

Contents

| | | |
|----------|--|-----------|
| 1 | Foreword | 4 |
| 2 | Non-Technical Summary | 5 |
| 2.1 | Introduction | 5 |
| 2.2 | What is the CORE STRATEGY? | 5 |
| 2.3 | Why is there a Sustainability Appraisal? | 5 |
| 2.4 | General Results Summary | 5 |
| 2.5 | Stage A: Baseline Analysis | 6 |
| 2.6 | Stage B: Option Assessment | 7 |
| 2.7 | Stage C: Report Preparation | 8 |
| 2.8 | Stage D: Public Consultation | 8 |
| 2.9 | Stage E: Monitoring | 9 |
| 3 | Introduction | 10 |
| 3.1 | Introduction | 10 |
| 3.2 | Background to the Forest of Dean | 10 |
| 3.3 | What is the Core Strategy? | 10 |
| 3.4 | What is the Sustainability Appraisal? | 11 |
| 3.5 | Strategic Environmental Assessment (SEA) | 12 |
| 3.6 | Habitat Regulations Assessment (HRA) | 13 |
| 4 | Statement of Methodology | 14 |
| 4.1 | Aims and Purpose of the Sustainability Appraisal | 14 |
| 4.2 | Structure of the Sustainability Appraisal | 15 |
| 4.3 | Who carried out the Sustainability Appraisal? | 16 |
| 4.4 | Sustainability Appraisal Development Restrictions | 16 |
| 5 | Stage A - Baseline Analysis | 17 |
| 5.1 | Stage A1: Identifying other relevant policies, plans and programmes and sustainability objectives | 17 |
| 5.2 | Stage A2: Collecting baseline information | 18 |
| 5.3 | Stage A3: Identifying sustainability issues and problems | 18 |
| 5.4 | Stage A4: Development of the SA Framework | 25 |

| | | |
|-----------|---|-----------|
| 5.5 | Stage A5: Consulting on the scope of the SA | 26 |
| 6 | Stage B - Option Assessment | 27 |
| 6.1 | Stage B1: Testing the DPD objectives against the framework | 27 |
| 6.2 | Stage B2: Developing the DPD options | 28 |
| 6.3 | Stage B3: Predicting the effects of the DPD | 30 |
| 6.4 | Stage B4: Evaluating the effects of the DPD | 33 |
| 6.5 | Stage B5: Considering ways of mitigating adverse effects and maximising beneficial effects | 38 |
| 6.6 | Stage B6: Proposing measures to monitor the significant effects of implementing the DPDs | 39 |
| 6.7 | Cumulative Impacts Table | 39 |
| 7 | Stage C - Report Preparation | 46 |
| 8 | Stage D - Public Consultation | 47 |
| 8.1 | Stage D1: Public participation on the preferred options of the DPD and the SA Report | 47 |
| 8.2 | Stage D2: Appraising significant changes (from representations) | 47 |
| 8.3 | Stage D3: Making decisions and providing information | 48 |
| 9 | Stage E - Monitoring | 49 |
| 9.1 | Stage E1: Finalising aims and methods for monitoring | 49 |
| 9.2 | Stage E2: Responding to adverse effects | 49 |
| 10 | List of figures and appendices | 50 |
| 11 | Annex A: Natural England - Habitat Regulations Assessment Screening | 52 |
| 12 | Annex B: Riki Therivel Report - Review of the SA | 55 |

1 Foreword

A number of minor changes to policies CSP1, 2 and 6 were made following the Submission Draft Consultation in 2011. They are points of clarification and do not change the overall emphasis of the policies. Following these changes a 'light' review of the SA has been undertaken. No significant changes to the SA were made

An examination in public was held in October 2011.

The Inspector in his report (21st December 2011) on the Independent Examination into the Core Strategy concluded that the '*SA has been carried out and is adequate*' and further more the two changes he considered were needed to make the DPD sound he stated '*neither of these changes materially alters the substance of the plan and its policies, or undermines the sustainability appraisal and participatory processes undertaken*'.

The Forest of Dean Core Strategy was adopted at Council on 23rd February 2012.

2 Non-Technical Summary

2.1 Introduction

2.1.1 This non-technical summary aims to summarise the content and outcomes of the Sustainability Appraisal for the Forest of Dean District Council (FODDC) Core Strategy Publication Draft (21st March 2011).

2.2 What is the CORE STRATEGY?

2.2.1 The new planning system set out in the Planning and Compulsory Purchase Act (PCPA) will result in the replacement of the present Structure and Local Plans.

2.2.2 At the present local level the Local Plan will be replaced by a series of documents which will comprise a Local Development Framework (LDF).

2.2.3 The Core Strategy provides the root for all the policies in other Development Plan Documents that will follow. It is therefore one of the first LDF documents to be prepared.

2.3 Why is there a Sustainability Appraisal?

2.3.1 Sustainability Appraisal (SA) is a required procedure which forms an integral part of the process of producing the LDF. There are six stages to the Sustainability Appraisal, these are Stages A-E which are summarised in the text below. By undertaking a Sustainability Appraisal it is possible to look at the range of policies and plans contained in the Local Development Framework (LDF) documents, and examine how they contribute to the aim of sustainable development.

2.3.2 By looking at every policy or document in this manner it is possible to identify areas where policies may not contribute to sustainable development. By identifying these problems at an early stage, it is possible to change and amend policies or text to ensure that they are as sustainable as possible.

2.4 General Results Summary

2.4.1 A Habitats Regulations Assessment (HRA - Appendix 10) was carried out as part of the Core Strategy and Sustainability Appraisal development. It indicated that there would be **NO** major effect on any the sites identified, further details are provided in Section 2.6 Habitat Regulations Assessment of the main Sustainability Appraisal Report.

2 Non-Technical Summary

2.4.2 The Core Strategy aims to develop a new portfolio of sites based on the hierarchy across the 4 towns set out in the 2005 Local Plan (**Option B: Develop New Portfolio of Housing Sites**). When tested against the Sustainability Appraisal objectives, the overall effects are positive. There are however negative effects relating to:

- Improvement of health - due to the lack of promotion of exercise.
- Reducing the need/desire to travel by car - no active promotion of sustainable alternative methods of transport.
- Reducing non-renewable energy consumption and 'greenhouse' emissions - no policies requiring a proportion of renewable energy from each development.

2.4.3 The Core Strategy policies have all been tested against the SA objectives; which have been formed as a result of the SA Framework (Appendix 4) that has been developed from the District's Key Sustainability Issues (Table 1 of the Report). The likely effects of each policy were mixed however the overall majority of effects were positive (further details can be found in both the main report and Appendix 7).

2.5 Stage A: Baseline Analysis

2.5.1 Appendix 2 lists the International, National and Local Plans that have influenced the development of the Core Strategy and Sustainability Appraisal. About 300 additional documents were also considered, including reports about the state of the District, previous versions of policies and plans and Parish level plans.

2.5.2 As a result of the Evidence Base, a variety of main issues have arisen, which have influenced the Core Strategy development process. They are as follows:

- Transport Issues;
- The need for Economic Improvement;
- Protection of the Environment;
- Protection of Habitats and Species;
- Protection of Flood Zones;
- The need for an increase in Housing Provision (in particular Affordable Housing).

2.5.3 During this stage the Key Sustainability Issues (Table 1) were identified by analysing the Baseline Information (Appendix 3). In addition Baseline characteristics are also illustrated on maps contained within Appendix 3b (relating to environmental, social and economic characteristics of the district).

2.5.4 At the end of the stage a Sustainability Appraisal Framework was developed which identified 17 local sustainability objectives and future indicators (Appendix 4). This was then circulated to English Heritage, The Environment Agency, Natural England and Gloucestershire County Council for their comments (Appendix 8).

2.6 Stage B: Option Assessment

2.6.1 During this stage the SA appraised in broad terms, a variety of options open to the CS. The SA then looked in greater detail at the predicted effects of the preferred option through the analysis of the Core Strategy policies.

2.6.2 The objectives of the SA (Stage A) and the objectives of the CS Preferred Options document are reviewed and checked for compatibility. Where there is a conflict between 2 objectives one is prioritised over the other (Appendix 5).

2.6.3 The constraints imposed by Government policy must be taken account of when considering the range of possible options for the Core Strategy. This narrowed the process down to the following 10 options (4 of which were developed as a result of SA analysis of the Core Strategy 1st Preferred Options):

- **OPTION A: Development based on the 2005 Local Plan**
- **OPTION B: Develop New Portfolio of Housing Sites**
- **OPTION C: More even Dispersal across Towns**
- **OPTION D: Focus Development in One Town**
- **OPTION E: Tourism Focus to Employment Development**
- **OPTION F: Greater Dispersal to Towns and Villages**
- **OPTION G: SA Themed Option - Employment Focus**
- **OPTION H: SA Themed Option - Increased Housing Numbers**
- **OPTION I: SA Themed Option - Reduced Housing Numbers**
- **OPTION J: SA Themed Option - Landscape Character (small scale development)**

2.6.4 The sustainability implications of these options were tested against the SA Framework (Stage A). The results of which can be found in Appendix 6. Broadly, options focusing development in one town or greater dispersal to the villages were considered less sustainable; principally through potential impacts on local services and increased private car travel.

2.6.5 The preferred option for the Core Strategy is to continue the Local Plan approach whilst taking greater account of the needs and capabilities of individual settlements (with elements from Option A, B, E and J).

2.6.6 A total of 17 policies have been developed in the CS to express this option these were tested against the sustainability objectives (Stage A) to predict the effects of the option (Appendix 7). Broadly the policies are assessed as being positive or neutral depending on the policy intent.

2.6.7 Six key areas for mitigating adverse effects of the policies have been identified:

2 Non-Technical Summary

1. Diversifying the range of employment opportunities (SA objective 3) is not easy to achieve. The SA assumes that the provision of a range of employment sites will stimulate diversification of the employment sector. The preferred strategy provides encouragement and opportunity for diversification as well as ensuring the quality and environment of such sites. No further opportunities for market intervention have been identified.
2. Rural elements of Policy CSP5 Housing and CSP16 Villages are considered to have negative elements in relation to the dispersed nature of the likely developments and reliance on private car transport. These policies have been adapted to ensure access to reasonable standards of public transport are an important consideration of the policies.
3. The impacts on landscape (SA Objective 10) have been identified as variable depending on the nature of proposals. The SA identifies that the implementation of the Council's Landscape Supplementary Planning Document (SPD) is vital in mitigating this variability.
4. The implementation of County Council's SPD on waste minimisation is seen an important mitigating factor in considering use of resources (SA Objective 16).
5. Flood risk; The SA evaluation has assumed that any policy implications identified with the Strategic Flood Risk Assessments will be implemented through the Core Strategy policies..
6. The impacts of the policies on habitats and species has been identified as variable. Through the assessment of the Evidence Base it is clear that the requirements of PPS 9 and Circular 06/2005 provide assessment guidance that would mitigate this variability. It is not considered necessary to repeat this guidance in the Core Strategy.

