

# Sustainability Appraisal for the Allocations Plan – ADOPTION STATEMENT

June 2018



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## 1. Introduction

- 1.1. This document is the Adoption Statement of the Sustainability Appraisal (SA) of the Forest of Dean Allocations Plan (AP). The AP was adopted on 28<sup>th</sup> June 2018 and forms part the Forest of Dean Districts Local Plan.
- 1.2. This report meets the requirements of:
  - Regulation 26 of the Town & Country Planning (Local Planning) (England) Regulations 2012.
  - Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.3. Under section 19(5) of the Planning and Compulsory Purchase Act 2004, Sustainability Appraisal (SA) is required for development plan documents such as the AP. The SA should include an assessment of the likely significant impacts - economic, social and environmental - of the plan.
- 1.4. It is considered good practice when undertaking SA to incorporate the requirements of Directive 2001/42/EC (The Strategic Environmental Assessment Directive), transposed into the UK legislation by the (The SEA Regulations) into a single assessment. The term SA is therefore used to refer to the combined assessment.
- 1.5. Sustainability Appraisals should be carried out in accordance with Government Policy and Guidance the 'National Planning Policy Framework (NPPF) 2012' and 'National Planning Practice Guidance (NPPG)'.
- 1.6. The SEA regulations sets out a series of requirements (16 (3) and (4)) for a statement and for ease of reference these requirements form the main structure of this report.
  - How sustainability considerations have been integrated into the plan or programme
  - How the Sustainability Report (SA report) has been taken into account
  - Details of the consultation undertaken and how opinions expressed in response to the public consultation have been taken into account
  - The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives.
  - The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

## 2. Background

- 2.1. This AP, together with the Core Strategy (CS) and the Area Action Plan for the Cinderford Northern Quarter currently comprises the Local Plan for the Forest of Dean District. The AP looks forward to 2026 and provides policies which identify specific areas of land whether for protection or for development. Along with the other documents the AP (formerly called

Allocations Development Plan Document, or ADPD) will ensure the delivery of development as envisaged for the benefit of the district.

2.2. The AP contains 113 policies together with the identification of a wide range land use features such as settlement boundaries, important open areas and recreational land amongst others. Broadly the AP will:

- Provide for the intensification / development / redevelopment of in the region of 250ha of employment land. A similar figure (255ha) to that identified in the February 2015 version of the plan.
- Identifies housing delivery to be in the region of 6600 new homes in the period 2006-2026
- The plan allocates sites for in the region of 4000 new homes over 46 sites covering in the region of 150ha.
- Provides a range of district and town centre development management type policies.

### 3. How have sustainability considerations have been integrated into the plan or programme?

3.1. Sustainability Appraisal is an iterative process and has been an integral part of preparing the AP. The SA began at the inception of the plan with a SA scoping report and therefore the SA process has been embedded into the development of the plan throughout. At key stages reports and assessment were published for consultation. The SA key stages are set out in table 1:

Table 1. Sustainability Appraisal Key Stages			
	Stage	Date	Link
1	SA Scoping Report	April 2013	<a href="https://www.fdean.gov.uk/media/5799/ap-scoping-report-dec2013.pdf">https://www.fdean.gov.uk/media/5799/ap-scoping-report-dec2013.pdf</a>
2	SA Report in relation to the Pre-Publication Version of the AP	July 2014	<a href="http://fdean-consult.limehouse.co.uk/portal/planning/adpd/ap?tab=files">http://fdean-consult.limehouse.co.uk/portal/planning/adpd/ap?tab=files</a>
3	SA Report in relation to the Publication Version of the AP	March 2015	<a href="https://www.fdean.gov.uk/media/3104/sa-main-document-march-2015.pdf">https://www.fdean.gov.uk/media/3104/sa-main-document-march-2015.pdf</a>

4	Examination hearings (Matter 1)	26 <sup>th</sup> January 2016	<a href="http://apps.fdean.gov.uk/Assets/docs/Allocations%20examiner/Examination%20Docs/ED007_Inspectors_Matters_and_Issues_8.12.15.pdf">http://apps.fdean.gov.uk/Assets/docs/Allocations%20examiner/Examination%20Docs/ED007_Inspectors_Matters_and_Issues_8.12.15.pdf</a>
5	SA Addendum following publication draft changes to the AP	August 2015	<a href="https://www.fdean.gov.uk/media/4117/allocations-plan-sustainability-appraisal-addendum-aug-2015.pdf">https://www.fdean.gov.uk/media/4117/allocations-plan-sustainability-appraisal-addendum-aug-2015.pdf</a>
6	SA Addendum in relation to Further Changes / draft Main Modifications to the AP	September 2016	<a href="http://fdean-consult.limehouse.co.uk/portal/planning/adpd/apfc/apfc?tab=files">http://fdean-consult.limehouse.co.uk/portal/planning/adpd/apfc/apfc?tab=files</a>
7	SA Addendum following publication of Further Changes to the AP	December 2016	<a href="http://fdean-consult.limehouse.co.uk/portal/planning/adpd/apfc/apfc?tab=files">http://fdean-consult.limehouse.co.uk/portal/planning/adpd/apfc/apfc?tab=files</a>
8	SA Addendum in relation to Main Modifications to the AP	October 2017	<a href="https://www.fdean.gov.uk/media/5271/ap-sa-addendum-october-2017.pdf">https://www.fdean.gov.uk/media/5271/ap-sa-addendum-october-2017.pdf</a>

