

Sustainability Appraisal for the Allocations Plan -MAIN DOCUMENT

(Publication Version March 2015)



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1 Introduction

1.1 Introduction

1.1.1 This section contains an explanation of the **Allocations Plan** and the need for a **Sustainability Appraisal**. It outlines the aims of the appraisal and the process involved.

1.2 Background to the Forest of Dean

1.2.1 The Forest of Dean is situated in the South West of England within the county of Gloucestershire and covers 526 km².

1.2.2 The Forest of Dean District takes its name from the Forest of Dean itself which forms a large part of the central core of the district, and comprises its largest landscape feature. The district includes a variety of other landscapes from the Severn Estuary and the Wye Valley to the rolling hills to the north. Although close to several major centres which exert various influences over different parts of it, the Forest of Dean District is deeply rural (DEFRA 2009).

1.2.3 The District falls into three National Character Areas⁽¹⁾:

NCA 104 South Herefordshire and Over Severn

NCA 105 Forest of Dean and Lower Wye

NCA 106 Severn and Avon Vales

1.2.4 The total population of the District is estimated at 81,961 (ONS 2011).

1.2.5 There are four main towns within the District, Cinderford, Lydney, Coleford and Newent.

1.3 The Allocations Development Plan Document

1.3.1 The Allocations Plan (AP) accompanies the Core Strategy (CS) and together with the Cinderford Area Action Plan (AAP) form the new style development plan which may now be known once more as the Local Plan (LP) for the Forest of Dean.

1.3.2 The primary role of the AP is to provide the detail of how and where the policies in the Core Strategy will be implemented. It also updates the CS where national policy or new data requires change. It contains allocations for development, but also protective designations and will also include revised defined settlement boundaries. It will sit within the context of the Core Strategy and has to be in conformity with it but take account of changes in information, legislation and guidance since its adoption.

1 Natural England, National Character Areas, Link:
<http://www.naturalengland.org.uk/publications/nca/>

1 Introduction

1.3.3 The objectives of the Core Strategy are summarised in table 1, and are common to the AP:

Table 1 Core Strategy Objectives

	Objective in Core Strategy	Outcomes in Sustainable Community Plan	number
	To be a thriving and sustainable community	All (listed below)	1-5
1	Providing quality environments throughout the district- to protect the environment for the benefit of the community and in order to attract new businesses	A place where the future matters	1
2	Develop a more self contained and diverse local economy including tourism- to address out commuting and enable more sustainable transport patterns while providing a greater range and number of jobs, and improving the services and facilities that are accessible	A place with a strong prosperous and diverse economy	4
3	Providing homes including affordable homes- to meet the housing needs of the community	A place that offers local people a quality home appropriate to their needs and lifestyle	3
4	Facilitate regeneration- to support a stronger more sustainable economy in a better quality environment	A place with a strong prosperous and diverse economy	4
5	Creating safer communities with better facilities	A place where communities feel safe and are safe A place where everyone can access the services they need	2,5

1.3.4 Underpinning the above objectives is the vision from the CS which is:

CORE STRATEGY VISION

The Forest of Dean will be a thriving sustainable community with a high quality environment, a developing local economy including tourism, housing which meets the needs of residents (including affordable homes) and safer communities.

The existing complementary nature of the three southern forest towns will be reinforced to ensure Coleford, Lydney and Cinderford work together with their hinterlands to provide a more sustainable future. Much of the planned change will be in the towns, especially Lydney and Cinderford, with improved shopping and services meeting the needs of the existing and new population. Improved town centres, services and a wider range of employment will reduce commuting and other journeys. Newent will become a more effective local centre through improvements in the centre and additional employment. The quality of the countryside and the built environment will be maintained through the careful promotion of the economy, and safeguarding of the landscape.

1.3.5 Whilst the vision and strategy of the CS remains unchanged the AP takes account of new information and national policy. Key changes since the adoption of the CS have been the publishing of the NPPF & NPPG as well as a review of the housing and employment requirements for the district. In order to achieve all this AP contains a total of 100 policies for the development of individual sites as well as more general policies for the protection of various areas within the district.

1.3.6 The structure of the AP is as follows:

1 Introduction

The Structure of the Allocations Plan

Preface

Introduction

- Setting out the purpose of the plan, its development and relationship to the Core Strategy

District Wide Policies

- Eight policies applicable to development anywhere in the District

Policy Overview and area policies not related to settlements

- Summarising sites allocated for employment (15 policies) and housing (29 policies)
- Setting out policies for sites which are not related to specific settlements (21 policies)

Policies for Towns and other Settlements

- Provides analysis and descriptions for 51 defined settlements
- Sets out policies and designations (a further 71 policies) for settlements including, where appropriate, housing and employment allocations

Appendices

- Contains a Glossary and list of Core Strategy policies

1.3.7 The plan makes allocations for about 3061 new dwellings ⁽²⁾ in the remaining plan period (2026). Taking into consideration existing commitments (current planning permissions), provision on 'mixed use sites' and windfall sites (smaller or non-allocated) overall housing provision in the remaining plan period is expected to be in the region 4,800 new dwellings.

² Including provision for 200 new dwellings as part of the Cinderford Northern Quarter Area Action Plan

Introduction 1

1.3.8 The plan makes provision for the retention or intensification of about 255ha of land to be used for employment within settlements and at defined locations outside.

1.3.9 In addition there are policies in regards to Gypsy, Traveller and Show people sites as well as five policies for 'mixed use' providing for both housing and employment.

1.3.10 There is a noticeable tourism element in the plan. Whilst many policies have tourism benefits though measures such as town centre improvements or landscape protection, there are 16⁽³⁾ policies with a specific tourism focus.

1.4 The Sustainability Appraisal

1.4.1 The Sustainability Appraisal (SA) is a required procedure which forms an integral part of the process of producing the Local Plan. It is required and guided by the following:

- National Planning Policy Guidance (Accessed 1st July 2014)
- Regulation 39 of the Planning and Compulsory Purchase Act 2004
- Office of the Deputy Prime Minister (September 2004) Sustainability Appraisal of Regional Spatial and Local Development Frameworks Guidance, Consultation Paper.
- Office of the Deputy Prime Minister (April 2005) Sustainability Appraisal of Regional Spatial and Local Development Frameworks, Interim advice note on frequently asked questions.

1.4.2 By undertaking a Sustainability Appraisal it is possible to look at the range of policies and plans contained in the LP and examine how they contribute to the aim of sustainable development. By reviewing every policy or document in this manner, it is possible to identify areas where policies may not contribute to sustainable development. By identifying these problems at an early stage, it is possible to change and amend policies or text to ensure that they are as sustainable as possible.

1.5 Strategic Environmental Assessment (SEA)

1.5.1 In addition to the Government's requirement for a Sustainability Appraisal (SA), European Legislation also requires that an assessment of the environmental effects of certain plans and policies (including planning documents) is undertaken. This is through the Strategic Environmental Assessment Directive 42/2001.

1.5.2 There is a large amount of overlap between the European 'Strategic Environmental Assessment (SEA)' and the UK Sustainability Appraisal process. They have therefore been combined into one process for the assessment of the AP. For

3 Policies AP9,10,17,18,20,23,24,25,26,27,28,29,42,46,61,83

1 Introduction

ease of reference this document will refer to both processes as the Sustainability Appraisal. The requirements of SEA and its relationship to the SA is set out in Appendix 1.

SEA Directive

Areas of information within this document, which are requirements of the SEA directive, will be identified as such by the use of text boxes at the beginning of the relevant sections. A full summary of the SEA requirements compliance can be found in Appendix 1.

Article 5.(1) 'An environmental report shall be prepared in which the likely significant effects on the environment, of implementing the plan or programme, and reasonable alternatives, taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated.'

Article 5.(2) 'The environmental report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process, and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment.'

Annex 1 (j) 'The information to be provided under Article 5(1), subject to 5(2) and (3) is the following: A non technical summary of the information provided under the above headings.'

Article 12.(2) 'Member states shall ensure the environmental reports are of sufficient quality to meet the requirements of this Directive.'

Statement of Methodology 2

2 Statement of Methodology

2.1 Aims and Purpose of the Sustainability Appraisal

2.1.1 There are many definitions of sustainability. This appraisal uses the international definition of sustainability most widely referred to:

2.1.2 *“Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs. It contains within it two key concepts:*

- *the concept of **needs** , in particular the essential needs of the world's poor, to which overriding priority should be given; and*
- *the idea of **limitations** imposed by the state of technology and social organization on the environment's ability to meet present and future needs.”* (Bruntland Report 'Our Common Future' 1987).

2.1.3 In 2011, the Coalition Government published its vision for sustainable development⁽⁴⁾ and a package of measures to deliver it through the Green Economy, action to tackle climate change, protecting and enhancing the natural environment, and fairness and improving wellbeing, and building a Big Society.

2.1.4 This refreshed vision and commitments build on the principles that underpinned the UK's 2005 Sustainable Development Strategy, by recognising the needs of the economy, society and the natural environment, alongside the use of good governance and sound science.

2.1.5 The National Planning Policy Framework (NPPF) recognises the broad principles of sustainable development, which was defined by the United Nations General Assembly Resolution 42/187, as 'meeting the needs of the present without compromising the ability of future generations to meet their own needs'. Paragraph 7 of the NPPF describes how the planning system is responsible for helping to deliver the three key dimensions to sustainable development which are the economic, social and environmental roles.

2.1.6 'Securing the Future - UK Government Sustainable Development Strategy' (March 2005) set out four priority areas for sustainable development. They are as follows:

- Sustainable Consumption and Production
- Climate Change
- Natural Resource Protection
- Sustainable Communities

4 <http://sd.defra.gov.uk/gov/vision/>

2 Statement of Methodology

2.1.7 The principles of sustainable development are demonstrated throughout the Core Strategy. They form the overall context for a more local view of sustainable development, reflective of the district's location, functions and composition. Development will need to consider how these aspects are evidenced and delivered, in accordance with the NPPF and CSP1, as development proposals proceed.

2.1.8 By undertaking a Sustainability Appraisal it is possible to look at the range of policies and plans contained in the LP, and examine how they contribute to the aim of sustainable development. By looking at every policy or document in this manner it is possible to identify areas where policies may not contribute to sustainable development. By identifying these problems at an early stage, it is possible to change and amend policies or documents to ensure that they are as sustainable as possible.

2.1.9 This document is the Sustainability Appraisal for the Forest of Dean District Council Allocations Plan. The relationship between the AP and SA is shown in Figure 1 below. The five stages of SA (A-E) are summarised in table 2 below. The Forest of Dean District Council decided to undertake SA and consult on it at the 'pre consultation' stage of the AP to ensure sustainability issues are identified at an early stage. The formal stage of consultation, as identified in the diagram, is expected to be undertaken during the spring 2015. This report is identified in Stage C of the process.

2.1.10 The Sustainability Appraisal was carried out by the Forward Plans and Sustainability Team at the Forest of Dean District Council (FODDC). The team is well placed to undertake the SA having an in depth knowledge of the District, being responsible for the SA in relation to the Core Strategy and has direct connection with the plan making process.

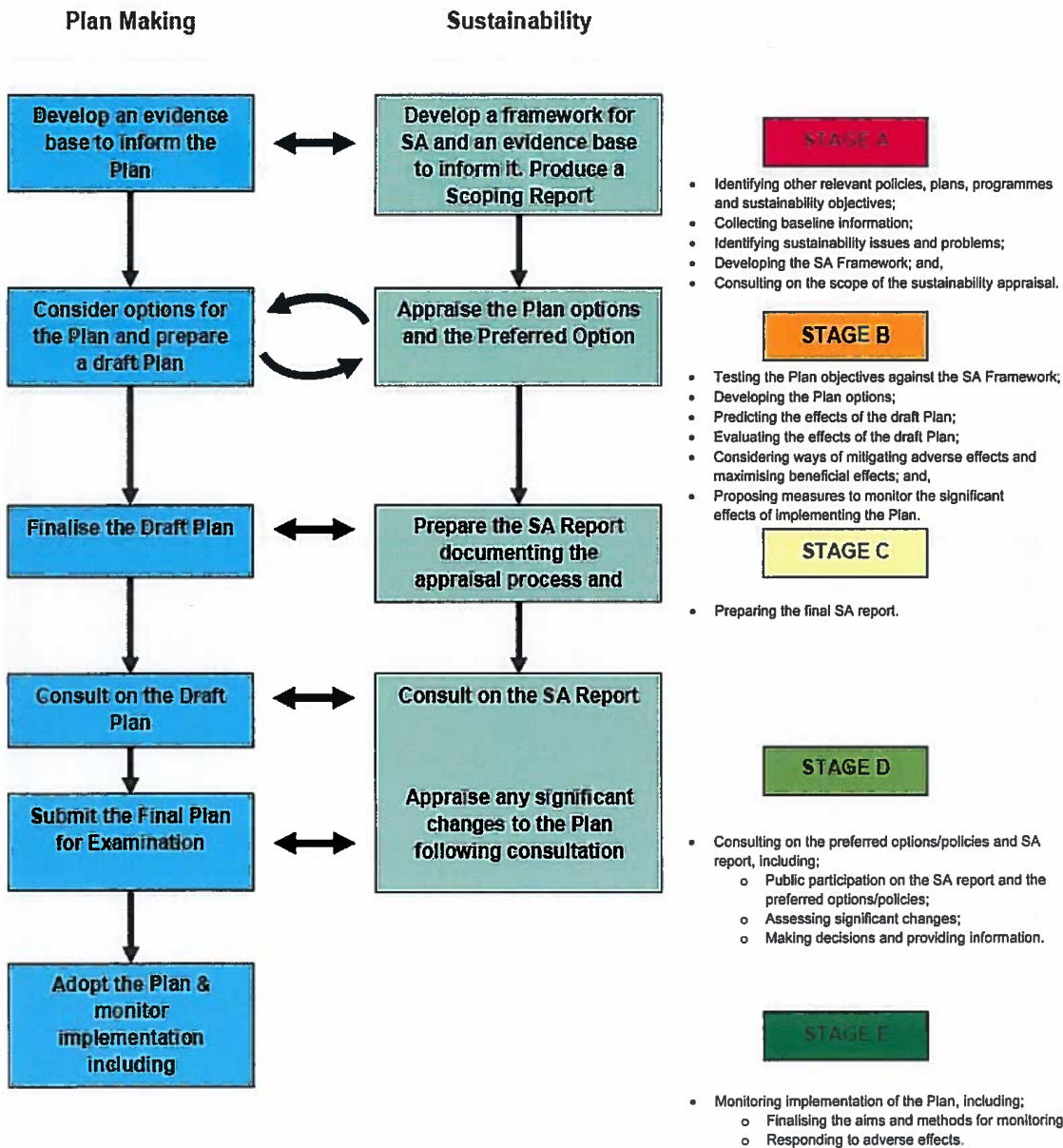
2.1.11 The Allocations Plan Draft document and Sustainability Appraisal were presented to the Cabinet on the 12th of June 2014 where members approved the document to go forward to the Full Council Meeting on the 17th of July 2014. At Full Council the document was approved to go forward for an 8 week public consultation, running from the 21st of July 2014 until 15th September 2014. During that period comments were invited on both the Allocations Plan Draft and Sustainability Appraisal documents.

