Sustainability Appraisal for the Allocations Plan –NON TECHNICAL SUMMARY (Publication Version March 2015)



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1 Introduction

1.1 Non-Technical Summary

1.1.1 Introduction

1.1.1.1 This non-technical summary aims to summarise the content and outcomes of the Sustainability Appraisal for the Forest of Dean District Council (FoDDC) Allocations Plan (AP).

1.1.2 The Allocations Development Plan Document

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

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

1.1.3 The Sustainability Appraisal

1.1.3.1 Sustainability Appraisal (SA) is a required procedure which forms an integral part of the process of producing the AP. There are five 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 LP and examine how they contribute to the aim of sustainable development.

1.1.3.2 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.

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

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

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

1.1.4 Stage A: Baseline Analysis

1.1.4.1 Appendix 2 lists the International, National and Local Plans that have influenced the development of the Allocations Development Plan Document and Sustainability Appraisal. Additional documents were also considered, including reports about the state of the District, previous versions of policies and plans and Parish level plans.

1.1.4.2 During this stage the Key Sustainability Issues (Table 1) were identified by analysing the Baseline Information (Stage A2 Main Report & Appendix 3). In addition baseline characteristics are also illustrated in a series of maps contained within Appendix 3 (relating to the environmental, social and economic characteristics of the district).

Social	Economic	Environmental
An ageing population	High percentage of populations with no or low level qualifications	Poor air quality in Lydney
High levels of obesity in children & adults	High reliance on low skilled industry	High level of designations in the District
Deficit of housing	Low ratio of jobs to available workforce	Decline in water quality & availability
Income vs average house price discrepancy	Slow growth of business start ups	High number of sites with potential for contamination from past industries
Poor access to services via public transport		Potential impacts of Climate change
		Population of 4 priority species of butterfly in decline
		Low percentage of waste being recycled.

Table 1 Key sustainability Issues

1.1.4.3 At the end of stage A, a Sustainability Appraisal Framework was developed which identified 12 local sustainability objectives (table 2) and future indicators (Stage A4 Main Report). This was then circulated to the statutory consultees; English Heritage, The Environment Agency, Natural England and Gloucestershire County Council for their comments (Appendix 5).

Table 2 Sustainability Appraisal Objectives

NO.	SUSTAINABILITY OBJECTIVES
1.	To improve the health and well being of the populations and reduce inequalities in health.

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NO.	SUSTAINABILITY OBJECTIVES
2.	To meet local housing needs, by ensuring everyone has the opportunity to live in a decent sustainably constructed and affordable home.
3.	To provide accessible community services, recreation and leisure facilities.
4.	To facilitate the development of academic and vocational skills.
5.	To create a more vibrant and sustainable local economy.
6.	To protect and enhance the landscape.
7.	To conserve and enhance biodiversity, flora and fauna.
8.	To maintain and improve air quality.
9.	To maintain and improve water quality and to achieve sustainable water resources management.
10.	To reduce emissions of greenhouse gases that cause climate change.
11.	To reduce waste generation and achieve sustainable management of waste.
12.	To maintain and enhance cultural and historic assets

1.1.5 Stage B: Option Assessment

Preferred Option

1.1.5.1 The options assessment considered the impacts of not having an AP and the requirements for housing and employment across the district. Taking account of the required relationship between the CS and the AP the preferred option is to follow the settlement hierarchy as set out int he CS when considering sites for employment and housing.

1.1.5.2 Having established the preferred option for the AP the SA assessed the range of sites (in excess of 200) being considered for inclusion as allocations within the AP.

1.1.5.3 It is not possible to compare each potential allocation site against every other potential allocation. Such an assessment would generate thousands of permutations and fail to consider the strategic approach as set out in the Core Strategy. Instead the assessment looked at each site in relation to its size, constraints and opportunities, its fit with the Core Strategy and finally relationship to settlements.

1.1.5.4 This assessment guided the selection of sites for inclusion and helped identify any specific requirements. District wide policies were also assessed against the sustainability framework to evaluate their likely effects (Appendices 6-12).

1.1.5.5 The general predicted effects of the AP in relation to the sustainability objectives are described in table 3 below.

