



**Newark & Sherwood Local Plan**

**Strategic Housing and Employment Land Availability Assessment –  
Draft Methodology**

**Statement of Consultation**

**June 2025**

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## 1.0 Introduction

1.1 Newark & Sherwood District Council has prepared a draft Strategic Housing and Employment Land Availability Assessment ('SHELAA') Methodology.

### Purpose of the Consultation Statement

1.2 This Statement of Consultation sets out the consultation, which was undertaken, and the responses received in relation to the SHELAA Methodology. The Statement sets out the following:

- i. The persons the local planning authority consulted when preparing the supplementary planning document.
- ii. A summary of the key issues raised by those persons; and
- iii. How those issues have been addressed in the supplementary planning document.

1.3 This report summarises the consultation process and sets out the feedback received. These comments helped to shape the amendments made to the final version of the SHELAA Methodology.

## 2.0 Early Engagement

2.1 The draft document was discussed at the Council's Planning Policy Board on 25<sup>th</sup> February 2025 and Cabinet on 1<sup>st</sup> April 2025. A final Draft of the document will be discussed at the Council's Planning Policy Board on 28<sup>th</sup> May 2025 and Cabinet on 10<sup>th</sup> June 2025.

## 3.0 Consultation

3.1 The consultation took place between the 7<sup>th</sup> of April and the 19<sup>th</sup> of May 2025, a period of 6 weeks. A total of 26 responses were received.

3.2 The District Council contacted various specific and general consultation bodies. An indicative list of groups is set out below.

Specific Consultees	General / Other Consultation bodies
County Council	Developers incl. House Builders
Neighbouring Authorities	Planning Agents
Town & Parish Councils / Meetings	Members of the Public
Environmental Bodies	
Highways England	
Network Rail	

- 3.2 All consultees received an email or letter by post setting out the period of consultation, where the documents could be viewed and the deadline for submitting comments (Appendix 1).
- 3.3 The Council published its Draft SHELAA Methodology document on its website and paper copies were made available at Castle House. The webpage included a copy of the document along with a copy of the representation form, which could be filled in electronically or printed and returned.
- 3.4 Notices were placed in the Local Press (Newark Advertiser, Nottingham Post, and the Mansfield Chad) inviting representations and information about the consultation was posted on the Council's social media platforms.
- 3.4 In response to the consultation the District Council received 26 representations, and a summary of the main issues raised and how they were addressed are included at Appendix 2.

## **4.0 Consultation Responses**

- 4.1 In response to the consultation, the Council received 26 responses from individuals, groups or organisations in the first consultation which ran from 7<sup>th</sup> April 2025 to 19<sup>th</sup> May 2025. This included responses from:
- Local residents.
  - Parish Councils.
  - Statutory consultees (incl. Historic England & Environment Agency)
  - Organisations (incl. Nottingham Trent University & Millgate Conservation Society)
- 4.2 A summary of the responses received, and the Council's response are set out in Appendix 2. There have also been several other minor changes, typos, presentational amendments, and factual amendments / updates.

### **Issues Raised**

- 4.3 In total, 26 responses were received from a range of respondents including statutory consultees, agents and parish councils.
- 4.4 Most respondents were supportive of the overall approach to the methodology and supportive of the exclusion of sites within Flood Zone 3 at Stage 1.
- 4.4 A number of typos were identified by respondents which have been addressed.
- 4.4 A number of respondents criticised the level and location of development in the District which falls outside the scope of this consultation. Decisions about site allocations are made in the plan-making process, and these decisions are informed by the SHELAA, evidence base documents and the results of community engagement. The

SHELAA only advises how sites submitted to the 'call for sites' exercise will be assessed and does not determine where development may occur.

**How was the Document Changed?**

- 4.4 Several changes were made to the draft document to respond to the representations received which all comprised minor typos and amendments. The Council's response to the consultation comments received can be viewed at Appendix 2.

**5.0 Appendices**

Appendix 1: Text of Email and letter sent to statutory consultees and consultees on the SHELAA database.

Appendix 2: Consultation Responses and LPA Response

## **Appendix 1: Text of Email sent to statutory consultees and consultees on the SHELAA database.**

Dear Consultee,

### **Strategic Housing and Employment Land Availability Assessment – Draft Methodology Consultation**

The District Council has published a Draft Methodology for the Strategic Housing and Employment Land Availability Assessment ('SHELAA') for consultation, and we are inviting representations to be made on this document.

We are working towards the preparation of a new Local Plan, which, once adopted, will guide future growth and development in the District and supersede the current Local Development Framework.

This report sets out the Council's methodology for undertaking the SHELAA and is proposed to update and replace the methodology we have previously used. The methodology has also been updated to reflect changes to national planning policy.

Once adopted, the Methodology will be used by the Council to undertake assessments of sites put forward for consideration for either housing and / or employment purposes.

We are now seeking your views on the draft Methodology for a period of six weeks, from 7th April 2025 to 19th May 2025.

The Draft SHELAA Methodology can be viewed on the Council's website at:

<https://www.newark-sherwooddc.gov.uk/shelaa/>

Please submit your responses online using our consultation site. If you are unable to comment online, please get in touch by calling 01636 650000 or emailing [planningpolicy@newark-sherwooddc.gov.uk](mailto:planningpolicy@newark-sherwooddc.gov.uk)

Kind regards,

## Appendix 2: Main Issues Raised by Public Consultation and LPA Response

Each of the questions are set out below. Responses are summarised and the Council has responded to each comment directly in the table below. The consultation responses summary does not include the personal details of private individuals. Nine respondents wish to be notified when the 'Call for Sites' exercise opens.

### Question 1: Do you have any comments on Chapter 1 (Introduction) of the SHELAA Methodology?

Respondent ID / Organisation	Summary of Comment	Response / Action
004 – Witham IDB	Upper Witham Internal Drainage Board's district covers areas to the South, East and North East of Newark. Maps or shapefiles are available on request.	Comments noted.
008 – Cllr Johno Lee	<p>The document should reflect the reality that areas such as Lowfield Lane and Fernwood have already accommodated substantial development and should not be earmarked for further major growth. These communities have absorbed more than their fair share of housing delivery in recent years, and any future strategic allocations should now be focused elsewhere in the district where infrastructure and community capacity allow for it.</p> <p>In the case of Middlebeck, development should remain within the scope of existing outline planning permissions. As much green and open space as possible should be delivered early as a priority, to meet the expectations of residents and maintain quality of life. There must be no future encroachment onto surrounding farmland or greenfield land near Fernwood and Lowfield Lane. These spaces should be safeguarded entirely. The SHELAA must be clear that previously allocated or speculative development sites in these locations are no longer appropriate for expansion.</p>	Comments noted. These comments relate to the Local Plan Spatial Strategy, not the SHELAA Methodology. Therefore, they are outside of the scope of this report.
010 - Nottinghamshire Wildlife Trust	We welcome a strategic approach to screening potential areas for housing and employment allocation and hope that it will be a mechanism that avoids designated sites of wildlife value, including Local Wildlife Sites (LWS), being allocated for housing to ensure that there is no net loss of biodiversity in the district.	Comments noted. The Local Nature Recovery Strategy will be fully considered and integrated in the SHELAA as and when the document has been finalised.