2.1.12 The AP and SA have been revised and updated during the winter of 2014/15 as result of the 2014 consultation and changes to the plan. The AP and supporting documents, including this SA, will be submitted for examination in 2015 following a further round of public consultation, the responses to which will also be submitted to the inspector undertaking the examination.

2.1.13 There were few restrictions/problems faced during the Sustainability Appraisal process. The approach to 'options' took some detailed consideration (as set out in Stage B) as the Core Strategy had clearly selected a preferred option (supported by its own SA), substantially limiting the options open to the AP. The process adopted was as a result of analysis and challenge through peer review of officers in the Council's planning services.

Statement of Methodology 2

Figure 1 Diagram of SA process and Plan Stages (Planning Advisory Service October 2014)



2 Statement of Methodology

2.1.14 Structure of the Sustainability Appraisal

Table 2 Key stages of Sustainability Appraisal

<p>Stage A: Setting the context and objectives. Establishment of the baseline and scope.</p> <ul style="list-style-type: none"> ● A1: Identification of other relevant policies, plans and programmes and sustainability objectives. ● A2: Collection of baseline information. ● A3: Identification of sustainability issues and problems. ● A4: Development of the SA framework. ● A5: Consultation on the scope of the SA.
<p>Stage B: Development of options and assessment of effects</p> <ul style="list-style-type: none"> ● B1: Testing the AP objectives against the framework. ● B2: Development of the AP options. ● B3: Prediction of the effects of the AP. ● B4: Evaluation of the effects of the AP. ● B5: Consideration of possible methods for mitigation of adverse effects and maximising beneficial effects. ● B6: Proposing measures to monitor the significant effects of implementing the AP.
<p>Stage C: Preparation of the Sustainability Appraisal Report</p> <ul style="list-style-type: none"> ● C1: Preparing the SA Report.
<p>Stage D: Consultation on the pre consultation draft of the AP and SA Report</p> <ul style="list-style-type: none"> ● D1: Public participation on the pre consultation draft of the AP and the SA Report. ● D2(i): Appraising changes to the AP made as a result of representations and representations received on the SA.
<ul style="list-style-type: none"> ● D2(ii): Publish updated SA with the Publication Draft of the AP for further consultation.
<ul style="list-style-type: none"> ● D2(iii): Proposed changes to the SA as a result of Publication Draft representations submitted with for examination along side AP.
<p>Adoption of AP and Monitoring</p>
<p>SA Stages and Tasks</p>
<ul style="list-style-type: none"> ● D3: Decision making and provision of information.
<p>Stage E: Monitoring of the effects of the implementation of the AP</p> <ul style="list-style-type: none"> ● E1: Finalisation of aims and methods for monitoring. ● E2: Response to adverse effects.

Stage A - Baseline Analysis 3

3 Stage A - Baseline Analysis

3.1 Stage A1: Identifying other relevant policies, plans and programmes and sustainability objectives

Stage A1 - Identify environmental, social and economic objectives contained in other relevant plans and programmes

SEA Directive Article 5 Annex 1

(a) 'An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes'

(e) 'The environmental protection objectives, established at International, Community or Member state level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation'

3.1.1 The aim of this stage is to show how the SA is affected by factors in other relevant policies, legislation or programmes.

3.1.2 The SA has been developed within the context of policies, plans and guidance from organisations such as the Government, Gloucestershire County Council and the Environment Agency. The SA also needs to reflect local needs and requirements.

3.1.3 Appendix 2 lists the Key International, National and Local plans that have influenced the development of the AP and SA. Many additional documents were also considered, including reports about the state of the district, previous versions of policies and plans, and parish level plans. All of these documents have been reviewed to help identify the key sustainability objectives, targets or specific requirements within them, as well as the implications for the development and content of the LP

The Core Strategy (CS)

3.1.4 Of primary importance is the relationship of the AP with the Cores Strategy (2012) (CS) for the district, which was also subject to SA/SEA. The CS set out a strategy to provide for 5162 new homes across the district in the period 2012- 2026. The CS sets out the requirement for some 60ha of land for employment generating uses focused in and around the four towns.

3.1.5 About 75% of all new housing and 80% of new employment is focused in the four towns, divided according to their need and capacities so that about 1900 new dwellings and 30ha of employment land is proposed at Lydney, about 1050

3 Stage A - Baseline Analysis

dwelling and 26ha of employment at Cinderford, about 650 dwellings and 6.8ha at Coleford and about 350 dwellings and 5ha at Newent. This is to be accompanied by new retailing in the town centres, with the biggest change at Cinderford, in order to attract trade now lost to the district. New and more diverse employment is encouraged at all the towns and on new sites and in the centres. Whilst the CS strategy remains unchanged new data on requirements for employment and housing may alter the total number of each but the overall distribution pattern remains unchanged.

3.1.6 The CS has district wide policies covering Design and environmental protection; Climate change; Sustainable Energy use; Development at Settlements; Housing; Sites for gypsies, travellers and travelling show people; Economy; Retention of community facilities; Recreational and amenity land. There are settlement policies for the four towns (Lydney, Cinderford, Newent, Coleford) as well as for the villages.

3.1.7 In rural areas including the villages, the emphasis of the CS is on sustainable rural development to be promoted where it supports the local economy and is compatible with the conservation of the countryside. The strategy reinforces the role of the villages, especially the larger ones and groups where it will make a positive contribution to the sustainable long term future of the area, and especially its economy. Provision is made for approximately 1212 new dwellings away from the towns. These will be mostly on sites (including small unallocated sites) within the settlement boundaries of villages. A settlement hierarchy sets out the scale and appropriateness of each settlement.

3.1.8 Within the villages there is a clear and distinctive settlement pattern and hierarchy. Amongst the group of the major villages, Mitcheldean stands out as having a very large employment site and this will continue to be supported. The villages are expected to provide much of the new housing and employment not planned for the towns and although the sites concerned are generally modest, provision should be in keeping with the scale and function of the settlement concerned. Affordable housing is especially important in villages and is encouraged throughout the district, again in proportion to the scale of the settlement concerned and the identified need. Whilst the CS strategy remains unchanged new data on requirements for employment and housing may alter the total number of each but the overall distribution pattern remains unchanged.

Cinderford Northern Quarter Area Action Plan (CNQ)

3.1.9 The CNQ covers an area of 84ha. Within this wider forest setting the CS identifies the provision for a mixed use development of about 175 new dwellings and 9.5ha of employment uses. The CNQ proposes a new access road together with new education and hotel development. Much of the CNQ area remains unchanged providing the setting for the education led regeneration area. The CNQ is not included in the AP as there is an existing adopted (2012) area action plan for the area.

National Planning Policy Framework (NPPF)

Stage A - Baseline Analysis 3

3.1.10 The NPPF was published after the adoption of the CS and CNQ. The Council considers that both plans are in conformity with the NPPF. Recent changes in legislation regarding changing offices to residential use and conversion of agricultural barns has not had any significant impact on the district to date. Mostly probably due to the type and nature of the buildings found in the district. Aspects in relation to a 'five year' housing land supply have had an impact on the district. Following appeal decisions the Council has at times not been able to adequately demonstrate a five year supply of land for housing and as such proposals have come forward outside of existing allocated sites some of which have been permitted due to the lack of supply. The AP will address the perceived under provision. The government has also changed the requirements for affordable housing, with sites of less than 10 dwellings not required to provide affordable housing but can make a contribution towards affordable housing elsewhere. The effect of this change has yet to be seen, however in a rural district such as the Forest of Dean, where there are a number of small sites in larger villages proposed this could have a negative effect on affordable housing provision in rural areas.

Neighbouring Land use Plans

3.1.11 The Forest of Dean adjoins two other local authorities in Gloucestershire as well as Herefordshire and Monmouthshire.

Gloucestershire

3.1.12 Across Gloucestershire LA's have a good understanding of neighbouring areas' land use plan requirements working at a strategic level as well as on specific areas. Objectively Assessed Need (OAN) for housing requirements was undertaken jointly by Cotwolds DC, Stroud DC and Forest of Dean District Council in light of the provision set out for the Joint Core Strategy area of Gloucester and Cheltenham. The predicted housing requirement for Gloucestershire ranges from 51,000 to 54,800⁽⁵⁾ depending on the allowance for extra homes for jobs for the period up to 2031.

3.1.13 The Gloucestershire Local Enterprise⁽⁶⁾ (SEP) aims to achieve 33,000 new jobs, 3,200 new homes, 6,108 new qualifications and 5,421 new apprenticeships in the period up to 2021. The SEP sets out 4 key delivery areas; a growth hub supporting businesses; a renewable energy, engineering and nuclear skills centre at Berkeley power station; a growth zone centred around junction 10 of the M5; enablers for growth, distinct infrastructure projects throughout the county. The focus for development in the SEP is predominantly centred around the largest settlements in the county and key road connections (M5) and therefore away from the Forest of Dean District. The AP takes account of the SEP and its impact on the district most noticeably through specific projects such as the Cinderford Northern Quarter and A40 road improvements (outside of the district).

5 http://www.stroud.gov.uk/info/plan_strat/Gloucestershire_SHMA_update.pdf

6 Partnership's Strategic Economic Plan

3 Stage A - Baseline Analysis

3.1.14 The Gloucestershire Minerals Local Plan is at an early stage⁽⁷⁾. In terms of the district the most significant options are for extensions to existing crushed rock quarries at Clearwell, Drybrook and Stowfield. There is also an option for a new quarry at Hewlsfield. Small building stone and sand quarries are expected to continue although in the district this is relatively small scale. Reserves of clay and coal are proposed to be safeguarded.

Monmouthshire

3.1.15 The Monmouthshire Local Development Plan was adopted in 2014 and covers a period until 2021. The Monmouthshire plan has been developed in the knowledge of the housing numbers and distribution set out in the Forest of Dean Core Strategy (2012). The Monmouthshire plan sets out provision for 4,950 new homes focused on the larger towns of Chepstow, Abergavenny and Monmouth with more limited distribution to other larger settlements. In terms of the Forest of Dean the most significant provisions are at Monmouth (825) and Chepstow (675).

3.1.16 The A48 is the main road access from the north and south in to the Forest of Dean. It is expected that development in the Lydney, Tutshill and Sedbury areas will have an impact on the Chepstow area due to the transport connections (road & rail). Economically these could be of benefit to Chepstow in accessing retail and employment but also negative in terms of demand for limited services and transport. Increased traffic on the A48 through could have a detrimental effect on the Air Quality Management Area in Chepstow.

3.1.17 In Monmouth the A40 separates the town centre from the River Wye and the Forest of Dean District. Road connections between Monmouth and the Forest of Dean, A4136 and A466, are relatively good although not as major a route as the A40 running north/south from the town. Taking into consideration connection south and west to Newport and the heads of the valleys; north to Hereford, the M50 and midlands; it is not considered that the level of growth proposed would cause any significant impacts for the Forest of Dean.

Herefordshire

3.1.18 Herefordshire's Core Strategy (HCS) was submitted for examination in the autumn of 2014. It too has been developed in the knowledge of the housing numbers and distribution set out in the Forest of Dean Core Strategy (2012). The HCS seeks to provide for 16,500 new homes in the period up to 2031 again the focus, for sustainability reasons, is on the larger settlements. The most significant area for the Forest of Dean is Ross on Wye, here the HCS proposes provision for 900 new homes and 10ha of existing employment land. The town is some distance from, and with limited connects to, the Forest of Dean and therefore, it is not considered that this level of growth would cause any significant impacts for the Forest of Dean.

Duty to Co-operate

Stage A - Baseline Analysis 3

3.1.19 The cross boundary issues identified to date within the existing / emerging strategies of the aforementioned adjoining authorities have been taken into account during the preparation of the AP. The Council is satisfied that the duty has been met and will be summarising 'co-operation' activity in a background paper.

3.2 Stage A2: Collecting baseline information

Stage A2 - Provide baseline information on environmental, social and economic characteristics of the district.

SEA Directive Article 5 Annex I

(b) *'The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.'*

(c) *'The environmental characteristics of areas likely to be significantly affected.'*

3.2.1 The aim of the baseline is to characterise the current situation in the district and identify likely trends for the future. Information about the overall baseline for the district has been drawn together from a wide range of sources and is available in Appendix 3. More detailed information for each site was collected, and is summarised in the appraisal tables of Appendix 6. The following is a summary of the district baseline. Where predictions or trends are clear enough, the likely future baseline without the plan is also described.

3.2.2 Population and deprivation: The current population of the Forest of Dean District Council is around 82,000 people. The district's population grew by 2.3% between 2001 and 2011, compared with Gloucestershire which grew by 5% and national growth of 7%. The Forest of Dean is 52,650 hectares in size. Its density is 1.6 persons/hectare. It is a rural community. A recent study ⁽⁸⁾ suggests that in the period until 2031 population in the district can be expected to increase by in the region of 6400-8600.

No parts of the Forest of Dean are within the 25% most deprived areas in England. Cinderford West is in the 10% most deprived areas of Gloucestershire. Other parts of the district that are comparatively deprived are in Coleford, Lydney, and three outlying parishes: Lydbrook & Ruardean, Littledean & Ruspidge, and Awre.

Likely future without the plan: The Office of National Statistics predicts that the population of the Forest of Dean will rise by 7.9% by 2033, and the number of households is predicted to increase by 26% between 2008 and 2033. The population of 0-19 year olds is expected to fall by 2%, the population of 20-64 year olds will fall by 8.7%, and the population of 65+ will increase by 10.7% during that time. The Gloucestershire Story predicts an even greater change in the district's age structure, with the 65+ age group making up nearly a third of the population by 2033.

