

Forest of Dean District Council



Sustainability Appraisal of the Forest of Dean District

Local Development Framework

Core Strategy Development Plan Document

February 2012

**Sustainability Appraisal & Environmental Report
Adoption Statement**

1. Introduction

1.1. This statement has been prepared with reference to:

Regulations 24(2), 35(2) and 36 of the Town & Country Planning (Local Development) (England) Regulations 2004 (as amended 2008)

Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004 requires that, as soon as reasonably practicable after the adoption of a plan (in this case the Forest of Dean Core Strategy DPD) for which an SA/SEA has been carried out, the planning authority must make a copy of the plan publicly available alongside a copy of the SA report and an SA statement (this document); and inform the public and consultation bodies about the availability of these documents. The consultation bodies are English Heritage, Natural England and the Environment Agency.

Strategic Environmental Assessment Directive 2001/42/EC

1.2. The Sustainability Appraisal (SA) identifies the social, environmental and economic impacts of a development plan document and suggests ways to avoid or minimise negative impacts and maximise positive impacts. It is required by the Planning and Compulsory Purchase Act 2004, and also incorporates the strategic environmental assessment (SEA) requirements of the European Strategic Environmental Assessment Directive, transposed into UK legislation through the Environmental Assessment of Plans and Programmes Regulations 2004. SA/SEA has five main stages (stages A to E). This report fulfils one of the requirements of Stage E, namely documentation of the decision-making process. In this statement the term SA is used to refer to the requirements of the above European and National legislation.

1.3. The above requirements are hereafter referred to as the SA.

1.4. The SA statement must explain:

- I. How environmental considerations have been integrated into the plan or programme;
- II. How the environmental report has been taken into account;
- III. How opinions expressed and results of public consultation have been taken into account;
- IV. Why the plan or programme has been adopted rather than the other options considered;
- V. How the significant environmental effects of implementing the plan or programme will be monitored.

- 1.5. This 'SA' statement explains how the SA process affected the development of the Forest of Dean Core Strategy (CS), here after referred to as the Development Plan Document (DPD).
- 1.6. The SA process is a way of ensuring that all plans and programmes which relate to land use issues are compatible with the aims of sustainable development as set out in government guidance. This includes the documents that will form the Forest of Dean Local Development Framework (LDF).
- 1.7. In addition to the above a Habitats Regulations Assessment (HRA) has been undertaken to assess the impacts of the DPD on the Natura 2000 network of internationally important nature conservation sites. It is required by the European Habitats Directive, transposed into UK legislation through the Conservation of Habitats and Species Regulations 2010 (and previous similar legislation). The Habitats Directive applies the precautionary principle to designated sites: plans can only be permitted if it has been shown that they will not adversely affect the designated sites, or else can go ahead only under limited and stringent requirements regarding findings of no alternatives, imperative reasons of overriding public interest and provision of compensatory measures.

2. How environmental considerations have been integrated into the plan or programme

- 2.1. The effects of the DPD, were assessed through the SA and HRA, throughout the DPD's development.
- 2.2. By looking at every policy or document it is possible to identify areas where policies may not contribute to sustainable development. By identifying these problems at an early stage, it is possible to change and amend policies or text to ensure that they are as sustainable as possible.
- 2.3. The DPD has gone through a series of stages since 2006. At all stages, the findings of the SA have been integrated into the preparation of the DPD. An SA/SEA scoping report was prepared as part of the evidence gathering stage, and the sustainability impacts of the evolving DPD were subsequently assessed at each stage of plan-making. It was a continual iterative process, the following were key stages:

Scoping report publication – January 2006
Preferred options report & Consultation - June 2006
Scoping report refresh – June 2008
Second preferred options report & Consultation – April 2008
Submission draft report & consultation - May 2011
Examination in public – October 2011