2.7 Stage C: Report Preparation

2.7.1 Preparing the SA Report (essentially this report).

2.8 Stage D: Public Consultation

2.8.1 The SA was initially presented with the CS First Preferred Options document for public consultation in May 2006. During this period comments were invited on both the Core Strategy and Sustainability Appraisal.

2.8.2 This SA was then presented together with the CS Second Preferred Options document for public consultation for a period of 6 weeks (3rd March 08 - 14th April 08). During that period comments were invited on both the CS Second Preferred Options and SA documents.

Copies of the Documents were available for viewing at local libraries, Council Offices or on the Council's web site <http://www.fdean.gov.uk>.

2.8.3 The Core Strategy Publication Draft will be sent out for the final round of public consultation on 21st March 2011 following Cabinet and Full Council approval. It will be open for public comment for a total of six weeks. The Core Strategy is not expected to be altered following this final consultation, however a Consultation Statement will be produced; detailing all comments that were submitted.

2.8.4 The comments provided are collated, together with the Council's view on the responses, and sent with the Core Strategy and associated documents to the Planning Inspectorate.

2.9 Stage E: Monitoring

2.9.1 Monitoring the effects of the Core Strategy will be undertaken by using the key indicators identified in the SA Framework (Appendix 4).

2.9.2 These indicators will be reported on in the Annual Monitoring Report (AMR) of the Local Development Framework produced by the Council.

3 Introduction

3.1 Introduction

3.1.1 The introduction uses a series of questions to explain what the Core Strategy Second Preferred Options (CS) is and why there is a Sustainability Appraisal for it. This section also outlines what the Sustainability Appraisal aims to do and the process that it will follow.

3.2 Background to the Forest of Dean

3.2.1 The Forest of Dean is situated in the South West of England within the county of Gloucestershire. According to Natural England's 'National Character Area'¹⁰ description the Forest of Dean is 'a well-wooded plateau of ridges and valleys', with many 'scattered and sprawling settlements and small holdings retaining the feel of clearances from the Forest'.

Additionally the south of the District forms part of the Severn Vale 'National Character Area', which comprises a 'diverse range of undulating landscapes, united by broad river valley character'.

3.2.2 The total population of the District is estimated at 81,901 (ONS mid-2008).

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

3.3 What is the Core Strategy?

3.3.1 The Core Strategy provides the root for all the policies in other Development Plan Documents that will follow. It is therefore one of the first LDF documents to be prepared.

3.3.2 The Core Strategy provides a guide to the way in which the District will change over time. It considers the traditional subjects such as housing and employment, but also the more general issues such as the overall approach to the way in which the area should develop. It proposes an approach that attempts to balance the needs of the district with the requirements of national guidance. This does however leave a degree of flexibility for adding a local dimension that reflects the needs and aspirations in the district, and takes into account local circumstances.

3.3.3 The **OBJECTIVES OF THE CORE STRATEGY** are:

i. Providing Quality Environments throughout the District: To protect the environment for the benefit of the community and in order to attract new businesses.

Natural England, National Character Areas, Link:

<http://http://www.naturalengland.org.uk/ourwork/landscape/englands/character/areas/default.aspx>

ii. Develop a more self contained and diverse Local Economy including Tourism:

To address out commuting and enable more sustainable transport patterns while providing a greater range and number of jobs.

iii. Providing Homes including Affordable Homes: To meet the housing needs of the community.

iv. Facilitate Regeneration: To support a stronger more sustainable economy in a better quality environment.

v. Create Safer Communities with better facilities: To improve confidence and well being in an environment that discourages crime.

3.3.4 The Core Strategy sets out the vision for the Forest of Dean, including a key diagram. Its spatial strategy provides for 6200 new dwellings between 2006 and 2026, with a focus on Lydney (1900 homes), Cinderford (1050), Coleford (650) and Newent (350). It focuses on regenerating the settlements in the south of the district; supporting economic development in both the settlements and the rural areas; protecting the natural and built environment; and improving Cinderford town centre to attract trade now lost to the district.

3.3.5 With regards to the provision of new employment land the Core Strategy will focus the majority of development (around 80%) within the four main towns at a total of 68.8ha. The breakdown is as follows:

- 30ha in Lydney
- 26ha in Cinderford
- 6.8ha in Coleford
- 5ha in Newent

3.4 What is the Sustainability Appraisal?

3.4.1 The new planning system set out in the Planning and Compulsory Purchase Act (PCPA) will result in the replacement of the present Structure and Local Plans. At the present local level the Local Plan will be replaced by a series of documents which will comprise a Local Development Framework (LDF). The Sustainability Appraisal (SA) is a required procedure which forms an integral part of the process of producing the LDF.

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

3.4.3 There is a large amount of overlap between the European 'Strategic Environmental Assessment (SEA)' and the UK Sustainability Appraisal process. They have therefore been combined into one process for the assessment of the Local Development Framework. For ease of reference this document will refer to both processes as a Sustainability Appraisal.

3.4.4 It is required and guided by the following:

- Regulation 39 of the Planning and Compulsory Purchase Act 2004
- SEA Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment
- Planning Advisory Service (2010) Sustainability Appraisal Advice Note

3.5 Strategic Environmental Assessment (SEA)

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

SEA Directive

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

This Sustainability Appraisal represents the preparation of an environmental report, in which the likely significant effects on the environment, of implementing the plan or programme, and reasonable alternatives, taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated (Art. 5 and Annex I).

The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process, and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2).

The report shall include a non-technical summary.

Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive (Art. 12).

3.6 Habitat Regulations Assessment (HRA)

3.6.1 The provisions of Article 6 (3) and (4) of the Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) requires Appropriate Assessments are carried out to assess the impacts of the Core Strategy against the conservation objectives of European protected sites within the District. These include Special Areas of Conservation (SAC), Special Protection Areas (SPA's) and Ramsar sites.

3.6.2 The HRA process considers the need for an Appropriate Assessment as required by the Directive.

3.6.3 The HRA assessed the possibility of the Core Strategy policies having an effect on the European Wildlife sites identified in the Screening section.

The HRA was reviewed by Natural England in April 2006, it was concluded that an Appropriate Assessment would not be required at that time.

The HRA was reviewed again in December 2010. Natural England concluded that an AA was not required, as in the case of the Core Strategy, it was more appropriate to undertake assessments at the lower plan tier; such as Area Action Plans or planning applications. The Core Strategy therefore required no further HRA assessment as the issues in the more sensitive areas would be revised and revisited through lower tier plans (Annex A: Natural England - Habitat Regulations Assessment Screening).

4 Statement of Methodology

4.1 Aims and Purpose of the Sustainability Appraisal

4.1.1 There are many definitions of sustainability. This appraisal uses the explanation of sustainability referred to in the Forest of Dean Community Plan (2004)

4.1.2 The idea of sustainability is to ensure a better quality of life for everyone now and for generations to come. A widely-used international definition is 'development which meets the needs of the present without compromising the ability of future generations to meet their own needs' (Bruntland Report 1987).

Another way of looking at it is what would we want to be here for our grandchildren?
- A great environment, employment opportunities and a good standard of living?"

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

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

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

4.1.5 This document is the Sustainability Appraisal for the Forest of Dean District Council Local Development Framework Core Strategy Submission. The five stages of SA (A-E) are set out in Box 1 below, here the SA stages are also shown with the stages of the Core Strategy (DPD process). This report is identified in Stage C of the process.

4.2 Structure of the Sustainability Appraisal

4.2.1 BOX 1 - THE SA PROCESS & DPD (CORE STRATEGY) STAGES

| |
|---|
| DPD Stage 1: Pre-production - Evidence Gathering |
| SA stages and tasks |
| <p>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</p> <ul style="list-style-type: none"> • A1: Identifying other relevant policies, plans and programmes and sustainability objectives. • A2: Collecting baseline information. • A3: Identifying sustainability issues and problems. • A4: Development the SA framework. • A5: Consulting on the scope of the SA. |
| DPD Stage 2: Production |
| SA stages and tasks |
| <p>Stage B: Developing and refining options and assessing effects</p> <ul style="list-style-type: none"> • B1: Testing the DPD objectives against the framework. • B2: Developing the DPD options. • B3: Predicting the effects of the DPD. • B4: Evaluating the effects of the DPD. • B5: Considering ways of mitigating adverse effects and maximising beneficial effects. • B6: Proposing measures to monitor the significant effects of implementing the DPDs. |
| <p>Stage C: Preparing the Sustainability Appraisal Report</p> <ul style="list-style-type: none"> • C1: Preparing the SA Report. |
| <p>Stage D: Consulting on the preferred options of the DPD and SA Report</p> <ul style="list-style-type: none"> • D1: Public participation on the preferred options of the DPD and the SA Report. • D2(i): Appraising significant changes. |
| DPD Stage 3: Examination |
| SA stages and tasks |
| <ul style="list-style-type: none"> • D2(ii): Appraising significant changes from representations. |
| DPD Stage 4: Adoption and Monitoring |
| SA stages and tasks |
| <ul style="list-style-type: none"> • D3: Making decisions and providing information. |

Stage E: Monitoring the significant effects of implementing the DPD

- **E1:** Finalising aims and methods for monitoring.
- **E2:** Responding to adverse effects.

4.3 Who carried out the Sustainability Appraisal?

4.3.1 The Sustainability Appraisal was carried out by the Forward Plans and Sustainability team at the Forest of Dean District Council (FODDC).

4.3.2 An Independent Sustainability Consultant (Levett-Therivel Sustainability Consultants) was hired by the Council to review the Sustainability Appraisal on five occasions (July 2006, April 2008, October 2009, May 2010 and September 2010).

4.4 Sustainability Appraisal Development Restrictions

4.4.1 There were few restrictions/problems faced during the Sustainability Appraisal process, however there were complications with the collection of some Baseline data. Data relating to Material Asset Use and Water Use was difficult to obtain.

5 Stage A - Baseline Analysis

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

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

SEA Directive

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

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

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

5.1.4 The Core Strategy and SA have not been prepared in a vacuum. They were developed within the context of policies, plans and guidance from organisations such as the Government, Gloucestershire County Council and the Environment Agency. The Core Strategy/SA also needs to reflect local needs and requirements such as those set out in the Community Plan.

5.1.5 Appendix 2 lists the Key International, National and Local plans that have influenced the development of the Core Strategy and SA. About 300 additional documents were also considered, including reports about the state of the district, previous versions of policies and plans, and parish level plans. All of these documents have been reviewed to help identify the key sustainability objectives, targets or specific requirements within them, as well as the implications for the development and content of the LDF.