Respondent ID / Organisation	Summary of Comment	Response / Action
		screened out at Stage 1. Public consultation will take place once the assessment has been completed as part of the Local Plan consultation.
015 – Fytche-Taylor Planning c/o NTU	No specific comments. The intention behind revising the SHELAA Methodology is clear.	Comments noted and welcomed.
019 – Environment Agency	We are pleased to see that "Sites within Flood Zone 3" are included within the "Exclusion Criteria for Stage 1".	Comments noted and welcomed.
025 – Resident	Yes. As well as avoiding sites that physically exist in Flood Zone 3, is it vital to assess whether development of sites that themselves do not flood would increase the risk and impact of flooding in other sites. This impact needs to be considered so the current flooding situation in Lowdham and other areas is not made unintentionally worse by new development. So specifically, it is not just sites in Flood area 3 but sites in other Flood areas where development would have a knock on effect.	Comments noted. National policy requires that any development should be made safe for its lifetime without increasing flood risk elsewhere (Paragraph 170).

## Question 2: Do you have any comments on Chapter 2 (NPPF Context) of the SHELAA Methodology?

Respondent ID / Organisation	Summary of Comment	Response / Action
008 – Cllr John Lee	The NPPF guidance must be applied with local knowledge at its core. Areas such as Fernwood, Middlebeck, and Lowfield Lane have already absorbed significant growth and should no longer be treated as default options for further development. Future site identification must focus on underused areas elsewhere in the district. Critically, officers must recognise that elected members—who live in and represent these communities—bring deeper, real-world understanding of local impact. Their views must carry more weight than detached assessments. Officers are there to advise, but members are democratically accountable and grounded in local reality.	Comments noted. Site identification will be informed by the Spatial Strategy identified as part of the Local Plan process and is therefore outside the scope of the SHELAA Methodology. Production of the Local Plan is overseen by Planning Policy Board, Cabinet and ultimately Full Council.
013 – Resident	The gathering of information on identified sites should not just be desktop exercises.	Comments noted. All sites being assessed will be subject to a site visit and consultation with key stakeholders (such as the Highways Authority).
015 – Fytche-Taylor Planning c/o NTU	The intention behind revising the SHELAA Methodology is clear and NTU welcomes the alignment with the approach set out in national planning policy and guidance to assess sites for the development of a new Local Plan.	Comments noted and welcomed.
018 – Balderton Wildlife Facebook Group	<p>Consideration should be given towards areas of greenspace deprivation by making reference to social access to green space as provided by Natural England’s Greenspace infrastructure mapping tool insert ref – <a href="https://designatedsites.naturalengland.org.uk/GreenInfrastructure/map.aspx">https://designatedsites.naturalengland.org.uk/GreenInfrastructure/map.aspx</a></p> <p>This is particularly important in improving limited access to green spaces within 15 mins walk as is a key target of government policy under the Environment Improvement Plan.</p>	Comments noted but this is outside the scope of the Methodology Report and will be considered at the next stage in the SHELAA process and through the production of the Local Plan.

### Question 3: Do you have any comments on Chapter 3 (Methodology) of the SHELAA Methodology?

Respondent ID / Organisation	Summary of Comment	Response / Action
005- Lincolnshire County Council	The proposed SHELAA methodology document is acceptable in highways and flood risk terms, it describes a standard RAG assessment of sites which will be used and that Officers will then make a decision of sites to be taken forward.	Comments noted and welcomed.
008 – Cllr John Lee	The methodology may follow PPG guidance, but its application must be rooted in local understanding. Areas like Fernwood, Middlebeck, and Lowfield Lane are already overdeveloped, and any process that still considers them viable broad locations risks repeating past planning mistakes. Methodology must include meaningful weight for the insight of elected members and local residents. Officers may follow policy, but members and residents live with the consequences. Their voices must be central—not secondary—to site assessments. In cases of conflict, local knowledge and community feedback should take precedence over generic national assumptions.	Comments noted. Site identification will be informed by the Spatial Strategy identified as part of the Local Plan process and is therefore outside the scope of the SHELAA Methodology.
013 – Resident	Assessment should include local water table data, not incorrect outdated reports from EA. If the ground levels need to be raised to overcome flood risk, then sites should be declined, raising land levels is not acceptable as this exacerbates the problems at lower level ground.	Comments noted. All types of flood risk are considered as part of the Local Plan process through the Strategic Flood Risk Assessment. National planning policy requires that any development should be made safe for its lifetime without increasing flood risk elsewhere (Paragraph 170).
004 - Witham IDB	Generally, Newark & Sherwood DC have the appropriate policies with regard to flood risk and land drainage.	Comments noted and welcomed.
015 – Fytche-Taylor Planning c/o NTU	NTU supports the decision to now base the SHELAA on the administrative boundary of NSDC instead of the wider Housing Market Area (HMA). Delivery rates have varied considerably across the HMA and the previous approach did not allow for local variations. Greater understanding with a more localised context will allow improved flexibility in the site selection process and better reflects the rural nature of the district than a singular approach better suited to the more urban areas	Comments noted and welcomed.

#### Question 4: Do you have any comments on Chapter 4 (Stage 1: Site Identification) of the SHELAA Methodology?

Respondent ID / Organisation	Summary of Comment	Response / Action
005 – Lincolnshire County Council	Lincolnshire County Council would welcome the opportunity to be involved with the assessment of any large sites near to the district's border with Lincolnshire, which could have an impact on LCC infrastructure.	Comments noted.
006 – Resident	Complete transparency of sites should be provided to all individuals on the self-build register. Give people the opportunity to see and purchase land suitable for self-build without corporate buyouts who just sell for profit.	Comments noted. All submitted sites will be published on the Council's website as part of the SHELAA process.
007 – Millgate Conservation Society	<p>Flooding - large areas of our locality are designated as Flood Zone 2 and Flood Zone 3. We notice that 'Sites within Flood Zone 3' are excluded from Stage 1. (See 'Newark and Sherwood Local Development Framework, Strategic Housing and Employment and Viability Assessment Draft Methodology' Para 4.10 Table 2: Exclusion Criteria for Stage 1). Does this mean they will not be assessed?</p> <p>Small sites - sites with capacity less than 5 dwellings and 0.25ha (employment) are excluded from the Stage 1 assessment. (See 'Newark and Sherwood Local Development Framework, Strategic Housing and Employment and Viability Assessment Draft Methodology' Para 4.9 Table 2: Exclusion Criteria for Stage 1) The character of our area is largely formed of very small developments and exclusion from Stage 1 would be a serious omission.</p>	<p>Any site within Flood Zone 3 will be excluded from further assessment and thus will not be considered any further in terms of its development potential.</p> <p>Sites with capacity of less than 5 dwellings for residential or 0.25ha for employment is the recommended threshold in the Government's Planning Practice Guidance. This will not stop small sites within the settlement boundaries coming forward through the planning application process.</p>
008 – Cllr Johno Lee	The site identification process must have integrity. The Council cannot act as both promoter and assessor of land in key areas like Fernwood, Middlebeck and Lowfield Lane—doing so amounts to checking its own homework. There must be a clear distinction between what the Council approves and what it later develops or supports through joint ventures. Residents have long faced wave after wave of growth, and trust is wearing thin. Sites already approved must be built out before anything new is considered. Communities need protection from speculative sprawl and reassurance that the process is fair, transparent, and free from conflict of interest.	<p>The Local Planning Authority (LPA) through the SHELAA process seeks to ensure it has a fuller understanding as possible of the land supply position in the District. This allows the LPA to most appropriately make judgements about the scale and location of growth in the District. This process is separate from a Council's role as a landowner.</p> <p>The best protection against 'speculative sprawl' is an up-to-date Local Plan prepared by the LPA which meets identified housing need.</p>