3. How the environmental report has been taken into account;

- 3.1. The SA was prepared alongside, and in support of the DPD, it is a key output of the policy development process. The scoping reports of 2006 & 2008 developed a set of Sustainability Appraisal Objectives (Annex A (Section 5 of the SA report 2012) reflecting the environmental, social and economic characteristics of the area. These objectives were developed following consultation responses and direct consultation with environmental agencies such as Natural England, English Heritage, The Environment Agency and Gloucestershire County Council.
- 3.2. The comments received on the SA Scoping Reports helped to create a final set of sustainability objectives, which were then used to test development options (SA Framework). A summary and detailed assessment of the options can be viewed in the final SA Report (Adopted 2012). These assessments, alongside other policy considerations and public consultation, assisted the council in developing the policy options (section 6 of the SA Final Report (Adopted 2012).
- 3.3. Development plan options and policies were then considered against these objectives in a framework (section 6 of the SA report) at each stage. The outcomes of these assessments are then either addressed or acknowledged in the DPD.
- 3.4. Appendix 9 of the final SA Report identifies the significant changes made as a result of the SA process. Section 6 of the final SA report also identifies the likely affects of the DPD and considers ways of mitigating adverse effects.
- 3.5. Whilst the SA/SEA was reviewed at each stage there were no major changes to the impacts of proposals following the Submission draft publication in May 2011 consultation.

4. How opinions expressed and results of public consultation have been taken into account;

- 4.1. The DPD has been prepared in accordance with the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended 2008), which require that a DPD be accompanied by a statement regarding consultation. The DPD also complies with the council's Statement of Community Involvement.
- 4.2. The SA Report has contributed to the development of the DPD by providing an independent assessment of the sustainability of the council's proposed options and policies through the DPD's production process. The SA Report demonstrates how the sustainability objectives have been taken into account, and integrated into the development of the DPD. This provides an audit trail and formal statement on the assessment of options, alongside the main document at each stage of the process. The key stages are set out in section 2 above.

- 4.3. An examination in public was held in October 2011
- 4.4. The Inspector in his report (21st December 2011) on the Independent Examination into the CS concluded that the:

“SA has been carried out and is adequate”

and furthermore he considered:

“neither of these changes [recommendation of two changes to make the CS sound] materially alters the substance of the plan and its policies, or undermines the sustainability appraisal and participatory processes undertaken”

- 4.5. Following analysis of the inspectors report it was concluded that no further changes needed to be made to the SA.
- 4.6. The DPD and SA were adopted at the meeting of the council on the 23rd February 2012

5. Why the plan or programme has been adopted rather than the other options considered;

- 5.1. The SA evaluated ten strategic options (Section 6 of the SA report). The preferred option is for the DPD was to continue the Local Plan approach whilst taking greater account of the needs and capabilities of individual settlements (Option B – Develop new portfolio of housing sites). The chosen option was therefore in part a continuation of the Local Plan strategy by focusing development in the towns of Lydney and Cinderford and to a lesser extent Coleford, with Newent receiving the smallest share of the four towns.
- 5.2. The SA considered this as the most sustainable approach when considered against the SA objectives, given that the overall scale of the requirements for housing land, over the DPD period, is likely to be similar to that in the 2005 Local Plan, and that the locations identified will need to focus on the towns. The option allowed for a re-appraisal of the existing portfolio of sites which could address housing need, accessibility to schools, shops and employment etc.

6. How the significant environmental effects of implementing the plan or programme will be monitored.

- 6.1. The Annual Monitoring Report (AMR) will be the vehicle for monitoring the significant environmental effects of implementing DPD and the progress being made towards the sustainability objectives of the SA. The AMR will monitor the DPD implementation and the key indicators as set out in the SA framework.

7. Habitats Regulations Assessment (HRA)

- 7.1. This HRA identified five European sites for nature conservation that had the potential to be affected by policies within the Core Strategy (SA Appendix 10). The assessment demonstrated that the majority of Core Strategy policies will either have a neutral or positive effect on the European sites. There are potentially two policy areas where the effects are less certain; Cinderford and Lydney.
- 7.2. The Core Strategy is strategic and does not identify specific land use locations, development forms or operations, it is therefore difficult to undertake any appropriate assessment due to the levels of uncertainty. In both locations however, the Core Strategy identifies the need for Area Action Plans (AAP) (Policies CSP 11 & 13). These Development Plan Documents will provide much greater clarity on land use locations, density, and use.
- 7.3. This HRA Screening has concluded that the Core Strategy will not result in any significant negative impacts on identified sites. There will be a need for HRA Screening in relation to Cinderford and Lydney, at later stages of the planning processes, when development proposals are more detailed.
- 7.4. In December 2010 Natural England supported the view that an Appropriate Assessment was not required, as in the case of the Core Strategy, it was more appropriate to undertake assessments at the lower plan tiers.