5 Stage A - Baseline Analysis

5.2 Stage A2: Collecting baseline information

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

SEA Directive

- (b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;
- (c) The environmental characteristics of areas likely to be significantly affected;

5.2.1 The aim of the baseline is to characterise the current situation in the District and identify likely trends for the future. This Baseline has been drawn together from a wide range of sources and is contained within Appendix 3. Where there are any gaps in the availability of information on these issues, they are acknowledged.

5.3 Stage A3: Identifying sustainability issues and problems

Consider Key Sustainability Issues facing the District

SEA Directive

- (d) Any existing environmental problems which are relevant to the plan or programme including, in particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;

5.3.1 The baseline data together with officer knowledge and consultation has been used to identify the key sustainability issues facing the district. These are outlined in Table 1 on the next page.

| KEY SUSTAINABILITY ISSUES FACING THE FOREST OF DEAN DISTRICT | | |
|---|--|---|
| ISSUE | SOURCE | LIKELY EVOLUTION WITH NO PLAN |
| Economic | | |
| EC.1. High Reliance on Manufacturing and Primary Industries | Forest of Dean Story (GCC 2006), Economic Development Strategy (FODDC 2004-2009) | If the current situation were to remain the same, with no plan intervention the opportunity to diversify employment types would be reduced. This would result in a higher reliance on manufacturing and primary industries, which in turn increases employment risk. |
| EC.2. The Proportion of the Population with no Qualifications is higher than County or National Averages | Forest of Dean Story (GCC 2006) | Due to the administrative structure of the County Council and District Council's, education and qualification levels are the responsibility of County Level policy. The Core Strategy can however encourage higher qualifications and aid County Level policy implementation. |
| EC.3. Supply of Labour exceeds the number of jobs available, with six jobs for every ten resident workers | Annual Monitoring Report 2010 | The effects of this situation would remain, with the high possibility of increased effects. Future changes in employment patterns would not be appreciated. |

| <u>KEY SUSTAINABILITY ISSUES FACING THE FOREST OF DEAN DISTRICT</u> | | |
|---|---|---|
| EC.4. Improvement of Town Centres to Increase Use Vitality and Access to Services | Forest of Dean Corporate Plan (FODDC) Market Towns Regeneration Strategy (FODDC) | The current situation would remain and worsen if there was no plan. The negative effects of the situation would also increase due to the lack of direction for town centre development. |
| EC.5. Low Aspirations, Basic Skills, Low-level Employment Sector and also Low-levels of Part Time Work | GCC response to Scoping Report | The situation at present would remain the same with the possibility of increased negative effects due to the decrease in promoting local jobs and aspirations. Any solutions that have been proposed in the 2005 Local Plan could soon be out of date. |
| <u>Environmental</u> | | |
| EN.1. Population of 4 Biodiversity Action Plan Butterfly Species declining | Butterfly Conservation 2007 | The no change scenario would not actively promote the protection of declining species, however it would not directly harm the declining rate. |
| EN.2. Concern over increasing impact on Landscape, Heritage and Biodiversity, e.g. through changes in Farming Practices, Tourism and Other Developments | Building on What's Special Programme (Countryside Agency) Integrated Rural Development Programme | The 2005 Local Plan addresses the impact of agricultural processes and tourism on the landscape. There may however be future negative impacts as the rate of change may increase. As a result there would be an increased impact on the landscape, heritage and |

| <u>KEY SUSTAINABILITY ISSUES FACING THE FOREST OF DEAN DISTRICT</u> | | |
|--|---|--|
| | | biodiversity of the area with no new solutions to combat the issue. |
| EN.3. Areas of Contaminated and Unstable Land as a Result of Past Industries | Environment Agency response to Scoping Report (Noted by officers of the District Council) | The serious nature of the issue would increase if the no change scenario were implemented; as the current Local Plan solutions are not up to date and do not appreciate the potential future changes. |
| EN.4. Air Quality is decreasing in areas of Lydney | Environmental Health Air Quality Monitoring (FODDC) | The situation would continue to decline if the no change scenario was applied; due to the potential increased speed of decline in the years following the implementation of the Local Plan 2005. |
| EN.5. Climate Change: effects on population, effects on flora and fauna and occurrence of weather extremes | Strategic Sustainability Appraisal (Environment Agency response to 2007 Scoping Report) | The current Local Plan does partly address the impacts of climate change but does not take account of the knowledge gained regarding climate change since the development of the Local Plan. Therefore the no change scenario would contain some mitigation measures but would not mitigate the continued effects of climate change. |
| EN.6. Increasing use and high reliance on private cars for transport, and high levels of out-commuting | Annual Monitoring Report 2010 | The no change scenario does not address the prediction that car reliance will increase, therefore the situation will |

| KEY SUSTAINABILITY ISSUES FACING THE FOREST OF DEAN DISTRICT | | |
|---|---------------------------------------|---|
| | | continue to increase with no mitigation methods. |
| EN.7. Condition of Sites of Special Scientific Interest, Special Areas of Conservation, Special Protected Areas and Key Wildlife Sites | Natural England SSSI Condition Report | The current Local Plan 2005 does not address the decline of these sites, although independent and government agencies are actively aiming to repair these sites it does require focus from Local Authorities. If the current situation were to continue the Forest of Dean District Council would have a minimal impact on the overall outcome. |
| Social | | |
| SO.1. On current trends the district's population will increase by about 5.2% between 2008 and 2026. The number of households is expected to increase by 5900 during that period. | Annual Monitoring Report 2010 | The no change scenario based on the Local Plan 2005, would deliver dwellings and services, however any changes that have occurred since the Local Plan adoption will not be dealt with. |
| SO.2. Population characteristics in the period up to 2026 is likely to change with a decrease in 20-54 year olds and an increase in the population. | Forest of Dean Story (GCC 2006) | The no change scenario would have a negative effect on the situation and issues that arise may not be solved effectively. |
| SO.3. Low levels of house building and proportion of affordable homes | Annual Monitoring Report 2010 | Not applicable. The no change scenario based on the Local Plan 2005 stated that |

| <u>KEY SUSTAINABILITY ISSUES FACING THE FOREST OF DEAN DISTRICT</u> | |
|---|---|
| | there would be an increase on housing numbers. |
| SO.4. Over a quarter of residents of the District feel they have made insufficient financial provision for retirement, the highest level in the County, | Forest of Dean Story (GCC 2006) The no change sceanrio does not appreciate the current and future aims regarding this issue therefore the negative effects will increase and no issues will be resolved. |
| SO.5. Higher than average death rates caused by Cancer in uncer 75's. The District figures are not following National decreasing figures. | Forest of Dean Story (GCC 2006) There would be unpredictable future effects if the no change scenario were to be maintained. |
| SO.6. In 2007, lowest quartile house prices were 7.8 times lowest quartile incomes, making house ownership difficult | Gloucestershire Story 2009 Due to the recent economic climate the future effects regarding this issue are not predictable therefore an assumption regarding the no change scenario can not be made. |
| SO.7. Access rates to services and facilities by public transport are low in comparison to SW and UK figures. | Office for National Statistics The no change scenario does not appreciate the current effects regarding this issue therefore any future mitigation works would have limited effect. In addition car reliance would increase due to the lack of policy implementation regarding this issue. |

| <u>KEY SUSTAINABILITY ISSUES FACING THE FOREST OF DEAN DISTRICT</u> | | |
|--|---|--|
| SO.8. Achieving set Carbon Reduction and Climate Change targets. | Gloucestershire Local Area Agreement | The Local Plan 2005 does not contain any requirements for carbon reduction or climate change targets. As a result, the issue of carbon and climate change increase would remain and the negative effects would intensify. |
| SO.9. Increase reliance on material assets. | NI 186 Energy Use; on going concerns regarding energy use | The no change scenario does not take account of the reliance on such assets or sources, therefore the effects of the issue would continue. In addition, there would be no promotional effort to address the issue and its effects. |
| SO.10. Increased reliance on water supplies | No data available; taking a precautionary approach | The no change scenario does not take account of the reliance on such assets or sources, therefore the effects of the issue would continue. In addition, there would be no promotional effort to address the issue and its effects. |

5.4 Stage A4: Development of the SA Framework

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

SEA Directive

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

5.4.1 The Sustainability Appraisal Framework sets out the sustainability objectives, targets and indicators against which the Core Strategy can be assessed. These objectives, indicators and targets are a progression from identification of what the sustainability issues are in the district (Stage A3 above).

5.4.2 The objectives should reflect and aim to address the sustainability issues identified in Stage A3. The targets or indicators will be used as ways of measuring change towards meeting the sustainability objectives. The objectives, targets and indicators will be used as a basis to assess the likely implications of policies within the Core Strategy.

5.4.3 Appendix 4 contains the Sustainability Framework. It identifies the High Level sustainability objective, the local sustainability issues, the local sustainability objectives and local sustainability indicators and targets.

5.4.4 The following table details the Sustainability Framework Objectives.

| NO. | SUSTAINABILITY OBJECTIVE |
|-----|---|
| | |
| 1. | Improve health |
| 2. | Provide new housing to meet local need |
| 3. | Diversify the range of employment opportunities within the District |
| 4. | Reduce poverty and income inequality |
| 5. | Meet local needs locally |
| 6. | Reduce vulnerability of the economy to climate change and harness opportunities arising |

5 Stage A - Baseline Analysis

| NO. | SUSTAINABILITY OBJECTIVE |
|-----|---|
| 7. | Reduce the need/desire to travel by car |
| 8. | Help everyone access basic services easily, safely and affordably |
| 9. | Protect and enhance habitats and species (taking account of climate change) |
| 10. | Protect and enhance landscape and townscape |
| 11. | Maintain and enhance cultural and historical assets |
| 12. | Reduce vulnerability to flooding, sea level rise (taking account of climate change) |
| 13. | Reduce non-renewable energy consumption and 'greenhouse' emissions |
| 14. | Reduce the risks associated with unstable or contaminated land |
| 15. | Conserve water resources and protect water quality |
| 16. | Minimise consumption and extraction of minerals |
| 17. | Minimise land, water, air, light, noise, and genetic pollution |

5.5 Stage A5: Consulting on the scope of the SA

Consulting on the scope of the SA

SEA Directive

Consult authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report (Art.5.4)

5.5.1 Government guidance requires that a Scoping Report; covering stages A1 - A4, is produced in order that the statutory consultees English Heritage, the Environment Agency and Natural England have an opportunity to comment. This was initially undertaken in January 2006 and was reviewed again in June 2008. The report of their comments is contained within Appendix 8. In addition to these statutory consultees, Gloucestershire County Council were also consulted. The 2006 Scoping Report was placed on the Council's website.

6 Stage B - Option Assessment

Developing options and assessing the effects of the option(s).

During this stage the SA appraises, in broad terms, a variety of options open to the Core Strategy. The SA then looks in greater detail at the predicted effects of the preferred option.

