Date: 03 November 2022

Our ref: 409407

Your ref: Matter 10, Issue 10b



Matter 10 – Local Character and Distinctiveness (Policies ST35 – ST42) Issue 10 b) Are the potential impacts arising from development proposed in the plan on Clumber Park SSSI adequately addressed?

Natural England responded to the Bassetlaw Local Plan Publication Version Second Addendum on the topic of recreational impact as set out in the amended Policy ST40. In our written response we supported the amendments that section 8.6 includes (detailed in paragraphs 8.6.10-8.6.12) which made changes associated with the withdrawal of the Bassetlaw Garden Village and the changed approach to recreational impact.

With the withdrawal of the Garden Village allocation, which would have been in close proximity to the Clumber Park Site of Special Scientific Interest (SSSI), the recreational disturbance issues potentially impacting the SSSI had changed. Following discussion with the Bassetlaw Planning Officers it was considered that the Strategic Solution as set out in the original version of Policy ST40 would be difficult to implement effectively in the changed circumstance. Natural England therefore agreed to an approach based on the Impact Risk Zones (IRZs) which now appears within paragraph 8.6.11 of the explanatory text for Policy ST40.

The IRZs are a GIS tool developed by Natural England to make a rapid initial assessment of the potential risks to SSSIs posed by development proposals. They define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts.

Natural England are intending<sup>1</sup> to amend the existing IRZ for the Clumber Park SSSI to include advice on mitigating recreational impact from new residential development within a 10km buffer zone. This distance will include the majority of housing allocations over 50 units proposed in the Local Plan (see Council's Recreational Impact Briefing Paper, October 2022).

The visitor behaviour survey, within the Recreational Impact Assessment for Clumber SSSI (CD-022), showed that a quarter of all interviewees who visited Clumber Park 1 to 3 times per week, and notably dog walkers were the group who visited the most frequently, with >16% visiting most days or daily. It is the impact that these regular visitors who tend to live in proximity to Clumber Park, and therefore most likely to increase as a result of additional housing development, that the 10km IRZ will focus on.

As described in paragraph 8.6.11, any housing development that falls within the IRZ for Clumber Park SSSI should give full consideration to the potential recreational impact on the SSSI when developing proposals and include appropriate mitigation measures. These measures may include Sustainable Alternative Natural Greenspace (SANGs) or other appropriate design, layout or management measures which would effectively mitigate recreational impact on the SSSI and would require agreement from Natural England.

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<sup>&</sup>lt;sup>1</sup> Please see Letter of Intent submitted with this statement