8 The Objectively Assessed Housing Needs of Stroud, Forest of Dean and Cotswolds October 2014

3 Stage A - Baseline Analysis

3.2.3 Health: 27% of households in the Forest of Dean have at least one person that suffers a long-term disability, slightly higher than the county and national average. The rate of under 18 pregnancy is well below the national average. The proportion of children who are overweight or obese is, at 36%, higher than the county figure. *Likely future without the plan:* A fall in the rates of many long-term health conditions is expected to be reversed over the next 20 years due to 1. the ageing population, and 2. behaviour such as smoking, excessive alcohol consumption, poor diet and physical inactivity.

3.2.4 Housing: The forest of Dean has 36,164 dwellings: 92% houses, 7% flats or maisonettes, and 1% temporary structures such as caravans. In 2011, 75% of households in the district owned their own home, compared with the county average of 70% and the national average of 64%. 11% of households live in privately rented accommodation. 2% of housing is social rented. All areas within the district are in the lowest 40% of deprivation for housing-wide barriers in the county, which considers overcrowding, affordability and homelessness. The rate of homelessness in the district is lower than the county or national average.

In 2010/11, 228 houses were built in the district: this fell short of the recommended annual rate of provision by 26%. Between 2005 and 2011, 298 affordable homes were built in the district, 101 in 2011. At the start of 2013, 2300 residents in the district were on the waiting list for affordable housing: this figure has doubled since 1999.

In 2012, the average house price in the district was £209,071 and the average annual income was £26,225. The average house price to earnings was thus 8:1 in 2012, compared to 8.5:1 in 2009. The ratio of lower quartile house prices to earnings in 2012 was 7.88, higher than the county ratio of 6.

Likely future without the plan: If current trends continue, housing prices will increase although the ratio of house price to earnings not necessarily. The number of residents on the waiting list for affordable housing is likely to increase significantly.

3.2.5 Crime: All types of crime in the district are lower than the county rate. Crime figures for the district have fallen by half since 2002. Cinderford East is the area in the district with the highest deprivation figures for crime and disorder. In a perception of crime survey, 13% of residents said that they felt either a bit unsafe or very unsafe in their community after dark, and 10.4% said that they felt either a bit unsafe or very unsafe in their home at night.

3.2.6 Education: Educational attainment at both Key Stages 1 and 2 is lower in the district than the county. 12% of the working population (16 – 64 year olds) of the district has no qualifications, higher than both the county (8.3%) and national (10.8%) average. 26.8% of the working population of the district has a degree, significantly less than the county (36.6%) and national (32.7%) average.

3.2.7 Access and transport: As a rural community, the road distance of residents to many services acts as a barrier to their accessibility, with the outlying parishes being most affected. Redmarley has the poorest access to services via public transport. Of the district's services, the Minor Injury Unit and Further Education College are the least accessible via public transport. Within the district, access to

Stage A - Baseline Analysis 3

primary schools, petrol stations, convenience stores, public houses and cash points is quite good; GP surgeries and post offices is reasonable; but banks/building societies, supermarkets, dentists and job centres is not good.

The proportion of households in the district with no access to a car/van fell from 16% in 2001 to 14% in 2011, below the county and national averages. The proportion of households with two or more cars is above the county and national averages. Nearly 50% of the working population of the district travel to work by car, again higher than the county and national averages; and only 2% use public transport, much fewer than the national average of 11%. 4.9% of the working population work from home, more than the national average.

19.5% of the district's working population travel between 10 and 20km to their place of work, nearly 5% higher than the county and national average. 10% travel between 20 and 30km to their place of work, almost twice the county and national averages. 37% of the district's working population travel outside the distance to their place of work, whilst 12.6% of the Forest of Dean's working population travel from outside the district.

Likely future without the plan: If present trends continue, access to services is unlikely to improve significantly and (for instance in the case of public houses) may get significantly worse. Public transport provision and use are also unlikely to improve significantly. An increasing proportion of homes will own one or more cars, and out-commuting will continue.

3.2.8 Economic: The economic picture for the district has recently been updated ⁽⁹⁾. Overall the economic activity rate in the Forest of Dean District has increased over the time. The figure as of March 2013 stood at 82.6% which is higher than the South West average (78.8%) and the English average of 77.3%. This puts the district above some of the others within the South West region and certainly not in the bottom in England. However, this is not a direct indicator that the job market within the Forest of Dean is healthy as there is a historic trend of a high level of out-commuting to work in neighbouring authorities and even further afield.

3.2.9 The average employment rate for the South West Region (73.9%) is almost matched by that of the Forest of Dean District (73.7%) with only a 0.2% difference as of March 2013. The Forest of Dean's employment rate has dipped slightly below the South West regions average but there are no projections to show that this figure will fall further or rise again.

3.2.10 During 2009 the Forest of Dean district saw a spike in unemployment seeing it rise above Regional and English averages to a figure of almost 8% very quickly and then falling dramatically until a low point in 2011 (4.8%). In March 2013 the Forest of Dean saw a figure of 6.9% which is an increase since the trough in 2011. This unemployment figure is higher than the regions average but still significantly below the national average.

3 Stage A - Baseline Analysis

3.2.11 The economic inactivity rate represents those not accounted for in the Economic activity section above. The Forest of Dean District as of March 2013 had an economic inactivity rate of 17.4%. This is the lowest rate that the district has seen other than one downward spike to 15.5% in 2011. This is a significant improvement of the peak figure of 28.4% in 2009. Both the regional and English average Economic Inactivity Rates have had a fairly linear trend with few big changes. The South West region overall has a lower average than the English and the Forest of Dean District has gone from being above both averages to significantly below the average in 2013.

3.2.12 Cheltenham Borough Council has the highest job density locally at 1.03. This means that for the economically active population within the borough there are 1.03 jobs each. The Forest of Dean District has the lowest job density locally at 0.54 this results in higher unemployment levels and more out commuting.

3.2.13 The percentage of jobs falling within the Manufacturing industry is a much higher proportion in the Forest of Dean district (13.5%) than in the South West region (9.1%) and England (8.8%) as a whole. The Forest of Dean also has a slightly higher proportion of jobs within the Construction industry (9.5%), and the Agriculture, Forestry and Fishing Industry (2.5%). The last of these is accounted for by the large expanse of forestry within the district that is managed by the forestry commission who are a key employer for the district. All other industry categories are similar in proportions for all other geographies with little variation in the figures. If we break this down further into the Local Authorities within Gloucestershire useful comparisons and conclusions can be drawn about employment within the county.

3.2.14 Out of a total figure of almost 30,000 working people in the district, 15,524 people live and work within the Forest of Dean District. This represents over half of the working population. However, this also means that over 14,000 people who are working and are living within the Forest of Dean District are out-commuting to a place of work. Total new job requirement for the district is 4902. The CS proposes about 66 ha and which could offer 5742 (approx) jobs, at the midpoint of the density assumptions.

The average annual income of the Forest of Dean in 2012 was £26,225, slightly higher than the county figure of £25,539 and roughly equal to the national figure. The average annual income of Forest of Dean workplaces was £21,470, below the county figure (£24,918), indicating a tendency for residents to commute to other areas for higher paid work.

The percentage of new business start-ups in the district, at 7.8%, is lower than the county (8.9%) and national (10.4%) average. Business closures are broadly in line with county and national figures. The Forest of Dean is the district with the highest proportion of businesses in the county employing four or fewer people, at 76%; and the lowest proportion employing ten or more people, at 6.5%.

Likely future without the plan: Employment within the district is unlikely to change significantly in the future without the plan: employers are likely to remain small scale, manufacturing is likely to remain higher than the national average. With increasing broadband coverage, a greater proportion of the population may become self-employed and/or work from home.

Stage A - Baseline Analysis 3

3.2.15 Landscape, soil and geology: The total area of the district is 526 square Km, of which 85% is green space and 8% is surface water. There are two Areas of Outstanding Natural Beauty within the district; the Wye Valley and the Malvern Hills, to the North of Bromsberrow parish: these cover around 26 miles of the district.

The district has diverse landscape character, reflecting the variations in the underlying geology. In the west the steep sided gorge of the Wye transitions to the undulating limestone plateau, blending into the distinctive forest core. The Forest basin is defined to the east by dramatic ridges, giving way to rolling vales and flat riverine farmland. Most of the agricultural land is grade 3, good to moderate quality. Three sites within the district have been identified for limestone extraction: Stowe Hill and Slowfield are active and Drybrook is currently inactive.

There are 875 sites of potential contamination concern in the district, but no sites determined as definitely being contaminated. Potential contamination could be through naturally occurring elevated heavy metal concentrations, and localised areas of lead and Polycyclic Aromatic Hydrocarbon concentrations due to the district's industrial heritage. The Health Protection Agency considers the Forest of Dean District to be a 'radon affected area'. Radon is a naturally occurring gas which can cause lung cancer in humans. The agency has advised that excessive exposure should be reduced.

Likely future without the plan: Most of these aspects are unlikely to change in the absence of the plan. However the Core Strategy is for the development of new homes and business premises in and near the built-up areas of the district, which will lead to more built-up land.

3.2.16 Biodiversity: There are five sites of European nature conservation interest in the district, with several having multiple designations: Special Area of Conservation (SAC) for habitats and species, Special Protection Area (SPA) for birds, Ramsar wetland sites. These sites require particularly strong protection related to their qualifying features (the reasons why they have been designated). These European sites are assessed as being in favourable or unfavourable conditions. A summary of the sites is provided in table 3 below.

Table 3 European Nature Conservation sites

Site	Qualifying features (why it is designated)	Condition Assessment	Reasons for adverse conditions
		Favourable / Unfavourable	
River Wye SAC	<ul style="list-style-type: none"> • Water courses of plain to montane levels with the Ranunculus fluitans and Callitriche-Batrachion vegetation • Transition mires and quaking bogs (Wales only) • White-clawed (or Atlantic stream) crayfish • Sea lamprey • Brook lamprey • River lamprey • Twaite shad • Atlantic salmon • Bullhead • Allis shad • Otter 	<p>12.72% Favourable.</p> <p>87.28% Unfavourable Recovering.</p>	<p>Agriculture - fertiliser use.</p> <p>Invasive species, siltation.</p> <p>Water pollution</p>

3 Stage A - Baseline Analysis

Site	Qualifying features (why it is designated)	Condition Assessment	Reasons for adverse conditions
		Favourable / Unfavourable	
Wye Valley Woodlands SAC	<ul style="list-style-type: none"> Asperulo-Fagetum beech forests Tilio-Acerion forests of slopes screes and ravines Taxus baccata woods of the British Isles Lesser horseshoe bat 	<p>Astridge Wood – 100% favourable.</p> <p>Bigsweir wood: - 11.9% favourable; 88.10% unfavourable - no change.</p> <p>Highbury Wood 100% favourable.</p> <p>Lower Wye Gorge 100% favourable</p> <p>Shorn Cliff and Caswell Woods Condition 100% favourable.</p> <p>Swanpool and Furnance grove Condition unfavourable and declining 100%</p> <p>The Hudnalls 63.77% favourable. 36.23% unfavourable recovering.</p> <p>Upper Wye Gorge 37.44% favourable. 62.56% unfavourable recovering</p>	<p>The majority of the identified threat to condition status in these woodlands is from high levels of deer browsing.</p> <p>Some of the woodlands suffer from varying levels of invasive non-native species being present and the need to control these species has been identified.</p> <p>Some changes in management practices are identified as recommended in the woodlands such as changes to coppicing to increase open space and structural diversity</p>
Severn Estuary SAC	<ul style="list-style-type: none"> Estuaries Mudflats and sandflats not covered by seawater at low tide Atlantic salt meadows Sandbanks which are slightly covered by sea water all the time Reefs Sea lamprey River lamprey Twaite shad 	<p>Severn Estuary - 95.88% favourable</p> <p>0.08% Unfavourable – recovering</p> <p>2.43% Unfavourable – no change</p> <p>1.69% Unfavourable declining</p>	<p>Agricultural - undergrazing</p> <p>Agricultural – overgrazing</p> <p>Coastal – Coastal squeeze</p>
Seven Estuary SPA/Ramsar	<p>Over winter the area regularly supports Bewick Swan, Gadwall, Greater White-fronted Goose, Dunlin, Common Shelduck, Common Redshank, large populations of waterfowl</p>	<p>Upper Severn Estuary</p> <p>96.69% favourable</p> <p>3.31% unfavourable recovering</p>	<p>Public access/ disturbance</p>
Wye Valley and Forest of Dean Bat Sites SAC	<ul style="list-style-type: none"> Greater horseshoe bat Lesser horseshoe bat 	<p>All SSSI component sites recorded as Favourable</p>	-

Stage A - Baseline Analysis 3

Site	Qualifying features (why it is designated)	Condition Assessment	Reasons for adverse conditions
		Favourable / Unfavourable	
W a l m o r e C o m m o n SPA/Ramsar	• Over winter the area regularly supports Bewick Swan	Condition 100% unfavourable - No change. Adverse conditions reasons: <ul style="list-style-type: none"> • Undergrazing • Freshwater pollution – agricultural run-off Discharge (diffuse pollution and septic tanks)	Ditch features have elevated concentrations of nitrate and phosphate (exceeding the SSSI threshold of annual Total P 0.1mg/l). Also evidence of diffuse pollution and septic tanks within the catchment.

There are 47 Sites of Special Scientific Interest in the district. The condition of 3 SSSIs has improved to favourable status since 2010. A further 4 sites are in unfavourable recovering condition. However Longhope Hill SSSI, which was in favourable condition, has deteriorated to unfavourable declining due to lack of management, and a further 7 sites have deteriorated from favourable to unfavourable recovering. About 220 of Gloucestershire's 750 Key Wildlife Sites are in the Forest of Dean, covering around 6% of the district. Of these, 54% were being managed in 2013, up from 49% in 2012. The population of four Butterfly Priority Species is declining in the district. There are 66 regionally important geological sites.

Likely future without the plan: If present trends continue, biodiversity in the district is likely to get worse over time. The condition of SSSIs and other designated sites could be affected by increased development, both in the Forest of Dean and cumulatively with nearby districts. Funding constraints may affect the management of designated sites.

3.2.17 Heritage: There are 27 conservation areas in the district, covering 476 hectares. There are 1470 listed buildings, of which 7 are at extreme risk and a further 10 at risk. The historic environment includes 93 Ancient Monuments and Buildings of Special Architectural or Historic Interest.

