

Forest of Dean District

Sustainability Appraisal scoping report



Forest of Dean
— DISTRICT COUNCIL —

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1 . Scope of the Sustainability Appraisal

1 Scope of the Sustainability Appraisal

1.1 This report provides a review of the scoping phase of the Sustainability Appraisal (SA) for the emerging Forest of Dean District Local Plan.

1.2 The purpose of the SA is to promote sustainable development through the integration of environmental, social and economic considerations in the preparation of Local Plans. It ensures that the principles of sustainable development are applied to planning policies, allocations and guidance and also provides a framework for decision making through the Plan drafting stage.

1.3 The purpose of this scoping phase is to review available data, and scope the extent to which the Local Plan can achieve and contribute to district wide sustainability. This information is then used to develop a SA framework, against which the policy and development alternatives will be appraised. The scoping study will assemble an evidence base which refers to the existing environmental, economic and social characteristics of the area likely to be affected by the Local Plan, and their likely condition without any possible future policy intervention.

1.4 The National Planning Practice Guidance states that the scoping stage (Stage A) must identify the scope and level of detail of the information to be included in the SA report. It should set the context, objectives and approach for the assessment; and identify relevant environmental, economic and social issues and opportunities.

1.5 The SA stages are as follows:

Sustainability Appraisal stages

- Stage A: Setting the context & objectives, establishing the baseline and deciding on the scope (the Scoping report represents this stage)
- Stage B: Development and refining alternatives and assessing effects
- Stage C: Preparing the Sustainability Appraisal Report
- Stage D: Consulting on the Local Plan and Sustainability Appraisal report
- Stage E: Post adoption reporting and monitoring

1.6 The Scoping Stage (Stage A) is further divided into the following tasks:

Task	Aim of the scoping task	Addressed in this report at:
Task A.1 Identifying other relevant plans, policies, programmes and sustainability objectives.	To document how the plan is affected by outside factors and suggest ideas for how any constraints can be addressed.	Policy context Pages -9-16.

1 . Scope of the Sustainability Appraisal

Task A.2 Collecting baseline information.	To provide an evidence base for sustainability issues, effects and monitoring.	Sustainability context: baseline condition reports Pages 17-65.
Task A.3 Identifying sustainability issues within the district.	To focus the SA and streamline subsequent stages, including the development of the SA framework, prediction of effects and monitoring.	Conclusion: Key Sustainability Issues. Pages 66-68.
Task A.4 Developing the SA framework	To develop a means by which sustainability of the plan can be appraised.	Sustainability Appraisal Framework Pages 69-74.
Task A.5 Consulting on the SA framework	To consult with statutory bodies to ensure SA covers key sustainability issues.	This will be achieved by asking for comment from key consultees on this document. Their feedback will be integrated into the final report.

1.7 Reference: [Sustainability appraisal process](#)

2 . Sustainability principles

2 Sustainability principles

2.1 The term sustainable development generally refers to economic development that is conducted without depletion of natural resources. The primary purpose of the National Planning Policy Framework (NPPF), and subsequently England's planning system is to contribute to the achievement of sustainable development, which it describes as "as meeting the needs of the present without compromising the ability of future generations to meet their own needs".

2.2 The NPPF sets out the overarching planning policies on the delivery of sustainable development through the planning system, which are broken down into the following dimensions:

There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

1. an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

2. a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

3. an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

2.3 For the purposes of the SA, these environmental, social and economic elements of sustainability taper down into more subsets, which include, but are not exclusive to:

ENVIRONMENT	SOCIETY	ECONOMY
Landscape	Housing	Economy
Ecology	Education	Transport & Infrastructure
Water	Community Well being	Retail centres
Climate & carbon	Local identity & culture	
Air		
Waste		
Heritage		

2 . Sustainability principles

2.4 The SA framework will be based around these headings, so the scoping study is also framed around them.

3 . Geographical area

3 Geographical area

3.1 The Forest of Dean District is the westernmost district of Gloucestershire, bordering on Monmouthshire in Wales. It covers a land area of 526.29 km² and is geographically defined by the Wye River to the west and the Severn River to the east, with the Royal Forest of Dean -a large protected forest reserve- in the centre. To the north, the district extends to the southern extent of the Malvern Hills. The image below illustrates the Forest of Dean district (highlighted in red) within the context of Gloucestershire and South West England.

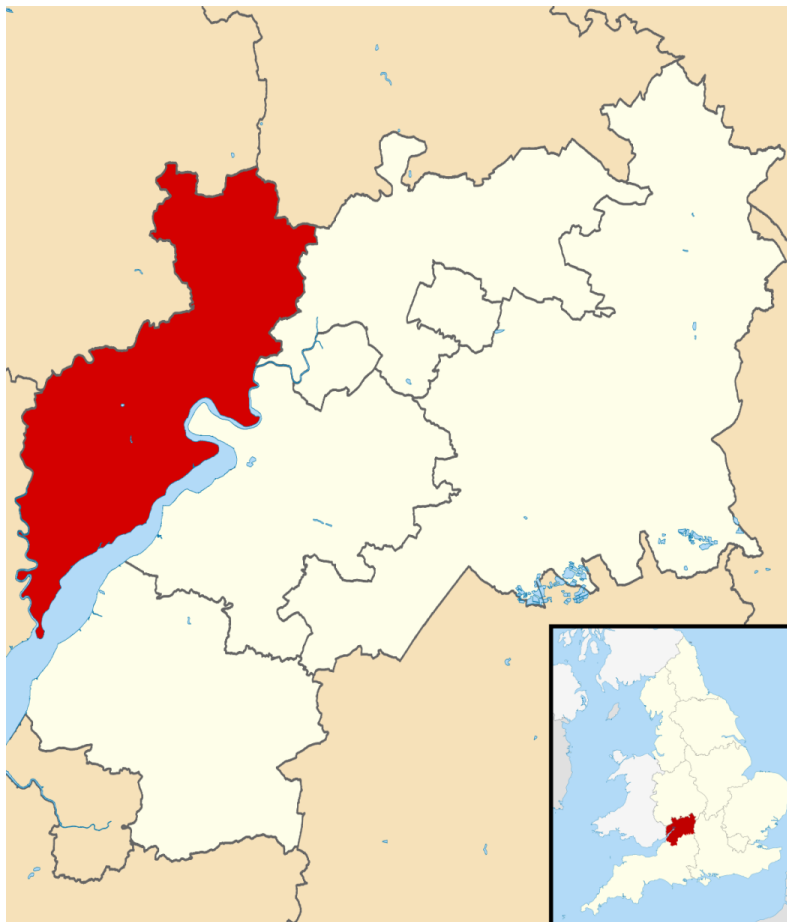


Figure 1: Forest of Dean district (red) in the context of Gloucestershire (cream) & the UK (inset)

3.2 With a total district population of 86,543 (ONS; mid-2018 estimate) the Forest of Dean has the second lowest population in Gloucestershire (ONS; 2019 & GCC; 2016). Of this figure, 42,280 are classed as “non-metropolitan” by the ONS (2019). According to the DEFRA urban/ rural classifications, the Forest’s population is 95% rural, making it the second most rural district in Gloucestershire after Cotswold (Source: GCC, 2015).

3.3 The Forest of Dean District is slowly but steadily growing. The population change from 2006 to 2016 was an additional 3,700 people- taking the district from a total population of 81,700 to 85,400-which represents a 4.5% increase over this ten year period. This is low compared to Gloucestershire and the UK which increased by 7.3% and 8.2% respectively in the same decade (Inform Gloucestershire; 2017). However the population has maintained steady growth which is projected to continue, necessitating new land for housing allocations into the foreseeable future.

3 . Geographical area

The district population is projected to increase to 89,804 by 2025 and 93,406 by 2037 (Gloucestershire County Council; 2015). The objectively assessed need calculated for the district is currently 330 new houses per annum to accommodate this growth (FoD Allocations Plan: 2018).

3.4 The settlement pattern of Forest of Dean is dominated by four market towns which provide the main services and employment centres for the district, and collectively these account for 46% of the total district population. These towns complement and interact in many ways, including:

1. **Coleford**; the administrative centre of the district, located in its western side;
2. **Cinderford**; which was the industrial heart of the Forest of Dean, and is currently the focus of a major regeneration project in its Northern Quarter;
3. **Lydney**; situated on the banks of the river Severn and connected to the national rail network;
4. **Newent**; which is an attractive and lively market town servicing the north of the District.

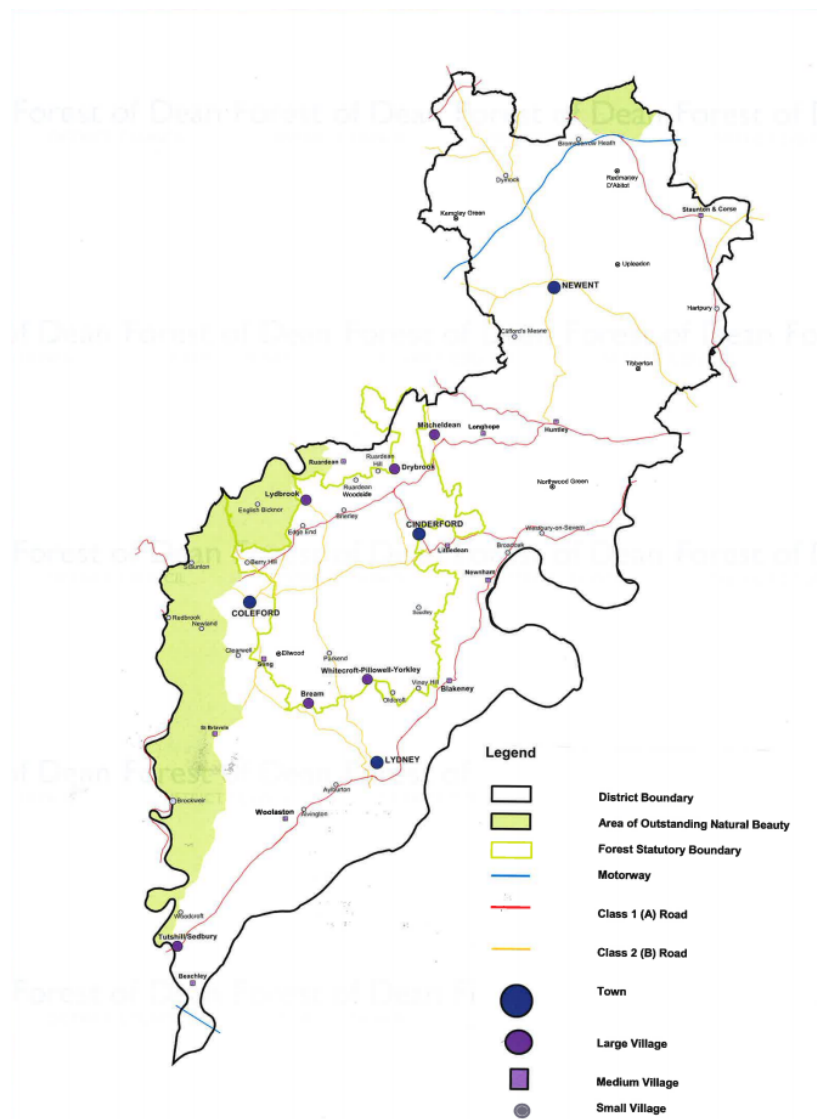


Figure 2: Forest of Dean district with main towns, A & B roads & Area of Outstanding Natural Beauty

4 . The Local Plan

4 The Local Plan

4.1 There is a statutory requirement for Local Planning Authorities to have an "up-to-date" Local Plan. One of the primary purposes of the Local Plan is to have a housing requirement figure based on up-to-date evidence and guidance.

4.2 The current Local Plan consists of a number of documents, which set out an overall strategy to guide development across the District until 2026. The Local Plan guides future development and sets out policies, against which planning applications are considered. This has replaced the 'Old' Local Plan which was adopted in 2005.

4.3 The existing Forest of Dean district council local planning framework is made up of the [Core Strategy](#) (adopted in 2012) and the [Allocations Plan](#) (adopted in 2018), as well as the following Local Plan documents:

1. [Berry Hill, Christchurch and Edge End Neighbourhood Plan](#)
2. [Cinderford Northern Quarter Area Action Plan](#)
3. [Coleford Neighbourhood Plan](#)
4. [Longhope Neighbourhood Plan](#)
5. [Lydney Neighbourhood Plan](#)
6. [Mitcheldean Neighbourhood Plan](#)

4.4 The Forest of Dean District Council has embarked on the development of a new Local Plan, which is scheduled for completion in 2023. The SA will provide a framework to assess and critique different policy options based on their performance against stated sustainability objectives, which will guide the Plan making process towards the most sustainable outcomes.

4.5 The new Local Plan must enable the delivery of enough housing to meet the district's needs up to 2041. The district is expected to deliver in excess of 350 new dwellings per year. In the period up to 2041, this will result in the need to find new land for approximately 4,000 new houses, once existing permissions have been accounted for. To calculate housing need into the future, the Council makes a series of assumptions. These include:

- All dwellings that are under construction will be completed, but not all of those that have gained permission will be completed.
- Combined with existing sites, this will add a further 1,500 to the total housing delivered during the period of 2021-2041.
- Small sites (between 1- 5 houses) will add around 74 new dwellings per year- resulting in an estimated total of 1,480 up to 2041.
- Windfall sites- or unexpected sites, will continue to deliver housing at the current rate, which would deliver around 1,200 between now and 2041.
- All these things combined would add an estimated total of 4,180 houses built on small sites and windfalls, or come from other sites that are already being constructed or have been permitted.
- Based on the current housing targets of 330 dwellings per year which has been set for the Forest of Dean district by the UK government (or 6,600 over 20 years), this means that the

4 . The Local Plan

new Local Plan will need to identify enough suitable land to accommodate for about a further 4,200 houses.

- This means at the current housing density target of 30 dwellings per ha, a further 140 ha of new land for housing will need to be identified in the new Local Plan.
- Furthermore, employment land and services like schools and doctors will need to be provided to all of these new households. These communities will also need transport links and hard infrastructure to support them.

4.6 The Local Plan also contains a suite of planning policies which relate to design, development management and protection of certain areas, values and features. This includes principles and guidance for the pattern of settlements across the district, the design of buildings and places, conservation and heritage protection, transport and infrastructure provision and ecological considerations and combating climate change.

4.7 Within this context, the SA will provide a critical decision making framework to ensure that this future development is directed to locations which are the most sustainable and have the least impact on existing natural and built features and values.

5 . National policy

5 National policy

5.1 The Local Plan must be developed within the revised [National Planning Policy Framework](#) (NPPF) which sets out government's planning policies for England and how these are expected to be applied.

5.2 The UK Government establishes their broad guidelines and policies for a variety of different topics in the NPPF, which includes the following key sustainability issues:

- *The need to ensure that new housing development meets local needs;*
- *The need to proactively support sustainable economic development;*
- *The need to include local people in plan making;*
- *The need to protect and enhance the vibrancy of urban areas and encourage brownfield development through regeneration;*
- *The need to maintain the vitality of town centres;*
- *The need to encourage the growth of communications infrastructure networks;*
- *The need to manage growth to promote sustainable methods of transport and improve accessibility;*
- *The need to protect the historic environment;*
- *The need to conserve and enhance biodiversity as an integral part of economic, social and environmental development;*
- *The need to promote sensitive and effective waste management;*
- *Recognising the importance of open spaces, sport, and recreation and the contribution that they make to enhancing quality of life;*
- *The need to reduce greenhouse gas emissions and increase energy efficiency;*
- *The prudent use of natural resources;*
- *The need to prepare Strategic Flood Risk Assessments.*

5.3 Furthermore, [Section 19 of the Planning and Compulsory Purchase Act 2004](#) requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a [Local Plan](#) during its preparation. A sustainability appraisal should also incorporate the requirements of the [Environmental Assessment of Plans and Programmes Regulations 2004](#).

6 . International policy

6 International policy

6.1 Sustainability appraisals incorporate the requirements of the [Environmental Assessment of Plans and Programmes Regulations 2004](#) (commonly referred to as the 'Strategic Environmental Assessment Regulations'), which implement the requirements of the [European Directive 2001/42/EC](#) (the 'Strategic Environmental Assessment Directive') on the assessment of the effects of certain plans and programmes on the environment.

