should be wider than archaeology. While there are likely to be few or no direct impacts with regard to other types of heritage assets, there are likely to be indirect impacts to the setting, including noise and dust as well as visual impacts; rarely, hydrological impacts could also be an issue.</li> <li>▪ Under landscape and countryside, there is an overlap with cultural heritage as mineral extraction, in particular, can result in the loss of historic landscape features, such as ridge and furrow, or development could affect the setting of a conservation areas. The avoidance of harm to such assets should be recognised under 'implications for the SA framework'.</li> </ul>	16
English Heritage	<p>Historic and cultural heritage</p>	26/27

	The Trent Valley has considerable archaeological potential as identified in the Trent Geo-archaeological project and other work undertaken within respect to potential aggregates sites.	
	<p>Sustainability issues</p> <ul style="list-style-type: none"> <li>▪ It is not clear why under ‘significance to plan’ natural environment and biodiversity issues are considered to be ‘moderate/high’, while those relating to the historic environment and cultural heritage are only considered to be ‘moderate’. What is the basis for this assessment?</li> <li>▪ We welcome the reference to building stone on page 35, as the supply of building stone is a key matter that should be addressed in the Minerals Development Framework. There are clearly inter-relationships with ‘landscape and countryside/townscape’.</li> </ul>	35
	<p>SA objectives</p> <p>We recommend the following change to SA05:  ‘Protect and enhance the quality of the historic environment above and below ground, <b>including the setting of heritage assets</b>’.</p>	44
	<p>Sustainability framework</p> <ul style="list-style-type: none"> <li>▪ As well as the amendment to the SA objective, the first decision making criteria should be amended as follows to reflect the terminology in PPS5: ‘Will the plan/proposal have an adverse impact upon <del>local historic</del> <b>heritage</b> assets, including archaeological remains <del>and historic buildings</del>?’ The term ‘heritage assets’ includes designated heritage assets as well as locally and regionally important assets.</li> <li>▪ Under ‘proposed indicators’, the second indicator should include all types of designated heritage assets, including registered parks and gardens and battlefields, as well as listed building, scheduled monuments and conservation areas.</li> </ul>	46
	<p>Testing the plan objectives</p> <p>This suggests that the historic environment is not an ‘environmental’ theme. Clearly the historic environment is relevant to all 3 aspects of sustainability.</p>	51
	<p>Internal compatibilities of the SA objectives</p> <p>We suggest, on the basis of the sustainability issues that have been identified, there could be potential incompatibilities between the objectives to protect the environment, including the historic environment (3,5,6) and objectives such as those relating to development (1,2,16).</p>	52
Jennifer Boca	Chapter 1 includes a section on the role of the minerals and waste policy documents. However, it does not outline the main objectives of the minerals and waste core strategies.	9
URS Scott Wilson	Provide a clear rationale for how the sustainability objectives were chosen.	
	Set out who was consulted and how responses were taken into account in finalising the report.	
	<p>Additional baseline data is needed to cover the following elements:</p> <ul style="list-style-type: none"> <li>▪ Extent of SPZs</li> <li>▪ Data on local carbon emissions (looking at various sectors including minerals and waste)</li> <li>▪ Data on likely future waste needs (capacity) for MSW, C&amp;I and C&amp;D</li> <li>▪ Data on overall freight movements that are made up of minerals and waste HGVs</li> </ul>	

	<ul style="list-style-type: none"><li>▪ Average distance waste travels in Nottinghamshire for management (in particular MSW)</li></ul>	
	<p>Objectives</p> <ul style="list-style-type: none"><li>▪ Consider merging objectives 1 and 2 – relate to making provision for minerals and waste</li><li>▪ Consider merging objectives 9 and 10</li><li>▪ Consider rewording objective 11 to encompass wider resource efficiency</li><li>▪ Consider deleting objective 15</li></ul>	