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Matter 6 – Climate Change Issue Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to climate change

Relevant Policies – CC1-CC3 and S3

Questions

Concerning measures related to flooding in S3:

c) The Council will ensure no development is put at risk of flooding nor does it increase the risk of flooding to surrounding areas, directing development and infrastructure to area at the lowest risk of flooding in the District.

d) vi) Ensure that surface water is managed so that there is no unacceptable impact from surface water flooding to the development, to surrounding areas or to existing drainage...

It is reasonable to expect flood risks to increase during the plan period as a result of global climate change. It is understood that appropriate Climate Change and related flood modelling has been taken into account as part of the planning process.

It is of concern that flooding is occurring on some of the new developments being built, such as Beck Lane. Measures are required to ensure the risks are reduced and better managed. The Forum questions whether these developments were considered under policies similar to S3 and if so whether S3 is sufficiently robust to mitigate against this growing issue of concern.

6.1 Are the requirements of the Meeting the Challenge of Climate Change and Adapting to its Effects (policies CC1 – CC3) justified by appropriate available evidence, having regard to national guidance, and local context?

We have found this to be the case in terms of the policies in the Draft Local Plan following national guidance. Concerning local context, we have raised the need for action in terms of insulation and energy efficiency of poor-quality rented housing in Stanton Hill. This appears to be met by initiation of ADC action on ‘Selective Licensing’ and cooperation with the ‘Healthy Homes’ programme of the Nottingham Energy Partnership. We would like to see this extended to more eligible streets in Stanton Hill.

6.2 Has Policy CC1 been shaped by engagement with all stakeholders, including infrastructure providers and statutory consultees?

As a statutory stakeholder, we are not aware of having been invited to take part in any meaningful engagement on Policy CC1.

CC1c

1c) Enable occupants to minimise their need to travel and, where travel is necessary, to maximise opportunities for sustainable modes of travel.

Unless electric cars are included under ‘sustainable modes of travel’, the current and planned pattern of development in Teversal, Skegby and Stanton Hill does not comply with this policy. The Forum is concerned that dispersed development as per the Sustainability Appraisal may result in development in locations that increase the reliance on the car and associated emissions, with more limited opportunities to support new public transport, walking and cycling infrastructure. Similarly, there

would also be minor negative effects on climate change and energy efficiency (SA Objective 13) with more limited opportunities to ensure integration of low carbon measures into new development than options with SUEs/new settlements.

Trying to increase the usage of EVs can be encouraged through the planning process with policies requiring EV charging points being installed in new homes. This too has knock on effects in that in some areas electricity sub stations need to be upgraded to cope with the additional demand. The question for the Inspector is how this is going to play out in TSS where there are many small to medium sized sites that may not need substation upgrades in their own right. The network provider can refuse people having charging points if the network cannot cope. Without this joined up approach these new housing sites will be pumping more cars onto congested roads through urban residential areas without the realistic prospect that those cars will be anything but carbon emitting. We need to have fewer cars (especially SUVs) even if they are electric.

The Council acknowledge that harms will occur in the dispersal development option, but they have continued with this option, without mitigation. Although electric vehicles would make a positive contribution to reducing dangerous emissions, they alone cannot address the issues around the air quality due to construction and the increased use of cars, and without increased provision of public transport.

1d) Minimising greenhouse gas emissions.

*Case Study: The Forum has taken up a government grant of £40,000 for a feasibility study on the possibility of creating a community owned green energy scheme. Consultants have been appointed and we have recently spent some time with them surveying the area for possible locations for green energy generation or battery storage. A final report is expected before March 2025. If it is positive we will the access a further grant of £100,000 towards the cost of setting up the scheme. This is an initiative by the Forum to reduce greenhouse gas emissions and achieve a net zero future for the area. **However, this initiative is threatened by housing development in the area most of which is unsustainable and will increase car usage and emissions from fossil fuel central heating bearing in mind that no developer is currently fitting renewables to their dwellings.***

3. The development of stand-alone renewable energy schemes will be supported in appropriate locations.

We welcome this policy and are in discussion with ADC and the Midland Net Zero Hub concerning sustainable Community Energy.

Although in principle we support onshore windfarms of a limited size, we have significant concerns relating to the identification of and extensive site close to Hardwick Hall for large and small turbines. As shown in Appendix 4: Map of Potential Commercial Scale Onshore Wind (East Midland Renewable Energy Study – Ashfield) in the Ashfield Local Plan 2023-2040: Regulation 19 Pre-Submission Draft.

6.3 Has Policy CC3 and S3 been shaped by engagement with all stakeholders, including infrastructure providers and statutory consultees?

As a statutory stakeholder, we are not aware of having been invited to take part in any meaningful engagement on Policy CC3 and S3.

6.4 Do Policies CC1-CC3 serve a clear purpose, avoiding unnecessary duplication of national policy? Is the wording consistent with national policy?

6.5 Do Policies CC1 – CC3 provide clear direction as to how a decision maker should react to a development proposal?

It is not clear to us whether, for example, gas or oil-fired central heating will continue to be accepted in new developments.

CC3: Flooding is becoming more of an issue in the TSS area, especially on Beck Lane (by the new developments) and on Fackley Road (worsened since the new developments on the ridge at Stanton Hill). Road flooding has resulted in closures of the A38 and Fackley Road. These remain significant concerns especially as more green fields are built on and old sewers are unable to cater for increased demand.

Flooding on new developments which have/or are being built, raises the question as to how different these policies to those which informed the new development, as clearly flooding is now apparent. If they are similar, then do they require reviewing to ensure improved effectiveness?