SEA Directive

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

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

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

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

(i) a description of measures envisaged concerning monitoring in accordance with Article 10;

6.1 Stage B1: Testing the DPD objectives against the framework

Testing the SA objectives

6.1.1 It is important to identify where the Core Strategy and SA objectives are compatible with each other and where there are possible conflicts in order to prioritise when conflicts arise. These priorities then help with predicting the effects of the Core Strategy. It must be remembered that there will be conflict areas. Conflict areas

6 Stage B - Option Assessment

should not be seen as negative, they are inevitable in the balance which is sustainable development. It is the combined effects of the objectives that should aim to achieve sustainable development.

6.1.2 The tables in Appendix 5 compare:

- The SA objectives against each other
- The SA objectives against the Core Strategy objectives

6.1.3 Potential impacts, conflicts or interactions between new development and landscape, nature conservation and employment diversification were identified. Where a balance between impacts needs to be struck it was expected that the corporate priorities of new development would outweigh any environmental impact, provided that such an impact was not to a significant extent. Development was also seen to generally have a negative impact on mineral use due to the increased use of resources.

6.1.4 Similarly the CS objectives ii -iv were considered to potentially conflict with landscape, nature conservation and use of resources in the analysis of objectives.

6.2 Stage B2: Developing the DPD options

Developing the Core Strategy Options

Potentially there are a range of actions and processes that the Core Strategy could undertake to deliver its objectives. These are expressed in the form of 'options'. It is essential that these options are realistic and they must take account of the environmental and other legislative constraints.

6.2.1 The **CS IDENTIFIES 6 POTENTIAL OPTIONS:**

6.2.2 A: DEVELOPMENT BASED ON THE 2005 LOCAL PLAN

To continue to identify all of the sites proposed in the 2005 Local Plan but to only release the "phase three" housing sites when the strategic need for them can be established. This would be likely to meet the currently identified requirement and ensure that the release of land was controlled in relation to its need.

The identified sites are still considered to meet the basic credentials necessary of new land identified for development. They are at the main towns and reflect the need to concentrate development in these locations. The scale of land allocated at Newent is more limited than at the others.

The option is based on the relationship and complimentary development of the three 'Forest Towns' and the services they provide. It is felt that where a service is not provided in one of the 'Forest Towns', it is provided in one of the other two 'Forest Towns' (Roger Tym, Functional Analysis of Settlements 2005)

6.2.3 B: DEVELOP NEW PORTFOLIO OF HOUSING SITES

To test and where appropriate identify a new portfolio of sites based on the overall needs of the area. This could use existing sites and new ones identified in substitution for the present Local Plan allocations which have yet to be taken up.

All options would need to be tested by the Sustainability Appraisal against other options. Given that the overall scale of the requirements for housing land is likely to be similar to that in the present Local Plan, and that the locations identified will need to focus on the towns, the range of options may be limited. It could be further restricted by the way in which sites for particular uses e.g. housing need to be accessible to schools, shops etc.

This option does however allow a re-appraisal of the existing portfolio of sites and could for example allow a degree of change between the towns.

6.2.4 C: MORE EVEN DISPERSAL ACROSS TOWNS

This option broadly encompasses the desire expressed in some representations to consider development sites at a variety of locations around district but principally at the four towns .

This option differs from B in that the strategic focus will not be based on the hierarchies as identified in the 2005 Local Plan, but more on a dispersal pattern of development between the four towns.

6.2.5 D: FOCUS DEVELOPMENT IN ONE TOWN

The proposal in this option would be to focus most development in one of the four market towns at the expense of the other towns with limited provision for development in the other 3 towns.

This option considers the strategic implications on the district as whole and is not intended to identify a 'most appropriate' town at this point. It is an option that would enable economies of scale and could assist with the retention of services in one location.

It is considered inappropriate in the Forest of Dean however where there is a clear need to build a strategy around the network of towns in the south and support Newent in the north.

6.2.6 E: TOURISM FOCUS TO EMPLOYMENT DEVELOPMENT

During the consultations on the issues and options the Council received a number of representations seeking greater support for tourism development. This option would see a stronger positive approach to tourism.

The strategy would support identifying appropriate locations for tourism development and the types of development sought. The option assumes tourism development would principally be within and or around the statutory forest. The preferred option is one of providing for a much more diverse economy and tourism is identified as one of the areas of the economy which is expanding. Elements of this option are therefore retained in the preferred option.

6.2.7 F: GREATER DISPERSAL TO TOWNS AND VILLAGES

Just as options for a greater dispersal amongst the four towns will need to be considered (Option C, as above) so could the greater dispersal to towns and villages. This idea had been suggested by a number of respondents from the previous issues and options exercises. The settlement pattern in the Forest of Dean is such that there are a number of large villages which are often quite closely linked, several of those offer substantial employment.

The previous Local Plan and the Core Strategy place an emphasis on the development of the towns, while allowing for some further development in villages, according to their size and the services and facilities that are present.

6.2.8 SUPPLEMENTARY OPTIONS (Following initial Sustainability Appraisal)

An additional 4 options were developed as a result of SA analysis of the Core Strategy 1st Preferred Options, they are detailed in the following section.

6.3 Stage B3: Predicting the effects of the DPD

Predicting the effects of the Core Strategy Options

6.3.1 The sustainability implications of the options were tested against the SA framework (Stage A). The results of this can be found in Appendix 6. Broadly options focusing development in one town or greater dispersal to the villages were considered less sustainable, principally through potential impacts to local services and increase private car travel.

6.3.2 **Option A** is development based on the hierarchy across the 4 towns as set out in the 2005 Local Plan and utilising existing identified sites (Business as Usual). The results of this option are neither positive or negative, there is not a clear majority for either aspect. Although the option will protect local features and will encourage a reduction in car use; due to development in 4 towns, it will not provide suitable services, facilities or housing for local need.

In addition, the option does not take into account the future economic, social and environmental effects of climate change. The option is based on the relationship and complimentary development of the three 'Forest Towns' and the services they provide. It is felt that where a service is not provided in one of the 'Forest Towns', it is provided in one of the other two 'Forest Towns' (Roger Tym, Functional Analysis of Settlements 2005).

6.3.3 Option B aims to develop a new portfolio of sites based on the hierarchy across the 4 towns set out in the 2005 Local Plan. Option B presents a mixture of positive and neutral effects with minimal negative effects. This option addresses local need and aims to provide for this. It does not however tackle health issues nor does it seek to promote sustainable methods of transport or encourage renewable energy use.

6.3.4 Option C aims to promote more even dispersal across the four main towns. Option C effects are mixed. Positive aspects include provision of housing, improvement of well-being and reduction of vulnerability to climate change. Negative effects centre around employment provision and infrastructure/access. A more even dispersal across the 4 main towns may initially be perceived as positive, however it does not take account of the hierarchy of the towns and their catchment.

6.3.5 Option D focuses development in one town. Option D presents mostly negative effects due to the focused development at one central location. This option does not promote sustainable living due to the need to travel to the 'central location'. Additionally it does not meet needs locally as the majority of the District will have to travel to a 'central hub'.

6.3.6 Option E focuses on developing a tourism aspect to employment development. Option E aims to encourage a greater focus on tourism development with a reduction in focus on alternative forms of development. Due to the nature of the option it presents mostly negative effects regarding meeting local needs, and protection of landscape and townscape. There are potential positive effects regarding transportation and public transport improvement; which the option aims to promote.

6.3.7 Option F aims to create greater dispersal to towns and villages. Option F is the least favourable option with the majority of effects being negative. Due to the development of a variety of settlements, it will result in increased movement within the District. In addition the spread of development sites will lead to a reduction in main town services, and increased pressure on towns and villages that do not have suitable infrastructure to cope with such development. Although the option is widely negative it does provide housing for local need.

6.3.8 An additional four options were considered following consultation on the Core Strategy 1st Preferred Options; as alternatives to the suggested options. They are referred to in the Sustainability Appraisal as SA Themed Options.

6 Stage B - Option Assessment

6.3.9 Option G aims to create an increased employment focus. The option would promote a strong employment lead approach prioritising development for employment purposes above other concerns such as housing availability, housing affordability and rural character. This option would promote substantial infrastructure to support major employment development. Distribution would be based on access to major transport corridors.

The overall effects are mostly negative. Although the option would focus on the delivery of additional employment opportunities it does not deliver other services based on local needs. Additional development would have a negative impact upon landscape and townscape, as well as the protection of habitats and species. Furthermore development activity would increase the consumption and extraction of minerals as well as increase pollution levels (of all varieties).

A more balanced option which delivers a variety of services to benefit a range of local needs is required. Various mitigation measures would be required dependant on the proposed effect.

6.3.10 Option H aims to increase the housing provision within the Core Strategy by at least 50%. The option would focus on bringing the most suitable and deliverable locations forward, based on access to transport corridors.

The overall effects are mostly negative however the option does deliver increased housing for the District. The option will also reduce the need to travel and improve access to services as the sites will be situated adjacent or near to existing transport corridors.

The option solely focuses on the delivery of housing, without regard for the delivery of other services/needs. Additionally, the option does not actively promote the use of sustainable construction or renewable energy techniques.

A more balanced option is required in order to ensure a wide variety of services are delivered and needs addressed. Various mitigation methods would be required dependant on the proposed effect.

6.3.11 Option I aims to decrease the housing provision within the Core Strategy by at least 50%. The option would focus on bringing the most suitable and deliverable locations around the four market towns forward.

The overall effect is likely to be negative/neutral. The proposed option does not deliver adequate housing numbers nor does it deliver service needs.

Due to the lower scale of development proposed within this option, its effects will not be as great as Option H, however they are still considered as negative. The option does not provide increased services nor does it address housing need. An option needs to be delivered which provides a variety of services and delivers services/infrastructure for local need.

6.3.12 Option J aims to focus on maintaining the existing character of the District above other considerations. Preservation of the natural and built environment would be the strategic drivers. In this option development is expected to be small scale with a varied dispersal leading to small-scale development becoming widespread, with some larger scale development clustered in the least sensitive locations. Overall development rates and areas would be significantly lower than those proposed in any of the other options.

The overall effect is likely to be neutral with additional negative/positive effects. The option does not actively provide services for local need. Although the option does not focus on development, any development that does take place will have to be designed and located in less sensitive locations. As a result the option does protect habitats, species, landscape and townscape. As development will take place, negative effects will still be seen relating to increased pollution and mineral consumption.

As with the other SA Themed Options a more balanced approach is required in order to ensure local needs are addressed.

Preferred Option

6.3.13 The preferred option is for the LDF is to continue the Local Plan approach whilst taking greater account of the needs and capabilities of individual settlements (**Option B**). The chosen option is 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.

6.3.14 The assessment of the options indicates that this is also the most sustainable approach when considered against the SA objectives.