009 – Historic England	<p>We welcome Scheduled Monuments (SM) forming part of the exclusion criteria for Stage 1 assessment work (Table 2, page 6). In our experience inclusion of SM's as part of Local Plan site allocations has resulted in additional work and/or subsequent deletion from plans so we are supportive of the proposed approach. We anticipate that any SM setting impacts would be considered as part of Stage 2 assessment work.</p>	<p>Comments noted. It is agreed that any SM setting impacts will be considered as part of subsequent assessment work (where relevant).</p>
010 - Nottinghamshire Wildlife Trust	<p>Potential sources used to collate the SHELAA sites are listed in Table 1. The SHELAA will be a key document in the new Local Plan, and it should be linked to the district 's Green Infrastructure Strategy (February 2010), which isn't included. The Strategy has been produced to respond to the need to plan for predicted growth, to enhance quality of life and to ensure environmental sustainability for many years to come. This Strategy allows for the growth of settlements whilst ensuring that the district's assets and landscapes suffer no negative effects and instead prosper from new development. The strategy states: 'Whilst new development is the main driver, the need for a high level of environmental quality, provision of recreational opportunities and access to green space, and the need to respond to the threats and challenges of climate change for communities and wildlife has also shaped the Strategy's development. The GI Strategy should be used to inform the location of housing and employment development. Had the strategy been referenced, a red flag would have been raised in relation to proposed development at Hawton and Fernwood. Part of that area is designated as a Biodiversity Protection &amp; Enhancement area. Key actions include creating an open access 'natural corridor' along the Middle Beck/Shire Dyke and the area of Fernwood development within Flood Zone 3; refrain from allowing development directly within this area and develop a series of LNRs.</p> <p>4.10 states that several national and local designations have informed the Stage 1 assessment, including Special Area of Conservation (SAC), Sites of Special Scientific Interest (SSSI) and Local Nature Reserves. We advocate that Local Wildlife Sites (LWS) should be included. There should be a presumption against development of and damage to sites of local biodiversity value. LWSs, are a local, non-statutory designation, that sit below (but complements) statutorily</p>	<p>Comments noted. The LPA will be looking to update the Green and Blue Infrastructure evidence base as part of the Local Plan process. The site assessment form will also include a section on green and blue infrastructure.</p> <p>The current strategic site allocations were informed by the Green Infrastructure Strategy; indeed, the strategic site policies reference the requirement to address the Middlebeck / Shire Dyke Corridors. Subsequent planning consents have secured significant green infrastructure improvements along these corridors.</p> <p>Comments noted. It should be noted that this list is not exhaustive, but reference to Local Wildlife Sites will be included.</p>

designated SSSIs. They are of substantive value for the conservation of biodiversity and are home to rare and scarce species or represent the best surviving examples of habitats that were once widespread and typical of the Nottinghamshire landscape. Collectively, these sites form an essential ecological network and act as wildlife corridors and stepping stones, allowing species to migrate and disperse between sites. The continued existence of these sites is vital to safeguard wildlife from the pressures of development, intensive agriculture, and climate change. The LWS network is comprehensive (meaning that every site which qualifies as an LWS is designated as one), whereas SSSIs are representative of the best sites in an area, such that that not all sites which meet the SSSI selection criteria have been, or will be, designated as a SSSI. Because of this, several LWS would potentially qualify as SSSIs, meaning that LWS are best described as sites that are of at least county-level importance for their flora and/or fauna. Regionally Important Geological Sites, Local Nature Reserves and Local Wildlife Sites, have a fundamental role to play in creating Nature Recovery Networks (NRN) and contributing to the quality of life and the well-being of the community. The aim should be to protect and enhance the natural environment and biodiversity by ensuring all new development does not have a negative impact, but a positive benefit for biodiversity.

The NPPF Section 192 states: *To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and **locally designated sites of importance for biodiversity.***

The District Council will carry out a 'Call for Sites' exercise in 2025 to provide landowners and developers an opportunity to submit their sites. The exercise will seek information on the site including environmental information. As a minimum, when considering protected species, the district should require comprehensive and up to date ecological information if the screening process relies solely on a desk top study. Data sets are rarely comprehensive, and a paucity of information typically relates to a lack of recording effort, which can be

Whilst the Council won't require an ecological appraisal at 'call for sites' submission stage, however these matters will be considered as part of the Local Plan process. It is considered that when submissions are reviewed, sufficient information would be available from desk-based assessment and site visits

	<p>misinterpreted as absence. Ideally, before land is submitted for consideration the landowner/developer would employ an ecologist to undertake a Preliminary Ecological Appraisal (PEA). The PEA is normally produced to inform a developer (or other client), and their design team, about the key ecological constraints and opportunities associated with a project, possible mitigation requirements and any detailed further surveys required to inform an Ecological Impact Assessment (EcIA). Under normal circumstances it is not appropriate to submit a PEAR in support of a planning application because the scope of a PEAR is unlikely to fully meet planning authority requirements in respect of biodiversity policy and implications for protected species. In most cases, additional surveys beyond the PEA will be required. This approach would benefit the developer as they would understand the potential ecological impact/constraints of proposed developments on their site at an early stage and help to inform their decision to continue or not with the process.</p> <p>Exclusion Criteria for Stage 1 states that designated sites including SACs, SSSI, LNRs and Ancient Woodlands will be excluded from development. However, 4.12 states <i>'Where only part of a site falls within any of the criteria above, a judgement will be made whether to include the site in the SHELAA and the developable area will be reduced.'</i> These statements appear to be contradictory.</p> <p>Section193 of NPPF states: <i>'b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest.'</i></p>	<p>to understand when more detailed ecological information would be needed.</p> <p>Commented note. Paragraph 4.12 clearly states that these sites would be excluded from being developed.</p>
013 – Resident	Any land identified and assessed as "valuable" in respect of greenspace or biodiversity, insist a move to protect this, enhance it, designate it.	Comments noted. Any impact on greenspace or biodiversity will be considered during the assessment process.
015 – Fytche-Taylor Planning c/o NTU	We support the inclusion of sites with potential for new settlements. Assessing them on merit including contributions to sustainable growth and housing needs	Comments noted and welcomed.