3.2.18 Water: Water management in the district comes under the Severn River Basin Management Plan. Only 29% of the surface water within the overall Severn River area was at good status in 2009. Within the Severn Vale only 7% of surface waters were at good status. Water quality in the Leadon Vale, dominated by arable land, suffers from excessive quantities of silt and high levels of phosphate and nitrate. There are also further water quality problems associated with uncontrolled discharges from former mine workings. These are often acidic and contain metals and other harmful substances that can have significant ecological impacts. 35% of the surface waters within the Wye catchment were at good status.

3 Stage A - Baseline Analysis

Surface water availability for abstraction in the district is restricted. The Cinderford and Glynch brooks are over abstracted and groundwater is used to enhance low flows in the Glynch Brook during summer months. Low flows are thought to be adversely affecting fish populations, particularly spawning and nursery areas, in some parts of the area.

Ground water within the Severn River Basin District has an overall current status of 75% good. Within the Forest of Dean the two main aquifers are the Bromsberrow and Oxenhall North, historically the Bromsberrow unit has been over abstracted.

Within the district there is one Nitrate Vulnerable Zone, namely an area of land that drains into waters polluted by nitrates, affecting ecosystems or water quality. In 2012 there was 1 pollution incident of significant impact to water within the district; there were 5 such incidents in 2011.

Likely future without the plan: Water quality in the district will not achieve the Water Framework Directive target of all inland and coastal waters achieving at least 'good' condition by 2015. It is unclear whether water quality in the district will improve or get worse in time.

3.2.19 Air quality and climate change: Nitrogen dioxide exceeded air quality standards at 7 sites in 2012. These sites are located within an Air Quality Management Area in Lydney declared in 2010. Between 2005 and 2010, per capita CO₂ emissions in the district reduced from 8.6t to 8.0t; end user emissions decreased by 26% during that time. Industry and commercial uses accounted for 41% of CO₂ emissions in 2010, and domestic uses for 33%.

In 2012 there were 920 renewable energy projects in the district producing 3.05MW of electricity, compared with 0.03MW in 2009. In 2012 there were 118 renewable energy projects producing 2.1MW of heat, compared with 0.2MW in 2009.

Likely future without the plan: Climate change projections indicate that summers will be drier by 13-18% and winters wetter by 11-15%. Winter and spring precipitation could become more erratic. The worst case scenario indicates a mean sea level rise around the UK of 93-190cm by 2100. Areas within the district prone to flood risk remain unchanged: there are 156 homes in the floodplain, an estimated 373 residents. There are likely to be an increasing number of renewable energy projects in the district over time.

3.2.20 Waste: In 2009/10 residents of the Forest of Dean produced an average 570kg of waste per household, compared with 605kg average for Gloucestershire. It recycled 40% of its waste, compared to a county figure of 52%. In 2009/10 there were 237 reported incidents of fly tipping in the district, the lowest in Gloucestershire.

Stage A - Baseline Analysis 3

3.3 Stage A3: Identifying sustainability issues and problems

Stage A3 - Consider Key Sustainability Issues facing the District

SEA Directive Article 5 Annex I

(d) 'Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.'

3.3.1 The baseline data together with officer knowledge and consultation has been used to identify the key sustainability issues facing the district. These are outlined in the following tables (3,4 & 5) .

Table 4 Social Issues

Key Social Issues	
SO1	An Ageing population <ul style="list-style-type: none"> ● Increase in long term conditions and diseases ● Increase in residents living alone ● Decline in percentage of the working population (16-65 year olds)
SO2	High levels of obesity in children and adults <ul style="list-style-type: none"> ● Leading to high levels of diabetes
SO3	Deficit of housing <ul style="list-style-type: none"> ● Deficit of housing ● Deficit of affordable housing
SO4	Income versus average house price discrepancy <ul style="list-style-type: none"> ● The average house price in 2012 was 8 times higher than the average income
SO5	Poor access to services via public transport <ul style="list-style-type: none"> ● High reliance on cars for access to community services and facilities

Table 5 Economic Issues

Key Economic Issues	
EC1	High percentage of the population with no or low level qualifications <ul style="list-style-type: none"> ● Lower than average 5 A-C grade GCSEs ● Qualification gap between Key stage 2 and 4 increases

3 Stage A - Baseline Analysis

Key Economic Issues	
EC2	<p>High reliance on low skilled industry</p> <ul style="list-style-type: none"> ● Manufacturing is the 2nd largest industry in the district ● The percentage of workforce employed in professional occupations is lower than average ● Lower than average income for workplace ● Certain industries under represented e.g. ICT, Professional Scientific & Technical, Finance & Insurance, Accommodation & Food & Education
EC3	<p>Low Ratio of jobs to available workforce</p> <ul style="list-style-type: none"> ● 5 jobs available to every 10 workers ● High level of commuting out of district to work ● Higher level of commuting for professional, higher paid occupations
EC4	<p>Slow growth of business start ups</p> <ul style="list-style-type: none"> ● Higher level of businesses 10 years or older, lower level of new start ups ● High level of small businesses employing less than 4 people ● Low level of businesses employing more than 10 people

Table 6 Environmental Issues

Key Environmental Issues	
EN1	<p>Air quality decreasing in AQMA of Lydney</p> <ul style="list-style-type: none"> ● 7 sites exceeded the annual mean objective of 40µg/m in 2012
EN2	<p>Preservation of the high level of designations within district</p> <ul style="list-style-type: none"> ● 47 Sites of Special Scientific Interest, the condition of one is declining and a further 15 are unfavourable but recovering ● Approximately 220 Key Wildlife Sites, ● 2 Areas of Outstanding Natural Beauty ● There are five Natura 2000 Sites (SAC's, SPA's Ramsar)
EEN3	<p>Decline in Water Quality & Availability</p> <ul style="list-style-type: none"> ● High percentage water categorized as less than 'good' ● Over abstraction of some surface & ground water sites
EN4	<p>SA number of Sites of potential concern as a result of past industries within the district</p> <ul style="list-style-type: none"> ● High metal concentrations and Polycyclic Aromatic Hydrocarbons concentrations at certain sites ● Unstable land due to former mining industry
EN5	<p>Potential Impact of Climate change by 2050</p> <ul style="list-style-type: none"> ● Estimated annual increase in temperature of 2° degrees ● A Change in seasonal weather conditions, summers drier & winters wetter ● Increased flood risk due to mean sea level rise
EN6	<p>Population of 4 Priority Species of Butterfly in decline</p> <ul style="list-style-type: none"> ● 4 species identified as in decline

Stage A - Baseline Analysis 3

Key Environmental Issues	
EN7	Percentage of Waste generated being recycled <ul style="list-style-type: none"> • <i>Lower half of the recycling league for the South West</i>
EN8	Safeguarding of heritage assets <ul style="list-style-type: none"> • <i>High level of designations within the district</i>

3.4 Stage A4: Development of the SA Framework

Stage A4 - Set out an appropriate framework for the SA including SA objectives and indicators

SEA Directive Article 5 Annex I

(e) 'The environmental protection objectives, established at International, Community or Member state level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.'

3.4.1 The Table 7 'Sustainability Appraisal Framework' sets out the sustainability objectives, and criteria against which the AP can be assessed. These objectives and criteria are a natural progression from the identification of the sustainability issues within the district (Stage A3 above).

3 Stage A - Baseline Analysis

Table 7 Sustainability Appraisal Framework

Key Issue	Objective	Criteria	Indicator	Source
Objective 1				
SO1 An Ageing population.	1. To improve the health and well being of the population & reduce inequalities in health.	1a. Does the policy support healthy living? 1b. Does the policy minimise adverse effects to health e.g. road accidents, crime?	i Life expectancy.	Public Health England
SO2 High levels of obesity.			ii Prevalence of key illnesses.	
EN1 Air quality in AQMA decreasing.			iv Percentage of obese adults.	
Objective 2				
SO1 An Ageing population.	2. To meet local housing needs, by ensuring everyone has the opportunity to live in a decent, sustainably constructed & affordable home.	2a. Does the policy provide for a mix of housing types and sizes to meet the needs of different sections of the community? 2b. Does the policy support the provision of affordable housing?	i Housing completions per annum.	Annual Monitoring Report (AMR)
SO3 Deficit of housing.			ii Affordable housing completions per annum.	
SO4 Income v house price discrepancy.			iii Average house price v average income. iv Number of homes meeting the Code for Sustainable Homes Standard.	Housing Register
Objective 3				

Stage A - Baseline Analysis 3

Key Issue	Objective	Criteria	Indicator	Source
SO1 An Ageing population.	3. To provide accessible community services, recreation and leisure facilities.	3a. Does the policy support ease of access to key services; including education, health, retail and recreation?	i Average distance of population to key services.	Understanding Gloucestershire 2012
SO5 Poor access to services via public transport.		3b. Does the policy support the use of public transport to access key services?	ii Level of accessibility via public transport.	MAIDeN
		3c Does the policy help to reduce dependence on the car?		
Objective 4				
EC1 Low level of qualifications.	4. To facilitate the development of academic and vocational skills.	4a. Does the policy provide improved access to educational facilities?	i Percentage of population within 30 minutes via public transport to a primary & secondary school.	Understanding Gloucestershire 2012
EC2 High reliance on low skilled industry.			ii % of 5 A-C GCSE's or equivalent.	Office for National Statistics (ONS)
EC3 Ratio of jobs to workforce.				
Objective 5				

3 Stage A - Baseline Analysis

Key Issue	Objective	Criteria	Indicator	Source
EC1 Low level of qualifications.	5. To create a more vibrant & sustainable local economy.	5a. Will the policy encourage an increase in the range of employment opportunities?	i Employment by occupation.	ONS
EC2 High reliance on low skilled industry.		5b. Does the policy support opportunities for higher paid & professional employment?	ii Median Annual Gross Full time pay.	
EC3 Ratio of jobs to workforce.				
EC4 Slow growth in business start ups.			iii Level of out commuting.	
Objective 6				
EN2 Preservation of designated sites.	6. To protect & enhance the landscape and conserve soil quality	6a. Does the policy protect & enhance the landscape including the countryside, areas of landscape value, river valleys and green space?	i Area of landscape protected by local landscape designations.	Mapping System FoDDC
EN4 Sites of potential concern.		6b. Does the policy promote access to areas of landscape value?		
		6c. Does the policy promote high quality design in keeping with the character of the area?		
		6d. Does the policy protect good quality agricultural land?		

Stage A - Baseline Analysis 3

Key Issue	Objective	Criteria	Indicator	Source
Objective 7				
EN2 Preservation of designated sites.	7. To conserve & enhance biodiversity, flora & fauna.	7a. Does the policy support no net loss to biodiversity?	i Number of designated sites.	Mapping System FoDDC
EN6 Population of 4 Butterfly species in decline.		7b. Does it contribute to the protection of designated areas?	ii Condition of SSSI's.	Natural England
		7c. Does the policy strengthen connectivity between wildlife habitats?	iii Population of 4 BAP Butterfly species.	Butterfly conservation 2007
Objective 8				
EN1 Air quality decreasing in AQMA in Lydney.	8. To maintain & improve air quality.	8a. Does the policy provide opportunities to travel via public transport? Is the policy likely to improve congestion?	i Monitoring of Air Quality in AQMA.	FoDDC
Objective 9				
EN3 Water quality and availability	9. To maintain and improve water quality and to achieve	9a. Does the policy seek to conserve water resources and increase water efficiency?	i Surface water & Groundwater status.	Water Framework Directive

3 Stage A - Baseline Analysis

Key Issue	Objective	Criteria	Indicator	Source
	<i>sustainable water resources management.</i>	9b. Does the policy seek to improve the water quality of rivers, lakes and ground waters?		Environment Agency
Objective 10				
EN1 Air quality decreasing in AQMA in Lydney.	10. To reduce emissions of greenhouse gases that cause climate change.	10a. Does the policy support energy conservation and energy efficient design?	i Annual emissions of greenhouse gases.	FoDDC
EN5 Impact of Climate Change.		10b. Does the policy reduce vulnerability of the built environment to the effects of climate change (e.g. flooding, extreme events)?	ii. Average household energy consumption.	ONS
Objective 11				
EN7 Waste generation.	11. To reduce waste generation and achieve sustainable management of waste.	11a. Does the policy support opportunities to reduce waste to landfill?	i Kg of household waste per head.	Dept of Energy & Climate Change
			ii % Waste recycled.	
			iii % Waste composted.	
Objective 12				

Stage A - Baseline Analysis 3

<i>Key Issue</i>	<i>Objective</i>	<i>Criteria</i>	<i>Indicator</i>	<i>Source</i>
EN2 Preservation of designated sites.	12. <i>Maintain and enhance cultural and historic assets</i>	12a. Does the policy support the protection of culturally significant assets and qualities. Not just designated sites and buildings, but also non-designated such as locally valued features and landmarks	Number of listed buildings and scheduled ancient monuments	English Heritage & Sites and monuments record

3 Stage A - Baseline Analysis

3.5 Stage A5: Consulting on the scope of the SA

Consulting on the scope of the SA

SEA Directive Article 5(4)

'The authorities referred to in Article 6 (3) (Member states shall designate the authorities to be consulted) shall be consulted when deciding on the scope and level of detail of the information which must be included in the environmental report.'

3.5.1 Government guidance requires that a Scoping Report; covering stages A1 - A4, is produced in order that the statutory consultees English Heritage, the Environment Agency and Natural England have an opportunity to comment. A five week consultation period was undertaken during April to May 2013. The report of the stakeholder comments is contained within Appendix 5. In addition to these statutory consultees, Gloucestershire County Council were also consulted.

3.5.2 English Heritage were initially concerned about data in relation to the historic environment. Following discussion they were satisfied that the scope of the SA included sufficient information including ancient monuments, listed buildings and conservation areas.

3.5.3 The Environment Agency did not comment on the scoping report.

3.5.4 Natural England made observations about the need to undertake Habitats Regulations Assessment, consider the conservation objectives of designated sites and include wildlife sites close to, but outside of, the district.

3.5.5 Gloucestershire County Council provided environmental data /amendments in a number of areas.

3.5.6 Following the pre publication consultation stage (Summer 2014) an additional objective (12) was added considering the safeguarding of cultural and historic assets.