6.4 Stage B4: Evaluating the effects of the DPD

Evaluating the effects of the Draft Core Strategy Preferred Options Policies

6.4.1 Following the identification of the Core Strategy Preferred Option the Core Strategy has developed policies that expressed this preferred option. At this stage the SA considers the predicted effects of these policies. The following guidance criteria were used to assess the predicted effects of the policies:

- *Likelihood of the effect happening* (Probability)
- *Whether the effect is long, medium or short term* (Duration)
- *Scale of the effect, localised or widespread, large or small* (Frequency & Extent)
- *Permanent or temporary effects* (Reversibility)

6 Stage B - Option Assessment

6.4.2 It should be remembered that in the CS Policies are not specific to identified sites for development. Therefore there is an inherent uncertainty in the exact effects of the policies. It is however possible to assess if the policies together conform with the principles of Sustainable Development (Appendix 7 demonstrates the process of assessing the effects).

6.4.3 In order to consider the holistic effects of the policies the SA also considers the predicted cumulative and synergistic effects of the policies in relation to the SA objectives. Appendix 7 displays the predicted cumulative effects.

6.4.4 The following provides a **SUMMARY** of the likely effects of policy:

Core Strategy Policy: CSP 1 Design, Environmental Protection and Enhancement

Description of Policy: The policy is intended to promote local distinctiveness as well as good design and conservation. The design and construction of new development must take into account important characteristics of the environment, and conserve, preserve or otherwise respect them in a manner that maintains or enhances their contribution to the environment, including their wider context. A variety of issues will be considered when assessing developments in order to ensure developments meet the aims of the policy.

Summary of Effects: Overall positive/neutral effects. Negative effects include no provision of new housing to meet local need due to the constraints of the policy, and the potential increase in land, water, air, light, noise and genetic pollution.

Core Strategy Policy: CSP 2 Climate Change Adaptation

Description of Policy: The policy looks to the future and ensures that new development takes account of the impacts of changes in climatic conditions over its lifetime. Proposals for major development will be required to demonstrate that their design and layout will reduce the impacts of climatic change, the following should be considered; Water Management, Heating and Cooling, Biodiversity.

Summary of Effects: The effects are positive/neutral.

Core Strategy Policy: CSP 3 Sustainable Energy within Development Proposals

Description of Policy: The policy is intended to reduce the carbon emissions from new developments by ensuring that a proportion of its energy requirements are provided by on site renewable means. All major developments and other developments involving the construction of one or more dwelling(s) will be expected to provide, as a minimum, sufficient on-site renewable energy to reduce carbon emissions from energy use by 10%.

Summary of Effects: The effects are positive/neutral.

Core Strategy Policy: CSP 4 Development Principles, Development at Settlements

Description of Policy: The policy sets out the principle that development should be concentrated at settlements and that it should be of a scale and nature which is compatible with the role of the settlement concerned. The policy aims to ensure that new development contributes to and reinforces the existing settlement pattern.

Summary of Effects: Overall the effects are positive. The only negative likely effect is the potential increase in land, water, air, light, noise and genetic pollution.

Core Strategy Policy: CSP 5 Housing

Description of Policy: The policy sets out the type, numbers and general location of new housing expected by the Core Strategy. Priority will be given to development on previously developed land and on sites identified for housing in the development plan. No new greenfield sites will be released unless it can be proven that land is not available from other sources and is needed to meet the plan's requirements.

Summary of Effects: Mixed neutral and positive effects. Potential negative effects relate to construction effects on the landscape, pollution and non renewable energy.

Core Strategy Policy: CSP 6 Sites for Gypsies, Travellers and Travelling Showpeople

Description of Policy: The policy sets out how the needs of gypsies, travellers and travelling showpeople will be met. The allocations will be made to reflect any identified need for sites in particular parts of the district, with preference given to locations near or in the towns and larger villages.

Summary of Effects: Majority of effects are neutral, with some positive and neutral effects. Mitigation measures will address issues. Local needs are met through this policy.

Core Strategy Policy: CSP 7 Economy

Description of Policy: The policy implements part of the Core Strategy's economic objective, setting out the aims of new employment provision. Economic development will be promoted throughout the district in accordance with the spatial strategy and its allocations, with the aim of encouraging new and diverse types of employment.

Summary of Effects: Overall the policy effects are neutral/positive. There are however negative effects surrounding the risks associated with contaminated land. Additionally, the policy does not minimise the consumption and extraction of minerals due to the increase of development and construction.

Core Strategy Policy: CSP 8 Retention of Community Facilities

6 Stage B - Option Assessment

Description of Policy: The policy aims to maintain access to community facilities. Development proposals which involve the loss of community facilities, including schools, shops, post offices, public houses, halls, places of worship and health services will not be permitted unless alternative suitable and convenient facilities are available or will be made available as part of the proposal.

Summary of Effects: Majority of effects are neutral, with some positive and neutral effects. Mitigation measures will address issues.

Core Strategy Policy: CSP 9 Recreational Land and Amenity Land including Forest Waste Protection and Provision

Description of Policy: The purpose of the policy is to protect recreational and amenity land and to ensure that any recreation space that may be lost is replaced. The policy covers the protection of amenity land (with additional reference to forest waste), protection of recreational use and recreational provision for new development.

Summary of Effects: Majority of effects are neutral/positive. Effects are likely to enhance landscape and townscape.

Core Strategy Policy: CSP 10 Cinderford

Description of Policy: The policy aims to establish Cinderford as a more sustainable and economically diverse town using mixed use development as a focal point for change.

Summary of Effects: Overall the effects are mixed. There are issues relating to the protection and enhancement of habitats and species; in particular relating to the Steam Mills site in Cinderford and the potential development damage. Additionally there are a variety of issues relating to the lack of renewable energy usage, conservation of water resources, minimisation of mineral consumption and minimisation of land, water, air, light, noise and genetic pollution; all resulting from the potential increase in development. Effects are mixed in terms of duration (short-term and long-term).

Core Strategy Policy: CSP 11 Cinderford Northern Quarter

Description of Policy: The policy focuses on the Cinderford Northern Quarter, where land will be allocated for mixed use development, with the aim of contributing to the regeneration of the town. Land will be set aside for approximately 175 dwellings, about 6ha of employment and 3.5ha for mixed use.

Summary of Effects: Effects are mixed with a variety of uncertain effects (neutral/positive). Negative effects relate to the potential implications surrounding construction and pollution.

Core Strategy Policy: CSP 12 Lydney

Description of Policy: The policy will support the proposed development of the land east of Lydney for a new neighbourhood and will promote a new mixed development along the axis between the harbour and the town centre. In addition, the development of the town centre including improvements following the implementation of the highway strategy and the improvement of key retail sites will be supported.

Summary of Effects: Overall effects are mixed. Negative effects include the lack of protection and enhancement of landscape and townscape, lack of renewable energy consumption, lack of water resource conservation, lack of control over mineral extraction and lack of control over pollution outputs. All the above effects will have to be mitigated appropriately.

Core Strategy Policy: CSP 13 Lydney AAP

Description of Policy: The policy supports the proposed Area Action Plan in which a new mixed form of development will be promoted on under utilised land between the harbour and the town centre.

Summary of Effects: Effects are mixed. The majority of negative effects are related to construction and resource consumption.

Core Strategy Policy: CSP 14 Coleford

Description of Policy: The policy provides for 650 dwellings; over the period to 2026 on eligible sites, whilst maximising the use of previously developed land, 6.8ha of employment land and the promotion of the continued redevelopment of the town.

Summary of Effects: Overall effects are mixed, however the majority are positive. Negative effects include the potential increased consumption of non-renewable energy, minerals and water. Additionally, there is a potential risk of increased pollution from development.

Core Strategy Policy: CSP 15 Newent

Description of Policy: The policy provides for 350 dwellings; over the period to 2026, 5ha of employment land, and support for the continued improvement of the town centre allowing for further retail and service provision.

Summary of Effects: Overall the effects are mixed. Positive effects include the provision of housing to meet local need, the diversification of employment types, protection of landscape, townscape and habitats as well as the reduction of environmental risks associated with unstable, contaminated land. Negative effects include the potential increased need to travel by car, issues regarding access to services, non-renewable energy consumption, mineral and water consumption and pollution increase. All negative issues have, where possible, included appropriate mitigation measures.

Core Strategy Policy: CSP 16 Villages

Description of Policy: The policy ensures that development proposals at villages comply with the 'Core Policies' and in doing so take account of the scale, function and level of services accessible from their intended location, taking into account the availability of public transport. Where appropriate the defined settlement boundary will be a key determinant in judging the acceptability of proposals.

Summary of Effects: The overall effects are mixed. Negative effects are centred around potential limited access to services, climate change effects and pollution increase.

Core Strategy Policy: CSP 17 Monitoring

Description of Policy: The policy ensures that the policies in the LDF will be monitored, principally through the Annual Monitoring Report, with the addition of local monitoring measures.

Summary of Effects: The effects are positive

6.5 Stage B5: Considering ways of mitigating adverse effects and maximising beneficial effects

Considering ways of mitigating adverse effects

6.5.1 Where neutral or adverse effects are identified (Stages B3 & B4 above) the SA examines ways of improving, reducing or mitigating those effects. As has been discussed before (B3 & B4) it is difficult to evaluate the precise effects of the CS preferred options. It is, therefore difficult to propose exact mitigation of any adverse effects due to this level of uncertainty. It is however possible to propose some broad approaches to mitigation. SA is a cycle of testing and improvement, and therefore many alterations to the policies have already taken place.

6.5.2 Six key areas for mitigating adverse effects of some of the policies have been identified:

1. Diversifying the range of employment opportunities (SA objective 3) is not easy to achieve. The SA assumes that the provision of a range of employment sites will stimulate diversification of the employment sector. The preferred strategy provides encouragement and opportunity for diversification as well as ensuring the quality and environment of such sites. No further opportunities for market intervention have been identified.

2. Rural elements of Policy CSP5 Housing and CSP16 Villages are considered to have negative elements in relation to the dispersed nature of the likely developments and reliance on private car transport. These policies have been adapted to ensure access to reasonable standards of public transport are an important consideration of the policies.
3. The impacts on landscape (SA Objective 10) have been identified as variable depending on the nature of proposals. The SA identifies that the implementation of the Council's Landscape Supplementary Planning Document (SPD) is vital in mitigating this variability.
4. The implementation of County Council's SPD on waste minimisation is seen an important mitigating factor in considering use of resources (SA Objective 16).
5. Flood risk; The SA evaluation has assumed that any policy implications identified with the Strategic Flood Risk Assessments will be implemented through the Core Strategy policies..
6. The impacts of the policies on habitats and species has been identified as variable. Through the assessment of the Evidence Base it is clear that the requirements of PPS 9 and Circular 06/2005 provide assessment guidance that would mitigate this variability. It is not considered necessary to repeat this guidance in the Core Strategy.

6.6 Stage B6: Proposing measures to monitor the significant effects of implementing the DPDs

Measures to monitor the significant effects of the Core Strategy

6.6.1 By monitoring the effects of the Core Strategy it is possible to compare the predicted effects with the actual effects. This highlights where changes could be made and increase the accuracy in predicting the effects of future Development Plan Documents and the LDF as a whole. Key indicators to monitor the predicted significant effects of the CS are suggested in the 'indicator' section of the SA Framework (Appendix 4).