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Table 3 Overall impacts of the AP

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

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

SA objective	Impact of AP policies	Impact of AP site allocations
	helping to encourage development and boost the local economy.	
6. To protect and enhance the landscape and protect soil quality	Policies will generally have a positive effect, helping to protect and enhance the landscape through sensitive design, character, sustainability and contribution to the protection of biodiversity and enhancement of the landscape. AP2 and AP3 and site policies which promote larger scale schemes and renewable energies have been assessed to have a negative effect. Other policies in the plan, Core Strategy and Landscape Supplementary Planning Document (SPD) help to mitigate these effects.	The effects of site policies will be variable. Policies relating to recreation, the retention of open space and landscape protection will contribute positively to the protection and enhancement of the landscape and protection of soil quality. Locally Valued Landscape designation policies for May Hil, Coleford and Staunton/Corse ensure the protection of 1390ha of valued landscapes. AP 8 ensures the provision of green infrastructure and safe guarding and enhancement of biodiversity and the surroundings of the development site. Larger scale schemes for housing and employment are expected to have negative effects while smaller sites generally associated with existing settlements are likely to have a neutral effect. Mitigation for neutral and harmful effects can be implemented through applying the principles of CSP.1 and the Landscape SPD.
7. To conserve and enhance biodiversity, flora and fauna	The majority of the policies in the Allocations Plan will have a neutral effect with some positives from AP1, AP6-8 and AP63, conserving and enhancing biodiversity, flora and fauna and promoting and protecting green infrastructure and valued landscapes. AP2, AP26 and some site policies have been assessed as potentially having negative effects where these policies	The effects of site policies will be variable. Positive effects are expected from policies promoting the protection of open spaces, development on land not currently of high biodiversity value and AP8 Green Infrastructure will also help to contribute positively. Negative effects will be due to disturbance from increased recreation such as cycle ways and sites in sensitive locations such as the Wye Valley and Severn Estuary. 12 sites and 1 town policy are within 250m of an SSSI. Mitigation of neutral and negative

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SA objective	Impact of AP policies	Impact of AP site allocations
	promote larger scale development, renewable energy and recreation policies which could cause increased disturbance to biodiversity.	effects can be introduced using the principles of CSP.1 and AP 7 and 8.
8. To maintain and improve air quality	The policies would generally contribute positively with a focus around towns and where green infrastructure and conservation of the local environment are promoted. Air quality in the district is generally good although air pollution is more concentrated around the main larger settlements and transport routes. Air pollution in Lydney is of particular concern in the district and an Air Quality Management Plan is being developed to mitigate this along with regular monitoring. Any new development will be expected to meet environmental health regulations in order to regulate air pollution standards. Overall the plan is considered positive by supporting the implementation of the management plan as set out in the lydney chapter.	The effects of site policies on air quality is generally equally balanced. Sites in towns will reduce commuting and therefore per person air pollution will be reduced however more remote sites such as AP 17 Stowfield Lydbrook and AP 69 Southend Lane Newent may have negative effects given their limited access to services. Sites in Lydney could potentially have a negative effect such as AP 40 Hill Street and AP 47 Land East of Lydney because of their proximity to the Lydney AQMA. Many sites will have a neutral effect. AP 38, 39, 41 will help to mitigate neutral and negative effects by driving improvements for the reduction of pollution in the AQMA and paragraph 6.20 of the AP requires major development schemes to demonstrate their affect on the AQMA and how they can reduce pollution.
9. To maintain and improve water quality and achieve sustainable water	Most of the general policies would have a neutral effect with some having positive effects. Policies AP 1, 4, 7, 8 and 39 could all contribute to improving water quality. AP7 Biodiversity and AP8	Generally site policies will have a neutral effect. The AP assumes that flood risk assessments and SUDS will be used as part of development proposals. Allocated sites are to be compliant with Core Strategy Policy CSP2. and government guidance on

SA objective	Impact of AP policies	Impact of AP site allocations
resources management	Green Infrastructure could both contribute by creating new wetland or pond habitats to benefit the water systems, helping to reduce flooding and also providing benefits to wildlife. It is assumed that flood risk management and SUDS will be implemented as a part of schemes.	SUDS. The Flood and Water Management Act 2010 also now requires SUDs systems for most development and part 'G' of the building regulations sets standards for water efficiency in new housing development. Those sites with expected negative effects on water quality include those that have existing uses and that are known to receive flood related issues.
10. To reduce emissions of greenhouse gases that cause climate change, and reduce vulnerability to flooding	The general policies would generally have a neutral effect on climate change, with positive effects from AP1, 2, 3 and 4 which promote a sustainable mix of uses, renewable energy as well as design.	Generally site policies will have a neutral effect. Allocations for employment and housing sites are generally located in areas which have access to community services, recreation and leisure facilities and academic facilities. This is likely to reduce per person air pollution due to reduced commuting. Negative effects are predicted from policy AP11 Dean Forest Railway as it is supporting the expansion of the local rail network and stations which will contribute more emissions from the use of coal etc. Further negative effects are predicted for remote sites and those that have high energy consumption. In terms of mitigating these effects, high energy users have existing regulatory controls on both emissions and carbon. Policies for cycle ways linking towns and services will also encourage sustainable modes of travel. 27 AP policies are within, partially or adjacent to flood zones. For the majority of these sites the impact of this is considered to be minor. Sites with a higher risk of flooding will be required to submit a flood risk assessment as part of the scheme.