6.2 European Directives are transposed into UK national legislation , therefore the key themes should influence into national, regional, sub-regional and local level documents and strategies as appropriate. In this instance, the requirements of a Strategic Environmental Assessment will be incorporated into the Sustainability Appraisal framework, thus satisfying both international and national obligations. The main difference between the SA and the SEA is that while the latter only takes into account the impacts of a plan or programme on the environment, the former also takes into account economic and social impacts.

6.3 The Local Plan will also require a [Habitats Regulations Assessment](#), as set out in the [Conservation of Habitats and Species Regulations 2010](#) (as amended) if it is considered likely to have significant effects on European habitats or species. The sustainability appraisal should take account of the findings of a Habitats Regulations Assessment.

7 . Neighbouring local authorities plans

7 Neighbouring local authorities plans

7.1 The Local Plan is unlikely to have significant effects on neighbouring authorities, however there are some cross boundary implications, and therefore the SA should consider the policy context of neighbouring authority's local plans. Furthermore, local authorities have a statutory "duty to cooperate", and Forest of Dean district sits within the county council boundaries of Gloucestershire, so county wide planning policy also forms part of the policy framework of the district.

7.2 The following table summarises the status of the planning policies of neighbouring authorities and the county.

Local Authority	Plan/ Policy title	Implications for Forest of Dean district Local Plan
Herefordshire County Council	Herefordshire Local Plan (2011-2031)	Herefordshire share a rural boundary on the north west of the FoD district, including parts of the Wye Valley. The impact of either plan on the other is likely to be neutral with policies which emphasise the conservation of the rural area whilst supporting rural enterprise.
Gloucester City Council	Joint Core Strategy (2017) Adopted Development Plan (2016 -2031)	Gloucester city, Cheltenham borough and Tewkesbury borough councils have combined their core strategies to provide for a cross district spatial strategy for development and housing demand across the three local authorities. This covers the more populated core of Gloucestershire, which lies to the eastern border of FoDD. The JCS as adopted provides for the needs of the area largely within the Gloucester/ Cheltenham urban area so the impact on the FoDD will be a result of increased pressure for growth as well as potentially a greater offer of services and employment from within the JCS area. Major changes in Gloucester such as retail development will have some influence on FoDD.
Gloucestershire County Council	Minerals Local Plan for Gloucestershire Gloucestershire Local Transport plan	The MLP and the WLP (Waste LP) sit or will sit alongside the FoDDC LP. The former protects some sites from development and supports the availability of land for future provision. This will have an impact on the relevant localities and may have a local impact on the policy options

7 . Neighbouring local authorities plans

		<p>for the LP although the geographical areas concerned are quite rural and not likely to be the subject of major LP development proposals.</p> <p>Stowe Hill and Stowfield quarries within the FoDD are active are described as key sites within this Plan.</p> <p>The LTP and LP should complement one another in a manner so that the LTP supports the LP and its strategy. The LTP is currently a draft so is under development. LTP policies are expected to support and encourage sustainable transport solutions as well as providing some by direct action.</p>
Malvern Hills District Council	Adopted South Worcestershire Development Plan (2016)	<p>The Malvern Hills district is located beyond the northern boundary of the FoDD. The Malvern Hills Area of Outstanding Natural Beauty straddles both districts.</p> <p>With the two areas being rural, there are few issues given the broadly similar development policies being followed by each LPA.</p>
Monmouthshire County Council	Monmouthshire Local Development Plan Draft Local Development Plan 2018 – 2033	<p>Monmouthshire lies with Wales at FoDD's south western boundary, which is defined by the River Wye through this section of the Wales/ England border. The Wye valley AONB straddles the two boundaries. The small city of Chepstow lies within Monmouthshire at the confluence of the Wye and Severn rivers, however the settlements of Tutshill and Sedbury which fall within the FoDD are functionally connected to Chepstow.</p> <p>The MCC plan and FODD plans are each likely to provide for their own needs within their respective areas. The main implications for each LPA are the changes in demands for services, increased traffic and travel requirements. Development in either area is constrained by the current congestion around Chepstow and any major change in the FoDD can only take place if there is a satisfactory resolution.</p>

7 . Neighbouring local authorities plans

Stroud District Council	Stroud District Local Plan (2015)	<p>The Stroud & FoD districts are separated by the Severn estuary, which lies to the east.</p> <p>The chief issue between FoDD and SDC relates to the common recreation strategy for the Severn Estuary. SDC and FoDDC aims and objectives are broadly similar and the policy approach is likely to be too.</p>
Tewkesbury Borough Council	Joint Core Strategy (2017) Tewkesbury Borough Local Plan (2017)	<p>Tewkesbury borough lies to the north east of the FoDD.</p> <p>With the main areas proposed for development being close to Gloucester, Cheltenham and Tewkesbury, there will be some impacts on the FoDDC but based on the assumption that each plan will look after its own needs, and given the focus on the major urban areas the effects on the FoDDC will be limited. More locally the implementation of policies in the TBC plan at Minsterworth and Highnam may have a limited impact on the FoDD. Proposals in the TBC area may add to demands for recreation and increase traffic into the FoDD.</p>

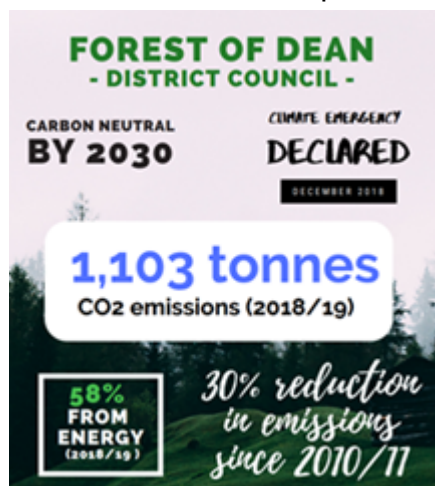
8 . Climate emergency declaration

8 Climate emergency declaration

8.1 The Forest of Dean District Council declared a 'Climate Emergency' in December 2018. The declaration essentially provides the context and objectives in regards to the Climate Emergency. These objectives include the following:

- Make the Forest of Dean District Council carbon neutral by 2030
- Make the Forest of Dean District carbon neutral by 2030
- Work with partners across the district, county and region to help deliver carbon neutrality through all relevant strategies and plans
- Call on the Government and other relevant organisations and partners to provide the powers, resources and funding to successfully meet the 2030 target

8.2 The Council has recently released a [Rapid Action Plan](#) (RAP) to meet these goals. This plan includes a reference to the new Local Plan, which it hopes will "set development standards in relation to new development" that "sets out strategic carbon neutral development plans".



8.3 These aspirations will be further reflected in Council's new corporate plan. Therefore it is important to reflect this clear priority in the development of the new Local Plan.

9 . Landscape, soil and geology

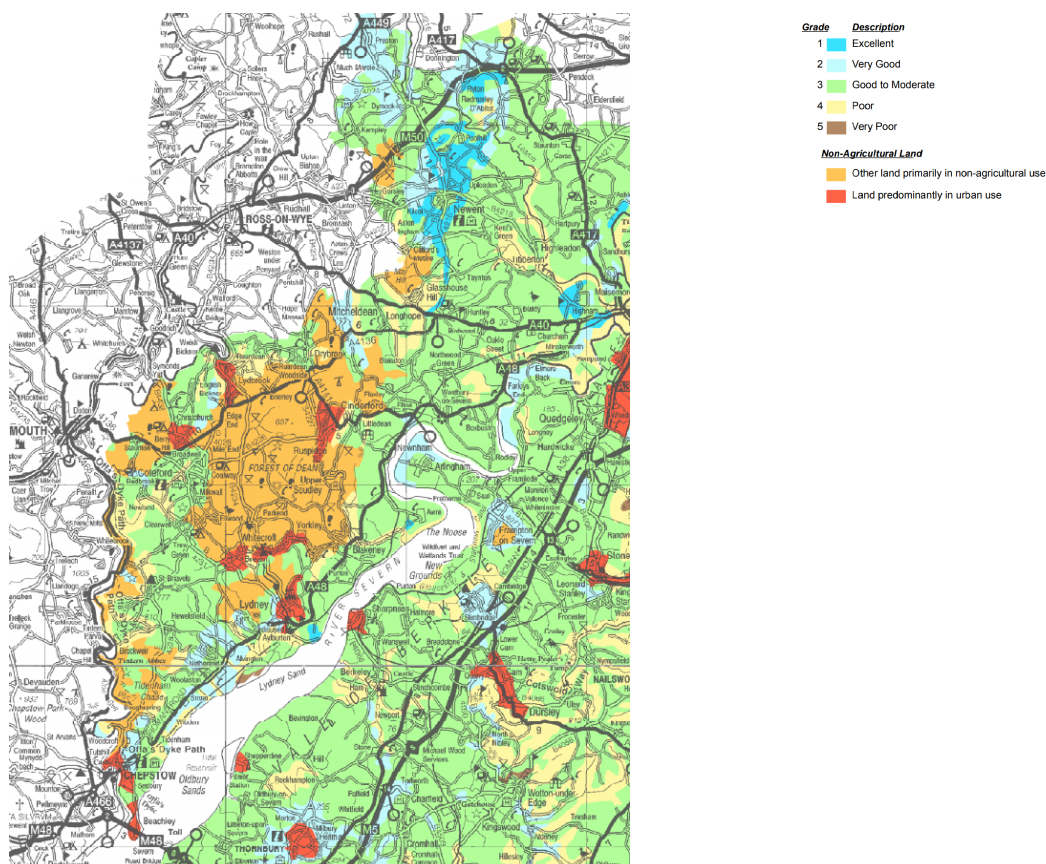
9 Landscape, soil and geology

9.1 Of the total area of the district, 85% is green space and 8% is surface water. The remaining 7% is built up areas.

9.2 The Forest of Dean district falls into three National Character Areas, which reflect the variations in the underlying geology:

- NCA 104 South Herefordshire and Over Severn
- NCA 105 Forest of Dean and Lower Wye
- NCA 106 Severn and Avon Vales

9.3 In the west, the steep sided gorge of the Wye transitions to the underlying 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. Three sites within the district have been identified for limestone extraction: Stowe Hill and Stowfield are active and Drybrook is currently inactive. Most agricultural land is grade 3- good to moderate quality, with an area of "excellent" agricultural land directly around Newent. The map below illustrates the agricultural land classification for the district:



9 . Landscape, soil and geology

Figure 3: Agricultural land classifications map

9.4 In 2002, the Forest of Dean District Council commissioned a [Landscape Character Assessment](#) for the district. This was a comprehensive study which separated the district into the following Landscape Character types:

1. Wooded valleys;
2. Limestone Hills;
3. Limestone Plateau;
4. Wooded scarp and lower scarp slopes;
5. Wooded syncline and settled Forest margin;
6. Unwooded Vale;
7. Drained riverine farmland and grazed salt marsh;
8. Littoral sands and rock outcrops; Undulating farmland;
9. Ridges and valleys;
10. Wooded Hills;
11. Floodplain farmland;
12. Vale Hillocks;
13. Low Hills and Orchards.

9.5 This assessment is still considered to be an accurate summary of the landscape values of the Forest of Dean district, and the Landscape Character Assessment forms a robust and comprehensive baseline for landscape character considerations.

9.6 The current planning framework also contains a number of [Locally distinctive areas](#) (LDAs). This designation protects landscape values within settlements, as opposed to the wider landscape. The current Local Planning Framework includes the following LDAs:

1. Bream, including: New Road LDA (Bream 1)/ Parkend Road LDA/ Hang Hill (Bream 2a)/ Parkend Road (Bream 2b)/ Bowson Road (Bream 2c)/ Bowson Square LDA (Bream 3)/ Brems Eaves LDA (Bream 4)/ Eastern Area LDA (Bream 5)/
2. Ruardean area, including: Ruardean Hillside/ Ruardean Hill LDA/ Ruardean/ Pettycroft LDA
3. Ellwood, including: Ellwood Fringe LDA/ Central Ellwood LDA
4. Redbrook
5. Harrow Hill
6. Camomile Green, Lydrook
7. Lower Soudley
8. Ruspidge South
9. Pillowell LDA
10. Yorkley, including: Yorkley West LDA & Yorkley Slade LDA

9.7 The district contains two Areas of Outstanding Natural Beauty (AONB)- the Wye Valley AONB and the southern extent of the Malvern Hills AONB. A [review](#) into the status of England's National park and Areas of Outstanding Natural Beauty was recently completed in September 2019, which recommended that these two existing designations should be combined into a new designation of National landscapes, and given great scope and resources to pursue a wider

9 . Landscape, soil and geology

sustainability agenda of nature recovery and connectivity than AONBs currently address. The Forest of Dean district was listed as a "stakeholder proposal submitted to Natural England for further landscape designation", and the following statement was included in the report:

9.8 *The Forest of Dean was on the original list in the 1947 Hobhouse report linked with the Wye Valley, which was designated as an AONB on its own in 1971. There have been several attempts since then to fulfil the expectation that the Forest of Dean would be designated. There now appears to be considerable local support that national designation would be good. There is a collaborative National Lottery Heritage Fund-supported project (the Foresters' Forest) which would appear to provide an excellent jumping-off point for a new designation. We support it.*

9.9 Some preliminary negotiations between stakeholders and the district council have occurred regarding the potential of the Forest of Dean to become designated as a Biosphere Reserve (BR). Biosphere reserves are an international landscape designation through UNESCO which recognises a defined areas special ecological values and promotes the area as a model region for sustainable development. This designation is compatible with AONG status, and it is possible that both designations could overlap.

Likely future without the Plan

Most aspects unlikely to change and existing policy framework will continue to discourage housing development outside allocated sites and the defined settlement boundary. Appeal outcomes may allow development in highly visible sites occasionally, particularly if the 5 year land supply becomes out of date.

Some incursions of built up land around existing settlements will incrementally impact on some countryside areas.

Forest of Dean district may in part be designated as a "National landscape" and a "Biosphere Reserve".

Guide questions

1. Does the policy protect scenic areas and notable views from encroachment from development?
2. Does the policy protect good quality agricultural land for primary production?

Monitoring framework

1. Visual changes from development to landscape values from a 2019 baseline.
2. The proportion of residential development which is located within defined settlement boundaries.

Evidence base

- [Coleford landscape study policy](#)
- [Staunton landscape study](#)
- [Forest of Dean District Council Landscape Supplementary Planning Document \(SPD\) Adopted March 2007](#)
- [Wye Valley Area of Outstanding Natural Beauty \(AONB\) Management Plan 2015-2020](#)

9 . Landscape, soil and geology

- [Malvern Hills Area of Outstanding Natural Beauty Management Plan 2019-2024](#)
- [National Character Area Profile 104: South Herefordshire and Over Severn](#)
- [National Character Area Profile 105: Forest of Dean and Wye Valley](#)
- [National Character Area Profile 106: Severn and Avon Vales](#)
- Agricultural land classification mapping
- [Landscape review: final report. Department for Environment, Food & Rural Affairs.](#)

10 . Biodiversity

10 Biodiversity

10.1 The Forest of Dean district has a large number and variety of protected sites and landscapes. They include areas protected by European and national legislation and development within them is strictly controlled. Examples include the Special Areas for Conservation (SAC) and Sites of Special Scientific Interest (SSSI). There are also locally protected Local Wildlife Sites and other areas of local interest. The following five sites are European nature conservation sites:

- The River Wye SAC;
- The Wye Valley Woodlands SAC;
- The Wye Valley Woodland and Forest of Dean Bat Sites SAC;
- The Severn Estuary European Marine Site (SAC, SPA, Ramsar);
- Walmore Common SPA and Ramsar.

10.2 There are 47 Sites of Special Scientific Interest (SSSI) in the Forest of Dean district. Of these, most have been assessed to be of "Favourable" condition by Natural England (2009-2019). However, the most recent assessments of the following nine SSSI's have attracted the following "unfavourable condition" status:

- Longhope Hill SSSI - Unfavourable: declining
- May Hill SSSI- Unfavourable : Recovering
- River Wye SSSI (Gloucestershire/ Herefordshire) Unfavourable: Recovering
- Scully Grove Quarry SSSI -Unfavourable: No change
- Swanpool Wood and Furnace Grove SSSI: Unfavourable- declining
- The Malvern Hills SSSI- Unfavourable: Recovering
- Upper Severn Estuary- Unfavourable: Recovering
- Upper Wye Gorge- Unfavourable: Recovering
- Walmore Common- Unfavourable: No change

The map below illustrates the main environmental values of the district, including forest cover, Special Areas of Conservation and Areas (SACs) of Outstanding Natural Beauty.