8. Further information

- 8.1. The adopted SA, DPD and supporting documents can be found on the Forest of Dean Council website (www.fdean.gov.uk) and following the pages to 'planning' and then 'Local Development Framework'.

ANNEX A

SA Framework. Figures in brackets () relate to sustainability objectives, stage A 3

SW High level/headline objective	Local issues	Local Objectives	Explanation where not obvious	Question used to assess policy	Future Indicators
Improve health	Higher than average death rates caused by cancer in the under 75's (SO.5)	1. Improve health	Access to sickness treatment services contributes, but health is more than this.	(1) a. Does the policy contribute to positive well-being, through (e.g.) pleasant surroundings and living conditions, freedom from noise and pollution, and enabling lifestyles free from stress, anxiety and exhaustion.	Average Life Expectancy. (SWO)
					% Of People describing their Health as not good (Forest of Dean Story GCC)
Support communities that meet people's needs	On current trends population will increase by over 8% in the period up to 2026, double the rate of the county. (SO.1)	2. Provide new housing to meet local need		(2) a. Does the policy provide a range of housing including at least 40% within the affordable range?	Provision of 'Affordable' Housing Units. (FoDDC)
	Over 62% of household in the district are unable to buy houses in the lowest quarter of the market. This is lower than the county figure but much more than the England average (SO.6)			(2)b. Does the policy provide new housing for local need?	Earnings / House price affordability ratio. (Forest of Dean Story GCC)
	Half the housing building set out in the structure plan was completed between 1992 – 2004 (SO.3)			(2)c. Is there appropriate employment development in the area to support local need?	Out commuting (Forest of Dean Story GCC)
				(2)d. Will the policy contribute to supporting local facilities within the towns?	

SW High level/headline objective	Local issues	Local Objectives	Explanation where not obvious	Question used to assess policy	Future Indicators
Develop the economy in ways that meet people's needs	High Reliance on manufacturing and primary industries. - Opportunities to diversify employment types to reduce future risk and provide a variety of employment types (EC.1)	3. Diversify the range of employment opportunities within the district		(3)a. Will the policy encourage an increase in the range of employment opportunities?	Under Investigation
	Supply of labour exceeds local demand and is likely to grow – Over a third of all working people commute out of the district, the highest in the county and this is increasing. 90% by car (EC.3)	4. Reduce poverty and income inequality	Levelling up cash incomes helps; so does reducing the disadvantage caused by (e.g.) not being able to afford a car or pay for commercialised services.	(4)a. Does the policy support opportunities for better paid jobs?	Average Income
	The proportion of the population with no qualifications is higher than county or national averages (EC.2)	5. Meet local needs locally	Contributes to resilience and community strength as well as reducing the transport and energy intensity of the economy	(5)a. Will the policy support the maintenance and enhancement of businesses meeting local needs? (5)b. Will the policy support improvements in education and Training?	% of workforce with no academic / vocational or professional qualifications

SW High level/headline objective	Local issues	Local Objectives	Explanation where not obvious	Question used to assess policy	Future Indicators
	Improvement of town centres to increase use, vitality and access to services (EC.4)	6. Reduce vulnerability of the economy to climate change and harness opportunities arising	Extreme weather, crop failures, water shortages at home or abroad may disrupt trade, long distance transport and availability of energy and other resources, and increase insurance liabilities. South West may become more attractive to visitors and business.	(6)a. Will the policy support a reduction in economic patterns that avoid unnecessary dependence on long distance trade and travel?	Under investigation (tourism)
	Low aspirations, basic skills, low-level employment sector and low levels of part time work (EC.5).	7. Reduce the need/desire to travel by car	Road traffic is the only major terrestrial source of greenhouse emissions still increasing, the main source of local air pollution, and identified in countless surveys as one of the main threats to local quality of life through danger, noise, vibration and community severance. Car dependence deepens social exclusion and adds to pressures for unsustainable land use patterns.	(7)a. Will the policy support visitor and recreation developments that will encourage people to stay/visit more locally? (7)b. Will the policy reduce the need to travel, such as ensuring that people can live closer to their work and improve local access to services? (7)c. Will the policy support the development or use of public transport, cycling or walking?	Out commuting (Forest of Dean Story GCC) Mode of travel to school (LTP4 GCC)