	<p>is essential. The revised approach relieves pressure on existing settlements and infrastructure while enabling discussions on new locations instead of concentrating growth in the same areas. Previously, viable sites like Brackenhurst Campus were excluded despite having a strong nucleus for development.</p> <p>This aligns with the Government's vision for new towns, allowing consideration of alternative growth locations. Southwell, for example, faces housing demand but has limited capacity due to its built form, heritage, and environmental distinctiveness. A new settlement nearby could provide economic and social benefits without straining infrastructure.</p>	
016 – Southwell Civic Society	<ul style="list-style-type: none"> <li>• Para 4.10 Table 2 – We think sites which are only partially within Flood Zone 3 should also be excluded.</li> <li>• Para 4.13 – This may apply on a District wide basis but is not appropriate for individual parishes.</li> </ul>	<p>Comments noted. Sites which are partly in Flood Zone 3 will not be immediately discounted and will be subject to a full site assessment before a final and evidenced decision can be made. Otherwise, there is potential to be excluding a number of sites where there is less than 1% is in Flood Zone 3 without a full assessment.</p> <p>Paragraph 4.13 will be determined through the Local Plan process and is outside the scope of this consultation.</p>
017 – Resident	<p>Please consider In your meeting: 1. Sewage 2. NSDC open space strategy, 3. Flood zone 2 4. The importance of open breaks between settlements 5. Presence of special scientific site's which needs to be changed to Presumption against</p>	<p>Comments noted.</p>
018 – Balderton Wildlife Facebook Group	<p>1. Flood Zone 2 should be included as a likely exclusionary criterion since the Environment Agency classification is often (in our experience) out-of-date, against a background of climate change presenting ever extreme flooding events. At present Flood Zone 3 is the only exclusionary criterion now.</p> <p>2. The importance of Open Breaks between settlements. For Balderton a defined Open Break between the East Coast mainline railway and Clay Lane and an Open Break south of the existing housing line and the Southern Link Road are both crucial</p>	<p>The Council considers this to be too restrictive and would like to see sites within Flood Zone 2 fully assessed before an evidenced decision is made on whether to exclude a site. This approach is in line with National Planning Policy.</p> <p>Comments noted in regard to open breaks, but consideration and / proposal of any new designations is beyond the scope of this document.</p>

	<p>3. Presence nearby of Sites of Special Scientific Interest, which can include sites sensitive for wildlife or natural protection such as local wildlife sites, (LWS) : instead of saying that these will be "carefully considered" the criterion should be changed to a "presumption against".</p>	<p>These are important designations and any sites for development within these designations will be excluded. Any sites adjacent to these designations will be carefully considered at Stage 2 where the full impacts can be assessed.</p>
022 – Norwell and Norwell Woodhouse Parish Council	<p>In relation to Stage 1, Members considered that the entry within Table 1 in relation to planning applications that have been refused, should be amended to read 'land should not be considered'.</p>	<p>Comments noted. The Council does not wish to exclude these sites from full assessment in order to understand why they were refused and if the reason for refusal can be overcome (such as lack of adequate documentation).</p>
026 – Balderton Parish Council	<p>Environment Agency floodzone3 data is out of date and unreliable. Floodzone2 must be considered. Severn Trent Water have more recent data on flooding &amp; sewage capacity.</p> <p>It is essential the capacity for sewage (of the local water providers) is assessed before allocating any land for housing/employment. If there isn't capacity for the combination of allocated housing sites the infrastructure requirements for drainage must be considered before planning permission is granted.</p> <p>STW should be a compulsory consultee. They must be able to assess drainage capacity to ensure homes are not subjected to sewage flooding when the capacity of pumping stations has not been increased in line with housing developments.</p> <p>4.10 'careful consideration' of sites next to SSSIs – careful consideration could be interpreted to meet the requirements of the landowner/developer - there should be presumption against using sites adjacent to SSSIs or a fixed buffer zone.</p>	<p>Comments noted. All types of flood risk are considered as part of the Local Plan process through the Strategic Flood Risk Assessment. National planning policy requires that any development should be made safe for its lifetime without increasing flood risk elsewhere (Paragraph 170).</p> <p>Severn Trent Water are already a statutory consultee.</p> <p>The Council will be carefully considering all sites adjacent to SSSIs and similar designations in line with national planning policy.</p>

**Question 5: Do you have any comments on Chapter 5 (Stage 2: Sites / Broad Location Assessment) of the SHELAA Methodology?**

<b>Respondent ID / Organisation</b>	<b>Summary of Comment</b>	<b>Response / Action</b>
004 - Witham IDB	Larges areas of the allocation 'Land around Fernwood (NAP 2C)' is at flood risk and in Zones 2/3 on the Environment Agency Flood Maps. The Board has a standing objection to development in flood plain and consideration should be given to whether development should be permitted here and if it is appropriate mitigation should be implemented. It is also noted that the site SP3 / DM8 in Harby has been removed as unsuitable.	Comments noted. These comments are outside the scope of the SHELAA Methodology document and relate to existing land allocations in the adopted Local Development Framework.
007 – Millgate Conservation Society	Conservation - How does our designation as a Conservation Area affect the Assessment of our locality? (See 'Newark and Sherwood Local Development Framework, Strategic Housing and Employment and Viability Assessment Draft Methodology' Para 5.11) This refers to 'Suitability Factors' but seems to omit reference to Heritage Assets. We regard this as a serious omission which will have a significant negative effect on our locality.	Heritage assets are encompassed in the last bullet point entitled ' <i>impact of landscape and biodiversity and historic environment</i> '.
008 – Cllr Johno Lee	The assessment framework is detailed, but it risks treating development as a technical exercise rather than a lived experience. Sites in Fernwood, Middlebeck, and Lowfield Lane should not pass suitability or achievability checks without full recognition of cumulative community impact. High-volume past approvals should trigger caution, not justify more. Achievability must not be judged in isolation from public resistance, infrastructure fatigue, and broken promises on green space. The traffic light system is only as honest as the values behind it— residents must not be sidelined by 'green' ratings that ignore their reality. Councils must assess social acceptability as seriously as land metrics. Otherwise, public trust collapses	Comments noted. This is a technical exercise to inform Plan-making. Decisions about site allocations are made in the plan-making process, these decisions are informed by the SHELAA, evidence base documents and the results of community engagement.
009 – Historic England	We welcome consideration of impacts for the historic environment forming part of the Stage 2 assessment work as part of the proposed methodology. We would recommend that the five steps for assessment set out in Historic England Advice Note 3 are made use of as part of historic environment work (link). It is noted that the Stage 2 assessment work will consider achievability (delivery in the envisaged timescales) as well as density. We welcome the potential for flexibility	Comments noted. A reference to heritage assets will be made to Paragraph 5.21(c).