10 . Biodiversity

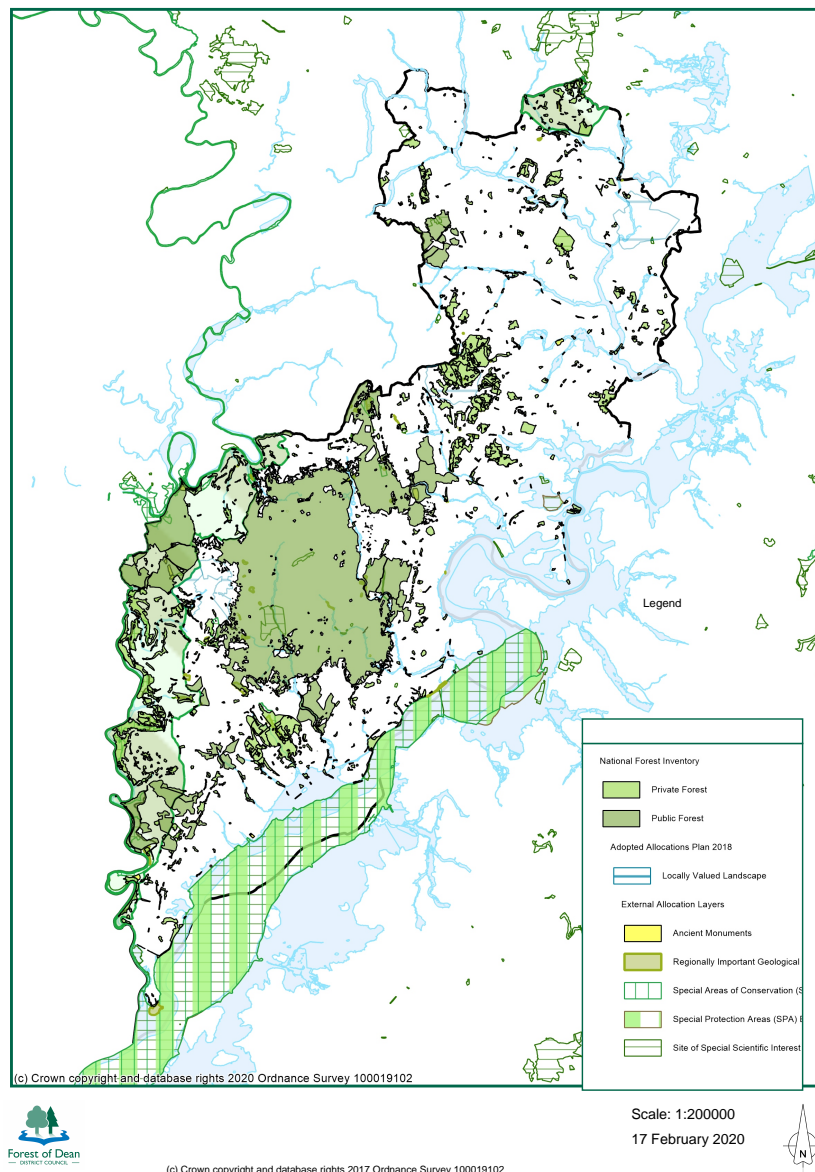


Figure 4: Environmental designations in Forest of Dean District

10.3 Figure 4 shows the location of internationally important sites for nature conservation in and near the Forest of Dean District: Special Areas of Conservation (SAC), Special Protection Areas (SPA), and Ramsar wetland sites.

10.4 The River Wye SAC is a large river in a geologically mixed catchment, with an exceptional range of aquatic flora and fauna. The Severn Estuary SAC/SPA/Ramsar site consists of intertidal mudflats, sandflats, saltmarsh, shingle and rocky shoreline. These habitats support internationally important populations of waterfowl. The estuary is also important for the run of migratory fish and has an immense tidal range. The Walmore Common SPA/Ramsar site is designated because of its large population of Bewick's swans. The Wye Valley and Forest of Dean Bat Sites SAC are designated because of their populations of greater and lesser horseshoe bats. The Wye Valley Woodlands SAC is a large woodland that straddles the England-Wales border and hosts lesser horseshoe bats.

10 . Biodiversity

10.5 The table below summarises the condition of, and threats and pressures on these internationally important sites for nature conservation. Key pressures related to development planning are water use leading to changes in water levels; sewage treatment effluent being discharged into rivers, affecting water quality; dredging and runoff from development sites affecting river water quality and hydromorphology; development near the nature conservation sites, leading to disturbance of the bats and birds that are the qualifying features of the sites; and wind turbines affecting flight paths. The condition of the birds using the Severn Estuary is particularly problematic, and particularly prone to ‘in combination’ (cumulative) impacts.

Condition of, and threats and pressures on, internationally important nature conservation sites in/near Forest of Dean District.		
Name of site	Why the site has been designated (‘qualifying feature’)	Threats and pressures
River Wye SAC	Water courses of plain to montane levels with the <i>Ranunculus fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation	<ul style="list-style-type: none"> • Pollution to groundwater (point sources and diffuse sources) • Human induced changes in hydraulic conditions • Other ecosystem modifications • Invasive non-native species • Forest and plantation management and use
	Transitional mires and quaking bogs	
	Twait shad (<i>Alosa fallax</i>)	
	White-clawed crayfish (<i>Austropotamobius pallipes</i>)	
	Bullhead (<i>Cottus gobio</i>)	
	River lamprey (<i>Lampetra fluviatilis</i>)	
	Brook lamprey (<i>Lampetra planeri</i>)	
	Otter (<i>Lutra lutra</i>)	
	Sea lamprey (<i>Petromyzon marinus</i>)	
	Atlantic salmon (<i>Salmo salar</i>)	
Severn Estuary SAC	Estuaries	<ul style="list-style-type: none"> • Urbanisation, industrial etc. • Changes in abiotic conditions • Human induced changes • Recreational activities • Modification of cultivation practices
	Mudflats and sand flats not covered by seawater	
	Atlantic salt meadows	

10 . Biodiversity

	<p>Sandbanks which are slightly covered by seawater all the time</p> <p>Reefs</p> <p>Sea lamprey (<i>Petromyzon marinus</i>)</p> <p>European river lamprey (<i>Lampetra flutviatilis</i>)</p> <p>Twait shad (<i>Alosa fallax</i>)</p>	
Severn Estuary SPA	<p>Bewick's swan (<i>Cygnus columbianus bewickii</i>)*</p> <p>Common shelduck (<i>Tadorna tadorna</i>)*</p> <p>Gadwall (<i>Anas strepera</i>)*</p> <p>Dunlin (<i>Calidris alpina alpina</i>)*</p> <p>Common redshank (<i>Tringa totanus</i>)*</p> <p>Greater white-fronted goose (<i>Anser albifrons albifrons</i>)*</p> <p>Waterbird assemblages</p>	<ul style="list-style-type: none"> • Recreational activities • Other urbanisation, industrial etc. • Modification of cultivation practices • Changes in abiotic conditions • Human induced changes in hydraulic conditions
Severn Estuary Ramsar	<p>Immense tidal range</p> <p>Unusual estuarine communities, reduced diversity and high productivity</p> <p>Run of migratory fish between sea and river via estuary</p> <p>Very diverse fish species</p> <p>Waterbird assemblages of international importance</p>	<ul style="list-style-type: none"> • Dredging • Erosion • Recreational disturbance
Walmore Common SPA	<p>Bewick's swan (<i>Cygnus columbianus bewickii</i>)*</p>	<ul style="list-style-type: none"> • Human induced changes in hydrologic conditions • Changes in biotic conditions

10 . Biodiversity

Walmore Common Ramsar	Large population of Bewick's swan	<ul style="list-style-type: none"> • Outdoor sports and leisure activities, recreational activities • Modification of cultivation practices
Wye Valley and Forest of Dean Bat Sites SAC	Greater horseshoe bat (<i>Rhinolophus ferrumequinum</i>)	<ul style="list-style-type: none"> • Other ecosystem modifications • Outdoor sports and leisure activities, recreational activities • Human induced changes in hydraulic condition
	Lesser horseshoe bat (<i>Rhinolophus hipposideros</i>)	
Wye Valley Woodlands SAC	Asperulo-Fagetum beech forests	<ul style="list-style-type: none"> • Other ecosystem modifications • Invasive non-native species • Changes in biotic conditions • Problematic native species • Forest and plantation management and use
	Tilio-Acerion forests of slopes, screes and ravines	
	Taxus baccata woods of the British Isles	
	Lesser horseshoe bat (<i>Rhinolophus hipposideros</i>)	

Global condition of qualifying feature:

A	B	C	* information only available about population and isolation, not global condition

10.6 The Gloucestershire Nature partnership has created the Strategic Nature map which may provide a foundation for any future policy development around the GI theme. This map (shown below- Forest of Dean district is the western most portion of the map west of the Severn river estuary and river corridor) highlights the ecological richness and landscape diversity of the district, and indicates how special the natural values of the Forest of Dean district are, in the wider context of Gloucestershire. In this context, ecological considerations must be given serious consideration.

10 . Biodiversity

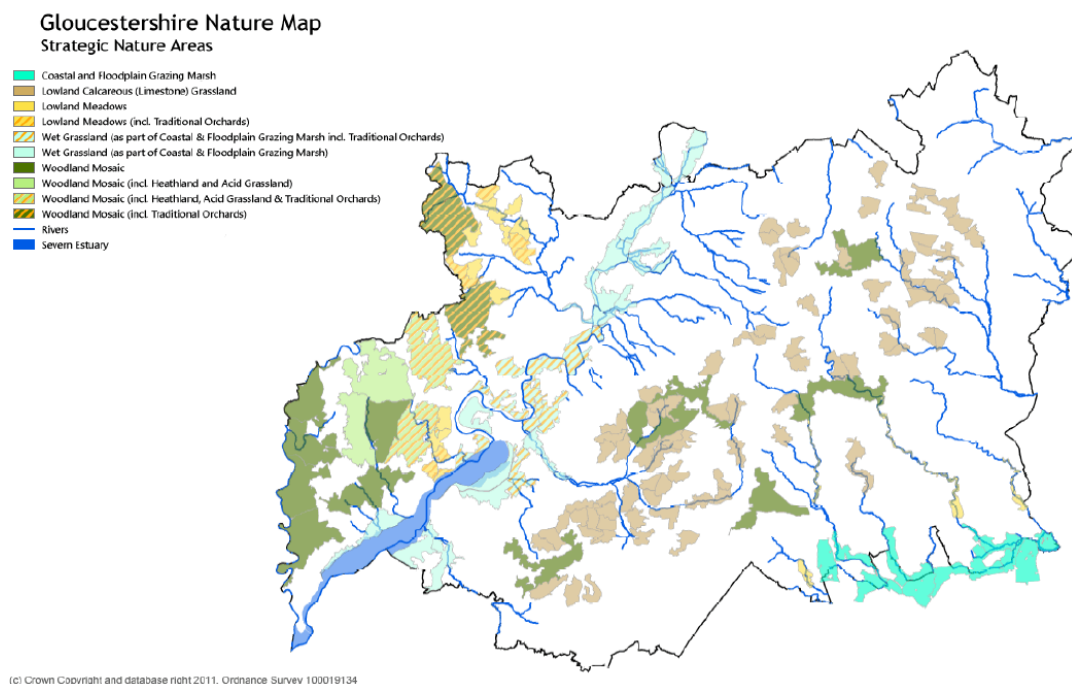


Figure 5: Gloucestershire Nature Map

10.7 One of the reasons why the ecological attributes of the Forest of Dean District feature more prominently on this map as compared to the rest of Gloucestershire, is the fact that the southern half of the district is defined by two major river corridors- the Wye and the Severn- and contains the Statutory Forest of Dean- a large publicly owned forest reserve which covers a land area of around 90 square kilometres.

10.8 The district contains 13,605 ha of woodland- 10,839 of this is designated ancient woodland. 9,990 of this woodland is publicly owned, and 3,874 ha is privately owned. In total, this means Forest of Dean district currently has 24.6% woodland cover; which well over twice the national average for comparable sized districts.

10.9 There are various projects in development which when completed will greatly assist the bench-marking and monitoring of ecological values and wildlife populations across the county, including key sites in the Forest of Dean district. For example, Gloucestershire Local Nature Partnership (GLNP) has embarked on a pilot scheme called the Nature Recovery Network, in which they will attempt to deliver on the following statement from the UK government's 25 year environment plan (25 YEP): *"We will explore the ways in which new data, tools and strategies can support development that brings wider environmental improvement, including linking with fresh initiatives, such as the Nature Recovery Network into the planning system"*.

10.10 Biodiversity enhancements are being made on a development site scale through Council's sustainability team; however opportunities to broker landscape scale habitat enhancements and linkages remain relatively unrealised up to date.

10.11 The GLNP is also developing a draft strategic framework for Green Infrastructure (GI) across the county of Gloucestershire. GI has been described in Natural England's guidance as *"Green Infrastructure is a strategically planned and delivered network comprising the broadest*

10 . Biodiversity

range of high quality green spaces and other environmental features. It should be designed and managed as a multi-functional resource capable of delivering those ecological services and quality of life benefits required by the communities it serves and needed to underpin sustainability. Its design and management should also respect and enhance the character and distinctiveness of an area with regard to habitats and landscape types".

10.12 This body of work can directly inform the Forest of Dean district Local Plan, and will hopefully provide a more holistic, landscape scale framework for assessing and progressing with a Green Infrastructure network.

10.13 The geography and natural values of the Forest of Dean district create a series of environmental constraints and limits of the settlement pattern and growth capacity of the district.

10.14 These primarily are:

The Wye River and the Severn estuary

10.15 The district is defined by the two river corridors of the Severn to the east and the Wye to the west, which meet at the Beachley peninsula at the district's most southern point. This creates the thin, V-shaped, wedge at the south of the district. The river corridors both contain important environments along their extent, particularly the estuarine environments of the Severn River which comprises of a network of low lying flood plains which provide important habitat for migratory birds. The Severn River corridor is also associated with large swathes of flood prone land which is unsuitable for anything more than minimal development.

10.16 This constrains growth in centres like Lydney, Westbury Upon Severn and Newnham which are located along the Severn River, and limits growth in an easterly direction.

The Statutory Forest of Dean

10.17 The statutory Forest of Dean is a protected area managed on behalf of the UK government by the Forestry Commission. This is a large area of mixed woodlands which covers an area of 8,286 ha. This protected area has a long history, and its status as a reserve for timber and game as well as the location of coal outcrops has defined the settlement pattern around it, forming the Forest ring of settlement which circles the statutory Forest, and provides a distinctive and attractive forest back drop to these settlements.

Sites of Special Scientific Interest (SSSI)

10.18 Estuarine, woodland and geological features have been identified as special places and thus attracted a SSSI designation to acknowledge these unique qualities.

Likely future without the Plan

The abundance of biodiversity is likely to decline, and the distribution of protected species is likely to shrink.

Habitat continues to be protected on a site by site basis through the development management process.

10 . Biodiversity

The mosaic of ecosystems across the district will continue to be fragmented. A lack of policy framework for Green Infrastructure means landscape scale wildlife linkage opportunities are missed.

The Gloucestershire Nature Partnership will continue to create and provide mapping and decision making tools to assist local authorities in the protection and enhancement of nature areas.

The UK government's Environment Bill provides a framework for achieving 10% biodiversity net gain through development management.

Guide questions

1. Does the policy strategically deliver a net gain to biodiversity?
2. Does the policy direct development and associated habitat disturbance away from areas identified as having high ecological value?
3. Does the policy support the creation of new habitat in strategic sites, which provide wildlife linkages across the district?