6.7 Cumulative Impacts Table

6.7.1 The table (Table 2) on the next page demonstrates the likely Cumulative Impacts of Core Strategy policies.

6 Stage B - Option Assessment

Cumulative Impact of Core Strategy Policies

| SA Objective | Core Strategy Policy | | | | | | | | | | SA objective summary | | | | | | | | | | |
|---|----------------------|---|---|---|---|---|---|---|---|----|----------------------|----|----|----|----|----|----|----|----|----|---|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | |
| 1. Improve Health | + | + | + | + | + | + | 0 | + | 0 | + | + | + | + | + | + | + | + | + | + | 0 | Generally positive with policies on energy and economy being seen as neutral. |
| 2. Provide New Housing to meet local need | + | - | + | 0 | + | + | 0 | + | + | 0 | 0 | 0 | 0 | + | + | + | + | + | + | + | Generally positive with economic policies seen as neutral it should be noted that CS 1 reflects the principles of mixed use development |
| 3. Diversify the employment opportunities within the district | + | 0 | 0 | + | 0 | 0 | + | + | 0 | 0 | 0 | 0 | 0 | + | + | + | + | + | + | 0 | Generally positive policies are seen as neutral. It should be acknowledged that the principles of mixed use development |
| 4. Reduce poverty and income inequality | + | 0 | + | 0 | + | 0 | + | + | 0 | + | + | + | + | + | + | + | + | + | + | 0 | Economic and town based policies are generally positive |
| 5. Meet local needs locally | + | 0 | + | + | + | + | + | + | 0 | + | + | + | 0 | + | + | + | + | + | + | + | Generally positive about meeting local needs and local content (CS1) |

Cumulative Impact of Core Strategy Policies

| SA Objective | Core Strategy Policy | | | | | | | | | | SA objective summary | | | | | | | | | |
|--|----------------------|---|---|---|---|---|---|---|---|----|----------------------|----|----|----|----|----|----|----|----|----|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 |
| 6. Reduce the vulnerability of the environment to climate change and harness opportunities arising | + | + | + | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | + | + | + | + | + | - |
| 7. Reduce the need/desire to travel by car | + | 0 | + | - | + | 0 | 0 | + | + | + | + | + | + | + | + | + | + | + | + | - |
| SA objective summary | | | | | | | | | | | | | | | | | | | | |

6 Stage B - Option Assessment

Cumulative Impact of Core Strategy Policies

| SA Objective | Core Strategy/Policy | | | | | | | | | | SA objective summary | | | | | | | | | | |
|---|----------------------|---|---|---|---|---|---|---|---|----|----------------------|----|----|----|----|----|----|----|----|----|---|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | |
| 8. Help everyone access basic services easily, safely and affordably | + | 0 | + | + | + | 0 | + | + | + | 0 | + | + | + | + | + | + | + | + | + | 0 | Greenly positive with policies focused on rural service provision. Rural developments (esp Low) seen as a priority. Policy may keep local services viable. |
| 9. Protect and enhance habitats and biodiversity (taking account of climate change) | + | + | + | + | + | 0 | 0 | + | + | + | 0 | 0 | 0 | + | + | + | + | + | + | 0 | Greenly positive with policies focused on town centres. However the scale of development will inevitably have a negative impact on biodiversity. Policies such as CS2 will be seen as important |
| 10. Protect and enhance the landscape and townscape | + | + | + | + | + | 0 | 0 | + | + | 0 | + | + | + | + | + | + | + | + | + | 0 | Positive for the townscapes, but negative for rural landscape. The implementation of CS2, AAPS and CS3. Development in the villages is likely to have a positive impact |

Cumulative Impact of Core Strategy Policies

| SA Objective | Core Strategy Policy | | | | | | | | | | SA objective summary | | | | | | | | | | | |
|---|----------------------|---|---|---|---|---|---|---|---|----|----------------------|----|----|----|----|----|----|----|----|----|---|---|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | | |
| 11. Maintain and enhance the natural and historical assets | + | + | + | + | + | + | 0 | + | + | 0 | + | + | + | + | + | + | + | + | + | + | + | + |
| 12. Reduce vulnerability to flooding and other environmental risks (taking account of climate change) | + | + | + | + | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 13. Reduce non-renewable energy consumption and greenhouse emissions | + | + | + | + | + | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

6 Stage B - Option Assessment

Cumulative Impact of Core Strategy Policies

| SA Objective | Core Strategy/Policy | | | | | | | | | | | | | | | | | | | SA objective summary |
|--|----------------------|---|---|---|---|---|---|---|---|----|----|----|----|----|----|----|----|----|----|---|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | |
| 14. Reduce the environmental risks associated with unstable or contaminated land | + | + | + | + | + | + | + | 0 | 0 | 0 | 0 | 0 | 0 | + | + | + | + | + | 0 | The focus of development in the towns is seen as positive. Other policies are variable (neutral overall) dependant on the location of Brownfield land |
| 15. Conserve water resources and protect water quality | + | 0 | + | 0 | + | 0 | 0 | 0 | + | + | 0 | 0 | 0 | + | + | + | + | + | 0 | Issue is poorly represented in policies. Reliance of FSS, PPS1 and schemes budgets |
| 16. Minimise the consumption of minerals | + | + | + | + | + | 0 | 0 | + | + | + | 0 | 0 | 0 | + | + | + | + | + | - | Focus of development in towns is seen as positive (reducing resources in infrastructure. It is scattering of development considered likely to require higher levels of resources. |

Cumulative Impact of Core Strategy Policies

| SA Objective | Core Strategy Policy | | | | | | | | | | | SA objective summary | | | | | | | | |
|--|----------------------|--------------------|--------------------|---|--------------------|---|--------------------|--------------------|--------------------|--------------------|--------------------|----------------------|---|---|--------------------|--------------------|--------------------|--------------------|----------|--|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 |
| 17. Minimise land, water, air, noise and genetic pollution | + | + | + | - | + | 0 | 0 | 0 | 0 | + | 0 | 0 | 0 | + | + | + | + | + | + | - |
| Policy/impact Summary | Generally positive | Generally positive | Generally positive | On balance + in relation to rural economy, social and environmental aspects being impacted by emissions | Generally positive | On balance neutral with + in relation to rural culture and social impacts being balanced by resources | Generally positive | On balance neutral. With benefits limited to well-being based on objectives | Monitoring impacts seen as positive to all the objectives | Generally positive | Generally positive | Generally positive | Generally positive | Variable | Focus of development in 4 villages is to reduce the need to travel. However in these locations development may be considered likely to increase travel |

7 Stage C - Report Preparation

7 Stage C - Report Preparation

7.0.1 This report comprises Stage C and has been prepared by following the guidance set out by the Office of the Deputy Prime Minister, 'Sustainability Appraisal of Regional Spatial and Local Development Frameworks Guidance' (November 2005).

8 Stage D - Public Consultation

SEA Directive

Authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2).

8.1 Stage D1: Public participation on the preferred options of the DPD and the SA Report

8.1.1 The SA was presented with the Core Strategy 1st Preferred Options for public consultation in May 2006 (15th May 2006 - 26th June 2006). During that period comments were invited on both the Core Strategy and Sustainability Appraisal documents.

8.1.2 The SA was then presented together with the CS Second Preferred Options document for a second round of public consultation for a period of 6 weeks (3rd March 09 - 14th April 09). During that period comments were again invited on both the CS Second Preferred Options and SA documents.

Copies of the Documents were available for viewing at local libraries, Council offices or on the Council's web site <http://www.fdean.gov.uk> for both rounds of consultation.

8.1.3 The Core Strategy Publication Draft will be sent out for the final round of public consultation on 21st March 2011 following Cabinet and Full Council approval. It will be open for public comment for a total of six weeks. It is envisaged that the Core Strategy will not be altered following this final consultation, however a Consultation Statement will be produced; detailing all comments that were submitted.

The comments provided will be collated, together with the Council's view on the responses, and sent with the Core Strategy and associated documents to the Inspector.

8.2 Stage D2: Appraising significant changes (from representations)

Appraising any significant changes to the Core Strategy

8.2.1 A number of minor changes to policies CSP1, 2 and 6 have been made following the Submission Draft Consultation July 2011. They are points of clarification and do not change the overall emphasis of the policies. Following these changes a 'light' review of the SA has been undertaken. No significant changes to the SA were

8 Stage D - Public Consultation

made. A technical change was made to the SA Framework (Appendix 4) replacing issues EN 3 with EN5 in relation to Local Objective 12; following comments from the Environment Agency.

8.3 Stage D3: Making decisions and providing information

Following the Adoption of the Core Strategy

SEA Directive

Provision of information on the decision:

When the plan or programme is adopted, the public and any countries consulted under Art.7 shall be informed and the following made available to those so informed:

- That the plan or programme as adopted;
- A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
- The measures decided concerning monitoring (Art. 9 and 10)

9 Stage E - Monitoring

Monitoring the significant effects of implementing the Core Strategy

SEA Directive

Monitoring of the significant environmental effects of the plan's or programs implementation. (Art.10)

9.1 Stage E1: Finalising aims and methods for monitoring

Finalising the aims and methods for monitoring

9.1.1 Monitoring the effects of the CS will be undertaken by using the key indicators identified in the SA framework (Appendix 4). These indicators will be reported on in the Annual Monitoring Report (AMR) of the Local Development Framework produced by the Council.

9.2 Stage E2: Responding to adverse effects

Responding to adverse effects

9.2.1 The annual monitoring of the key indicators for the CS (Appendix 4) identified in this SA, will highlight significant adverse effects. This will enable the Council to respond in planning policy terms to any significant adverse effects.