	<p>around density set out in Para 5.20. In our experience the quantum of development being achievable within the context of heritage impacts, including setting impacts, is sometimes unclear as a Plan progresses. It is our preference to address issues at early stages of the Plan process to avoid delays later on in the process. As such, we recommend that ‘impacts on the significance of heritage assets, including setting,’ is included with the other identified constraints at Paragraph 5.21 criteria c for the avoidance of doubt.</p>	
010 - Nottinghamshire Wildlife Trust	<p>Section 5.11 states that officers will make a judgement as to the site’s overall suitability with reference to several factors including impact of landscape and biodiversity and historic environment. Our concern with this approach is that when considering protected species, the information needs to be comprehensive and up to date if the screening process relies solely on a desk top study. Data sets are rarely comprehensive, and a paucity of information typically relates to a lack of recording effort, which can be misinterpreted as absence. All sites that are potentially suitable for protected species will require an Ecological Impact Assessment (EclA) prior to any planning decision to ensure that protected species are properly considered in the planning process. We note in the SHELAA report (2023) under Landscape, Biodiversity and Built Heritage Constraints we do not see a reference to the list of habitats and species of principal importance in England, which includes 56 habitats and 943 species first identified as priority habitats and species in the UK Biodiversity Action Plan (UK BAP). The list is for public bodies to help them meet their ‘biodiversity duty’ to be aware of biodiversity conservation in their policy or decision making. Publishing the list is a legal duty under Section 41 of the Natural Environment and Rural Communities (NERC) Act.</p>	<p>Comments noted. The SHELAA is a technical assessment and any sites that are potentially suitable for protected species will require an Ecological Impact Assessment prior to any planning decision.</p> <p>The document will be amended to reflect the statutory duty to conserve and enhance biodiversity.</p>
013 – Resident	<p>Sites should not be deemed as suitable or may be suitable without thorough assessment.</p>	<p>Sites will only be determined as suitable, may be suitable or not suitable once the full assessment process and site visits have been undertaken unless screened out at Stage 1.</p>
014 – Resident	<p>The last bullet point of 5.11 should stated Impact on..... replacing Impact of.....</p>	<p>Comments noted. An amendment will be made to reflect this comment.</p>

	<p>The "Policy considerations" need expanding so the factors to be considered when assessing suitability are known. For example, Open Breaks, Conservation Areas, Conservation Area Appraisals etc.</p> <p>Other factors to be included potentially affecting suitability and achievability are:</p> <ul style="list-style-type: none"> <li>- Legal agreements</li> <li>- Covenants affecting use of land</li> <li>- Traffic congestion</li> <li>- Access to highways</li> </ul> <p>Last row of Table 3: Density Assumptions should read "where a single end user" to replace "where a singer end user"</p>	<p>Comments noted. Conservation Areas and their appraisals are captured under historic environment, but a reference has been made to Open Breaks under policy considerations.</p> <p>Traffic congestion and access to highways is captured under physical constraints.</p> <p>Reference to covenants will be included in '<i>identified constraints</i>'.</p> <p>Legal agreements will be included in '<i>information taken from 'call for sites' form</i>'.</p> <p>Amendment has been made to reflect comments regarding Table 3.</p>
<p>015 – Fytche-Taylor Planning c/o NTU</p>	<p>We support the traffic-light system for site assessments, which enhances clarity and consistency. However, it should be clarified whether missing constraint information automatically results in a 'red' classification.</p> <p>Consideration should also be given to constrained land—such as flood-risk areas or protected views—that can contribute positively to development by providing habitat creation, BNG areas, or public open space.</p> <p>We support the minor adjustments to site suitability criteria but emphasize the need to consider sustainability potential, as its exclusion could disadvantage new settlements despite their merits.</p> <p>While density assumptions remain unchanged, the inclusion of the Biodiversity Gain Hierarchy as a constraint is a positive step. Proper on-site planning and recognition of land-take requirements will ensure balanced development outcomes.</p>	<p>No, if there is missing information then this would result in an 'orange' classification where further work or information would be required.</p> <p>Comments noted.</p> <p>Comments noted.</p> <p>Comments noted and welcomed.</p>

	We fully support the inclusion of locally informed assumptions on build-out rates and lead-in times.	Comments noted and welcomed.
016 – Southwell Civic Society	<ul style="list-style-type: none"> <li>Para 5.15 – A detailed assessment of each SHELAA site must be made. Statutory consultees such as the Parish (or Town) Council, Local Lead Flood Authority and Highways Authority must be consulted as should local specialist organisations such as the Flood Forum, Civic Society and Community Archaeology Group.</li> </ul>	Comments noted. Once sites have been assessed they will be published on the Council’s website and a period of consultation will be undertaken alongside the Local Plan process.
017 - Resident	<p>Consideration should be given towards social access of green space deprivation by social access to green as Natural England’s Greenspace infrastructure mapping tool (link).</p> <p>Improving limited access to green spaces within 15 mins walk as is a key target of government policy under the Environment Improvement Plan.</p> <p>I am against development of sites that have great potential to provide ecosystem services such as natural flood management (NFM), flood storage, wildlife, services.</p> <p>This is particularly important in improving limited access to green spaces within 15 mins walk as is a key target of government policy under the Environment Improvement Plan.</p> <p>Strong presumption should be given against development of sites that have great potential to provide ecosystem services such as natural flood management (NFM), flood storage, wildlife corridors to ensure biodiversity connectivity as Government. These areas also provide other social benefits such as mental health and keep fit.</p>	Comments noted. Sites will be assessed considering the Open Space Assessment & Strategy. The natural environment will also be considered as part of this assessment. Consideration of these issues will be in line with the requirements of national planning policy.
018 – Balderton Wildlife Facebook Group	1. Sewage treatment capacity (pipes and sewage works) needs to be a criterion when land is identified for housing development. The confirmed hydraulic overloading of Balderton Sewage works and consequent foul sewer flooding of properties demonstrates that allocation should not be made where foul sewer capacity is not available	Comments noted. A reference will be made to sewerage capacity.

	<p>2. NSDC's Open Space Strategy document should be a criterion too, so that any new housing isn't detrimental to any existing shortfall in the parish for youngsters' play areas, amenity green space, allotments, playing fields etc. Where there is a particular deficiency in accessible greenspace provision as is the case in Balderton, which has the lowest greenspace provision per capita of the district further weighting of this factor should be given to balance against further deterioration and loss of greenspace</p>	<p>Comments noted. The criterion 'proximity and access to green spaces' encapsulates the Open Space Assessment &amp; Strategy as a key evidence base document.</p>
<p>026 – Balderton Parish Council</p>	<p>5.11 Impact on landscape, biodiversity and historic environment should be the primary factor (not last).</p> <p>5.11 Should also consider sewage capacity</p> <p>This section should also take into account N&amp;SDC's play pitch/open space strategy findings. If there is already a shortfall of play pitches/open spaces, any land in that parish should not be allowed to be redesignated for housing/employment land if there is already a shortfall in the area. More housing/employment land would only increase the deficit. Planning needs to be based on up-to-date data.</p> <p>(E.g. Balderton already has a 254 across shortfall of play pitches/open spaces – more development will only increase this).</p> <p>Natural breaks between settlements need to be considered.</p>	<p>Comments noted. The list is neither exhaustive nor in order of priority.</p> <p>Comments noted and bullet point amended.</p> <p>Comments noted. This is encapsulated in the bullet point 'proximity and access to green spaces'.</p> <p>Comments noted.</p>