Monitoring Framework

1. Extent of woodland cover (National Forest Inventory);
2. Condition and assessment of designated sites (Natural England);
3. Realisation of the draft strategic framework for Green Infrastructure (GI) - pending adoption;
4. Nature Recovery Network- pending adoption;
5. Analysis of Gloucestershire Centre for Environmental Records- trends in abundance and distribution of wildlife

Evidence base

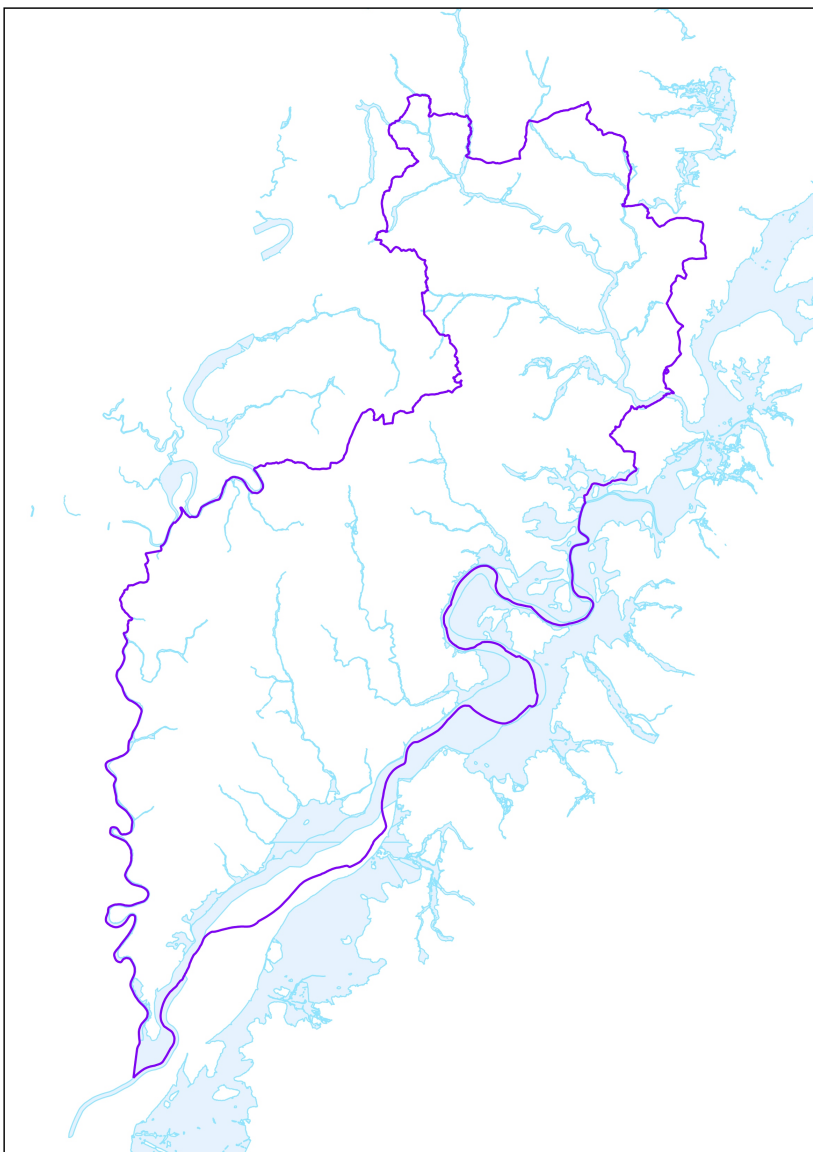
- [Gloucestershire Centre for Environmental Records \(GCER\)](#)
- [A strategic framework for Green Infrastructure in Gloucestershire- Gloucestershire Local Nature Partnership, 2015.](#)
- [A Strategy for the Conservation of Horseshoe Bats in the Wye Valley and Forest of Dean- 2016](#)
- [Designated sites condition and assessment- Natural England](#)
- [Forest Research- National Inventory of Woodland and Trees](#)
- Biodiversity Survey of Forest of Dean Project
- [Joint Nature Conservation Committee- Special Areas of Conservation list](#)

11 . Water

11 Water

11.1 The Forest of Dean district contains some areas of flood risk, which are mainly grouped around the banks of the River Severn corridor in areas such as Awre, Boxbush and Rodley. However there is one area of high flood risk on the Wye river banks in Upper Lydbrook.

11.2 Climate change is likely to exacerbate flooding through the district. Strategic flood risk assessments for the district have been undertaken in (2008) and form the basis of the flood zone mapping. This is currently being updated and should be complete by 2020. The map below illustrates of areas exposed to flooding throughout the district, with areas along the Severn vale in the south eastern extent of the district, most effected.



11.3 The Forest of Dean district entirely falls into the catchment area classed by the Environment Agency as Severn Vale and Wye - Carboniferous Limestone Forest of Dean operational catchment. The overall rating for this catchment was consistently “Good” over various quantitative and chemical indicators from a period of 2009-2016, and future predictions expect this to continue.

11.4 This catchment contains a ground water area of 8176.999 ha and a total surface area length of 81.77 km². It also contains three protected areas: two designated under the Nitrates directive and one Drinking Water Protected Area.

11.5 There are some water quality problems associated with former mine workings in the Forest of Dean, which are often acidic and contain metals which can have significant ecological impacts.

11.6 Figure 6: Surface water and flood zones in the Forest of Dean district

11 . Water

11.7 Some smaller tributaries within this catchment which have been rated as Poor to Moderate. The reasons for the Poor status of Cinderford Brook (Ruspidge area) and Warth Brook (Aylburton area) are described as “Macrophytes and Phytobenthos Combined” caused by unknown causes and Poor nutrient management within Agriculture and rural land management respectively.

11.8 Abstraction within the districts catchments is mainly for public water supply and agriculture. The Cinderford and Glynch Brooks are considered to be over abstracted (Severn Rivers Trust: 2016) Severn Trust has projected that they will focus on in-river and habitat improvements in the Cinderford Brook rather than make long term reductions in abstraction.

Watercourse	Overall classification
Blackpool Brook- source to conf Cinderford Brook	Poor
Cannop Brook- source to River Severn Estuary	Moderate
Cinderford Brook- source to conf Blackpool Brook	Moderate
Cinderford Brook conf Blackpool Brook to Severn estuary	Moderate
Soudley ponds	Good
Warth Brook- source to River Severn estuary	Poor

Likely future without the Plan

Development currently avoids streams and flood zones through the development management process.

In dry years (which will potentially increase with climate change) water supply to the district may become critically low.

Water quality in the district will not achieve the Water Framework Directive target of all inland and coastal waters achieving at least "good" condition.

Guide questions

1. Does the policy safeguard streams and bodies of water from new development?
2. Does the policy direct new development away from areas mapped as Zone 2 or 3 flood risk?
3. Does the policy ensure new land allocations for development are supported by adequate water supply and infrastructure?
4. Does the policy ensure the location and construction of development does not result in a decline of water quality through sediment run off?

11 . Water

Monitoring framework

1. Environment Agency overall status of Severn Vale and Wye- carboniferous Limestone Forest of Dean operational catchment
2. Environment Agency overall status for Forest of Dean district watercourses
3. Environment Agency Flood are mapping

Evidence base

- [Environment Agency catchment water quality data](#)
- [Environment Agency flood area data](#)
- [Environment Agency rainfall and river flow summaries](#)
- [River basin management plans \(RBMPs\) for the Severn river](#)
- [Water resource management plan- Severn Trent](#)

12 . Carbon emissions & energy use

12 Carbon emissions & energy use

12.1 There has been some good progress in the past 8 years in reducing the Forest of Dean district's carbon footprint by 30%, in line with national trends. However to meet the challenge of the Climate Emergency and achieve Council's target of net zero carbon emissions by 2030 there will need to be deeper and more rapid cuts to green house gas emissions again.

12.2 The following graph illustrates the rate of carbon reductions over the past eight years, and the rate that will be required to achieve net zero carbon emissions by 2030. The following pie chart shows which sectors account for current district wide carbon emissions.

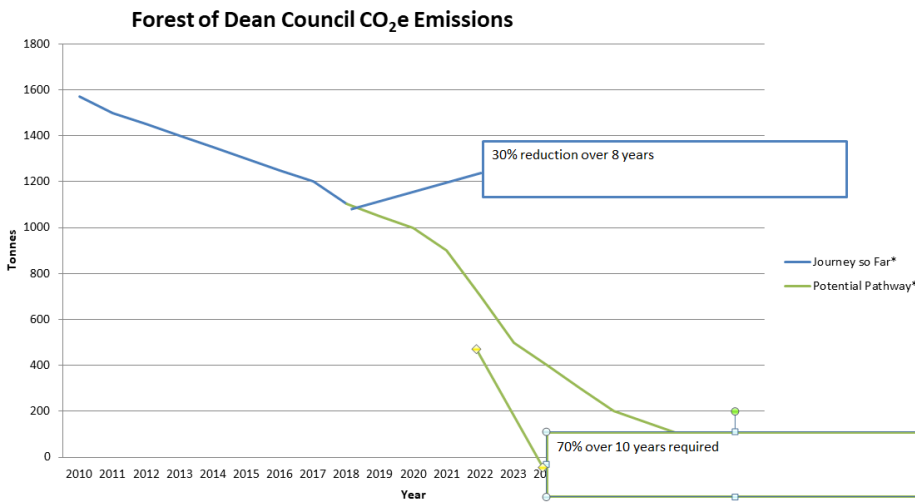
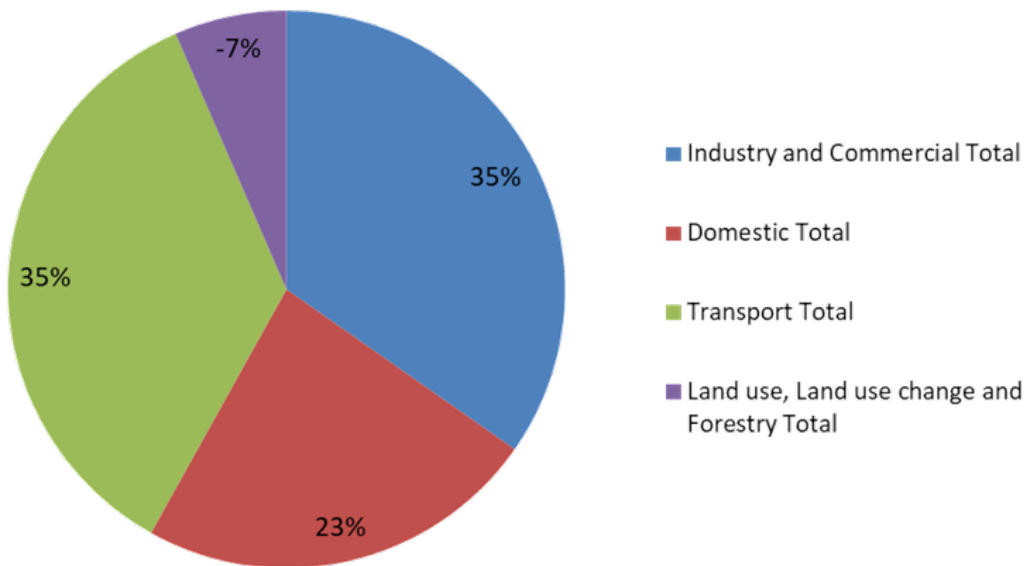


Figure 7: Forest of Dean Council CO₂e emissions



12 . Carbon emissions & energy use

Figure 8: District carbon emissions by sector

In the third quarter of 2019, all districts, apart from Gloucester, had higher CO2 emissions per dwelling than England. Forest of Dean district has dropped from the highest emitter per dwelling in 2018, to the second highest after the Cotswolds in 2019.

	Average Carbon Dioxide Emissions (tonnes pa) per dwelling	
	2018 Q3	2019 Q3
Cheltenham	3.53	3.64
Cotswold	4.62	5.05
Forest of Dean	5.32	4.75
Gloucester	3.18	3.10
Stroud	4.49	4.03
Tewkesbury	3.36	3.93
England	3.66	3.49

12.3 This is the equivalent of the following average carbon emissions (tonnes p/a) per dwelling.

Source: Domestic Energy Performance Certificates for all domestic dwellings (existing and new) by type of property, average energy use, carbon dioxide emissions and fuel costs.

12.4 These figures indicate that the CO2 emissions and energy use per dwelling in the Forest of Dean district are significantly higher than both Gloucestershire and England's average. This may be because of a higher proportion of older style, detached building stock which is not well insulated or designed for warmth. *Source: Gloucestershire County Council*

12.5 The Forest of Dean district's housing stock performs poorly in terms of energy efficiency compared with other areas, which contributes to higher emissions from domestic sources than necessary. Only **31%** of homes are well insulated in Forest of Dean, meaning they have an Energy Performance Certificate (EPC) rating of A, B or C. **11%** of households in the area are in fuel poverty, which means they can't afford to heat their homes properly. Poor insulation contributes to this problem. Friends of the Earth claims that by upgrading the insulation of 2,262 homes per year within the Forest of Dean area, all homes will be insulated by 2030.

	Energy use (Kwh/m2 pa) per dwelling	
	2018 Q3	2019 Q3
Cheltenham	256.2	262.7

12 . Carbon emissions & energy use

Cotswold	233.5	252.0
Forest of Dean	315.7	245.7
Gloucester	239.2	261.0
Stroud	250.5	231.1
Tewkesbury	191.5	255.5
England	247.7	247.0

12.6 The average energy use per dwelling in the third quarter of 2019 was higher than in the third quarter of 2018 in all districts of Gloucestershire, apart from the Forest of Dean and Stroud where it was lower. The fall was greatest in the Forest of Dean whilst Tewkesbury had the sharpest increase. The result of these changes was to bring the Forest of Dean and Tewkesbury more in line with the other districts compared with 2018 Q3.

12.7 In 2019 Q3 the average energy use was highest in Cheltenham (262.7 kWh/m² pa) with this being above the England average (247.0 kWh/m² pa). The lowest usage was in Stroud (231.1 kWh/m² pa) with this being below the England average. The energy use of dwellings across the county varies considerably in each district, with household carbon emission rates are being strongly linked to income; the richest decile emitting three times that of the poorest decile. However policy to reduce carbon emissions usually results in higher energy bills that disproportionately affect the poorest households as they spend more of their overall income on energy.

12.8 Whilst development control and building regulations can improve the efficiency standards of new builds, this has limited influence over the total energy use and carbon emissions as new development only contributes an additional 1% (approximately) to the total housing stock of the district per annum. Therefore, any significant reduction in household carbon emissions will also require retrofitting the existing housing stock of the district.

12.9 A switch from gas central heating to eco-heating (such as heat pumps) which doesn't burn fossil fuels is needed. There are only **332** government funded eco-heating systems in the Forest of Dean area, yet the UK needs to fit around 1 million per year. A fair share of this figure would involve homes in the Forest of Dean district being fitted with **1,203** eco-heating systems every year.

12.10 The largest contributors to district wide carbon emissions are transport and industry/commercial sectors, which both contribute 35% each. Dwellings account for a smaller sector of only 23%. Whilst transport planning lies outside of the influence of the Local Plan, as it sits with the Gloucestershire County Council, the Local Plan can influence travel patterns by consolidating development at established nodes, thus reducing the need for access travel.

12.11 In 2018, carbon dioxide emissions from the transport sector were 2.6% lower than in 2017 UK wide, and 3.2% lower than in 1990. The large majority of transport based emissions are from road transport. Driven by steady growth in vehicle kilometres traveled, road based emissions peaked in the UK in 2007, but since then have fallen back down to 1990 levels, driven mainly by

12 . Carbon emissions & energy use

improvements in new car fuel efficiency. It is assumed that these nation wide trends reflect the district level trajectory, though very little data is available on transport sector emissions on the district level (Source: UK government provisional emissions statistics; 2018).