10 List of figures and appendices

| | |
|---------|--|
| BOX 1 | The Core Strategy (DPD) and SA process |
| TABLE 1 | Key sustainability issues facing the Forest of Dean District |
| TABLE 2 | Cumulative Impacts of Core Strategy Policies |

Appendices (Separate Document)

APPENDIX 1 SEA Checklist

APPENDIX 2 Evidence Base

APPENDIX 3 Baseline

Appendix 3a - Text

Appendix 3b - Maps

- Sustainability Appraisal Map
- Sustainability Appraisal: Agricultural Land Classification Map
- Sustainability Appraisal: Flood Risk Map
- Sustainability Appraisal: Key Wildlife Sites Map
- Sustainability Appraisal: Topography Map
- Sustainability Appraisal: Conservation Areas Map
- Sustainability Appraisal: Landscape Character Types Map
- Sustainability Appraisal: Cinderford Map
- Sustainability Appraisal: Coleford Map
- Sustainability Appraisal: Lydney Map
- Sustainability Appraisal: Newent Map
- Sustainability Appraisal: Cinderford Historic Environment Map
- Sustainability Appraisal: Coleford Historic Environment Map
- Sustainability Appraisal: Lydney Historic Environment Map
- Sustainability Appraisal: Newent Historic Environment Map

APPENDIX 4 SA Framework

APPENDIX 5 Objective Testing

- CS vs. SA Objectives
- SA vs. SA Objectives

APPENDIX 6 Options Assessment

- Option A: Development based on the 2005 Local Plan

- Option B: Develop New Portfolio of Housing Sites
- Option C: More even Dispersal across Towns
- Option D: Focus Development in One Town
- Option E: Tourism Focus to Employment Development
- Option F: Greater Dispersal to Towns and Villages
- Option G: SA Themed Option - Employment Focucs
- Option H: SA Themed Option - Increased Housing Numbers
- Option I: SA Themed Option - Reduced Housing Numbers
- Option J: SA Themed Option - Landscape Character (Small Scale Development)

APPENDIX 7 Preferred Options Assessment

- CSP 1: Design, Environmental Protection and Enhancement
- CSP 2: Climate Change Adaptation
- CSP 3: Sustainable Energy within Development Proposals
- CSP 4: Developments Principles, Development at Settlements
- CSP 5: Housing
- CSP 6: Sites for Gypsies, Travellers and Travelling Showpeople
- CSP 7: Economy
- CSP 8: Retention of Community Facilities
- CSP 9: Recreation and Amenity Land including Forest Waste Protection and Provision
- CSP 10: Cinderford
- CSP 11: Cinderford Northern Quarter
- CSP 12: Lydney
- CSP 13: Lydney AAP
- CSP 14: Coleford
- CSP 15: Newent
- CSP 16: Villages
- CSP 17: Monitoring

APPENDIX 8 Consultees Recommendations

APPENDIX 9 Amendments to the Core Strategy SA

APPENDIX 10 Habitat Regulations Assessment (HRA)

**11 Annex A: Natural England - Habitat Regulations
Assessment Screening**

Date: 1st February 2011
Our Ref:
Your Ref:

Alastair Chapman
Sustainability Team Leader
Forest of Dean District Council
Council Offices, High Street
Coleford
Gloucestershire
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Forest of Dean Core Strategy Habitat Regulations: Screening Report

Dear Alastair,

This reply gives our advice on the requirements of Regulation 61 of the Conservation of Habitats and Species Regulations 2010 (known as "the Habitats Regulations" and referred to herein as HRA).

Regulation 61 requires your authority, before deciding to give any consent to a LDF Document which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects), and (b) not directly connected with or necessary to the management of the site, to make an appropriate assessment of the implications for the site in view of its conservation objectives.

In this case the proposal is not directly connected with or necessary to the management of a site. A revised draft was submitted to Natural England on 4th November 2010, which was considered to be incomplete and a re-submission with further information was requested.

Natural England is now pleased to see that our comments have been taken into account, and the additional plans and projects which have arisen since 2006 have been included in the in-combination assessment.

Natural England's main remaining concern with regard to the HRA overall, is that it is reliant upon lower tier plan (either AAP or planning application) assessments in order to ensure that the higher tier strategy will not have an adverse effect upon any of the European sites. Where a higher tier plan's HRA relies upon lower tier plan assessment in order to ensure that elements of the plan will not have an adverse effect upon European site integrity, it is necessary for the higher tier plan assessment to be confident that there is a reasonable likelihood that each element of the higher tier plan can be implemented without adverse effects, even though the detailed aspects are better assessed at a lower tier level.

Annex A: Natural England - Habitat Regulations Assessment Screening

Natural England was concerned that, without that confidence, some elements of the Core Strategy may therefore ultimately fail the tests of the Habitats Regulations at some later stage, when LDFs are examined or planning applications are submitted.

Natural England has concluded in this instance that there can be confidence in the delivery of the lower tier plans without adverse effects (with appropriate quality Appropriate Assessment and mitigation work) and so **Natural England has no objection to the draft Core Strategy**. It is our view that, either alone or in combination with other plans or projects, this plan would not be likely to have a significant effect on the SPA/CSAC/Ramsar sites of Gloucestershire and the Core Strategy may be submitted for adoption under the terms of the Habitats Regulations.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tim Quinton', is centered within a white rectangular box.

Tim Quinton

Planning and Green Infrastructure Adviser
Gloucestershire Team

12 Annex B: Riki Therivel Report - Review of the SA

Report to Forest of Dean District Council

**Review of the Sustainability Appraisal of the
Core Strategy**

16 February 2011

Levett-Therivel sustainability consultants

Contact: Riki Therivel, tel/fax 01865 243488
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1. Introduction

As a partner of Levett-Therivel sustainability consultants, I have been supporting Forest of Dean District Council as a 'critical friend' since 2006, as the council have appraised the impacts of their emerging Core Strategy through sustainability appraisal / strategic environmental assessment (SA/SEA). This has involved:

- Reviewing the draft SA/SEA of the Core Strategy preferred options in July 2006;
- Reviewing the draft SA/SEA of the Core Strategy second preferred options in April 2008
- Reviewing the draft SA/SEA and Habitats Regulations Assessment (HRA) of the Core Strategy in October 2009
- Reviewing subsequent versions of the draft SA/SEA of the Core Strategy as the Core Strategy was developed further, in May 2010, September 2010 and February 2011 (this review).

This report explains my qualifications (Sec. 2), discusses the legal requirements that SA/SEA must meet (Sec. 3), summarises the findings of previous reviews of the draft SA/SEAs of the Forest of Dean Core Strategy (Sec. 4)¹, and discusses the legal adequacy of the final SA/SEA of the Core Strategy (Sec. 5). It does not discuss the HRA of Appendix 10 of the SA report.

¹ Although we reviewed one round of the Habitats Regulations Assessment (HRA) of the Core Strategy, this was not our main remit, and we did not review later rounds of the HRA.

2. Qualifications

Levett-Therivel are a sustainability consultancy established in 2001 which specialises in carrying out, and helping clients to carry out, sustainability appraisals / strategic environmental assessments (SA/SEA) of their plans and programmes.

I have a PhD in strategic environmental assessment. I was the lead author for the first (then) Office of the Deputy Prime Minister guidance on SA/SEA; run training courses on SA/SEA internationally; and have advised a range of other organisations on their SA/SEA, including the Ministry of Defence, Department of Energy and Climate Change, several of the formal regional assemblies / partnership boards, and the Environment Agency. I have visited Forest of Dean District several times, and the council offices once.

3. Legal requirements

Strategic environmental assessment (SEA) of land use plans is required under the European 'SEA Directive'². In England, this was transposed through the Environmental Assessment of Plans and Programmes Regulations 2004. The Directive and Regulations set detailed requirements regarding preparation of an environmental report, consultation on the scope and level of detail of this report and subsequently the report itself, taking the findings of the report and consultation into account in decision-making, preparation of a post-adoption 'SEA statement', and monitoring of the actual impacts of the plan in question. Box 1 summarises these requirements.

The SEA Directive and transposing regulations are procedural, in that they specify a process that needs to be followed, rather than specific environmental standards that need to be met. As such, the legal adequacy of an SEA is reviewed by checking whether the required processes have been adequately carried out.

Additionally in England, sustainability appraisal (SA) of Local Development Documents is required by the Planning and Compulsory Purchase Act 2004. The Act only requires that *"The local planning authority must also (a) carry out an appraisal of the sustainability of the proposals in each document; (b) prepare a report of the findings of the appraisal"* (Regulation 19.5): it gives no indication of what the appraisal or report should contain or look like. English guidance³ recommends that the SEA process should be integrated within the wider SA, and in turn that the SA process involves widening out the SEA process to include social and economic as well as environmental factors.

SA/SEA is a complex and technical process, and many local authorities – especially smaller ones like Forest of Dean District Council – commission consultants to carry it out. Although this may help to ensure legal compliance and lack of bias, it has the strong disadvantage that the SA/SEA process becomes remote from the plan-making process, with a lower likelihood of influencing the plan or of planners learning about sustainable development by going through the SA/SEA process. It is to the Forest of Dean District Council's credit that they have carried out their SA/SEA themselves.

² Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the environment'

³ Formerly Office of the Deputy Prime Minister (2005) *Sustainability appraisal of Regional Spatial Strategies and Local Development Documents*. Since Summer 2010, this has been superseded by an advice note from the Planning Advisory Services. However, this is not currently available on the PAS website: see <http://www.pas.gov.uk/pas/core/page.do?paqelid=225072#contents-2>

Box 1. Summary of the requirements of the SEA Directive

Preparing an environmental report in which the likely significant effects on the environment of implementing the plan, and reasonable alternatives taking into account the objectives and geographical scope of the plan, are identified, described and evaluated. The information to be given is (Article 5 and Annex I):

- a) An outline of the contents, main objectives of the plan, and relationship with other relevant plans and programmes;
 - b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan;
 - c) The environmental characteristics of areas likely to be significantly affected;
 - d) Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;
 - e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;
 - f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);
 - g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;
 - h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;
 - i) a description of measures envisaged concerning monitoring in accordance with Article 10;
 - j) a non-technical summary of the information provided under the above headings
- The report must include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Article 5.2)

Consulting:

- authorities with environmental responsibilities, when deciding on the scope and level of detail of the information which must be included in the environmental report (Article 5.4)
- authorities with environmental responsibilities and the public, to give them an early and effective opportunity within appropriate time frames to express their opinion on the draft plan and the accompanying environmental report before the adoption of the plan (Article 6.1, 6.2)
- other EU Member States, where the implementation of the plan is likely to have significant effects on the environment in these countries (Article 7).

Taking the environmental report and the results of the consultations into account in decision-making (Article 8)

Providing information on the decision:

When the plan is adopted, the public and any countries consulted under Article 7 must be informed and the following made available to those so informed:

- the plan as adopted
- a statement summarising how environmental considerations have been integrated into the plan and how the environmental report of Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with; and
- the measures decided concerning monitoring (Article 9)

Monitoring the significant environmental effects of the plan's implementation (Article 10)

One way of helping to ensure legal adequacy and lack of bias is by using a 'critical friend' reviewer at key stages, as has been done by the district council. Section 4 summarises the findings of the first five rounds of 'critical friend' reviews, through September 2010.

4. Legal adequacy of previous rounds of SA/SEA for the Forest of Dean Core Strategy

One problem faced by the planners who carried out the SA/SEA was due to the long (more than four years) plan-making process. During this time, the sustainability situation in the district evolved, and the policy environment – particularly in spring 2010 – changed rapidly. Government requirements for other forms of evidence, for instance flood risk assessments and strategic housing land availability assessments, also changed over time, and best practice SA/SEA guidance evolved⁴. This meant that the background data for the SA/SEA had to be updated several times, and accounts for some of the critical comments.