Stage B - Option Assessment 4

4 Stage B - Option Assessment

SEA Directive Article 5 Annex 1

(e) *'The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.'*

(f) *'The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the inter-relationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects).'*

(g) *'The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.'*

(h) *'An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.'*

(i) *'A description of measures envisaged concerning monitoring in accordance with Article 10.'*

4.0.1 This stage the SA identifies a variety of options open to the AP; appraises these options; and explains the choice of preferred options. It then assesses the impacts of the preferred options (the draft plan) in more detail, and proposes measures to minimise any significant negative impacts.

4.1 Stage B1: Testing the Allocations Plan objectives against the framework

Testing the SA objectives

4.1.1 The AP is required to be in conformity with the Core Strategy taking into account of new information since the CS's adoption. The AP outlines specific allocations and policies to deliver the Forest of Dean District Core Strategy, and therefore its objectives were considered to be the same as those of the Core Strategy shown at Section 1.

4 Stage B - Option Assessment

4.1.2 It is important to identify where the AP and SA objectives are compatible with each other and where there are possible conflicts in order to prioritise when conflicts arise. These priorities then help with predicting the effects of the AP. It must be remembered that there will be conflict areas. Conflict areas should not be seen as negative, they are inevitable in the balance which is sustainable development. It is the combined effects of the objectives that should aim to achieve sustainable development. Where a balance between impacts needs to be struck it is expected that the priorities for development, as set out in the National Planning Policy Framework, would outweigh any environmental impact, provided that such an impact was not to a significant extent.

4.1.3 The table in Appendix 4 compares the SA objectives against each other and SA objectives against CS objectives; identifying areas of potential conflict. Development was also seen to generally have a negative impact on mineral use due to the increased use of resources. CS and SA objectives were generally compatible. This was not surprising as both set of objectives start from the principles of sustainable development. It was notable that CS objectives did not address waste reduction although the CS objectives were not seen as being contrary to waste reduction (neutral).

4.2 Stage B2: Developing the Allocations Plan options

Strategic Options

4.2.1 As set out previously the AP is required to be in conformity with the Core Strategy. Realistically there are therefore very limited options. The adopted option of the Core Strategy was to identify a new portfolio of sites based on the overall settlement hierarchy for the District. The Core Strategy policies identify general principles policies (CSP 1,2,3,7,8,9) and identify the quantum of new development and strategic locations through policies CSP4,5,6 and the settlement policies.

Only two strategic options therefore realistically exist.

No Allocations Plan (business as usual)

In this option there is no AP. National Policy, the Core Strategy and the 2005 Local plan are the reference points for planning policy. In this scenario it is considered that the allocations within the 2005 Local plan would soon be considered out of date. They would not meet the requirements of National policy and not demonstrate a sufficient supply of land for housing or employment uses. The outcome of this option is considered to be a scattered one with the national policy requirements outweighing outdated local policies leading to development patterns without a cohesive strategic approach to the needs or resources of the area.

Core Strategy Settlement Hierarchy

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Follow the strategic policies set out in the Core Strategy and the distribution of development as set out in the settlement and hierarchy policies (CSP 4,5,6 and the settlement policies). These policies focus the greatest level of change in the four towns followed by 'major villages'. A limited level of change is expected in 'group' or 'service villages' and very limited in small villages and outside settlement boundaries.

Preferred Strategic Option

4.2.2 Taking account of the required relationship between the Core Strategy and the AP, not surprisingly, the preferred strategic option is to follow the settlement strategy as set out in the Core Strategy. Therefore the AP considers sites for employment and housing allocations.

Site Options - Employment

A study of 2011⁽¹⁰⁾ suggested that 5039 new jobs would need to be accommodated in the district. This assumed that the dwelling requirement from 2009/10 to 2026 is 5162; 2.2 persons would live in each new home on average; 72.2% of these would be of working age; and 70% of the working age population would be employed. The study suggested that 5039 new jobs would require between 50 and 67 hectares of land, although it noted that some of these jobs (for instance agricultural jobs) would not require employment land. The study also showed that there is a case for creating 9000 new jobs in the district, to reduce the need for residents to commute out of the district: this would require roughly 92 hectare of land.

The study noted that that the Core Strategy aims to re-affirm allocations that already exist and provide new sites. The study listed accessible employment sites totalling about 61ha, with the potential to provide about 5307 jobs.

Site Options - Housing

4.2.3 The Forest of Dean Core Strategy has a requirement of 6200 new dwellings between 2006 and 2026. In the period of 2006 – 2013, 1761 dwellings were completed leaving a balance of 4439 to find. Were completions to be evenly spread over the entire plan period (the likely delivery pattern of major sites makes this unlikely), then 2170 completions would have been expected by the end of 2012/13. The 1761 recorded is about 19% below this figure.

Site Assessment Process

4.2.4 The sites were assessed and compared using a four stage methodology:

Stage 1 - Site Size and Planning Status

Proposed sites of 0.16ha or smaller were excluded from the assessment as these were considered too small to become allocations (Appendix 6). Other sites were excluded because they had already been granted planning permission. Appendix 6 explains why they were excluded.

10 [Keynote - Economy - Land for Employment](#)

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Stage 2 - Site Appraisals

The remaining sites were subject to site based assessments based on the criteria of Table 9, prior to the pre-publication draft of the plan. The results are shown at Appendix 7 and summarised against the SA objectives in appendix 10. The assessment was undertaken by officers of the Council with local knowledge and subject to peer review.

For individual sites, several SA objectives were not felt to be appropriate and were thus removed from the framework. All sites meet either housing needs (objective 2) or aim to support the local economy (objective 5). Provision of housing and employment sites would have minimal effect on academic/vocational skills (objective 4). Historic assets connections were considered within the designations topic of the site assessments, where historic assets were specifically considered important it was identified in the site assessment summary. These were then used to inform the assessment summary tables in relation to objective 12 (Historical and cultural assets). Air quality (objective 10) was felt to be covered by the criteria of accessibility: for instance the distance of the site to the nearest settlement gives an indication of car use and thus emissions from vehicles. All housing sites were felt to have similar effects on waste generation and management (objective 11).

Stage 3 - Fit with Core Strategy

With the knowledge of the site based appraisal, sites were considered as to their fit with the strategic locations for development as set out in Core Strategy (Appendix 8). This included the size of the site compared to the existing settlement; whether the site was in an Important Open Area, a strategic gap or the countryside, or would otherwise lead to ribbon development; whether the site would affect designated sites such as a wildlife site, conservation area or Landscape Protection Area; whether the site would be visually prominent; and whether the site would result in the loss of community assets. Generic design, environmental and appearance type policies were excluded from the criteria on the basis that they had either already been assessed or, for example, in the case of design could be applied uniformly across all the sites.

Stage 4 - Settlement Hierarchy Assessment

Finally sites were grouped by settlement, and their cumulative and synergistic impacts were appraised and also considered in relation to settlements (Appendix 9). This was in order to consider the overall impact of a number of sites in relation to settlements and the relationship to the Core Strategy. Where appropriate, mitigation measures to counteract negative effects were recommended.

4.2.5 When assessments were undertaken

4.2.6 Developing the AP and the SA has been an iterative process and therefore potential sites and policies have been evaluated at different stages. To avoid repartition, sites or policies subject to assessment early in the plans development,

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sites initially evaluated following a 'call for sites', are contained within Appendices 7 & 10. Those which were subsequently carried forward, into the plan have not been reassessed, as such their assessments have been carried forward. Policies and sites which came forward at later stages of the plan's development have been evaluated (Appendix 11). The location of the assessments for the spring 2015 version of the AP is summarised in Appendix 13.

4.2.7 Sites and District wide policies

4.2.8 Because much more detailed information is available for the sites proposed in the AP than for the AP's more general policies, two appraisal processes, using common objectives, were utilised. The assessment criteria for policies is set out in table 8 below with the assessment in Appendix 11.

Table 8 Sustainability Framework for the AP policies

SA objective	Criteria
1. To improve the health and wellbeing of the population and reduce inequalities in health	Does the policy support healthy living?
	Does the policy minimise adverse effects to health, e.g. road accidents, crime?
2. To meet local housing needs, by ensuring everyone has the opportunity to live in a decent, sustainably constructed and affordable home	Does the policy provide for a mix of housing types and sizes to meet the needs of different sections of the community?
	Does the policy support the provision of affordable housing?
3. To provide accessible community services, recreation and leisure facilities	Does the policy support ease of access to key services, including education, health, retail and recreation?
	Does the policy support the use of public transport to access key services?
	Does the policy help to reduce dependence on the car?
4. To facilitate the development of academic and vocational skills	Does the policy provide improved access to educational facilities?
5. To create a more vibrant and sustainable local economy	Will the policy encourage an increase in the range of employment opportunities?
	Does the policy support opportunities for higher paid and professional employment?

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SA objective	Criteria
6. To protect and enhance the landscape and conserve soil quality	Does the policy protect and enhance the landscape including the countryside, areas of landscape value, river valleys and green space?
	Does the policy provide access to areas of landscape value?
	Does the policy promote high quality design in keeping with the character of the area?
	Does the policy protect good quality agricultural land?
7. To conserve and enhance biodiversity, flora and fauna	Does the policy support no net loss to biodiversity?
	Does the policy contribute to the protection of designated areas?
	Does the policy strengthen connectivity between wildlife habitats?
8. To maintain and improve air quality	Does the policy provide opportunities to travel by public transport?
	Does the policy reduce congestion?
9. To maintain and improve water quality and achieve sustainable water resources management	Does the policy seek to conserve water resources and increase water efficiency?
	Does the policy seek to improve the water quality of rivers, lakes and ground water?
10. To reduce emissions of greenhouse gases that cause climate change, and reduce vulnerability to flooding	Does the policy support energy conservation and energy efficient design?
	Does the policy reduce vulnerability of the built environment to the effects of climate change (e.g. flooding, extreme events)?
11. To reduce waste generation and achieve sustainable management of waste	Does the policy support opportunities to reduce waste going to landfill?
	Does the policy reduce waste generation and achieve sustainable management of waste?
12. To maintain and enhance cultural and historical assets	Does the policy maintain and enhance cultural and historical assets?

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Table 9 Sustainability Framework for the AP sites

SA objective	Criteria
1. To improve the health and wellbeing of the population and reduce inequalities in health	<p>Highway access</p> <ul style="list-style-type: none"> Public right of way/bridleway <p>Access to health services</p>
3. To provide accessible community services, recreation and leisure facilities	<p>Proximity to settlement boundary</p> <p>Size of settlement</p> <p>Distance to key services</p> <ul style="list-style-type: none"> Number of services within 800m <p>Access to public transport</p> <p>Pedestrian access</p> <p>Access to classified road</p>
4. To facilitate the development of academic and vocational skills	<p>Distance to educational facilities</p>
5. To create a more vibrant and sustainable local economy	<p>Current land use</p> <p>Agricultural land</p>
6. To protect and enhance the landscape and conserve soil quality	<p>Site status & Landscape impact</p> <ul style="list-style-type: none"> Area of Outstanding Natural Beauty Protected Open Space Brownfield/greenfield Agricultural and quality Potential contamination Land use (arable, grazing etc.) Topography (elevated, level) Tree Preservation Orders
7. To conserve and enhance biodiversity, flora and fauna	<p>Designations</p> <ul style="list-style-type: none"> Site of Special Scientific Interest European designated site Tree preservation orders Ancient Woodland Protected Hedgerows Key Wildlife Site
8. To maintain and improve air quality	<p>Site affecting an AQMA</p>

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SA objective	Criteria
9. To maintain and improve water quality and achieve sustainable water resources management	Water quantity/quality Proximity to watercourses / water bodies
10. To reduce emissions of greenhouse gases that cause climate change, and reduce vulnerability to flooding	Flood risk zone Drainage capacity
12. To maintain and enhance cultural and historical assets	Designations <ul style="list-style-type: none"> ● Listed Building ● Scheduled Ancient Monuments

4.3 Stage B3: Predicting the effects of the Allocations Plan

Predicting the effects of the Allocations Plan

4.3.1 From the over 200 sites evaluated, 83 site policies and 17 District/General Town policies were selected to form the AP. Table 10 summarises the impacts of the District/General policies. The detailed appraisals are shown at appendix 11. Table 11 summarises the impacts of the site allocations. The site appraisals are shown in more detail at Appendices 7, 9 and 11 (See assessment process 4.2.6). Table 12 summarises the overall impacts of the AP, based on Tables 10 and 11.

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Table 10 District and Town General policies - Summary Table

Policy Number	Objective/Effects											
	1. To improve the health and well being of the populations and reduce inequalities in health	2. To meet local housing needs, by ensuring everyone has the opportunity to live in a decent sustainably constructed and affordable home.	3. To provide accessible community services, recreation and leisure facilities.	4. To facilitate the development of academic and vocational skills.	5. To create a more vibrant and sustainable local economy.	6. To protect and enhance the landscape	7. To conserve and enhance biodiversity, flora and fauna.	8. To maintain and improve air quality.	9. To maintain and improve water quality and to achieve sustainable water resources management.	10. To reduce emissions of greenhouse gases that cause climate change.	11. To reduce waste generation and achieve sustainable management of waste.	12. To safeguard historical and cultural assets.
AP 1 Sustainable Development	+	+	+	0	+	+	+	0	+	+	0	0
AP 2 Renewable Energy	0	0	0	0	+	-	+	+	+	0	-	-
AP 3 Mixed Uses and Proximity	0	+	0	0	+	-	0	0	+	0	0	0
AP 4 Design of Development	0	0	0	0	0	+	+	+	+	+	+	+
AP 5 Style and Materials	+	0	0	0	0	+	0	0	0	0	0	+
AP 6 Locally Distinctive Areas	0	0	0	0	+	+	0	0	0	0	0	+
AP 7 Biodiversity	+	-	0	0	0	+	0	+	0	0	0	0
AP 8 Green Infrastructure	+	0	+	0	0	+	+	+	0	0	0	0
AP 26 Additional Cycle Connections	+	0	+	0	+	-	+	+	0	0	0	0
AP 30 Cinderford Town Centre	0	-	+	0	+	0	0	0	0	0	0	0
AP 31 Environmental Improvement Area Cinderford Town Centre	0	0	+	0	+	0	0	0	0	0	0	0
AP 38 Lydney Town Centre	+	0	+	0	+	0	+	0	0	0	0	0
AP 39 Lydney Town Centre, Retail and mixed use including Public Space	+	+	+	0	+	0	0	+	0	0	0	0
AP 41 Lydney Town Centre Highway Improvements	+	0	+	0	+	0	+	0	0	0	0	0
AP 54 Coleford Town Centre	0	+	+	0	+	0	0	0	0	0	0	+
AP 64 Coleford - Locally Valued Landscape	0	-	0	0	0	+	+	0	0	0	0	+