12.12 In 2016, the total renewable energy capacity of the district was calculated at 54.7MW (up from 44.9MW in 2015), which ranked Forest of Dean district 104 of 348 local government areas in England and Wales. This is broken down to the following renewable type:

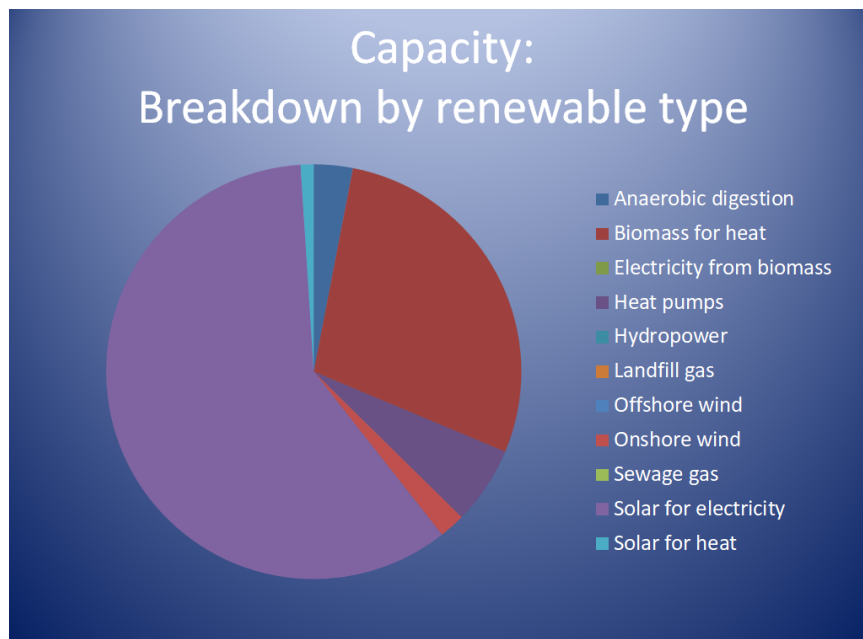


Figure 9: District wide breakdown of renewable capacity by type

12.13 The total generation in 2016 from renewables was 99,525MWh (up from 84,268MWh in 2015), which ranks Forest of Dean district 113 of 348 local government areas in England and Wales.

12.14 This means that the renewable energy % share of total electricity consumption was 11% in 2016 (up from 9% in 2015), which ranks Forest of Dean district 125 of 348 local government areas in England and Wales.

Likely future without the Plan

Transport and industry will continue to account for around 70% of the districts carbon emissions.

Net district carbon emissions continue to rise as more dwellings are built in the district.

Renewable energy technology continues to be taken up slowly.

Out commuting continues to increase and most trip will be made by private car, as more and more residents rely on jobs and services outside of the district.

12 . Carbon emissions & energy use

Steady increase in the uptake of renewable energy technology and 2-3 new major renewable energy installations per year.

Climate change projections indicate that summers will be drier (13-18%) and winter will be wetter (11-15%). This will impact on the condition of infrastructure like storm water drains and the road network, and will mean that more buildings will be impacted by flooding and be difficult to keep cool through hotter periods.

Guide questions

1. Does the policy deliver high standards of building design which reduces energy consumption?
2. Does the policy decrease the need for long distance daily travel by residents to access jobs and services?
3. Does the policy promote the uptake of renewable energy technology?
4. Does the policy direct development away from areas of flood risk and low lying land?
5. Does the policy “climate proof” hard infrastructure and reticulated systems such as roads, storm water drainage and utilities?

Monitoring Framework

1. % share by sector of district wide carbon emissions
2. Average carbon emissions per dwelling
3. Average energy use per dwelling
4. Renewable energy share of total energy use of the district
5. Domestic Energy Performance Certificates for all domestic dwellings (existing and new) by type of property, average energy use, carbon dioxide emissions and fuel costs

Evidence base

- [Renewable Energy Locator](#)
- [Environment Overview of Gloucestershire \(2017\) Inform Gloucestershire](#)
- Energy use and carbon emissions per dwelling data (2018) Gloucestershire County Council.
- Department for Business, Energy & Industrial Strategy, national statistics on electricity consumption (based on Lower and Middle Super Output Areas)
- [Gloucestershire Sustainable Energy Strategy, GFirst LEP.](#)
- Gloucestershire Climate Change Strategy and Action Plan (GCC)
- Climate Action Co-Benefits toolkit for local authorities
- Met office UK climate datasets
- [Forest of Dean District Council Greenhouse gas emissions report 2018-2019](#)
- [Live tables on Energy Performance of Building Certificates](#)
- [Sub-regional fuel poverty data 2018](#)
- [Data on numbers of domestic eco-heating systems installed](#)

13 . Air

13 Air

13.1 Air quality across the Forest of Dean District remains very good, with measured levels of nitrogen dioxide (NO₂) generally well within national limits. There is one Air Quality Management Area (AQMA) in the District which is in Lydney and was declared in July 2010. It was identified that traffic congestion (at the T junction between the High Street and the Bream Road) was the most likely cause of the nitrogen dioxide (NO₂) levels which exceeded the national air quality objectives at the time the AQMA was declared.

13.2 Monitoring throughout 2017 has not identified any exceedances in the Forest of Dean District.

13.3 With the exception of our AQMA, in Lydney High Street, the diffusion tube survey results were marginally lower (about 1 ug_m-3) than those recorded last year. Within the AQMA, the results were very slightly higher than last year, but still below the national air quality objective of 40 ug_m-3. These monitoring points were the only sites with nitrogen dioxide levels within 10 per cent of the annual average air quality objective (i.e. above 36ug_m-3).

13.4 Within Forest of Dean District Council's administrative area there are no point sources of pollution that give rise to concern in respect of air quality. No new or significantly changed sources have been identified within the district. All proposed residential and industrial developments are considered with regard to their potential to increase traffic pollution in the AQMA and other areas.

13.5 However, the area encompassing properties either side of the A48, between the roundabout with the A466 to the west and extending east just beyond the junction with the B4293 at Hardwick Terrace, is included in the Chepstow Air Quality Management Area (AQMA). While this area lies outside the district in neighbouring Monmouthshire, any development within the Tutshill/ Sedbury area should be aware of its potential traffic impacts on this problem area which may compound declining air quality in this AQMA.

Likely future without the Plan

National trends are improving for air quality, in part because of the closure of polluting power stations, in part because of the switch to electric vehicles and increasingly stringent emission requirements for new petrol/ diesel vehicles.

Air quality in Lydney and Chepstow AQMAs continue to decline due to traffic congestion issues in both locations.

Guide questions

1. Does the policy avoid further congestion in identified AQMA (Chepstow and Lydney)?
2. Will the policy locate animal industries and associated odour impacts close to settlements?

Monitoring Framework

1. Annual air quality reports for Forest of Dean district
2. Progress against High Street Lydney AQMA action plan

13 . Air

Evidence base

- [Air Quality Annual Status Report \(ASR\) for the Forest of Dean district \(2018\)](#)
- [High Street Lydney Air quality Action Plan](#)
- UK Air- Air Information Resource, Department for Environment Food & Rural Affairs data and AQMAs interactive map

14 . Waste

14 Waste

14.1 In 2017/18 approximately 300,000 tonnes of waste was produced in Gloucestershire. This comprises municipal, industrial, commercial (non-inert), construction and demolition (inert) and hazardous waste. The majority of the county's waste (45.3%) was sent to landfill, this is much higher than the regional (21.9%) and national (12.4%) averages. 54.3% of Gloucestershire's waste, was recycled or composted which is higher than the regional (48.9%) and national (42.4%) averages.

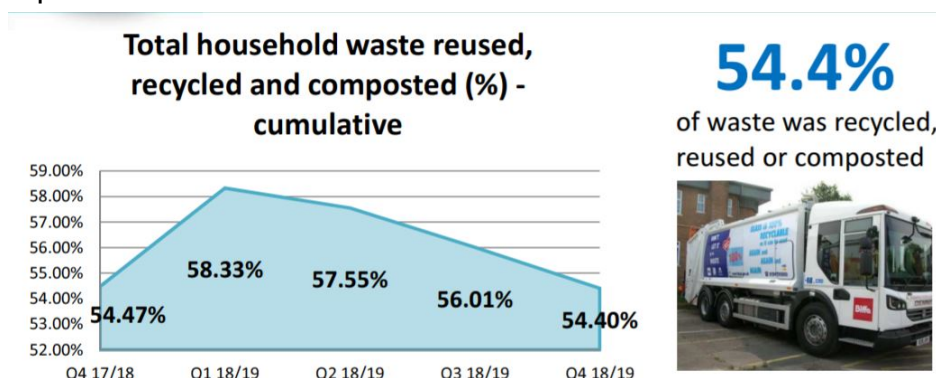
14.2 *Note: 'Household recycling' contains materials sent for recycling, composting or reuse by local authorities as well as those collected from household sources by 'private/ voluntary' organisations.*

14.3 The following table shows the percentage of household waste which was recycled by the six districts of Gloucestershire in 2018:

Local authority waste

District	Percentage of household waste sent for reuse, recycling or composting (Ex NI192)
Cheltenham	48.5
Cotswold	58.7
Forest of Dean	54.2
Gloucester	41.9
Stroud	61.2
Tewkesbury	54.5
Gloucestershire	54.2
South West	49
England	43.2

14.4 This figure below demonstrates how much of Forest of Dean district's waste was reprocessed. .



14 . Waste

Figure 10: Waste reprocessing statistics for Forest of Dean district council; Source: Quarterly cabinet reports, Forest of Dean District Council, 2019

Likely future without the Plan

Volumes of waste generated in the district continue to increase incrementally.

Rates of recycling remain at current levels.

Guide questions

1. Does the policy option reduce waste generation?
2. Does the policy option support opportunities to reduce waste going to landfill?

Monitoring Framework

Annual monitoring of local authority collected waste

To reprocess waste efficiently.

Evidence base

Statistical data set - ENV18 - Local authority collected waste: annual results tables, [Department for Environment, Food & Rural Affairs](#), last updated 18 December 2018

15 . Heritage

15 Heritage

Conservation status

15.1 The Forest of Dean District contains 1480 listed buildings/structures (which represent approximately 11% of listed buildings in the whole of Gloucestershire). 26 of these are Grade I, which means that they are of exceptional interest. In this District, these include Severn Bridge, Chepstow Bridge, St. Briavels Castle, Flaxley Abbey and the remainder are churches.

15.2 There are 66 Grade II* listed buildings/structures in the District, which means that they are important buildings of more than special interest. These include Bigsweir Bridge, Clearwell Castle, Dean Hall, a former blasting furnace (Gunn's Mill) and some churches and farmhouses.

15.3 1,388 of the listed buildings in the District are Grade II, which means that they are of special interest. These mainly include a wide range of domestic dwellings, agricultural buildings, churches and monuments, etc. in this District.

15.4 There are currently 92 nationally important archaeological sites (known as SAM- scheduled ancient monument) in the Forest of Dean (approximately 19% of the SAMS in Gloucestershire). These include portions of Offa's Dyke (47 sections), Lydney Harbour, a Motte, Scowles, Whitecliff Furnace, Castle Ruins, Ironworks, Steelworks, Village Cross, amongst many others.

15.5 Conservation Areas (CAs) are places of special architectural or historic interest, which have a particular character or appearance worthy of preservation or enhancement. The Forest of Dean District contains 27 Conservation Areas. These range from small areas of larger villages and towns, such as Lydney, Newent and Mitcheldean to quite significant chunks of villages, such as Westbury on Severn and even rural locations, such as Lowbands, which contains a former chartist community. Three (out of four) of our town centres (Lydney, Coleford and Newent) contain Conservation Areas.

15.6 The Forest of Dean District benefits from 3 Registered Parks and Gardens. These are Westbury Court (Grade II*), Clearwell Castle (Grade II) and Flaxley Abbey (Grade II). Whilst this represents only 5.4% of the 55 Parks and Gardens in Gloucestershire, these 3 sites are still of local and national importance.

15.7 Archaeological evidence within the District is varied and ranges across all different periods. The Forest of Dean Archaeological Survey Stage 4 (Gloucestershire County Council) provides a wealth of information on this topic, including a break-down of the HER (Historic Environment Record), which shows that 22% of the whole of the Gloucestershire HER areas are within the Forest of Dean.

Forest of Dean district history

15.8 The geological formation of the region, being a carboniferous strata with fields of coal and iron ore, has led to miners extracting these deposits for over two thousand years. Indeed, the industrial employment within the 'Forest Core' revolved around the mining of iron ore and later

15 . Heritage

coal and the rise and fall of these industries was a huge factor determining the wealth, poverty and human geography of the District. This including the iron and coal industries as well as quarrying of stone and clay for building materials.

15.9 A large portion of the central area of the Forest of Dean district is Statutory Forest. This area of wooded Crown Land was originally in the ownership of the King during Norman times and was used as the King's hunting grounds. Due to this history of the Forest protected as a royal game preserve, approximately 110 square kilometres of the woodland is Ancient Woodland.

15.10 The Statutory Forest provided timber which was used in abundance for ship building (Navy), building trade and fuel. Mines (iron ore and later coal) were established in and around the edges of the forest and therefore the deep mines and tram roads within it placed new pressure on the woodlands as they required more space to operate and expand. Furthermore, iron smelting at the times of the Roman settlements meant that there needed to be a charcoal supply.

15.11 Other local industries included tinplate, glass, pins, paper, fishing, nails, candle making and ropes. Also, boat/ship building took place along the Severn and Wye dating back to the 17th Century.

15.12 The Forest of Dean (in particular the Crown Land) sits within the triangle between the Rivers Severn and Wye. The transport role that these rivers have played throughout time has been huge. Before the commencement of the railways in about the mid-19th century, these two rivers were the main routes through the District.

15.13 The first form of rail transport in the District were Tramroads which consisted of rail tracks on which carts were pulled by horses. These sprang up, in particular around the Statutory Forest connecting mines, quarries and ironworks to each other and to ports (such as Lydney) or places of distribution. With the introduction of steam locomotives Tramways began to appear around the 1860s. The main canal route in the Forest of Dean District was the Herefordshire and Gloucestershire Canal, which linked their respective cities via a 34 mile canal network. It ran through the northern part of the district between Leddington to Rudford, passing nearby Dymock, Oxenhall, Newent and Tibberton. Remains of the canal can still be found and it is hoped that it will be reinstated in parts in the future.

15.14 The Land Settlement Association was a Government Scheme established in 1934 with the aim of re-settling unemployed workers from depressed industrial areas. Over the period between 1934-1939, 1,100 small holdings were established nationwide within 26 settlements (Wikipedia.org). Schemes were set up all around the country and significantly in the area north of Newent, known as The Scarr. The pattern of development and their associated holdings is still very much evident.

15.15 The Chartist Movement was an attempt at both a social and political reform. In 1845, O'Connor (a leader of the movement) pushed for the launch of the 'The Chartist Land Company'. O'Connor's vision was to purchase land and create small holdings of between 2 and 4 acres, each with a small cottage and outbuildings. Two of the Land Company estates are located at Snigs End (Staunton and Corse) and Low Bands (Redmarley), three miles from each other. The other Chartist settlements are Dodford near Bromsgrove, Heronsgate (O'Connorville) near Rickmansworth,

15 . Heritage

Hertfordshire and Minster Loevell (Charterville) near Whitney, Oxfordshire. Sadly, the scheme was ill-fated and in 1851 the company folded. However, the original pattern of development and many of the buildings are still very much evident and unchanged today.

15.16 It is recognised that the large majority of buildings, structures, monuments and landscapes within the Forest of Dean District are not considered worthy of statutory designation, by being formally listed or by being situated within a Conservation Area. However, there will be some which have sufficient local significance to be considered as a non-designated heritage asset. This may be by virtue of their local architectural or historical features of merit, or possibly owing to their association with people or events. It is vital that these buildings are acknowledged, so that they can be afforded greater protection from potential future impacts. The Council envisages that work in collaboration with Parish Councils and local interest groups and individuals, would provide a local heritage list within the next 2-3 years.

15.17 A small portion (currently 17) of the Forest of Dean District's designated heritage assets have been identified as being 'at risk' through Historic England's monitoring programme, Heritage at Risk (HAR). This list records and highlights which designated heritage assets require more immediate attention to be restored and preserved and this may be through sensitive development opportunities. However, there are clearly gaps in our knowledge of the condition and vulnerability of the wider historic environment in the Forest of Dean District, and in particular the un-designated heritage assets. It is anticipated that this number of listed buildings and structures on the register will increase for the next review (2010-2021).

Likely future without the Plan

Some historic buildings fall into disrepair.