SA/SEA of the Core Strategy preferred options (July 2006)

The review of the SA/SEA found that the SA/SEA was pleasingly concise and very clearly written, and that it fulfilled most of the legal requirements. Critical comments were that:

- The assessment of plan policies did not use the SA framework, and that no clear indication is given about why some indicators but not others were used to appraise each policy (and why different indicators were used).
- The SA/SEA report should be sent to social and economic stakeholders – particularly the Local Strategic Partnership – as well as to the (then) four main environmental consultees.
- More baseline data should be provided generally, and particularly on biodiversity, soil, climatic factors, water and landscape. Some of the data could usefully be presented as maps, e.g. location of designations.
- The report should include a statement of methodology – : “a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information”.

SA/SEA of the Core Strategy Second Preferred Options (April 2008)

The April 2008 review was influenced by the September 2007 Northern Ireland judicial review, which suggested that the requirements of the SEA Directive would need to be followed much more closely and comprehensively than had hitherto been the case. As a result, this review was much more critical, to help ensure that these tougher standards were met. The review raised significant concerns about the legal compliance of the April 2008 SA/SEA report, and also with the Habitats Regulations/Directive. It found that:

⁴ For instance, Communities and Local Government (2010) *Research on sustainability appraisal and strategic environmental assessment*, <http://www.communities.gov.uk/documents/planningandbuilding/pdf/1514614.pdf>, which emphasised spatial data and greater consideration of alternatives.

- The baseline information did not cover water, soil, air, climate change or the landscape, and provided little useful information about biodiversity, despite some of this information having been included in the SA/SEA report for the preferred options;
- It included no description of the likely evolution of the environment without implementation of the Core Strategy, nor information on environmental characteristics of areas likely to be significantly affected despite the fact that the Core Strategy identifies quite precisely some of the areas where development is expected, e.g. Steam Mills at Cinderford;
- The SA/SEA report still did not include a statement of methodology;
- The policy impact assessment tables may not have fully represented the likely impacts (particularly the negative impacts) of the Core Strategy, and did not provide adequate justification for all of the marks given;
- Despite the fact that (then) English Nature considered that the Core Strategy did not require an appropriate assessment / HRA, I felt that such an assessment should be prepared in light of the proximity of some of the proposed development to Special Protection Areas or Special Areas of Conservation.

The review also suggested some other good practice measures, including providing a summary of key messages from the policy analysis in the main SA/SEA report, including some maps in the baseline description, and considering options for how to deal with sustainability problems such as increasing car use and low affordability of housing.

SA/SEA of the Core Strategy (October 2009)

This review noted that significant improvements had been made to the SA/SEA since the April 2008, including:

- very handsome maps of environmental designations, including 'zoom down' constraints maps for Cinderford, Lydney and Coleford
- information about statutory consultees' recommendations on the scoping report, and how these were responded to
- detailed appraisal matrices for the six spatial options and 19 core strategies. These seems clear and unbiased, and include an analysis of short, medium and long term impacts, permanent and temporary impacts, and cumulative impacts
- reference to a completed Habitats Regulations Assessment screening report

However, it noted that the first three bullet points from the April 2008 review (above) had not yet been dealt with; that the SA/SEA report listed but did not analyse other policies, plans and environmental objectives; and that the main SA report discussed the appraisal steps carried out but did not say much about the results of the appraisal. It also made some recommendations on the HRA for the Core Strategy.

SA/SEA of the Core Strategy (May 2010)

The May 2010 SA/SEA review found that most of the concerns raised in previous rounds of review had been addressed. The new version of the SA/SEA contained a statement of methodology; provided information about air quality, biodiversity, landscape etc.; and it discussed the likely evolution of many sustainability components in the absence of the plan. It made a range of additional, more minor, recommendations, notably:

- The policy analysis in the SA/SEA report should be updated to include recent policy changes;
- The original environmental data should be re-inserted, as the new data essentially supplemented rather than replacing the old data;
- Further spatial information could be included in the form of maps;
- The assessment was still not as detailed as the plan itself, notably in relation to Hurst Farm, east of Lydney, and Mead Lane;
- The SA/SEA could focus more on mitigating the plan's cumulative impacts;
- The discussion of alternatives should be extended beyond the six spatial options;
- The non-technical summary could be extended beyond the current very concise four pages.

SA/SEA of the Core Strategy (September 2010)

The September 2010 review found that the SA/SEA was broadly legally compliant, but made some suggestions for further improving the report, including:

- Providing further information about the contents of the Core Strategy;
- Refreshing and streamlining the policy analysis of Appendix 2;
- Providing better information about water quality; and
- Correcting a few typographical errors.

5. Legal adequacy of the final (February 2011) SA/SEA of the Forest of Dean Core Strategy

Table 1 tests the SA report against the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. I believe that the SA report fulfils all of the legal requirements.

Table 1. Sustainability appraisal documents v. SEA requirements

| SEA requirement ¹ | Covered by the SA report? | | | |
|--|---|---|-----------------------|--|
| 1. An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes | Core Strategy (CS) objectives are discussed at para. 2.3.3. Its contents are summarised at para. 2.3.2. Para. 2.3.4 states where new employment land will be located. | | | |
| 2. The relevant aspects of the current state of the environment/sustainability | Introduced at Sec. 4.1. Appendix 2 lists a wide range of other plans and programmes, summarises their contents, and discusses their implications for the Core Strategy. | | | |
| | Introduced at para. 4.2.1. Appendix 3 provides data and maps of baseline data. | | | |
| | SEA topics | current state | specific to FoD area? | likely evolution without Core Strategy |
| | (a) biodiversity | 3.1.3 area and condition of SSSIs, key wildlife sites map (Map 4) | yes | Table 1: EN.1, EN.2, EN.7 App. 3.1.3 |

| SEA requirement ¹ | Covered by the SA report? | | | |
|---|--|--|-----|--------------------------------|
| | (b) population | 3.1.1 Index of Multiple Deprivation (IMD) overall, education, crime and income domains | yes | SO.1, SO.2, SO.6 App. 3.1.1 |
| | (c) human health | 3.1.1 IMD health domain, flood risk map (Map 3) | yes | SO.5 App. 3.1.1 |
| | (d) fauna | see (a) | | |
| | (e) flora | | | |
| | (f) soil | agricultural land classification and topography maps (Maps 2 and 5) | yes | EN.2 |
| | (g) water | flood risk map (Map 3) | yes | EN.3, SO.10 |
| | (h) air | 3.1.2 NO2 levels | yes | EN.4 App. 3.1.2 |
| | (i) climatic factors | 3.1.5 carbon emissions, renewable energy, flood risk map (Map 3) | yes | EN.5, EN.6, SO.8 App. 3.1.5 |
| | (j) material assets | 3.1.1 IMD housing domain | yes | SO.3, SO.7, SO.9 |
| | (k) cultural heritage etc. | 3.1.4 condition of listed buildings, conservation areas map (Maps 6 and 14-17) | yes | EN.2 App. 3.1.4 |
| | (l) landscape | 3.1.6 landscape character description and maps, historic sites maps (Maps 7, 12) | yes | EN.2 App. 3.1.6 |
| | (m) inter-relationship between factors | 3.1.1 IMD overall deprivation domain, overlap maps (Maps 8-11) | yes | EC.2, EC.3, EC.4, EC.5 |
| and the likely evolution thereof without implementation of the plan or programme. (Task A2) | Table 1 discusses the likely evolution of many sustainability components in the absence of the plan. | | | |
| 3. The environmental/sustainability characteristics of areas likely to be significantly affected. | The maps at Appendix 3 show biodiversity, landscape and historical designations for Cinderford, Coleford, Lydney and Newent, as well as ancient woodlands, watercourses, and previously developed land | | | |
| 4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and | Table 1 lists existing problems, including environmental problems, and provides references for this. It notes that condition of SSSIs, SPA and SACs is a problem | | | |

| SEA requirement ¹ | Covered by the SA report? |
|--|---|
| 92/43/EEC | |
| 5. The environmental protection objectives, established at inter-national, Community or Member State level... | See 1. |
| 6. The likely significant effects on the environment..., on issues such as— | Sec. 4.4 summarises the SA framework, and App. 4 gives more detailed information. Sec. 5 discusses the impact of the Core Strategy policies on the SA objectives, supported by App. 5. App. 6 assesses the impacts of alternatives, and App. 7 assess the impacts of the plan policies. SA objectives related to impacts are shown below: |
| (a) biodiversity | 9, 17 |
| (b) population | 2, 4, 8 |
| (c) human health | 1, 17 |
| (d) fauna | 9, 17 |
| (e) flora | |
| (f) soil | 14 (contaminated land), 16 (minerals), 17 |
| (g) water | 15, 17 |
| (h) air | 7, 17 |
| (i) climatic factors | 6, 7, 12, 13 |
| (j) material assets | 2, 16 |
| (k) cultural heritage etc | 11 |
| (l) landscape | 10 |
| (m) interrelationships | 5, 7, 8 |
| These effects should include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects | The appraisal matrices used for App. 6 and 7 include short, medium and long term, permanent and temporary, positive and negative effects, and the scale of the impacts. Table 2 shows the cumulative effects of the Core Strategy. |
| 7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme. | The tables of App. 6 and 7 include a column suggesting mitigation measures. Sec. 5.5 of the main report summarises these. |
| 8. An outline of the reasons for selecting the alternatives dealt with... | Sec. 5.2 of the SA report presents six spatial options. They are appraised at App. 6, and the main findings from this appraisal are summarised at Sec. 5.3. Sec. 5.3 also discusses the findings of four additional thematic options. Reasons for choosing the preferred option are stated at para. 5.3.13 and 5.3.14. |
| ...and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information. | Box 1 lists the stages in the SA process. Sec. 3.3 states who carried out the SA. Sec. 3.4 notes some difficulties in carrying out the SA. Appendix 9 shows changes made to various versions of the SA report. |
| 9. A description of the measures envisaged concerning monitoring... | Para. 8.1.1 of the main report notes that the indicators from App. 4 (the SA framework) will be monitored and reported on in the Annual Monitoring Report. App. 4 lists a series of indicators which measure whether the CS is achieving the council's sustainability appraisal objectives |
| 10. A non-technical | Ch. 1 of the main SA report presents a very concise (4 page) |

| SEA requirement ¹ | Covered by the SA report? |
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| summary of the information provided under paragraphs 1 to 9. | non-technical summary of the rest of the report. |
| Consultation on the scope and level of detail of the SA | Para. 4.5.1 notes that statutory consultees were consulted on the scoping report in January 2006 and January 2008. Appendix 8 lists their responses and how they were dealt with by FoDDC. |
| Consultation on the draft plan and environmental report | Section 7.1 explains that the SA report was made public with the Core Strategy 1 st preferred options in May 2006, and 2 nd preferred options in March-April 2009. Para. 7.1.3 suggests that the SA will be made available to the public alongside the Core Strategy submission document in October 2010. |

1. The numbers (1-10) refer to the requirements of the SEA Directive Annex I.