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Policy Number	Objective/Effects											
	1. To improve the health and well being of the populations and reduce inequalities in health	2. To meet local housing needs, by ensuring everyone has the opportunity to live in a decent sustainably constructed and affordable home.	3. To provide accessible community services, recreation and leisure facilities.	4. To facilitate the development of academic and vocational skills.	5. To create a more vibrant and sustainable local economy.	6. To protect and enhance the landscape	7. To conserve and enhance biodiversity, flora and fauna.	8. To maintain and improve air quality.	9. To maintain and improve water quality and to achieve sustainable water resources management.	10. To reduce emissions of greenhouse gases that cause climate change.	11. To reduce waste generation and achieve sustainable management of waste.	12. To safeguard historical and cultural assets.
AP 65 Newent Town Centre: Environment and Uses	0	+	+	0	+	0	0	0	0	0	0	+

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Table 11 Sites assessed and going forward into the AP

AP	Site	Sustainability Objectives											
		1. To improve the health and well being of the populations and reduce inequalities in health.	2. To meet local housing needs, by ensuring everyone has the opportunity to live in a decent constructed and affordable home.	3. To provide accessible community services, recreation and leisure facilities.	4. To facilitate the development of academic and vocational skills.	5. To create a more vibrant and sustainable local economy.	6. To protect and enhance the landscape.	7. To conserve and enhance biodiversity, flora and fauna.	8. To maintain and improve air quality.	9. To maintain and improve water quality and to achieve sustainable water resources management.	10. To reduce emissions of greenhouse gases that cause climate change.	11. To reduce waste generation and achieve sustainable management of waste.	12. To safeguard Historical and Cultural Assets
9	Herefordshire and Gloucestershire Canal	+	-	+	0	+	+	0	+	0	+	0	+
10	Dean Forest Railway	0	0	+	0	+	0	0	0	0	0	0	+
11	Transport Yards near Blakeney - Caircant and Dene Close near Blakeney	0	+	0	0	+	-	0	0	0	0	0	0
12	Stone End Farm, Churcham	0	0	0	0	+	-	0	0	0	0	0	0
13	Hartpury College	+	0	+	+	+	+	0	0	0	0	0	+
14	Locally Valued Landscape May Hill	0	-	0	0	0	+	0	0	0	0	0	+
15	Oak Tree Park, Churcham	+	+	0	0	0	-	0	0	0	0	0	0
16	Woodlands Farm, Bromsberrow Heath	+	+	0	0	0	0	0	0	0	-	0	0
17	Land at Stowfield, Lydbrook Policy to enable redevelopment for a variety of uses	0	+	+	0	+	+	0	0	-	0	0	+
18	Taurus Crafts near Lydney	0	0	+	0	+	0	0	0	0	0	0	0
19	Aylburton Business Park	0	0	0	0	+	-	0	0	0	0	0	0

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AP	Site Address	Sustainability Objectives										
		1. To improve the health and well being of the populations and reduce inequalities in health.	2. To meet local housing needs, by ensuring everyone has the opportunity to live in a decent sustainably constructed and affordable home.	3. To provide accessible community services, recreation and leisure facilities.	4. To facilitate the development of academic and vocational skills.	5. To create a more vibrant and sustainable local economy.	6. To protect and enhance the landscape.	7. To conserve and enhance biodiversity, flora and fauna.	8. To maintain and improve air quality.	9. To maintain and improve water quality and to achieve sustainable water resources management.	10. To reduce emissions of greenhouse gases that cause climate change.	11. To reduce waste generation and achieve sustainable management of waste.
20	Former Lightmoor Colliery, near Cinderford	0	0	+	0	+	0	0	0	0	0	+
21	Staunton Court	0	0	0	0	+	0	0	0	0	0	+
22	The Hawthorns, Corse	0	0	0	0	+	0	0	0	0	0	+
23	National Diving and Activity Centre, Tidenham	0	0	+	0	+	0	0	+	+	0	0
24	Cannop Depot	0	0	+	0	+	0	0	0	0	0	+
25	Whitehead Park	0	0	+	0	+	0	0	0	0	0	0
27	Lydney to Parkend Cycle Route	+	0	+	0	+	0	+	0	0	0	0
28	Christchurch/Berry Hill Cycle Route	+	0	+	0	+	0	+	0	0	0	0
29	Wye Valley	+	0	+	0	+	0	0	+	+	0	+
32	24 High Street, Cinderford and related area	0	-	+	0	+	0	+	0	0	0	0
33	Station Street, Cinderford Housing Allocation	+	+	+	0	+	-	+	0	0	0	0
34	Cinderford Football Club,	+	+	+	0	0	+	+	0	0	0	0

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AP	Site Address	Sustainability Objectives											
		1. To improve the health and well being of the populations and reduce inequalities in health.	2. To meet local housing needs, by ensuring everyone has the opportunity to live in a decent sustainably constructed and affordable home.	3. To provide accessible community services, recreation and leisure facilities.	4. To facilitate the development of academic and vocational skills.	5. To create a more vibrant and sustainable local economy.	6. To protect and enhance the landscape.	7. To conserve and enhance biodiversity, flora and fauna.	8. To maintain and improve air quality.	9. To maintain and improve water quality and to achieve sustainable water resources management.	10. To reduce emissions of greenhouse gases that cause climate change.	11. To reduce waste generation and achieve sustainable management of waste.	12. To safeguard Historical and Cultural Assets
35	Forest Vale, Cinderford - Employment Area	+	-	+	0	+	+	+	0	0	0	0	
36	Valley Road, Cinderford	+	+	+	0	0	-	+	0	0	0	0	
37	Linear Park, Cinderford	+	-	+	0	+	+	0	0	+	0	0	
40	Hill Street, Lydney	0	+	+	0	+	0	-	0	0	0	0	
42	Lydney Harbour	+	0	+	+	+	0	0	+	0	0	+	
43	Pine End Works and Land to the North	0	-	-	0	+	-	0	0	0	0	0	
44	Lydney Industrial Estate	0	-	-	0	+	-	0	0	0	0	0	
45	Lakes South of the Mainline Railway	+	-	+	0	+	+	+	0	0	0	0	
46	Lydney Harbour Area - Cycling and Walking	+	0	+	0	0	0	+	0	+	0	0	
47	Land east of Lydney	0	+	0	0	+	-	-	0	0	0	0	
48	Employment Uses including Foundry Site	+	+	+	+	+	-	-	0	0	0	0	
49	Mead Lane, Lydney	0	0	0	0	+	-	-	0	0	0	0	
50	Mead Lane Existing Employment Area	0	0	0	0	+	0	-	0	0	0	0	
51	Railway Station Area, Lydney	+	+	+	+	+	0	0	+	+	0	+	

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AP	Site Address	Sustainability Objectives										
		1. To improve the health and well being of the populations and reduce inequalities in health.	2. To meet local housing needs, by ensuring everyone has the opportunity to live in a decent sustainably constructed and affordable home.	3. To provide accessible community services, recreation and leisure facilities.	4. To facilitate the development of academic and vocational skills.	5. To create a more vibrant and sustainable local economy.	6. To protect and enhance the landscape.	7. To conserve and enhance biodiversity, flora and fauna.	8. To maintain and improve air quality.	9. To maintain and improve water quality and to achieve sustainable water resources management.	10. To reduce emissions of greenhouse gases that cause climate change.	11. To reduce waste generation and achieve sustainable management of waste.
52	Land North of the Mainline Railway	+	-	+	0	0	0	+	0	+	0	0
53	Holms Farm - Housing Site	0	-	+	0	+	0	0	0	0	0	0
55	Lawstone House	+	+	+	0	+	+	+	0	0	0	0
56	Former Courts and Police Station	+	+	+	0	0	0	+	0	0	0	0
57	King's Head Public House	+	+	+	0	+	+	+	0	0	0	+
58	Land at Berry Hill	0	+	0	+	+	+	0	0	0	0	0
59	Land Adjoining Sunbury Factory, Coleford	+	-	+	+	+	0	0	0	-	0	0
60	Tufthorn Avenue and Pingry Farm Employment Sites	+	-	+	0	+	+	0	0	0	0	0
61	Slaunton Road Coleford Employment/Hotel Site	0	-	-	0	+	-	0	0	-	0	0
62	Land At Poolway Farm, Coleford	0	+	0	0	0	-	0	0	0	0	0
63	Former Bells Field - Recreation Allocation	+	-	+	0	+	+	+	0	0	0	+
66	Newent Town Centre Mixed Development Allocation	+	+	+	0	+	0	+	0	0	0	+
67	Community Centre; Lewall Street	+	-	+	+	0	-	+	0	0	0	0

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AP	Site Address	Sustainability Objectives										
		1. To improve the health and well being of the populations and reduce inequalities in health.	2. To meet local housing needs, by ensuring everyone has the opportunity to live in a decent sustainably constructed and affordable home.	3. To provide accessible community services, recreation and leisure facilities.	4. To facilitate the development of academic and vocational skills.	5. To create a more vibrant and sustainable local economy.	6. To protect and enhance the landscape.	7. To conserve and enhance biodiversity, flora and fauna.	8. To maintain and improve air quality.	9. To maintain and improve water quality and to achieve sustainable water resources management.	10. To reduce emissions of greenhouse gases that cause climate change.	11. To reduce waste generation and achieve sustainable management of waste.
68	Watery Lane, Newent	+	+	+	0	+	0	+	0	0	0	0
69	Southend Lane Newent	0	+	0	0	-	0	0	0	-	0	0
70	Foley Road, Newent	0	+	0	0	0	0	+	0	+	0	0
71	Gloucester Road, Newent	0	0	0	0	+	0	0	0	0	0	0
72	Ross Road, Newent	+	+	+	0	0	0	+	0	0	0	0
73	Extra Care Accommodation, Cleeve Mill Lane	+	+	0	0	0	0	+	0	0	0	0
74	Recreation Area Foley Road	+	-	+	0	+	0	0	+	+	0	0
75	New Road and High Street, Bream	+	+	+	0	0	0	+	0	0	0	0
76	Land Off Ryelands Road, Bream	+	+	+	0	0	0	+	0	0	0	0
77	High Street, Drybrook	0	+	+	0	-	0	+	0	0	0	0
78	Drybrook Farm	0	+	0	0	0	0	0	0	0	0	0
79	Land off Church Road, Longhope	+	+	+	0	0	0	0	0	0	0	0
80	Transport Depot A4136	0	0	0	0	-	0	+	0	0	0	0
81	Longhope Industrial Estate	0	+	+	0	0	0	+	0	0	0	+

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Site		Sustainability Objectives											
AP	Site Address	1. To improve the health and well being of the populations and reduce inequalities in health.	2. To meet local housing needs, by ensuring everyone has the opportunity to live in a decent sustainably constructed and affordable home.	3. To provide accessible community services, recreation and leisure facilities.	4. To facilitate the development of academic and vocational skills.	5. To create a more vibrant and sustainable local economy.	6. To protect and enhance the landscape.	7. To conserve and enhance biodiversity, flora and fauna.	8. To maintain and improve air quality.	9. To maintain and improve water quality and to achieve sustainable water resources management.	10. To reduce emissions of greenhouse gases that cause climate change.	11. To reduce waste generation and achieve sustainable management of waste.	12. To safeguard Historical and Cultural Assets
82	Former Timplat Works, Lydbrook	0	+	0	0	0	0	0	0	0	0	0	0
83	Former Severn and Wye Railway	+	0	+	0	0	-	0	0	+	0	0	+
84	Land off Bradley Court Road (Vantage Point) Mitcheldean	0	+	0	0	-	0	0	0	0	0	0	0
85	Old Coach Depot, Mitcheldean - Housing Allocation	+	+	+	0	0	+	+	0	0	0	0	+
86	Former George Hotel, Mitcheldean - Housing Allocation	+	+	+	0	0	+	+	0	0	0	0	+
87	Employment Intensification/Retention, Vantage Point, Mitcheldean	0	0	+	+	+	0	0	0	0	0	0	0
88	High Street, Newnham on Severn - additional conservation policy	0	-	0	0	0	0	0	0	0	0	0	+
89	The Victoria Hotel, Newnham on Severn and land adjoining	+	+	+	0	0	+	+	0	0	0	0	+
90	Land North of Newnham on Severn and adjoining Unlawwater Lane	0	+	0	0	0	+	+	0	0	0	0	0

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AP	Site Address	Sustainability Objectives												
		1. To improve the health and well being of the populations and reduce inequalities in health.	2. To meet local housing needs, by ensuring everyone has the opportunity to live in a decent sustainably constructed and affordable home.	3. To provide accessible community services, recreation and leisure facilities.	4. To facilitate the development of academic and vocational skills.	5. To create a more vibrant and sustainable local economy.	6. To protect and enhance the landscape.	7. To conserve and enhance biodiversity, flora and fauna.	8. To maintain and improve air quality.	9. To maintain and improve water quality and to achieve sustainable water resources management.	10. To reduce emissions of greenhouse gases that cause climate change.	11. To reduce waste generation and achieve sustainable management of waste.	12. To safeguard Historical and Cultural Assets	
91	Land adjoining A48 and Bigstone Meadow, Tutshill	+	+	+	0	0	+	-	+	0	0	0	0	0
92	Land adjacent WyeDean School, Sedbury	+	+	+	0	0	+	0	+	0	0	0	0	0
93	Land adjoining Miners Arms, Sling - Housing Allocation	+	+	+	0	0	+	0	-	0	0	0	0	0
94	New Dumm Business Park	0	+	0	0	+	0	0	0	0	0	0	0	0
95	Housing Allocation off Gloucester Road, Staunton	0	+	+	0	0	+	+	0	0	0	0	0	0
96	Locally Valued Landscape- Staunton and Corse	0	-	0	0	0	+	0	+	0	0	0	0	+
97	Lydney Road, Whitecroft	0	0	0	0	+	0	0	0	0	0	0	0	0
98	Whitecroft Scovill	+	+	+	0	+	0	+	-	0	0	0	0	0
99	Housing Site Ash Way	0	+	+	0	0	+	+	0	0	0	0	0	0
100	Netherend Farm, Woolaston	0	+	0	0	0	0	-	0	0	0	0	0	0

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4.3.2 Key positive impacts are likely to be on health and well being of populations in the district due to policies for improved access and recreation; provision of more homes as a result of the housing allocations; accessibility due to the locations of allocations and key individual sites promoting recreation, leisure and tourism; increased employment opportunities and creation of a sustainable local economy due to the allocation of employment sites and promotion of recreation and tourism; protecting and enhancing the landscape due to policies specific to protecting valued landscapes and the promotion of sensitive design; air quality as any new development will be expected to meet environmental health regulations in order to regulate air pollution standards; and heritage and cultural assets through the consideration of these assets in policies and the promotion of good design. While the preferred sites will have variable and neutral effects overall on the landscape, air quality and heritage, as shown in table 12, together with the general and town policies the AP will have an overall positive effect on these objectives.