Insensitive development is refused in protected areas and sites through the development management process.

Guide questions

1. Does the policy promote development on sites on or adjacent to valued, protected and listed sites which does not overwhelm their heritage values?
2. Does the policy promote development is of a scale and density which is consistent with its surroundings?
3. Does the policy promote development within Conservation areas is consistent with existing character values?

Monitoring Framework

Number of Listed Buildings at risk

Evidence base

- [Forest of Dean Archaeological Survey Stage 4 \(Gloucestershire County Council\)](#)
- [Buildings at Risk register](#)
- [Historic England database of listed buildings](#)

15 . Heritage

- [Scheduled ancient monuments list](#)
- Forest of Dean district heritage appraisal
- Gloucestershire Historic Landscape Character Assessment

16 . Housing

16 Housing

16.1 In the Forest of Dean district, there was the following development activity as of the end of the financial year 2018/19:

Gross Dwelling Completions	287
Net Dwelling Completions (minus dwellings removed)	270
Gross dwellings Permitted but not Started	2255
Gross under construction	343
Gross for Outstanding and under construction	2598

16.2 In 2018/19, further 239 new dwellings were permitted in the district.

16.3 The Core Strategy lays out the following targets for new housing in the district:

- Average development density of 30 dwellings per ha;
- Tenure mix 70:30 in favour of rented accommodation sought;
- Total of 70 affordable dwellings district wide per year;
- 40% affordable housing contribution on housing developments over 5 houses.

16.4 The notable features of this data is that Forest of Dean District has the highest level of owner occupied housing (74.3%), ownership rates in the district are on average higher than county averages, and a high proportion of the district's housing stock is detached or semi-detached, with a much lower proportion of terrace housing and flats in the context of the whole of Gloucestershire.

16.5 Whilst there is significant, identified housing need in the district, the number of rough sleepers continues to remain very low with only one recorded in 2018/19. Homelessness is still an issue albeit in low numbers compared to other districts, and tends to be in the form of staying with friends or relatives.

Affordable housing

16.6 Average house prices for the 2018/19 for the district were as follows:

	Detached	Semi-detached	Terraced	Flat/ maisonette	Overall
2018/19	£350,209	£207,922	£173,007	£101,867	£264,535
2017/18	£310,41	£184,364	£165,235	£110,880	£237,620
2016/17	£294,546	£171,432	£155,563	£99,803	£224,225
2015/16	£277,817	£166,041	£145,786	£93,508	£214,434

16 . Housing

16.7 These figures illustrate that house prices in the Forest of Dean district are consistently tracking upwards, while house prices across the UK have experienced a downturn on average over the same period. These house prices are beyond many local people's reach, thus the need to secure affordable housing as a portion of net housing development.

16.8 Affordable housing is deemed affordable to those with a median household income as rated by the national government or a local government by a recognised housing affordability index. It includes a wide range of housing types from emergency shelters, to transitional housing, to non-market rental, to formal and informal rental, and affordable home ownership schemes.

16.9 For the period 1 April 2017- 30 March 2018, 100 affordable houses were completed and a further 65 affordable houses were permitted in the Forest of Dean district⁷. These were spread over the following locations: For the period 1 April 2018- 31 March 2019, 21 affordable houses were completed in the Forest of Dean district⁷. These were spread over the following locations:

Parish	No of units
Coleford	9
Lydney	8
Newent	4
Total	21

16.10 This is down significantly from 100 affordable housing units delivered in the previous 12 months to this period.

16.11 This delivery and these permissions go some way to meet the need for affordable housing, which has been identified in the Strategic Housing Market Assessment (SHMA) of 2013. This assessment determined that there is a need for **814** affordable homes per annum. This figure is not a realistic expectation given that the net target of all housing in the district is only 330 dwellings per annum, and actual delivery is lower. However it does serve to highlight the marked need for more affordable housing throughout the district, as compared with actual delivery.

16.12 The housing mix of affordable dwellings is also important, as a range of tenures and sizes are required. In 2018/19, 14 rented and 7 shared ownerships dwellings were delivered in the following formats:

1 bed	6
2 bed	8
3 bed	7
Total	21

16.13 A further 81 Affordable housing units were granted permission in 2018/19 (based on Full or Reversed Matters), which were in the following locations:

Parish	Affordable Units permitted in 2017/18
Newent	34

16 . Housing

Staunton	11
Tidenham	36
Total	81

16.14 The Local Plan contains targets and numbers for how many new dwellings should be located in each settlement, which is underpinned by a total target of 330 new dwellings per year over the plan period, set by central government to meet UK's housing needs. This is generally due to lack of market demand to make up the short fall. Any shortfall below 330 within the Plan period will be compounded onto the total number of dwellings expected to be delivered in the remaining period. The average number of houses built each year within the Forest of Dean district consistently falls below this number. Currently, the back log from 2006 to 2017 is 678.

16.15 For the overwhelming majority of new dwellings in the 2017/18 period, the Local Development Framework has been successful in containing new growth within the defined settlement boundary. These areas are considered to be the most sustainable, as they are positioned to take best advantage of existing infrastructure, especially public transport, and to prevent urban development in encroaching on the open countryside.

16.16 Larger housing developments are leveraged for additional infrastructure and services within towns through developer contributions, which have the potential to further enhance the quality of existing towns and villages for the benefit of both current and existing residents.

16.17 During the total 2017/18 financial year, the following figures were current:

- In total, **2255 dwellings are outstanding** over the Plan period, partially from this reporting period but predominantly compounded from previous years.
- **57.88%** of this outstanding figure is from within the four market towns of Lydney, Coleford, Cinderford and Newent, and **42.12%** in the other villages.
- **287 dwellings were completed** in this 12 month period;
- Of these **18.4% were in the villages collectively and 81.6% were in the four market towns;**
- **343 dwellings were under construction** in this period;
- Of these **49.5% were in the villages and 50.5% were in the four market towns.**
- In total, a further **17 (gross) were completed outside of the defined settlement boundary** in 2017/18. This represents a total of **6.6% of dwelling houses** in Forest of Dean district are built outside defined settlement boundaries in this period.
- Of the **239 which were permitted in 2018/19, 202 (88.9 %) were inside the settlement boundary and 37 (11.1%) were outside of .**

Likely future without the Plan

The number of people on the Council's housing register (home seeker plus) continues to grow, and demand continues to out strip supply.

Guide questions

16 . Housing

1. Does the policy promote the delivery of affordable homes to meet demand?
2. Will the policy deliver a mix of housing types which respond to community needs?

Monitoring Framework

1. New housing delivered
2. % share of affordable housing;
3. % share of new housing located within allocated sites and the Defined settlement boundary (DSB).

Evidence base

- [Strategic Housing Market Assessment- SHMA Update Paper: Impact of new Objectively Assessed Need figures \(2014\)](#)
- [Strategic Housing Market Assessment Update of the Local Authorities of Gloucestershire](#)
- [The Objectively Assessed Housing Needs of the Forest of Dean district- update report \(2015\)](#)
- Rough sleeper count and rate (Gloucestershire County Council)
- Strategic Housing Market Assessment for Local Authorities of Gloucestershire Housing register for Forest of Dean district.

17 . Education

17 Education

17.1 Levels of GCSE attainment in the Forest of Dean district are worse than the average for England. Within the context of Gloucestershire, the local districts of Forest of Dean consistently perform the lowest in terms of educational attainment at the GCSE level, as illustrated by this table of educational attainment from the 2017/18 financial year:

	9-4 pass in English and Maths		Average Attainment 8 score per pupil		Average Progress 8 score	
	2016/17	2017/18	2016/17	2017/18	2016/17	2017/18
Cheltenham	70.0	68.8	52.0	51.3	0.12	0.06
Cotswold	72.3	73.1	50.1	51.1	0.03	0.12
Forest of Dean	61.7	64.0	43.1	44.7	-0.19	-0.09
Gloucester	71.6	69.9	51.0	50.8	-0.10	-0.01
Stroud	71.5	75.4	50.5	52.6	-0.07	0.06
Tewkesbury	59.0	61.9	42.4	45.6	-0.41	-0.04
Gloucestershire	68.0	69.1	48.4	49.6	-0.11	0.02
South West	64.1	65.0	46.2	46.7	-0.13	-0.07
England	64.2	64.4	46.4	46.6	-0.03	-0.02

17.2 *These calculations are based on a new system of attainment which was introduced in 2016. The total score is allocated according to pupil achievements which are added together to give an Attainment 8 score, through a new rating criteria developed by the UK government.

17.3 The number of people with skills based qualifications and degrees in the Forest of Dean district also falls below the South west and Great Britain, as per the following tables:

	Cheltenham	Cotswold	Forest of Dean	Gloucester	Stroud	Tewkesbury
% with degree or equivalent and above - aged 16-64	45.2	39.5	26.2	16.2	24.4	27.9

School name	Amount of students above over capacity
Pillowell	1
Lydney	1
Ellwood	1

17 . Education

Hope Brook	5
Huntley	7
Blakeney	23
Tibberton	12
Bromsberrow	3

17.4 The capacity of local schools is another concern, with many local primary schools and one secondary school are consistently oversubscribed in terms of student numbers. The schools listed above are currently over subscribed as of 2019.

Likely future without the Plan

Forest of Dean district continues to under perform in educational attainment compared to other districts in the county.

Local schools continue to struggle to meet the demand for school places as the districts population steadily grows.

Guide questions

Does the policy option provide improved access to educational facilities?

Monitoring Framework

1. Educational attainment as 8 score index.
2. Proximity of housing development to educational facilities.
3. School places

Evidence base

- [Educational attainment in Gloucestershire \(2015\) Inform Gloucestershire](#)
- [TRACC- transport accessibility- Distance to primary schools by bus, Gloucestershire County Council](#)
- [TRACC- Transport accessibility- Distance to secondary school by bus, Gloucestershire County Council](#)
- [TRACC- Transport accessibility- distance to further education by bus, Gloucestershire County Council](#)
- Availability of school places (School Census Data from Gloucestershire County Council) October 2019.

18 . Community well being

18 Community well being

Health

18.1 While the population continues to grow, within the community there is a marked population change towards an ageing population, in line with trends across the western world. The following tables illustrate how stark this trend is in the Forest of Dean district, which is above the UK national averages. The UK median age in 2017 was estimated to be 40, compared to 48 for Forest of Dean district. This will impact on the form and scale of the development that is required to support future housing provision throughout the district.

18.2 The average life expectancy is currently 74.2 for men and 79.4 for women, and the median age in mid-2017 is 48 years old. The following tables illustrate how stark this trend is in the Forest of Dean, which is above the UK national averages.

<i>Forest of Dean % population change in the Gloucestershire district by broad age group from 2006-2016</i>		
<i>0-19</i>	<i>20-64</i>	<i>65+</i>
<i>-4.2%</i>	<i>-1.5%</i>	<i>+34.7%</i>

Table 3: Forest of Dean district population change 2006-2016 Source: Inform Gloucestershire, September 2017:

18.3 The Forest of Dean has a higher percentage of low birth weight babies (3.05%) than England (2.80%) but slightly lower than Gloucestershire (3.07%).

18.4 In 2012, 67% of adults in Forest of Dean District were overweight or obese, which is higher than the Gloucestershire (64%) and England (64%) averages. For the last seven years the Forest of Dean has had a higher percentage of excess weight in 4-5 year olds and 10-11 year olds compared to Gloucestershire and England. In Year 6, 19.1% (148) of children are classified as obese. Estimated levels of adult excess weight are worse than the England average as are the number of recorded diabetics.

18.5 In 2014, the percentage of physically inactive adults in Forest of Dean District was below the Gloucestershire and England benchmark.

18.6 Excess weight in adults and recorded diabetes are both significantly higher in the Forest of Dean district than the rest of England. However, the districts rates of violent crime, long term unemployment and early deaths from cancer are better than average for England.

18.7 Disabilities

18.8 19.6% of Forest of Dean residents (16,603 people) reported having a long term health problem or disability; this was above the county, regional and national averages. Analysis of disability living allowance and attendance allowance claimants show Forest of Dean had a higher proportion of disability benefit claimants (7.8% of total population) than the county, regional and national averages and higher than all the other districts in Gloucestershire. Arthritis was the most commonly reported disabling condition in the Forest of Dean, representing almost a quarter of all claims. This reflects the picture at county, regional and national level. However, learning difficulties

18 . Community well being

was the second common condition with almost 14% of claimants a higher rate than elsewhere in the county. Since 2009/10 the number of people with the lowest level of need have declined, while those with higher levels of need have increased.

18.9 The rate per 100,000 of people receiving community-based adult social care services in the Forest of Dean is the highest in the county but like the rest of the county, numbers have declined since 2013/14.

18.10 The Forest of Dean district has the highest rate of people in residential care in the county in recent years, however nursing care the Forest of Dean district is consistent with county averages. There are estimated to be over 1,350 people aged 65 and over with dementia in Forest of Dean District and this is forecast to rise by almost three quarters to over 2,330 in 2030.

18.11 The number of people aged 18+ with a learning disability is forecast to increase to 1,617 people by 2025, this represents an increase of 65 people or 4.2%.

18.12 The number of people aged over 65 who are unable to manage at least one mobility activity on their own, is forecast to increase steeply.

Deprivation

18.13 Forest of Dean district has a distinct population pattern with the majority of residents being in the third quintile of deprivation (mid-range), with very few being in either the highest or lowest socio-economic quintile.

18.14 About 16% (approximately 2,100) of children live in low income families. Life expectancy for both men and women is similar to the England average . 9.41% of children had parents where drug abuse was a concerning factor, and 8.99% where alcohol was a concerning factor. In the same year, 10.24% of children have parents where mental health is recorded as a concerning factor, and there were 218 young people and 274 people between 18 -74 who were admitted to hospital for mental health, which is a trend which is consistently tracking upwards.

18.15 In 2013, an estimated 4,181 households in the Forest of Dean were in fuel poverty representing 11.6% of all households.

18.16 Life expectancy is 6.4 years lower for men and 2.8 years lower for women in the most deprived areas of Forest of Dean than in the least deprived areas.

18.17 For the majority of long term conditions (LTCs) Forest of Dean District has a higher prevalence rate than the county as a whole. It should be noted that it is the only District in the county that is above average for both the proportion of older people and for deprivation and the combination of these two factors is likely to lead to higher rates of LTCs.

Crime and Safety

18.18 Overall, the district has experienced crime rates much lower than the overall rates for England and Wales and the rest of the county since 2003/2004. However, the towns of Newent, Coleford, Cinderford and Lydney all have crime rates in the top quintile for Gloucestershire. The district average crime rate for 2017/18 is 34.6 recorded crime incidents for every 1,000 residents.

18 . Community well being

This is slightly up from 33.86 from the proceeding 12-month period. The Coleford ward was significantly higher than last year with 71.24 recorded crime rates per 1,000 residents for the 2017/2018 period.

18.19 The rate of alcohol-specific hospital stays among those under 18 is 27 per 1000,000. This represents 4 stays per year.

18.20 The rate of alcohol-related harm hospital stays is 570 per 1000,000, better than the average for England. This represents 513 stays per year. The rate of self-harm hospital stays is 215*. This represents 175 stays per year. Rates of sexually transmitted infections and tuberculosis are better than average. Rates of violent crime, long term unemployment and early deaths from cancer are better than nation and county wide averages.

Inclusion

18.21 The [2013 Gypsy and Traveller Area assessment \(GTAA\)](#) report of shows a shortfall of 39 permanent sites. This was downgraded to 33 in the intervening period. [A further study](#) in 2017 using revised government guidelines concluded that there was a modest need for up to 6 for housing for persons who wished to travel and identified 9 about whom there was no information or who did not say that they wished to travel. These households may however still be in need of suitable housing and will need to be catered for.

Likely future without the Plan

- Provision of new open space and integration of existing open space continues to be negotiated on a development site basis, with some wins and some losses, but no overarching district wide strategy.
- Elderly, disabled people and children continue to be a low priority in the design of new settlements.
- Securing sites for new gypsy and traveller accommodation continues to be fraught with controversy.
- Gradual uptake of allocation site in the Cinderford Northern Quarter.
- The three leading causes of death in the Forest of Dean are cancer, cardiovascular disease (CVD), and respiratory disease, respectively, which is consistent with the national health trends.