### Question 6: Do you have any comments on Chapter 6 (Stage 3: Windfall Assessment) of the SHELAA Methodology?

Respondent ID / Organisation	Summary of Comment	Response / Action
007 – Millgate Conservation Society	<p>Vacant sites and vacant buildings - new uses? We are most concerned that a 'Windfall allowance' will not be included in relation to employment land supply. (See 'Newark and Sherwood Local Development Framework, Strategic Housing and Employment and Viability Assessment Draft Methodology' Para 6.5). A steady depletion of properties used for employment over the years has resulted in a change of our locality from a vibrant mixed use neighbourhood, to mostly residential. This is contrary to the spirit of the 'Millgate Plan' (see below).</p> <p>The Millgate Plan - The plan established under the 'Millgate Revival' guided development when the Conservation Area was established and the plan for dualling Millgate was abandoned. Will the spirit of that plan which established principles of housing and small-scale employment permeate this assessment?</p>	<p>Windfall allowances are typically only used for housing supply.</p> <p>The purpose of the Methodology Document is not to set policy, but to assess the suitability of sites for development.</p>
008- Cllr John Lee	<p>Windfall sites should not be used as a blanket justification for additional development in already saturated areas like Highfield (Balderton) and Lowfield Lane. This approach risks undermining proper planning scrutiny. Just because an area has delivered in the past does not mean it should continue to absorb growth indefinitely. Windfall allowances must not load pressure onto communities that have already borne the brunt of large-scale expansion. Each proposed site should be assessed on its own individual merits, with genuine local input. Windfall status should never override site-specific impacts or the wider planning context.</p>	<p>Windfall sites are sites which come through the planning system that are not allocated in a Development Plan. The NPPF (2024) permits Councils to include an allowance for windfall development.</p> <p>It states at Paragraph 75 that 'where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.' Based on our local evidence since 2013/14, 53% of all housing completions comprise of windfall sites. A windfall allowance is not used in the supply of employment land.</p>
015 – Fytche-Taylor Planning c/o NTU	<p>Unlike the previous approach, the SHELAA will now include a windfall allowance, recognizing the significant role windfall sites play in the District's housing supply.</p>	<p>Comments noted and welcomed.</p>

	<p>We support this change, as windfall development can make a valuable contribution to overall housing provision, helping to meet demand more effectively</p>	
<p>022 – Norwell and Norwell Woodhouse Parish Council</p>	<p>In relation to Stage 3, further clarification was sought on point 6.5 to determine what this meant and how it impacted on rural areas.</p>	<p>Windfall sites are sites which come through the planning system that are not allocated in a Development Plan. The NPPF (2024) permits Councils to include an allowance for windfall development.</p> <p>It states at Paragraph 75 that ‘where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.’ Based on our local evidence since 2013/14, 53% of all housing completions comprise of windfall sites. A windfall allowance is not used in the supply of employment land.</p>

### Question 7: Do you have any comments on Chapter 7 (Stage 4: Assessment Review) of the SHELAA Methodology?

Respondent ID / Organisation	Summary of Comment	Response / Action
008 – Cllr Johnno Lee	The indicative trajectory must not just reflect technical deliverability but must consider social fatigue and fairness. Areas like Fernwood and Lowfield Lane cannot keep being treated as deliverable by default just because infrastructure is already in place. That logic punishes the communities who've already done their part. The trajectory must fairly balance where housing should go, not just where it can go. Relying too heavily on previously developed areas without a reset will cause long-term public disengagement from planning.	The indicative trajectory will be prepared in accordance with National Planning Practice Guidance. The trajectory does not choose where housing should go but indicates where suitable land may be available for development. The Spatial Strategy that forms part of the Local Plan will determine where housing should be located.
013 – Resident	Keep area zones as they Are, don't change boundaries to suit/include site. If an area is rural, it stays rural.	Comments noted.
015 – Fytche-Taylor Planning c/o NTU	Enhancing the previous methodology, an indicative trajectory will outline the development potential of all sites and their anticipated delivery timeline. We agree that sites demonstrably deliverable in the shorter term should be given positive weight.	Comments noted and welcomed.
026 – Balderton Parish Council	We can see the 2023 assessment for Newark and Balderton and the answers that officers have asked at <a href="https://www.newark-sherwooddc.gov.uk/shelaa/">https://www.newark-sherwooddc.gov.uk/shelaa/</a> Should the questions be updated to include more such as: <ul style="list-style-type: none"> <li>- STW data on flooding/sewage capacity</li> <li>- Is there capacity for an SSSI buffer?</li> <li>- Is there a shortfall of open spaces? If yes by how much?</li> <li>- Is there a shortfall of pitches? If so by how much?</li> </ul>	Comments noted. Some elements highlighted will be covered by the SHELAA process, others by decision making as part of the wider Local Plan process.

### Question 8: Do you have any comments on Chapter 8 (Stage 5: Final Evidence Base) of the SHELAA Methodology?

Respondent ID / Organisation	Summary of Comment	Response / Action
008 – Cllr John Lee	The final evidence base must be more than a desk-based exercise—it needs to clearly demonstrate that public feedback and democratic input have shaped outcomes. Publishing maps and assessments is welcome, but if the same overused locations reappear, the evidence base loses credibility. Sites must be justified not just by planning logic but by fairness, deliverability in community terms, and balanced geographic spread. If it simply echoes developer interest, it fails its purpose.	The final evidence base will comprise of a desk-based study, discussions with statutory consultees, a review of any documents submitted to us and site visits. Site identification will be informed by the Spatial Strategy identified as part of the Local Plan process and is therefore outside the scope of the SHELAA Methodology.
009- Historic England	The last stage of the proposed methodology is set out as the Final Evidence Base. We have no concerns about that approach but would suggest that the Plan is clear about where impacts on the historic environment are set out - whether through the SHELAA information informing the Sustainability Appraisal, through a separate historic environment topic paper setting out how impacts on significance have been considered for any relevant preferred allocation sites, or through an alternative document. Clarity around the Council’s assessment work would help demonstrate NPPF Paragraph 203 requirements for a positive approach to the historic environment in the plan making process.	Comments noted. The site assessment process will look at the historic environment in detail.
010 - Nottinghamshire Wildlife Trust	<p>There is no guidance on the level and detail which should be included in an ecological assessment. Please see our comments in section Chapter 5 (Stage 2: Sites / Broad Location Assessment) of the SHELAA Methodology. We appreciate that there needs to be a balance between getting enough information up front to ensure that the sites being promoted and which may potentially be allocated can be delivered against putting the prospective developer to too much expense too early in the process. The SHELAA asks questions about land ownership, consent to develop and timescales for development but we do not think the methodology requires an appropriate level of detail to identify potential ecological constraints which could affect deliverability.</p> <p>We would certainly expect that if sites were considered for potential allocation, then further details would be required to particularly ensure that protected species are fully considered in the allocation process. An ecological desktop study</p>	Comments noted. The SHELAA is a technical assessment and any sites that are potentially suitable for protected species will require an Ecological Impact Assessment prior to any planning decision.