4.3.3 Key negative impacts are likely to be in terms of land take from employment and housing allocations in particular; and on biodiversity where larger scale schemes, development in sensitive locations and increased recreation and hence a potential for greater disturbance are proposed. Negative effects from AP policies, some of which are noted in table 12 will generally be counteracted by other supporting policies and the mitigation measures specified.

4.3.4 Key short-term, medium-term and temporary impacts are likely to be from construction of new homes and employment sites: additional heavy vehicle movements, dust, noise, disturbance etc.

4.3.5 Key long-term and permanent impacts are likely to include land take and the loss of land for biodiversity and agriculture; an increase in the number of dwellings in the district; an increase in the population of the district due to the housing allocations; improved opportunities for self containment due to meeting housing and employment needs and improving access to services and facilities.

4.3.6 Key secondary impacts are likely to include reduction in out-commuting due to the availability of more employment sites, and thus employment, in the district; reduced per person air pollution due to reduced commuting and improving vehicle efficiency; improved health from various walking and cycling schemes in the plan, and an emphasis on providing homes within walking and cycling distance of services; negative impacts on biodiversity due to land take, runoff, and increased recreational pressure on nature conservation sites; negative impact on water quality and resources due to increased demand for water and increased runoff; increased likelihood of flooding from any new developments located in flood risk zones, and from increased runoff.

4.3.7 Key cumulative and synergistic impacts are likely to include the provision of 4800 homes and approximately 60 hectares of new employment land. The preferred sites together would take up 504.46 hectares of land, of which 293.51 are on previously developed land, where allocated farms and farmsteads are included as undeveloped land. Of the 211.95 hectares of undeveloped allocated land, 57.11 of

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these are allocated for recreation and open space. 12 sites and 1 general/town policy are within 250m of an SSSI. Two allocations for employment and housing are within 0.5km of the Lydney AQMA, including allocations at East of Lydney, Hill Street Lydney and Holms Farm, Lydney providing for approximately 1736 dwellings. Nine allocated housing and employment sites are within 1km of the Lydney AQMA. This includes some existing employment sites for example at Mead Lane, Lydney, Taurus Crafts near Lydney and the Foundry site at Lydney.

Habitats Regulations Assessment

4.3.8 A Habitats Regulations Assessment (HRA) has been carried out along side the SA and is available as a separate document. The HRA reviewed the AP with regard to likely significant effects on European designated nature conservation sites (Table 3). The HRA screened out 70 of the policies with the remaining 30 policies subject to further assessment (Appropriate Assessment (AA)). For 5 of the 30 policies the AA considered there were no residual effects on the European nature conservation sites. The AA identified mitigation measures, through avoidance measures and policy measures/safeguards, which should be incorporated into the AP in relation to 25 policies to avoid and residual effects on the European nature conservation sites. Mitigation measures were recommended principally in relation to Lydney and the Severn Estuary; waste water treatment capacity and the Severn Estuary and disturbance in relation to the Wye valley Woodlands and Bat SAC's.

4.3.9 The mitigation measures identified in the AA have been incorporated in the AP. Further details are available in the HRA.

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Table 12 Overall impacts of the AP

SA objective	Impact of AP policies	Impact of AP site allocations
1. To improve the health and wellbeing of the population and reduce inequalities in health	The majority of the general policies contribute positively to supporting health and wellbeing by providing access to services and the environment.	The site specific policies will generally have a positive effect (approximately two thirds of the sites). These are generally policies promoting recreation and access and housing sites within towns which will improve access and reduce per person air pollution due to reduced commuting. There are 4 cycle policies connecting towns and services. The remaining sites are expected to have neutral effects.
2. To meet local housing needs, by ensuring everyone has the opportunity to live in a decent, sustainably constructed and affordable home	The general policies have a positive effect overall although AP7, AP30 and AP54 have negative effects on achieving the objective. These policies reflect potential constraints on housing development. AP7 relates to Biodiversity and where ecologically sensitive land is proposed for development the developable area of the site or ecological mitigation needed may reduce the potential housing numbers and viability of a scheme. In turn this would slow the rate of housing development indirectly.	The AP provides for 4800 homes. Site policies will generally have a positive effect (approximately two thirds of the sites), particularly around sites providing for housing, and approximately one third of the allocated sites expected to have negative and neutral effects. Potential negative effects stem from employment sites and recreation sites and policies which do not promote new housing. The AP specifies that allocated housing sites will comply with Core Strategy policy CSP.5 which provides for the development of affordable homes. Allocations take account of the constraints in relation to the likely number of dwellings that can be accommodated on any site.
3. To provide accessible community services, recreation	The policies mainly have a positive effect in promoting accessibility to community facilities, recreation and leisure facilities.	Approximately two thirds of the site policies are expected to have positive effects, promoting access and recreation. Allocations for employment and housing sites are located in areas which have access

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SA objective	Impact of AP policies	Impact of AP site allocations
and leisure facilities		to services, recreation and leisure facilities. Key individual sites have been identified in the AP for recreation, leisure and tourism development such as AP 18, AP 20, AP 23, AP 25, AP 42, AP 46 and AP 74. AP 26-29 and AP 46 relate to new cycle ways including between Lydney and Parkend and Christchurch and Coleford which will facilitate recreation while promoting access to community services and allocation sites for further recreation facilities. Negative effects are expected from intensive employment sites or sites that are more isolated from facilities for example AP61 Staunton Road, Coleford.
4. To facilitate the development of academic and vocational skills	The policies would have an overall neutral effect. Policies could improve the range of employment and skills development opportunities by attracting a more diverse employment sector.	Generally site policies will have a neutral effect. Some site policies are expected to have positive effects. AP 13 Hartpury College for example specifically supports development for educational purposes. Other positive effects may be seen from large employment sites, railway policies which may improve access to facilities and particular attraction sites such as Lydney Harbour which could attract a range of employment areas and skills.
5. To create a more vibrant and sustainable local economy	Policies have been assessed to have an overall positive effect in helping to create a more vibrant and sustainable local economy as they could improve the range of employment opportunities by attracting a more diverse employment sector. This is	Allocations provide for about 60 hectares of new employment land. 55% of sites policies have been assessed as having a positive effect. Key individual employment sites have been identified in the plan. The only negative assessment is that of AP 84 Land off Bradley Court Road (Vantage Point) Mitcheldean which

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SA objective	Impact of AP policies	Impact of AP site allocations
	also supported by a number of site specific policies in the rest of the document which promote specific sites for tourism, employment and recreational purposes in helping to encourage development and boost the local economy.	is for housing on existing employment land.
6. To protect and enhance the landscape and protect soil quality	Policies will generally have a positive effect, helping to protect and enhance the landscape through sensitive design, character, sustainability and contribution to the protection of biodiversity and enhancement of the landscape. AP2 and AP3 and site policies which promote larger scale schemes and renewable energies have been assessed to have a negative effect. Other policies in the plan, Core Strategy and Landscape Supplementary Planning Document (SPD) help to mitigate these effects.	The effects of site policies will be variable. Policies relating to recreation, the retention of open space and landscape protection will contribute positively to the protection and enhancement of the landscape and protection of soil quality. Locally Valued Landscape designation policies for May Hil, Coleford and Staunton/Corse ensure the protection of 1390ha of valued landscapes. AP 8 ensures the provision of green infrastructure and safe guarding and enhancement of biodiversity and the surroundings of the development site. Larger scale schemes for housing and employment are expected to have negative effects while smaller sites generally associated with existing settlements are likely to have a neutral effect. Mitigation for neutral and harmful effects can be implemented through applying the principles of CSP.1 and the Landscape SPD.
7. To conserve and enhance biodiversity,	The majority of the policies in the Allocations Plan will have a neutral effect with some positives from AP1, AP6-8 and AP63, conserving and	The effects of site policies will be variable. Positive effects are expected from policies promoting the protection of open spaces, development on land not currently

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SA objective	Impact of AP policies	Impact of AP site allocations
flora and fauna	enhancing biodiversity, flora and fauna and promoting and protecting green infrastructure and valued landscapes. AP2, AP26 and some site policies have been assessed as potentially having negative effects where these policies promote larger scale development, renewable energy and recreation policies which could cause increased disturbance to biodiversity.	of high biodiversity value and AP8 Green Infrastructure will also help to contribute positively. Negative effects will be due to disturbance from increased recreation such as cycle ways and sites in sensitive locations such as the Wye Valley and Severn Estuary. 12 sites and 1 town policy are within 250m of an SSSI. Mitigation of neutral and negative effects can be introduced using the principles of CSP.1 and AP 7 and 8.
8. To maintain and improve air quality	The policies would generally contribute positively with a focus around towns and where green infrastructure and conservation of the local environment are promoted. Air quality in the district is generally good although air pollution is more concentrated around the main larger settlements and transport routes. Air pollution in Lydney is of particular concern in the district and an Air Quality Management Plan is being developed to mitigate this along with regular monitoring. Any new development will be expected to meet environmental health regulations in order to regulate air pollution standards. Overall the plan is considered positive by supporting the implementation of the management plan as set out in the lydney chapter.	The effects of site policies on air quality is generally equally balanced. Sites in towns will reduce commuting and therefore per person air pollution will be reduced however more remote sites such as AP 17 Stowfield Lydbrook and AP 69 Southend Lane Newent may have negative effects given their limited access to services. Sites in Lydney could potentially have a negative effect such as AP 40 Hill Street and AP 47 Land East of Lydney because of their proximity to the Lydney AQMA. Many sites will have a neutral effect. AP 38, 39, 41 will help to mitigate neutral and negative effects by driving improvements for the reduction of pollution in the AQMA and paragraph 6.20 of the AP requires major development schemes to demonstrate their affect on the AQMA and how they can reduce pollution.

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SA objective	Impact of AP policies	Impact of AP site allocations
9. To maintain and improve water quality and achieve sustainable water resources management	Most of the general policies would have a neutral effect with some having positive effects. Policies AP 1, 4, 7, 8 and 39 could all contribute to improving water quality. AP7 Biodiversity and AP8 Green Infrastructure could both contribute by creating new wetland or pond habitats to benefit the water systems, helping to reduce flooding and also providing benefits to wildlife. It is assumed that flood risk management and SUDS will be implemented as a part of schemes.	Generally site policies will have a neutral effect. The AP assumes that flood risk assessments and SUDS will be used as part of development proposals. Allocated sites are to be compliant with Core Strategy Policy CSP2. and government guidance on SUDS. The Flood and Water Management Act 2010 also now requires SUDS systems for most development and part 'G' of the building regulations sets standards for water efficiency in new housing development. Those sites with expected negative effects on water quality include those that have existing uses and that are known to receive flood related issues.
10. To reduce emissions of greenhouse gases that cause climate change, and reduce vulnerability to flooding	The general policies would generally have a neutral effect on climate change, with positive effects from AP1, 2, 3 and 4 which promote a sustainable mix of uses, renewable energy as well as design.	Generally site policies will have a neutral effect. Allocations for employment and housing sites are generally located in areas which have access to community services, recreation and leisure facilities and academic facilities. This is likely to reduce per person air pollution due to reduced commuting. Negative effects are predicted from policy AP11 Dean Forest Railway as it is supporting the expansion of the local rail network and stations which will contribute more emissions from the use of coal etc. Further negative effects are predicted for remote sites and those that have high energy consumption. In terms of mitigating these effects, high energy users have existing regulatory controls on both emissions and carbon. Policies for cycle ways linking towns and services will also encourage

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SA objective	Impact of AP policies	Impact of AP site allocations
		sustainable modes of travel. 27 AP policies are within, partially or adjacent to flood zones. For the majority of these sites the impact of this is considered to be minor. Sites with a higher risk of flooding will be required to submit a flood risk assessment as part of the scheme.
11. To reduce waste generation and achieve sustainable management of waste	The general policies would have a neutral effect apart from Policy AP3 Design of Development. This policy could promote waste minimisation and waste reuse in the form of biodigesters, grey water recycling and other waste recycling schemes. This objective is also supported by Gloucestershire County Council's Waste Local Plan and Waste Core Strategy policies.	Generally site policies will have a neutral effect. Although an increase in the consumption of resources and materials will increase the district's potential for waste generation, the objective is supported by the County Councils Waste and Minerals Local Plan as saved and the new Waste Core Strategy for Gloucestershire, also policies & guidance found in DEFRA'S Waste Management Plan for England referenced in paragraph 156 of the NPPF.
12. To maintain and enhance cultural and historical assets	The general policies will generally have a positive effect on cultural and historical assets. AP2 has the potential to have a negative effect where renewable energy schemes could affect the setting of these assets.	Generally site policies will have a neutral effect with approximately one quarter of sites contributing positively to the objective when they protect historical and cultural assets or policies take these assets into consideration when proposing development nearby. AP 4 and AP 5 will regulate mitigation.

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4.4 Stage B5: Considering ways of mitigating adverse effects and maximising beneficial effects of the Allocations Plan

Considering ways of mitigating adverse effects

4.4.1 Where neutral or adverse effects are identified (Stages B3 & B4 above) the SA examines ways of improving, reducing or mitigating those effects. It is difficult to evaluate the precise effects of the AP. The predicted effects are an analysis based on local knowledge, baseline information, past evidence and expertise. It is, therefore difficult to propose exact mitigation of any adverse effects due to an inherent element of uncertainty. It is however possible to propose some broad approaches to mitigation. SA is a cycle of testing and improvement, and therefore many alterations to the policies have already taken place.