Guide questions

1. Does the policy option locate new development in easy proximity to open space, recreation and leisure facilities?
2. Is the policy option integrated with PRoW and other active transport routes and opportunities?
3. Does the policy regenerate deprived areas?
4. Does the policy integrate universal design (e.g. dementia friendly and disability friendly design) into new public spaces?
5. Does the policy accommodate for Gypsy and traveller sites in line with identified need?

Monitoring Framework

18 . Community well being

1. Hospitals admissions
2. Mortality rate

Evidence base

- [Gloucestershire and Districts Health Profiles](#)
- [Forest of Dean Local Authority Health Profile \(2019\) Public Health England](#)
- [2013 Gypsy and Traveller Area assessment \(GTAA\) report](#)
- [Gloucestershire Gypsy and Traveller Accommodation Assessment March 2017](#)
- Health Impact Assessment and toolkit (GCC)

19 . Local identity & culture

19 Local identity & culture

19.1 Situated between two rivers, the Forest of Dean has historically often been considered as an isolated area, hidden away by its geology, topography and the densely wooded landscape of the Statutory Forest, with limited connectivity to the UK & Wales beyond. The hardships of the former local employment industries, such as timber, quarrying and mining added to the sense of cultural uniqueness of the local people and the identity of being a ‘Forester’ became strong. Many of the older generations still feel this strong sense of local identity today and fortunately, with a recent surge of interest in this subject, younger generations are still being inspired to understand the heritage of the District and how important it is to retain a cultural identity.

19.2 Forest people, particularly those within and around the Statutory Forest have always held a strong affinity to the importance of the forest itself, not just in regards of its landscape, ecology and employment opportunities, but also for the historical rights and privileges it has provided locals overtime. Forest people wish to retain their rights to roam through the Crown Land and threats from government to privatise forestry land have met with strong opposition over the recent decades.

19.3 Unusual rights such as the ability to graze sheep on crown land (known as Commoning) have existed since the 17th Century and still continue to this day. It is not unusual to see small flocks of sheep roaming the roadsides and the forestry, being hefted to the land.

19.4 Freemining rights are still retained and fought for, however, the number of locally born people who are able to obtain this privilege are sadly rapidly dwindling. Most of the Freeminers left in the Forest are older men who mine as a hobby and a way of keeping the historical right alive.

19.5 The ‘Forest’ accent and its local dialect also play an important role in local social history and culture. Whilst the smooth broad accent of the area (broadly around the Statutory Forest boundaries), has generally been retained through the generations, the ability to speak ‘Forest’ has dwindled over recent decades. Nevertheless, a smattering of ‘Forest’ vocabulary still verbally survives in general conversation and many older ‘Foresters’ see it as a way of preserving this uniqueness of belonging to the Forest of Dean.

19.6 Local projects and historical societies, such as the ‘Forester’s Forest’ and ‘Reading the Forest’ are vital in engaging local historians, authors and volunteer groups to record and preserve examples of both language and social history through biographies and oral recordings. In addition, the District takes pride in promoting its cultural achievements and distinctiveness through annual literary festivals, music concerts and carnivals. The landscape and the social history of the District has been the crux of attracting writers, poets, artists, and musicians from further afield, whilst also providing the inspiration for locally grown talent. The District ranks famous names such as The Dymock Poets, Dennis Potter, Winfred Foley, Joyce Latham, F.W. Harvey, amongst many more. Visual records of events, local people of importance and the need to preserve the forest are currently being captured in the form of wall murals within the town centres and on private property. Within the last decade, the unique geological and topographical features of the District have become more internationally recognised, with a surge in film crews using locations around Coleford and the nearby Wye Valley.

19 . Local identity & culture

19.7 In an age where younger generations tend to move further afield to be educated and gain employment, it is vital that links between the past and present are retained. Fortunately, what is highly evident is that both newcomers to the area as well as those with strong multi-generational links to the Forest of Dean are striving to promote and preserve an understanding of the importance of this unique local identity.

Likely future without the Plan

- Impacts from development on local character will be mediated through the existing development management process.
- Some valued community spaces such as local pubs will be lost to conversions.

Guide questions

1. Is the policy option consistent with Neighbourhood Development Plans?
2. Does the policy option protect, integrate and reinforce community spaces?

Monitoring Framework

Not applicable

Evidence base

- By Definition project (Forest of Dean Landscape and Heritage Study)
- What makes the Forest of Dean Special? report
- Neighbourhood development plans (Various)
- Forest of Dean district Locally distinctive areas
- Forest of Dean district Conservation area appraisals
- Forest of Dean district Design guidelines
- Forest of Dean district Heritage appraisal.

20 . Economy

20 Economy

20.1 In June 2019, there were 46,400 economically active people in the Forest of Dean district, which represent 88% of the total district population of 16-64-year olds. This is up 6.6% from the previous 12-month period. While job numbers are increasing in the Forest of Dean district, this is not a steady trend, and is subject to spikes and down turns.

20.2 The job density of the Forest of Dean district as compared with the county and the nation is outlined in the table below:

	Forest of Dean (jobs)	Forest of Dean (Density)	South West (Density)	Great Britain (Density)
Job density	28,000	0.55	0.89	0.86

Source: ONS job density, ration of total jobs to population aged 16-64. Total jobs includes employees, self-employed, government-supported trainees and HM forces.

20.3 The profile of the number of jobs per industry or sector up to 2017 reveals how the economy is changing and some marked differences between the Forest of Dean District employment base as opposed to the rest of the country and region, as illustrated in the table below :

Industry	Forest of Dean (Employee jobs)	Forest of Dean (%)	South West (%)	Great Britain (%)
B : Mining and quarrying	30	0.1	0.1	0.2
C : Manufacturing	4,000	17.4	9.3	8.1
D : Electricity, gas, steam and air conditioning supply	5	0.0	0.4	0.4
E : Water supply; sewerage, waste management and remediation activities	125	0.5	1.0	0.7
F : Construction	1,500	6.5	5.3	4.6
G : Wholesale and retail trade; repair of motor vehicles and motorcycles	3,500	15.2	16.7	15.3
H : Transportation and storage	700	3.0	3.5	4.9
I : Accommodation and food service activities	1,750	7.6	9.0	7.5

20 . Economy

J : Information and communication	450	2.0	3.3	4.2
K : Financial and insurance activities	350	1.5	3.5	3.6
L : Real estate activities	450	2.0	1.7	1.6
M : Professional, scientific and technical activities	1,250	5.4	6.6	8.6
N : Administrative and support service activities	1,250	5.4	7.1	9.0
O : Public administration and defence; compulsory social security	500	2.2	4.3	4.3
P : Education	3,000	13.0	9.3	8.9
Q : Human health and social work activities	3,500	15.2	14.7	13.3
R : Arts, entertainment and recreation	450	2.0	2.2	2.5
S : Other service activities	500	2.2	2.0	2.0

Source: Job number by industry. ONS Business Register and Employment Survey via NOMIS 2018

20.4 The most dramatic of these is the 4,000 employee jobs in the manufacturing sector, which in terms of percentage share of total jobs, puts Forest of Dean district at around double the rate of both the south west and Great Britain. This may be accounted for by large manufacturing employers like the Ribena/ Lucozade factory in Coleford and manufacturers based at Forest Vale in Cinderford and Vantage Point in Mitcheldean. Some of these 4,000 manufacturing jobs may be outside of the district, and Forest of Dean residents commute to access them. Jobs in construction are also above both regional and national averages.

20.5 Conversely, residents employed in financial and insurance activities as well as professional, scientific and technical jobs are significantly lower for Forest of Dean district than the wider region and country.

20.6 Education sector is also higher, which may be attributable to the large number of colleges and schools spread across the district. Hartpury College continues to expand with plans for a new Sports academy and Agri-Tech centre; and Cinderford College opened in September 2018. The expansion of these two facilities bodes well for the educational sector of the district to continue to generate employment.

20 . Economy

20.7 A recent study (2019) of employment sites assessed the occupancy and vacancy rates of the key employment areas across the breadth of the district, as well as provided an estimate of employment generated from each. Overall designated employment sites across the district were estimated to have be 82% occupied, and have a total infill capacity of 84ha. The following large employment sites are estimated to generate the following number of jobs and businesses:

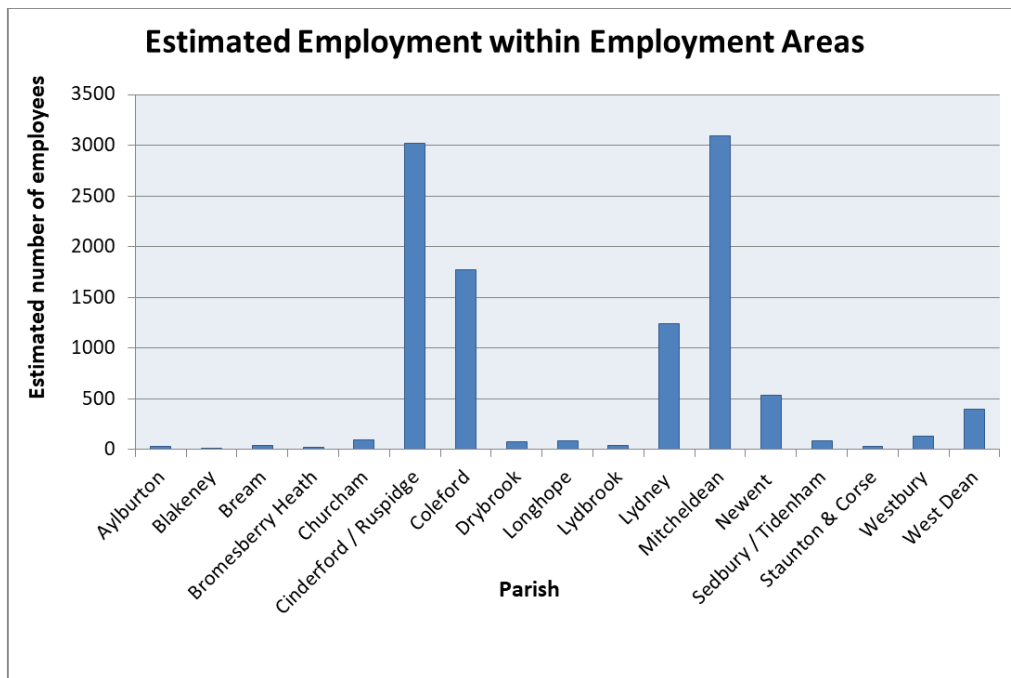


Figure 11: Estimated employment within employment areas

20.8 There is significant employment land and infrastructure existing in the Forest of Dean district, with large industrial areas and trade parks in Cinderford, Lydney, Coleford and Mitcheldean in particular. While some of these have high occupancy rates, many are under used and contain many vacant units. If the demand is not there, then allocated new employment areas will not necessarily deliver more employment.

20.9 Established light industrial areas in Coleford and Newent are almost fully occupied, but there is plenty of capacity in existing employment sites in Lydney and Cinderford. New areas allocated for employment delivered through Lydney east and Cinderford Northern Quarter master planned developments have had very little uptake.

20.10 Of the 47 new commercial development applications lodged in the 2018/19 year (down from 53 in the preceding 12 month period), 13 were tourism developments, 16 were agricultural uses, 3 were food industries, 3 were office and stores.

20.11 Tourism development in recent years has resulted in expansions of well-established tourist attractions such as a new zip line at the National Diving and Activity Centre at Tidenham and more bicycle storage at Cannop cycle centre in the Cannop valley. It continues to be a big driver of the district's economy.

20 . Economy

20.12 Of all 47 commercial applications in the 2018/19 financial year, only seven applications were within a designated employment site. This indicates that new economic activity is fairly dispersed in location, which may be linked to the prevalence of tourism and agriculture as drivers of new economic activity.

20.13 There is a great deal of spill of retail trade to bigger centres outside of the district. The numbers below are an indication of how much local trade is lost from the Forest of Dean district by residents accessing bigger centres to meet their needs. These statistics are now over a decade old, but it is likely that this trend has exacerbated since then, though no new data exists to verify this.

Centre	Retail footprint score	Market share lost to competing centres outside the SW region
Cinderford	11	30.8%
Coleford	5	30.6%
Lydney	12	22.4%

Source: Baseline retail assessment of the regional/ sub-regional centres in the south west, Draft report, south west regional assembly, 2004. CACI property consulting.

20.14 While Cinderford and Lydney are the largest concentrations of business rated premises, Coleford lags behind, despite being the largest conurbation in the district in terms of population size. Predictably, Mitcheldean ranks a couple of places higher in the hierarchy comparative to its population size, which is undoubtedly due to the very large employment facility which is Vantage Point business park.

Likely future without the Plan

1. Employment within the district is unlikely to change significantly.
2. Level and distribution of business rated properties throughout the district is comparable to current level, with growth in home based business.
3. Vacancy and occupancy rates of Employment sites remain the same, with many unutilised sites.

Guide questions

1. Does the policy support the retention and development of quality employment generating uses within the district?
2. Does the policy support diverse scales and types of business?

Monitoring Framework

1. Total district wide employment;
2. Estimated jobs within allocated employment areas;
3. Estimated business premises with allocated employment areas;
4. Infill capacity of allocated employment areas;
5. Level and distribution of home based businesses throughout the district;
6. Occupancy rate of allocated employment areas.

20 . Economy

Evidence base

- Forest of Dean district council's development application database
- Forest of Dean district business rates database
- Forest of Dean employment site study (2019)
- Local Industrial Strategy
- Gloucestershire Economics Study
- [ONS Business Register and Employment Survey via NOMIS 2018](#)
- [ONS job density, ration of total jobs to population aged 16-64. Total jobs includes employees, self-employed, government-supported trainees and HM forces.](#)
- Forest of Dean district Employment study 2019
- [Understanding Forest of Dean district](#)

21 . Transport and Infrastructure

21 Transport and Infrastructure

21.1 The arterial road network exerts a strong influence over how residents interact with their districts and their settlements. Local services have decreased as private car ownership has increased, to the point where even large villages lack many basic services. Sub catchments within districts are mostly defined by the shortest arterial route to the closest major centre, often outside of the district in the wider south-west region. Centres along major road corridors in particular often have high car-borne out-commuting. This pattern will change their form and function incrementally over time. In the case of the Forest of Dean District, this particularly relates to Newent and its proximity to the M50 corridor, as well as the Tutshill/ Sedbury hub which is a functional part of Chepstow, and very influenced by its proximity to the Severn Bridge with its direct access to Bristol.

21.2 Minimising car use is critical to achieving sustainable development. Communities which can provide a range of services, including economic, employment and social needs, are favoured in order to reduce reliance on travel by private car, and maximise efficiency of service infrastructure provision.

21.3 There are several problem spots within the district which are currently experiencing significant congestion in peak times. This mainly concerns the A40 going into Gloucester and the A48 around Sedbury/ Tutshill. The width of the A48 through villages is also an issue with HGV's getting wider, forcing many trucks and lorries having to move into the centre of the road or mount pavements to avoid oncoming traffic at certain points.

21.4 Current data on commuting patterns thus provides a measure of the self-containment of a community, informing potential sustainable growth directions, and helping to avoid the development of commuter towns. This data indicates that the Forest of Dean District has low levels of self-containment, especially when compared with other regional centres of south west England. This is consistent with a trend of smaller settlements tending to be less self-contained in terms of providing a balance of jobs to resident workforce. The Forest of Dean District settlements are at risk of functioning as dormitory towns for out-commuters, who account for over half of the district's economically active residents- a trend which is already established to a certain degree but has the potential to become greatly exacerbated.

21.5 Forest of Dean district is in the bottom quartile for the proportion of residents who do any walking or cycling, at least once a month. It has been ranked 189 out of 201 for all Districts in England.

21.6 Several road transport improvements are planned for the district – including major schemes like Chepstow By-pass/Bridge crossing and the Third Severn crossing (road or rail options have been discussed). The Cinderford Northern Quarter spine road has been recently completed, and a Newerne Street Link, Lydney will bypass the town centre and divert traffic away from a primary school. This should help to reduce congestion & road transport pollution, improve air quality over time (See information on Lydney AQMA in Air section).