	<p>may not provide sufficient information. See previous comments. We understand that the viability of allocated sites will now be part of the plan making process as required by the NPPF. This may require further amendments to data collected through the SHELAA to ensure sites with potential viability issues are highlighted at this stage to ensure further investigations are made to enable the site to be delivered if allocated.</p>	
<p>011 - National Highways</p>	<p>The SHELAA identifies a total of 6,903 “potentially suitable” dwellings and a further 1,112 dwellings may be suitable over the 15-year plan period. It also highlights 114.44 ha “potentially suitable” employment land and 42.12 ha of land that may be suitable within the same period.</p> <p>While the SHELAA is a key part of the evidence base, it does not in itself determine whether a site should be allocated for development in the Local Plan. It should be used alongside other supporting evidence when addressing anticipated future growth and Plan preparation.</p> <p>Although growth proposals in the new Local Plan are yet to be finalised, it is essential that they are supported by a robust transport evidence base. We would welcome early sight of this as soon as it becomes available.</p> <p>Any proposed site allocations that could impact the SRN must be accompanied by clear, site-specific evidence of the potential impacts on key junctions. This includes a comprehensive assessment of the cumulative impacts of all developments proposed in the Plan. These assessments must be developed in consultation with National Highways and be fully aligned with the DfT Circular 01/2022. Depending on the scale and nature of the identified impacts, appropriate and deliverable mitigation measures must be identified and secured where necessary.</p> <p>The transport demand generated by new developments should be accommodated either via the existing highway network or through sustainable, non-motorised transport solutions. Where required, new highway infrastructure should be identified to maintain the safe and efficient operation of the SRN.</p>	<p>Comments noted.</p>

013 – Resident	There is only 1 "retail" suitable site, yet we have a town full of empty properties. Think outside the box, resident would be less inclined to object if good use was made of existing opportunities.	This is a site in the current SHELAA and falls outside the scope of the Methodology document.
015 – Fytche-Taylor Planning c/o NTU	Building on the previous methodology, the SHELAA will be presented as a comprehensive written report, incorporating location maps and assessments grouped by settlement. We support this approach, as it aligns with the presentation of SHELAA reports in most other Local Planning Authority areas, ensuring consistency and clarity in site assessments.	Comments noted and welcomed.
016 – Southwell Civic Society	<ul style="list-style-type: none"> <li>• Para 8.1 – The type and quantity of development should include a statement of housing mix required.</li> </ul>	Comments noted. This is outside the scope of the Methodology Report.

### Question 9: Do you have any other comments?

Respondent ID / Organisation	Summary of Comment	Response / Action
002 – Canal and River Trust	The Trust have reviewed the document and based on the information available we have no comment to make.	Comments noted and welcomed.
003 – Natural England	Natural England does not consider that your draft Methodology proposals pose any likely risk or opportunity in relation to our statutory purpose and so does not wish to comment on this consultation.	Comments noted.
004 - Witham IDB	Through the planning process the Board will continue to comment on the individual planning applications, as and when they are submitted. Please send consultations to <a href="mailto:planning@witham3idb.gov.uk">planning@witham3idb.gov.uk</a> Within the Upper Witham Internal Drainage Board district under the terms of the Land Drainage Act. 1991 the prior written consent of the Board is required for any proposed temporary or permanent works or structures within any watercourse including infilling or a diversion.	Comments noted.
005 – Lincolnshire County Council	Thank you for the opportunity to engage at this early stage and we look forward to working together further in the future.	Comments noted.
006 – Resident	Individuals on the Self-Build register should have the opportunity to see potential build opportunities.	All sites which form part of the SHELAA will be available to view on the Council's website.
007 – Millgate Conservation Society	Natural Environment - As the town expands at its perimeter, the locality becomes more densely developed and we increasingly value the surviving wildlife within the natural environment. The assessment will need to embrace this aspect.	Comments noted.
008 – Cllr Johno Lee	The greatest difficulty in the planning process is the disconnect between what residents and councillors know is urgently needed—more medical facilities, schools, GP surgeries, and other vital infrastructure—and what the planning system is actually empowered to deliver. Local authorities are forced to allocate more housing without the power to guarantee the services those homes require. Residents experience this first-hand and rightly question the fairness and logic of the system. This disconnect undermines trust in planning decisions. If infrastructure delivery remains outside the planning remit, then public opposition will only grow. This must be acknowledged as a central flaw and addressed in future policy.	Comments noted but falls outside the scope of the SHELAA Methodology document.

<p>010 - Nottinghamshire Wildlife Trust</p>	<p>A significant proportion of sites put forward in the Strategic Housing and Employment Assessment Main Report (December 2023) for development are either adjacent to Local Wildlife Sites (21) or in the case of CRO0016 and NEW0002, 8 LWS will be directly impacted (see comments in section <b>Chapter 4 (Stage 1: Site Identification) of the SHELAA Methodology</b>). In circumstances where a LWS is not being developed directly, adverse impacts can occur from adjacent development. Without adequate consideration and protection there is potential for an adverse impact during the construction phase due dust deposition, pollution, changes to drainage and direct damage from construction activity and machinery. After the construction phase there is potential for disturbance if a LWS is accessible to people. Trampling of plants; nutrient input from dog faeces, predation of wildlife by cats, fly tipping of garden waste and disturbance of fauna could have a significant adverse impact. In addition, it is not appropriate to isolate/fragment LWSs or habitats for protected species because they cannot then function as part of a larger ecosystem and there are barriers to dispersal/migration of animals. Simply establishing a buffer around a LWS may not adequately protect it from the impacts described above and wouldn't necessarily improve ecological networks as advocated in the NPPF and The Lawton Review published in 2010, that states we need to make our network of sites bigger, better, and more joined up. If there are sites that would result in isolation of habitats then we consider that the development would be contrary to the approach in the National Planning Policy Framework (NPPF 2024).</p> <p>Section 187 of the NPPF states: <i>Planning policies and decisions should contribute to and enhance the natural and local environment by</i></p> <p><i>a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); and</i></p> <p><i>d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and</i></p>	<p>Comments noted. We are preparing a new SHELAA and will be undertaking a 'call for sites' exercise later this year. All landowners with sites in the current SHELAA will be invited to resubmit their site using the new form and a new and full assessment will be undertaken in accordance with the new methodology.</p>
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	<p><i>future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.</i></p> <p>Section 188 states: <i>Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.</i></p> <p>Section 192 states: <i>To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.</i></p>	
011 - National Highways	<p>In relation to this consultation, National Highways' principal interest is in safeguarding the operation of A1 and A46 which fall within the District.</p> <p>In responding to the draft SHELLA Methodology consultation, we refer to the Department for Transport (DfT) revised Circular 01/2022 – Strategic Road Network and the delivery of sustainable development ('the Circular'), which sets out how interactions with the SRN should be considered in the making of Local Plans. Paragraph 28 of the Circular sets out that:</p> <p><i>The policies and allocations that result from plan-making must not compromise the SRN's prime function to enable the long-distance movement of people and goods. When the company assists local authorities in the development of their plans and strategies, the local authority should ensure that the SRN is not being</i></p>	Comments noted.