#### 4. How the Sustainability Report (SA report) has been taken into account?

- 4.1. The SA was prepared alongside, and in support of the AP, it is a key output of the policy development process. The scoping report (2013) developed a set of Sustainability Appraisal Objectives reflecting the environmental, social and economic characteristics of the area. These objectives were developed following consultation with environmental agencies such as Natural England, English Heritage, The Environment Agency and Gloucestershire County Council.
- 4.2. The comments received on the SA Scoping Reports helped to create a final set of sustainability objectives, which were then used to test policies and the AP (SA Framework). These assessments, alongside other policy considerations and public consultation, assisted the Council in developing the policy options through SA during the development of the AP
- 4.3. Table 14 of the SA in relation to the Publication Draft (March 2015) identifies the main changes to the AP as a result of the SA. Whilst changes were considered at each stage only further changes to the AP, as result of the SA, were made following the September 2016 assessment (Section2).

## 5. Details of the consultation undertaken and how opinions expressed in response to the public consultation have been taken into account?

- 5.1. SA Reports have been published alongside the development of the AP being open for consultation with the public and consultation bodies.
- 5.2. At each stage the Council prepared a consultation report detailing comments received on the Local Plan documents, including those in relation to the SA, and how the Council responded to them. The consultation reports and changes made as a result are in the reports listed in table 2.

Table 2. Consultation Reports			
	Stage	Date	Link
1	SA Scoping Report (Appendix 5)	April 2013	<a href="https://www.fdean.gov.uk/media/4028/sa-appendix-a4-march-2015.pdf">https://www.fdean.gov.uk/media/4028/sa-appendix-a4-march-2015.pdf</a>
2	Allocations Plan Pre-Publication Draft	July 2014	<a href="http://fdean-consult.limehouse.co.uk/portal/planning/adpd/ap">http://fdean-consult.limehouse.co.uk/portal/planning/adpd/ap</a>
3	Allocations Plan Publication Version	March 2015	<a href="http://fdean-consult.limehouse.co.uk/portal/planning/adpd/allocations_plan_publication_version/appv?pointId=3093431">http://fdean-consult.limehouse.co.uk/portal/planning/adpd/allocations_plan_publication_version/appv?pointId=3093431</a>
4	Allocations Plan Submission Draft – Statement of Consultation	August 2015	<a href="https://www.fdean.gov.uk/media/3106/statement_of_consultation.pdf">https://www.fdean.gov.uk/media/3106/statement_of_consultation.pdf</a>
5	Further Changes Consultation	December 2016	<a href="http://fdean-consult.limehouse.co.uk/portal/planning/adpd/apfc/apfc">http://fdean-consult.limehouse.co.uk/portal/planning/adpd/apfc/apfc</a>
6	Main Modifications consultation	October 2017	<a href="http://fdean-consult.limehouse.co.uk/portal/planning/adpd/apmainmods/apmm?tab=info">http://fdean-consult.limehouse.co.uk/portal/planning/adpd/apmainmods/apmm?tab=info</a>
7	SA Addendum following publication of Further Changes to the AP	December 2016	<a href="http://fdean-consult.limehouse.co.uk/portal/planning/adpd/apfc/apfc?tab=files">http://fdean-consult.limehouse.co.uk/portal/planning/adpd/apfc/apfc?tab=files</a>

8	SA Addendum in relation to Main Modifications to the AP	October 2017	<a href="https://www.fdean.gov.uk/media/5271/ap-sa-addendum-october-2017.pdf">https://www.fdean.gov.uk/media/5271/ap-sa-addendum-october-2017.pdf</a>
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- 5.3. An inspector appointed by the Secretary of State examined the plan and held hearings in public January/February 2016 and July 2017. Hearing session 1 considered legal compliance including *“is the AP based on a sound process of sustainability appraisal and testing of reasonable alternatives, and does it represent the most appropriate strategy in the circumstances?”*
- 5.4. In considering legal compliance the inspector’s [final report](#) (June 2018) considers *“sustainability Appraisal has been carried out and is adequate”*.

## 6. The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives.

- 6.1. The AP is required to be in conformity with the Core Strategy. Therefore, realistically at a strategic level, there were very limited options. Two strategic options were therefore considered:

### 1. No Allocations Plan (business as usual)

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

### 2. Core Strategy Settlement Hierarchy

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

- 6.2. The preferred strategic option was to follow the settlement strategy as set out in the Core Strategy (2 above). Therefore the AP considered a range of sites for employment and housing allocations. At a policy and allocations level individual sites were assessed. As a result of

assessment policies either selected for inclusion into the next stage of the plan, modified or excluded from the plan and not considered further.

## **7. The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.**

7.1. Table 13 of the March 2015 SA identifies the SA monitoring framework. The indicators identified will be reported through the Local Plans Annual Monitoring Report (AMR). In terms of the environment indicators include the condition of Sites of Special Scientific Interest, air quality, greenhouse gas emissions, surface and ground status. The SA monitoring framework also includes a wider set of indicators covering of social and economic conditions.

## **8. Conclusion**

8.1. Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) in accordance with appropriate regulations and guidance have been undertaken. In analysis and reporting terms SA and SEA has been combined in to one process which has been embedded in to the development of the Allocations Plan. At the relevant stages the SA has been available for public consultation and was included in the examination in public of the AP. Now the plan is adopted the effects of the implementation plan will be monitor through a series of identified environmental indicators.