21.7 The Lydney Railway Station masterplan is scheduled for delivery; which will improve the station car park extension; build a pedestrian footbridge over the main line; support for the Dean Forest Railway heritage railway extension linked to tourism sector growth.

21 . Transport and Infrastructure

21.8 Utility supplies gas/electric/water upgrades will also be required to support new investment and development. Where possible, these should be well connected to existing trunk infrastructure to ensure efficiency. New renewable energy installations, and electric vehicle (EV) charging points may become much more prevalent over the course of the next Local Plan.

21.9 Telecommunications infrastructure also has the capacity to support Local Plan sustainability goals by promoting increased home working & home-based business, and reduced car use.

21.10 Currently, the district has no cycle lanes dedicated for commuting by bike, which represents a significant opportunity for improvement. There is a well known network of bicycle routes through the Forest of Dean district, however these are mainly dedicated to recreational users, who are mainly visitors to the district.

Likely future without the Plan

- New development is provided with connections to existing networks;
- Existing networks continue to age and degrade in response to increased demand;
- Further congestion on identified freight routes continue to slow delivery and transit times;
- Cycling infrastructure is very minimal throughout the district.

Guide questions

1. Does the policy focus new development on existing infrastructure networks, and invest in their maintenance?
2. Does the policy support existing employment areas and new development access to high speed broadband connections?
3. Does the policy match development with infrastructure provision, without overwhelming existing networks with undue demands, in both the short term and long term future?
4. Does the policy ensure that freight routes to major employment areas are not overwhelmed by residential traffic?
5. Does the policy locate new development with practical proximity to an arterial road?
6. Does the policy put new homes within easy access to jobs and services?
7. Does the policy improve walking and cycle routes and connectivity throughout the district?

Monitoring Framework

1. Digital broadband speeds;
2. Traffic volumes.
3. Census data on commuting patterns (published each decade);
4. Traffic modelling (Gloucestershire County Council);

Evidence base

- Ofcom/ Gloucestershire
- Department for Business, Energy & Industrial Strategy's national statistics on regional renewable statistics (based on devolved administrations and regions of England)
- [Gloucestershire Local Transport Plan](#)
- Department for Transport statistics.

22 . Retail centres

22 Retail centres

22.1 Retail centres are important not only in terms of providing goods and services, but also in providing a basis for social activity and supporting the cultural life of each community.

22.2 The trend towards out of town retailers seems to have abated, but the trend of online shopping is displacing retailers in the town centres. While vacancy rates within the town centres of Lydney, Newent, Coleford and Cinderford have shop vacancy rates which are either equivalent or below national averages, the trend towards town centre decline is concerning, and is likely to have significant implications for the town centres of the district going into the future.

22.3 Each year, the Forest of Dean district council conducts a town centre assessment of their four main market towns; Cinderford, Coleford, Lydney and Newent. This includes tracking town centre health & success against the following indicators:

- Footfall
- Car Parking
- Retail and Commercial Offer
- Convenience vs Comparison
- Trader Types
- Culture and Leisure Offer
- Events
- Reported Crime
- Markets
- Charity Shops
- Vacant Shops
- Town Centre Investment
- Evening/Night Time Economy

22.4 The following tables provides some key figures on the health of the four town centres. The vacancy rates for town centre premises for 2019 is as follows:

	Total units	Vacant units	% of units vacant
Cinderford	105	12	11%
Coleford	134	11	8%
Lydney	169	22	13%
Newent	96	13	14%

22.5 This compares unfavourably with the national town centre vacancy rate of 10.2% (BRC-Springboard data: 2019).

22 . Retail centres

22.6 Recorded footfall over a 10 and 20 years period dating back from 1999 shows a less consistent pattern, with Coleford in particular experiencing a higher footfall in 2019 than 1999. Newent is the most consistent, but Cinderford and Lydney have had significant decreases in recorded footfall over a 20 year period.

	2019	2018	2017	2016	2015	2014	2013	2009	2008	1999
Cinderford	63	93	63	75	79	81	78	91	85	212
Coleford	64	79	47	53	52	40	60	40	31	29
Lydney	50	51	67	52	79	81	78	91	85	212
Newent	56	45	59	51	57	56	57	49	59	56

Likely future without the Plan

Steady increase in traffic congestion and out commuting for jobs and services continues. Residents continue to rely on retail centres and services outside of the district.

Guide questions

1. Does the policy promote high level of occupancy rates of shopfronts in market town centres?
2. Does the policy protect and enhance active street frontages?

Monitoring Framework

1. Footfall
2. Vacant shop fronts
3. Town centre car parking rates

Evidence base

- [Cinderford town centre report \(2018\)](#)
- [Coleford town centre report \(2018\)](#)
- [Lydney town centre report \(2018\)](#)
- [Newent town centre report \(2018\)](#)
- 2019 Footfall review for UK- Springboard

23 . Key issues for sustainability in Forest of Dean district

23 Key issues for sustainability in Forest of Dean district

23.1 The following key issues have been identified through the scoping process. Some relate specifically to the Forest of Dean district and others are more universal, but all present barriers and challenges to sustainability across its different aspects:

Environment

LANDSCAPE

- Lack of landscape designation over Forest edge settlements;
- Agricultural buildings in visually prominent locations under permitted development;
- Decline in traditional primary industries;
- Glover review of AONB roles (2019), including the Wye Valley and Malvern Hills AONB;
- Potential new Forest edge landscape designation or Forest of Dean district [Biosphere reserve](#).
- Agricultural commodities under valued, leading to declining viability of domestic primary production. This leads to increased pressure to convert good quality agricultural land to urban uses.

ECOLOGY

- Loss of biodiversity and habitat;
- Condition of several of the districts protected areas are in decline;
- Climate change impacts on biodiversity and the natural range of native species;
- Landscape fragmentation over different tenures and management regimes.

WATER

- Increased flooding and wider variations in seasonal rainfall due to climate change;
- Existing storm water infrastructure is ageing and inadequate for current flood events, which may become more extreme in future;
- Climate change creating hotter, drier conditions which will impact on water supply and ecology;
- Additional demands of new settlements and expansions on water resources.
- Poor water quality in several problem areas.

CARBON MANAGEMENT

- Forest of Dean district council (FoDDC) has set an ambitious corporate target for a carbon neutral district by 2030- how can the Local Plan support this?;
- Current poor quality of existing housing stock in terms of energy efficiency and insulation;
- Some activity for renewable installations, but fairly minimal.
- Housing stock and built environment may be under equipped and poorly designed to respond to more extreme weather events.
- Financial resources to "climate proof" existing settlements is limited.

23 . Key issues for sustainability in Forest of Dean district

AIR

- Air Quality Management areas (AQMAs) in Chepstow (linked to Tutshill and Sedbury) and Lydney;
- Increased traffic and congestion in key commuting pinch points like the A40 and A48.

WASTE

- Cost of waste collection and recycling on the Council;
- Limited recycling capacity within the district.

HERITAGE

- Some historical buildings at risk.

Society

HOUSING

- Some larger schemes may come forward in the next few years which temporarily meet demand, but this is a trend unlikely to continue in the longer term.
- There are limited policy interventions to improve the situation; however Council officers are working proactively with Registered Providers to bring forward 100% affordable housing sites.

EDUCATION

- Policy at a district level has limited influence over poor levels of educational attainment.
- Many local schools are at capacity and local children have to travel outside of their Parish to access a school place.

COMMUNITY WELL BEING

- Societal factors leading towards sedentary lifestyles and poor diets are outside the influence of the Local Plan.
- The provision of active transport routes and quality open space is sometimes compromised through the development management process, and at appeal.
- Cinderford West continues to be assessed as the worst area for deprivation within the district. Regeneration efforts may not impact this enclave.
- An ageing population means that more people have declining mobility and independence, and may be effectively marginalised by poor urban design.

LOCAL IDENTITY

- Forest of Dean district is becoming more attractive to out commuters, which may over time result in local identity and local culture becoming diminished.
- New housing development is relatively generic, and does not respond to local vernaculars.

23 . Key issues for sustainability in Forest of Dean district

Economy

EMPLOYMENT

- Leak of jobs out of the district and high levels of out commuting.
- Some employment sites are falling into disrepair or are partially abandoned, with low occupancy rates in some employment sites, with many vacant units.

BUSINESS AND ENTERPRISE

- Declining commodity values and rising costs for agriculture.

TRANSPORT & INFRASTRUCTURE

- Lack of investment into new infrastructure and maintaining existing networks.
- Unstable policy environment for investment into renewables.
- Strong national trend toward car born out commuting;
- Declining quality and provision of public transport;
- Very poor existing bicycle and pedestrian infrastructure;
- Traffic congestion on larger arterial routes continues to increase, meaning freight is slowed in traffic congestion leading to lag times and increased costs to industry.

RETAIL CENTRES

- Online shopping and large out of town retail precincts continue to draw trade from local services and retail centres.

24 . Sustainability Appraisal Framework

24 Sustainability Appraisal Framework

24.1 The following appraisal framework reflects the sustainability elements and issues detailed in the proceeding sections of this report. This framework will be used to appraise policy options and alternative for the new Local Plan.

24.2 Sustainability element: ENVIRONMENT

Sustainability element	Sustainability goals	Guide questions	Local Plan influence
Landscape, soils & geology	<p>The distinctive character of valued landscapes is safeguarded, and designated areas are maintained at or improved to favourable condition</p> <p>Good quality agricultural land is kept in primary production.</p>	<ol style="list-style-type: none"> Does the policy protect scenic areas and notable views from encroachment from development? Does the policy protect good quality agricultural land for primary production? 	Direct
Biodiversity	Intact habitat is identified and restored, and development delivers a net gain for biodiversity.	<ol style="list-style-type: none"> Does the policy strategically deliver a net gain to biodiversity? Does the policy direct development and associated habitat disturbance away from areas identified as having high ecological value? 	Direct
	Increase linkages between habitat fragments.	Does the policy support the creation of new habitat in strategic sites, which provide wildlife linkages across the district?	
Water	Development is set back from significant water bodies, streams and flood prone land.	<ol style="list-style-type: none"> Does the policy safeguard streams and bodies of water from new development? Does the policy direct new development away from areas mapped as Zone 2 or 3 flood risk? 	Direct

24 . Sustainability Appraisal Framework

	Water supply to new homes is sustainable and secure.	Does the policy ensure new land allocations for development are supported by adequate water supply and infrastructure?	Direct
	Water quality across the district improves.	Does the policy ensure the location and construction of development does not result in a decline of water quality through sediment run off?	Indirect
Climate & carbon	<p>MITIGATION</p> <p>The districts carbon emissions are reduced to achieve Council's corporate goal of carbon neutrality by 2030.</p> <p>The district transitions to a low carbon economy.</p> <p>New homes are designed to optimise passive heating and cooling.</p> <p>Opportunities to develop renewable energy sources are maximised.</p>	<ol style="list-style-type: none"> 1. Does the policy deliver high standards of building design which reduces energy consumption? 2. Does the policy decrease the need for long distance daily travel by residents to access jobs and services? 3. Does the policy promote the uptake of renewable energy technology? 	Direct
	<p>ADAPTATION</p> <p>To increase climate resilience of natural and built environments.</p> <p>To adapt and be prepared for changing climatic conditions.</p>	<ol style="list-style-type: none"> 1. Does the policy direct development away from areas of flood risk and low lying land? 2. Does the policy "climate proof" hard infrastructure and reticulated systems such as roads, storm water drainage and utilities? 	Direct
Air	To maintain clean air.	<ol style="list-style-type: none"> 1. Does the policy avoid further congestion in identified AQMA (Chepstow and Lydney)? 2. Will the policy locate animal industries and associated odour impacts close to settlements? 	Direct

24 . Sustainability Appraisal Framework

Waste	To reduce waste and pollution.	Does the policy option reduce waste generation?	Indirect
	To reprocess waste efficiently.	Does the policy option support opportunities to reduce waste going to landfill?	Remote
Heritage	To protect historical features and cultural assets of the district. To maintain the built character of the district, including any distinct local vernacular design.	<ol style="list-style-type: none"> 1. Does the policy promote development on sites on or adjacent to valued, protected and listed sites which does not overwhelm their heritage values? 2. Does the policy promote development is of a scale and density which is consistent with its surroundings? 3. Does the policy promote development within Conservation areas is consistent with existing character values? 	Direct

24.3 Sustainability element: SOCIETY

Sustainability element	Sustainability goals	Guide questions	Local Plan influence
Housing	To ensure every resident of the district has a decent and affordable home. To deliver a mix of housing types, including affordable housing, in sustainable locations. To deliver housing stock which is energy efficient and well designed.	<ol style="list-style-type: none"> 1. Does the policy promote the delivery of affordable homes to meet demand? 2. Will the policy deliver a mix of housing types which respond to community needs? 	Indirect
Education	To increase the levels of education and skills attainment. To facilitate the development of academic and vocational opportunities within the district.	Does the policy option provide improved access to educational facilities?	Remote

24 . Sustainability Appraisal Framework

	To provide ease of access to education and training opportunities.		
Community well being	To promote healthy, active lifestyles. To address health inequalities and address disadvantage and entrenched deprivation.	Does the policy locate new development in easy proximity to open space, recreation and leisure facilities?	Indirect
	To deliver quality design of community and open space	Is the policy integrated with PRow and other active transport routes and opportunities?	Direct
	To maintain highly accessible urban environments for all types and levels of ability. To encourage a strong, respectful and inclusive community.	<ol style="list-style-type: none"> 1. Does the policy regenerate deprived areas? 2. Does the policy integrate universal design (e.g. dementia friendly and disability friendly design) into new public spaces? 3. Does the policy accommodate for Gypsy and traveller sites in line with identified need? 	Indirect
Local identity & culture	To honour and celebrate the traditions and local culture of the Forest of Dean district. To promote a sense of neighbourhood and civic pride. To reinforce the character of individual settlements.	<ol style="list-style-type: none"> 1. Is the policy option consistent with Neighbourhood Development Plans? 2. Does the policy option protect, integrate and reinforce community spaces? 	Indirect

24.4 Sustainability element: ECONOMY

Sustainability element	Sustainability goals	Guide questions	Local Plan influence

24 . Sustainability Appraisal Framework

Economy	<p>To maintain and create stable levels of quality employment.</p> <p>To ensure a high and stable level of economic diversity and competitiveness.</p>	<ol style="list-style-type: none"> 1. Does the policy support the retention and development of quality employment generating uses within the district? 2. Does the policy support diverse scales and types of business? 3. Does the policy create conditions in which businesses can invest, expand and adapt? 	Indirect
Transport & Infrastructure	<p>To consolidate and efficiently utilise networks of high quality infrastructure, including roads, drainage, utilities and telecommunications.</p>	<ol style="list-style-type: none"> 1. Does the policy focus new development on existing infrastructure networks, and invest in their maintenance? 2. Does the policy support existing employment areas and new development access to high speed broadband connections? 3. Does the policy match development with infrastructure provision, without overwhelming existing networks with undue demands, in both the short term and long term future? 	
	<p>To ensure that everyone can efficiently move around and through the district to access work and services.</p> <p>To enhance transport connectivity and improve links between centres in and outside the district.</p>	<ol style="list-style-type: none"> 1. Does the policy focus new development on existing infrastructure networks, and invest in their maintenance? 2. Does the policy support existing employment areas and new development access to high speed broadband connections? 3. Does the policy match development with infrastructure provision, without overwhelming existing networks with undue demands, in both the short term and long term future? 4. Does the policy ensure that freight routes to major employment areas are not overwhelmed by residential traffic? 5. Does the policy locate new development with practical proximity to an arterial road? 	

24 . Sustainability Appraisal Framework

		<p>6. Does the policy put new homes within easy access to jobs and services?</p> <p>7. Does the policy improve walking and cycle routes and connectivity throughout the district?</p>	
	To provide for efficient and accessible public & active transport.	Does the policy improve walking and cycle routes and connectivity throughout the district?	Indirect
Retail centres	To ensure the vitality and viability of the districts town and village centres.	<p>1. Does the policy promote high level of occupancy rates of shopfronts in market town centres?</p> <p>2. Does the policy protect and enhance active street frontages?</p>	Indirect

25 . References

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