	<p><i>relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The company will also work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan.</i></p> <p>In addition to the DfT Circular 01/2022, the response set out below is also in accordance with the NPPF and other relevant policies, which helps to ensure the soundness of the Local Plan is being appropriately considered (from a transport perspective).</p> <p><u>Duty to Co-operate</u></p> <p>We recognise Newark and Sherwood District Council’s commitment to working with relevant authorities and stakeholders to support sustainable development. For any development that may have cross boundary impacts, we encourage a coordinated and collaborative approach. This should include engagement with National Highways, neighbouring local authorities, and prospective developers. Such joint working will help ensure that shared interests are reflected, and effective solutions are delivered.</p> <p>We have no further comments at this stage and would welcome ongoing engagement with Newark and Sherwood District Council to support the delivery of planned growth.</p>	
012 – Coal Authority	<p>The records of the Coal Authority, trading as the Mining Remediation Authority, indicate the presence of coal mining features at surface and shallow depth in the area including; mine entries and reported surface hazards. These features pose a potential risk to surface stability and public safety.</p> <p>If coal mining features are recorded to be present on a site we would expect these to be identified as part of the site assessment as they may impact on the quantum of development that can be accommodated in any future allocation.</p>	Comments noted.

013 – Residents	Listen to constituents, is called democracy. You are here to serve constituents not central government.	Comments noted.
015 – Fytche-Taylor Planning c/o NTU	Further comments: We support a call for sites and will actively participate in the consultation and local plan review. NTU values its collaboration with NSDC and looks forward to exploring future options for Brackenhurst Campus.	Comments noted.
016 – Southwell Civic Society	<p>How this will be affected by the reorganisation of local government and when the new unitary authority is likely to be established?</p> <p>We understand NSDC have a commitment for their relevant experts to do site assessments of sites. In the case of biodiversity to assess the implications for Biodiversity Net Gain, valuable habitat and species and where appropriate issue TPOs prior to Allocation</p>	Comments noted. Any successor Local Planning Authority will be required to have an understanding of their land supply.
017 – Resident	Please can you stop anymore development on Lowfield Lane after present planned development? We have Fernwood, Middlebeck the old Worthington Simpson's site all ever expanding and impacting on infrastructure, which will struggle to cope. No extra services. I'm aware NSDC have targets from the Government but would think these sites alone will meet or surpass, without driving the last bit of nature from the last bit of natural on Lowfield Lane We are meant to be protecting nature too.	Comments noted. Site identification will be informed by the Spatial Strategy identified as part of the Local Plan process and is therefore outside the scope of the SHELAA Methodology.
018 – Balderton Wildlife Facebook Group	<p>This consultation is tendered in good faith on behalf of the 1400 members of the Balderton wildlife group on Facebook and myself. It is quite a complex process for laypeople to engage with and should be made more accessible and understandable. I have tried to include the relevant points in the section where i see they fit best but may not be to those more familiar with the process.</p> <p>2.Strong presumption should be given against development of sites that have great potential to provide ecosystem services such as natural flood management (NFM), flood storage, wildlife corridors to ensure biodiversity connectivity consistent with current govt policy. This also links well with the presumption against development in flood zone 2. These areas may also provide other multiple social benefits such as green space access, connectivity, green transport, mental health, or other similar initiatives such as green burial sites/ community hubs which should be recognised</p>	<p>Comments noted.</p> <p>Sites which are partly in Flood Zone 2 will not be immediately discounted and will be subject to a full site assessment before a final and evidenced decision can be made as to whether a site may be suitable for development.</p>

<p>020 – South Muskham &amp; Little Carlton Parish Council</p>	<p>My Members did not have any comments on the methodology contained with the document, however, they did have concerns in relation to the site assessment forms and the contradictory information in terms of availability, suitability, etc. The minute is below:</p> <p>Members noted the information circulated in relation to the consultation. The Clerk was asked to seek clarification on the land outlined at SMU0019 as there were contradictory entries on the document and it was not clear where this land sat within the SHELAA.</p>	<p>Comments made refer to existing sites in the SHELAA and fall outside the scope of this consultation. For info, all sites currently in the SHELAA will need to be resubmitted using the new 'call for sites' form and if not, will not carried forward.</p> <p>The extent of SMU0019 can be seen here on page 3 of the <a href="#">pdf</a>.</p>
<p>022 – Norwell and Norwell Woodhouse Parish Council</p>	<p>Members considered that the site assessment forms were contradictory in relation to the suitability and achievability comments. An example was given in relation to NORW0212 which gave a suitability conclusion of 'Not Suitable', yet an achievability conclusion of 'Achievable' and that was repeated on other site assessment forms in relation to Norwell.</p> <p>The site assessment form in relation to NORW0235, listed as 'Achievable', did not take into consideration that it was adjacent to important Listed Buildings and Heritage Assets which could render it unachievable. Neither did it have direct access and was considered to be 'land locked'.</p> <p>The Chair also sought clarification on developments within the open countryside, as a number of the sites included within the site assessment form were outside of the village envelope and clearly within open countryside.</p>	<p>Comments noted. Existing site assessment forms and sites within the existing SHELAA fall outside the scope of this consultation. All sites submitted in the upcoming 'call for sites' exercise will be subject to a new site assessment form.</p> <p>In relation to a site being 'suitable', this refers to a site's potential for housing development while 'achievable' focuses on the realistic prospect of that development being able to occur. So, a site may not be suitable because it is in flood zone 3 but could be achievable because the landowner is actively promoting the site.</p> <p>Development in the open countryside will still be assessed by Spatial Policy 3 and Policy DM8 until a new Local Plan has been adopted.</p>
<p>024 – Farndon Parish Council</p>	<p>In terms of the Site Assessment Forms, Members noted FARN0237 (Now F23). The form refers to there being public transport available to get pupils to secondary schools, this is not the case as the timings do not allow that medium.</p>	<p>Comments noted. Existing sites within the SHELAA fall outside the scope of this consultation. For info, all sites currently in the SHELAA will need to be resubmitted using the new 'call for sites' form and if not, will not carried forward.</p>

	Further Members noted the contradictions within the forms in relation to suitability, availability, and achievability. Additionally, the site is not 800m from a primary school, it is 0.8 miles, so there is an inconsistency in information.	Suitability, availability, and achievability are the tests required by National Planning Policy.  Data on access to services is provided by Nottinghamshire County Council.
026 – Balderton Parish Council	Local water company feedback on capacity for sewage for 50+ dwellings should be compulsory.	Comments noted. Severn Trent are a statutory consultee and will be engaged throughout the Local Plan process. They are also consulted at planning application stage.