SW High level/headline objective	Local issues	Local Objectives	Explanation where not obvious	Question used to assess policy	Future Indicators
<p>Provide access to meet people's needs with least damage to communities and the environment</p>	<p>Over a quarter of residents of the district feel they have made insufficient financial provision for retirement, the highest level in the county. – Likely to increase need for access to services in the future. (SO.4)</p> <p>Population characteristics in the period up to 2026 likely to change with a decrease in 20 – 54 year olds and an increase in the 55+ population. This would lead to a decrease in the working age population. (SO.2)</p> <p>Increasing use and high reliance on private cars for transport (EN.6). Access to services and facilities by public transport are low in comparison to SW and UK figures (S0.7)</p>	<p>8. Help everyone access basic services easily, safely and affordably</p>	<p>Enabling people to get access to what they want in life with less travel is a 'win-win', reducing costs and effort as well as environmental damage.</p>	<p>(8)a. Will the policy support the reduction of distance to, and/or ease accessing, schools, shops, places of work and recreation?</p>	<p>Mode of travel to school (LTP4 GCC)</p>

SW High level/headline objective	Local issues	Local Objectives	Explanation where not obvious	Question used to assess policy	Future Indicators
Maintain and improve environmental quality and assets	Population of 4 Biodiversity Action Plan Butterfly Species are declining (EN.1) Climate Change effects on population, effects on flora and fauna and occurrence of weather extremes (EN.5) Condition of Sites of Special Scientific Interest, Special Areas of Conservation, Special Protected Areas and Key Wildlife Sites (EN.7)	9. Protect and enhance habitats and species (taking account of climate change)	The natural environment of the district is one of its major strengths, perhaps best expressed in its landscapes and range of habitats.	(9)a. Will the policy contribute to not only the protection of designated areas, but also of the wider wildlife interest of the district, especially strengthening of links between 'wild' areas to increase adaptation to climate change	Condition of SSSI's that form the Bat SAC. Population of 4 BAP Butterfly Species
		10. Protect and enhance landscape and townscape		(10)a. Does the policy encourage the location and design of development to respect and improve character and settlement setting.	Countryside quality counts indicator.
	Concern over increasing impact on landscape e.g. through changes in farming practices, tourism and other developments. (EN.2)	11. Maintain and enhance cultural and historical assets		(11)a. Does the policy support the protection of culturally and historically significant assets and qualities. Not just designated sites and buildings, but also non-designated such as locally valued features and landmarks	Number of listed buildings and scheduled ancient monuments (English Heritage)

SW High level/headline objective	Local issues	Local Objectives	Explanation where not obvious	Question used to assess policy	Future Indicators	
Minimise consumption of natural resources	Areas of contaminated land as a result of past industries (EN.3)	12. Reduce vulnerability to flooding, sea level rise (taking account of climate change)	Existing settlements need to plan for increased risk.	(12)a. New development and infrastructure should not be built in areas at risk. Relocation and managed retreat may be the best option.	% of properties at 1% risk of flooding (Environment Agency / FoDDC)	
	Achieving set Carbon Reduction and Climate Change Targets (SO.8)	13. Reduce non-renewable energy consumption and 'greenhouse' emissions	Renewable energy production and energy efficient technologies help. Best of all, look for ways to design out the need to use energy	(13)a. Will the policy promote the use of natural lighting, ventilation and capture the sun's heat an the use of renewable energy where appropriate.	Installed low carbon energy projects (LAA)	
		14. Reduce the risks associated with unstable or contaminated land		(14)a. Does the policy support the improvement of contaminated land and reduce the impact of unstable land.	HA of contaminated land. (Foddc & EA)	
	Increased reliance on water supplies (SO.10)		15. Conserve water resources and protect water quality.		(15)a. Will the policy contribute to minimise water consumption and maximise use of rainwater / grey water?	Water usage by postcode. Data unlikely to be available until 2010.
						% of Main rivers achieving good status in 2015 (EA)
Air Quality is decreasing in areas of Lydney (EN.4)	16. Minimise consumption and extraction of minerals			(16)a. Will the policy promote the reuse of old material in new construction and provide for reuse and recycling.	Applications submitted with a Waste minimisation strategy (GCC)	
Increased reliance on material assets (SO.9)						

SW High level/headline objective	Local issues	Local Objectives	Explanation where not obvious	Question used to assess policy	Future Indicators
	Areas of contaminated land as a result of past industries (EN.3)	17. Minimise land, water, air, light, noise, and genetic pollution		(17)a. Will the policy lead to increased pollution?	Air Quality monitoring areas in the district