4.4.2 Within this context it is important to bear in mind that the AP will not be used in isolation. It will be used along side the Core Strategy, National Planning Policy and other legislative / regulatory requirements. In the case of Cinderford the Area Action Plan and Masterplan and Design Code SPD will also have a role for the Northern Quarter. CSP1 provides a set of criteria against which all proposals coming forward for planning permission should be judged. Approaches to ensure compliance with CSP1 will vary depending on the nature of the development proposed and its location. Of particular note is the requirement for *"new development must take into account important characteristics of the environment and conserve, preserve or otherwise respect them in a manner that maintains or enhances their contribution to the environment, including their wider context"*. Also of particular note are Core Strategy Policies CSP2 and CSP3 which provide for mitigation against climate change, including water management and provision of renewable energy.

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Core Strategy CSP1

Design, environmental protection and enhancement (strategic objective: providing quality environments)

The design and construction of new development must take into account important characteristics of the environment and conserve, preserve or otherwise respect them in a manner that maintains or enhances their contribution to the environment, including their wider context. New development should demonstrate an efficient use of resources. It should respect wider natural corridors and other natural areas, providing green infrastructure where necessary.

In achieving the above, the following will be considered:

- The effect of the proposal on the landscape including AONBs and any mitigation/ enhancement that is necessary or desirable
- The impact on any protected sites (natural and historic sites and heritage assets and potential for avoiding and/ or mitigating any impacts, or providing enhancement, should the development be acceptable
- The requirements of the management plans of the AONBs
- Whether the existing infrastructure is adequate- additional provision will be required where it is not.
- Whether the development is at risk from flooding, whether it can be permitted taking into account any risks; and the sequential approach and any mitigation that may be necessary to ensure the development is safe and flood risk is not increased elsewhere
- The impact of the development on any land contamination or risk to the development from ground instability including the mining legacy- Proposals must undertake appropriate remediation measures and verification works where contamination and /or stability issues are identified
- The potential for the development to cause pollution and any mitigation measures to avoid pollution or make environmental improvements where existing problems occur
- The provision of water supply and the development's impact on groundwater, watercourses and any protected abstractions
- Any potential impact on the sterilisation of mineral resources and consideration of the potential for the prior extraction of those mineral resources ahead of development
- Proposals for waste minimisation and management

Development that is not able to be satisfactorily accommodated in respect of the above will not be permitted

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Core Strategy CSP 2**Climate Change Adaptation**

Proposals for development will be required to demonstrate that their design and layout will reduce the impacts of climatic change as identified in national, regional and local predictions over the lifetime of the development concerned. The following should be addressed in an integrated way, demonstrating that one element benefits another:

1 Water management

1. Improving water efficiency- proposals should demonstrate high levels of water efficiency. Rain water harvesting and grey water recycling systems should be incorporated unless it can be demonstrated that it is not appropriate in a specific location
2. Managing surface run off- Sustainable Drainage Systems (SUDS) and measures to reduce or avoid water contamination and safeguard ground water supply should be incorporated into all development unless it can be demonstrated that this is not appropriate in a specific location
3. Flood risk- ensuring that risks (including changing risks due to climate change) are taken account of in new development, including improving resistance, resilience and safety of the areas concerned.

2 Heating and cooling

Proposals will be required to demonstrate how the development comprehensively utilises passive solar gain and provides cooling for buildings, gardens and communal areas at the appropriate times of the year.

3 Biodiversity

1. Developments must support green infrastructure corridors that link to existing habitat features and networks. They must show that the integrity of any affected nature conservation sites is not compromised by the development proposed. Proposals that prevent or restrict network connections will not be supported.
2. Developments will be required to make long lasting biodiversity enhancements which could include the creation of new habitats where these would be appropriate. They should support existing features (trees, ponds, hedgerows etc), provide and manage public open space and should also provide additional

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features for a wide variety of species and habitats in appropriate locations throughout the development. Additional features provided should be consistent with the characteristics of the surrounding area.

Core Strategy CSP 2

Sustainable Energy within Development Proposals

All major developments and other developments involving the construction of one or more dwelling(s) will be expected to provide, as a minimum, sufficient on-site renewable energy to reduce carbon dioxide emissions from energy use by 10%. The proportion will increase to 15% from 2015 and 20% from 2020.

Proposals must be accompanied by an energy use assessment which should demonstrate how the requirements of this policy will be achieved within the wider energy hierarchy context. The assessment must set the baseline for the calculation of the proportion of on site generation, describe the measures that are being undertaken and the predicted levels of efficiency. A nationally recognised evaluation of energy requirements such as the Targeted Emission Rates (TER) as set out in the building regulations should be used for assessments.

Where a dwelling is proposed to be extended the Council will expect the applicant to demonstrate that cost effective energy efficiency measures have been or will be carried out on the existing dwelling. Energy efficiency measures which would have an adverse impact on a Listed Building or the character of an area will not be required.

Measures which may be considered will include the level of loft insulation, cavity wall insulation, draft proofing, and boiler efficiency.

The Council will bring forward further guidance on the above in a residential design guide which will be a Supplementary Planning Document

4.4.3 Four key areas for mitigating adverse effects of some of the policies have been identified:

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1. Site specific mitigation. A wide range of site-specific mitigation measures have been included in the AP, reflecting the constraints and opportunities of each site. These include requirements to:

- maintain the integrity of Special Protection Areas, Special Areas of Conservation and Ramsar Sites
- provide landscaping and good design, to minimise visual impacts
- protect and enhance rights of way, to support recreational activities and health
- consider areas liable to flooding
- protect nature conservation features such as ponds, hedges and bat habitats
- protect conservation areas and listed buildings
- provide play areas / recreational areas

4.4.4 AP7 Biodiversity and AP8 Green infrastructure are also important mitigation policies, setting out requirements to safeguard and enhance environmental assets. Core Strategy policy CSP 1, will also be an important factor as it requires, amongst other things

"new development must take into account important characteristics of the environment and conserve, preserve or otherwise respect them in a manner that maintains or enhances their contribution...."

Habitats regulations assessment is being undertaken and this may result in further measures being applied to sites where likely significant adverse effects on European designated site for nature conservation have been identified.

2. Meeting Housing Needs. Conversely to the above policies AP7 & 8 could restrict delivery of a range of housing to meet local needs. In the same way as constraints in relation to landscape and ecology have been identified on specific sites (see above), allocations take account of the constraints in relation to the likely number of dwellings that can be accommodated on any site. In this way greater confidence can be attributed to the likelihood of the number of new dwellings required coming forward.

3. Air Quality. Air quality issues relate to a relatively small area of Lydney. An Air Quality Management Plan is being developed and development proposals will be required to meet the requirements of the plan. For allocations in and around Lydney it is recommended that Air Quality assessment in relation to the sites is identified as a requirement. Conditions vary from year to year depending on the weather conditions, however currently it appears to be static. If policies and proposals outlined in the plan do not have the effect of reducing, or not increasing, rectification measures can be triggered through the AQMA management plan dependant on the specifics of the issues at that time.

4. Water Management. The AP sites are likely, cumulatively, to have a significant impact on water resources, and this is likely to be exacerbated by climate change. Core Strategy policies CSP2 and CSP3 specifically address these points. The Flood and Water Management Act 2010 also now requires SUDs systems for most development and part 'G' of the building regulations sets standards for water efficiency in new housing development.

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Residual Impact

4.4.5 The AP provides for 4800 houses and approximately 60 hectares of additional employment land. The above mitigation will limit the impacts of the AP to an extent however there will be some residual impacts resulting from the AP even after mitigation. Significant residual impacts are likely to include land take, an increased use of resources due to meeting housing and employment needs. To a lesser degree there will be residual impacts in relation to air quality in both Lydney and Chepstow. Impacts on the historic and natural environment are expected to be 'static' with the mitigation measures set out, there is clear potential in a number of areas for enhanced biodiversity especially within the realms of green infrastructure (AP 8).

Conclusion

4.4.6 In summary following assessment the AP as a whole it can be seen to have principles of sustainability or sustainable development embedded within its approach and policies. This is not surprising as the AP needed to be consistent with the CS which set the strategic framework for the district and which was subject to SA and SEA. The CS principles of; Increased self containment; meeting local housing need; focusing development in areas with the greatest access to services and facilities and strong environmental safeguard and enhancement policies are evident through the AP. In addition the AP has key elements to improve cycle and pedestrian routes between settlement for local and tourism uses. The AP provides for specific landscape protection in areas and safeguarding of areas of recreational land (in all its forms). Residual impacts are low, but will need to be monitored to ensure the impacts are within the bounds expected.

4.5 Stage B6: Proposing measures to monitor the significant effects of implementing the Allocations Plan

Measures to monitor the significant effects of the Core Strategy

4.5.1 By monitoring the effects of the AP it is possible to compare the predicted effects with the actual effects. This highlights where changes could be made and increase the accuracy in predicting the effects of the Local Plan. Key indicators to monitor the predicted significant effects of the CS are suggested at Table 13.

4.5.2 The Authority's Annual Report monitors the performance of the Core Strategy policies in line with the appraisal framework as set out in the Sustainability Appraisal. The annual report will continue to monitor these objectives by using policies from the Core Strategy and in future using the policies from the Allocations Plan as contributing factors that influence achieving the objective.

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Table 13 Proposed monitoring framework

SA objective	Indicator	Source
1. To improve the health and wellbeing of the population and reduce inequalities in health	(no significant impact)	
2. To meet local housing needs, by ensuring everyone has the opportunity to live in a decent, sustainably constructed and affordable home	<ul style="list-style-type: none"> Housing completions per annum Affordable housing completions per annum Cumulative shortfall in housing completions Average house price v. Average income Number of homes meeting the Code for Sustainable Homes Standard 	Annual Monitoring Report; Housing Register
3. To provide accessible community services, recreation and leisure facilities	<ul style="list-style-type: none"> Average distance of population to key services Level of accessibility via public transport 	Understanding Gloucestershire 2012; MAIDeN
4. To facilitate the development of academic and vocational skills	(no significant impact)	
5. To create a more vibrant and sustainable local economy	<ul style="list-style-type: none"> Median annual gross full time pay Level of out commuting 	Office of National Statistics
6. To protect and enhance the landscape and protect soil quality	<ul style="list-style-type: none"> Amount of Greenfield land developed 	Housing Land Availability Database

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SA objective	Indicator	Source
7. To conserve and enhance biodiversity, flora and fauna	<ul style="list-style-type: none"> • Include info needed to monitor the integrity of SPA/SAC/Ramsar sites • Condition of SSSIs • Population of 4 BAP butterfly populations 	Natural England; Butterfly Conservation 2007
8. To maintain and improve air quality	<ul style="list-style-type: none"> • Air quality in the Lydney AQMA 	FoDDC
9. To maintain and improve water quality and achieve sustainable water resources management	<ul style="list-style-type: none"> • Surface water and groundwater status 	Environment Agency
10. To reduce emissions of greenhouse gases that cause climate change and reduce vulnerability to flooding	<ul style="list-style-type: none"> • Annual emissions of greenhouse gases • Average household energy consumption • Renewable energy projects (total KW) • % of properties at 1% risk of flooding 	Office of National Statistics; Regen SW MAIDeN FODDC
11. To reduce waste generation and achieve sustainable management of waste	(no significant impact)	
12. To maintain and enhance cultural and historical assets	<ul style="list-style-type: none"> • Listed buildings at risk 	FODDC / English Heritage

Stage C: Preparation of the Sustainability Appraisal Report 5

5 Stage C: Preparation of the Sustainability Appraisal Report

5.0.1 The Allocations Plan Pre-Submission document and this report will be sent out for the final round of public consultation toward the end of the year or the beginning of 2015 following Cabinet and Full Council approval. It will be open for public comment for a total of six weeks. It is envisaged that the Allocations Plan will not be altered following this final consultation, however a Consultation Statement will be produced; detailing all comments that were submitted. The comments provided will be collated, together with the Council's view on the responses, and sent with the Allocations Plan and associated documents to the Inspector.

6 Changes made to the AP as a result of the SA/SEA

6 Changes made to the AP as a result of the SA/SEA

6.0.1 SA and SEA is an iterative process, especially as in this case, it has been undertaken through out the AP's development. It is not possible to record all the outcomes of considerations and discussions however outlined below are some of the key changes as a result of the SA following the July 2014 pre publication draft. Some of the comments are likely to have been raised through consultations and may have occurred without the intervention of the SA. The table does not included those changes as a result of the HRA, which are identified separately in the HRA report.

Table 14 Changes to the AP as a result of the SA

Policy	Change
AP3	Inclusion of Green Infrastructure
AP4	Inclusion of Environmental enhancement
AP5	Inclusion of Natural Environment
AP7	Inclusion of priority Species
AP8	Addition of landscape matters and removal of barriers
AP9	Inclusion of landscape and ecological matters
AP17	Identification of Ecological and landscape matters
AP18	Inclusion of transport assessment
AP20	Inclusion of requirements for Key Wildlife Site
AP23	Inclusion of requirements for biodiversity and transport assessments
AP29	Inclusion of requirements for landscape and biodiversity
AP34	Inclusion of open space requirements
Lydney Town	Inclusion if AQMA management plan
AP38	Inclusion of air quality issues
AP41	Inclusion of Air Quality opportunities
AP45	Inclusion of nature conservation requirements
AP49	Inclusion of Green Infrastructure opportunities
AP52	Identification of Key wildlife site
AP59	Inclusion of Landscape requirements

Changes made to the AP as a result of the SA/SEA 6

Policy	Change
AP69	Inclusion of protected species requirements
AP71	Inclusion of substantial landscaping requirement
AP77	Identification of ecology and landscaping issues
AP79	Inclusion of proximity to bat roost
AP90	Inclusion of Landscaping and biodiversity issues

7 List of appendices

7 List of appendices

Appendices (Separate Documents)

APPENDIX 1 SEA Checklist

APPENDIX 2 Evidence Base

APPENDIX 3a Baseline Data (Text)

APPENDIX 3B Maps

APPENDIX 4 Objective Testing

APPENDIX 5 Consultees Recommendations

APPENDIX 6 Site Assessment - Stage 1 Site Size

APPENDIX 7 Site Assessment - Stage 2 Site Appraisals

APPENDIX 8 Site Assessment - Stage 3 Fit with Core Strategy

APPENDIX 9 Site Assessment - Stage 4 Settlement Assessment

APPENDIX 10 Site Assessments at Pre publication stage of the AP (July 2014)

APPENDIX 11 Additional site and policy assessments at publication stage of the AP (January 2015)

APPENDIX 12 District and Town General policies carried forward in the AP - Summary Table

APPENDIX 13 Assessment location table

APPENDIX 14 Assessment of sites carried forward into the AP- Summary Table

APPENDIX 15 Sites not carried forward into the AP - Summary Table