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

Mitigating the adverse impacts

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

1.1.5.7 Within this context it is important to bear in mind that the AP will not be used in isolation. It will be used along side the Core Strategy, National Planning Policy and other legislative / regulatory requirements. In the case of Cinderford the Area Action Plan and Masterplan and Design Code SPD will also have a role for the Northern Quarter. CSP1 provides a set of criteria against which all proposals coming forward for planning permission should be judged. Approaches to ensure compliance with CSP1 will vary depending on the nature of the development proposed and its

location. Of particular note is the requirement for "new development must take into account important characteristics of the environment and conserve, preserve or otherwise respect them in a manner that maintains or enhances their contribution to the environment, including their wider context". Also of particular note are Core Strategy Policies CSP2 and CSP3 which provide for mitigation against climate change, including water management and provision of renewable energy.

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

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

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

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

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

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

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

3. Air Quality. Air quality issues relate to a relatively small area of Lydney. An Air Quality Management Plan is being developed and development proposals will be required to meet the requirements of the plan. For allocations in and around Lydney it is recommended that Air Quality assessment in relation to the sites is identified as a requirement. Conditions vary from year to year depending on the weather conditions, however currently it appears to be static. If policies and proposals outlined in the

plan do not have the effect of reducing, or not increasing, rectification measures can be triggered through the AQMA management plan dependant on the specifics of the issues at that time.

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

Residual Impact

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

Habitats Regulations Assessment

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

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

Conclusion

1.1.5.13 In summary following assessment the AP as a whole it can be seen to have principles of sustainability or sustainable development embedded within its approach and policies. This is not surprising as the AP needed to be consistent with

the CS which set the strategic framework for the district and which was subject to SA and SEA. The CS principles of; Increased self containment; meeting local housing need; focusing development in areas with the greatest access to services and facilities and strong environmental safeguard and enhancement polices are evident through the AP. In addition the AP has key elements to improve cycle and pedestrian routes between settlement for local and tourism uses. The AP provides for specific landscape protection is areas and safeguarding of areas of recreational land (in all its forms). Residual impacts are low, but will need to monitored to ensure the impacts are within the bounds expected.

1.1.6 Stage C: Report Preparation

1.1.6.1 Preparation of this, the SA Report.

1.1.7 Stage D: Public Consultation

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

1.1.7.2 The Allocations Plan and accompanying SA will now be presented for another consultation period in the spring of 2015. Copies of the Documents and details of the consultation can be found on the Council's web site <u>http://www.fdean.gov.uk</u>.

1.1.7.3 Following this period of consultation the plan and the SA will be subject to examination by an independent inspector appointed by the Government prior to the Council adopting the plan $^{(1)}$.

1.1.8 Stage E: Monitoring

1.1.8.1 Monitoring the effects of the Allocations Plan will be undertaken by using the key indicators shown in table 4. These indicators will be reported on in the Annual Monitoring Report (AMR) produced by the Council.

SA objective	Indicator	Source
1. To improve the health and wellbeing of the population and reduce inequalities in health	(no significant impact)	
2. To meet local housing needs, by ensuring everyone has the opportunity to	Housing completions per annum	Annual Monitoring Report;

Table 4 Proposed monitoring framework

Forest of Dean District Council Sustainability Appraisal for the Allocations Plan Non Technical Summary (Publication Version March 2015)

SA objective	Indicator	Source
live in a decent, sustainably constructed and affordable home	 Affordable housing completions per annum Cumulative shortfall in housing completions Average house price v. Average income Number of homes meeting the Code for Sustainable Homes Standard 	Housing Register
3. To provide accessible community services, recreation and leisure facilities	 Average distance of population to key services Level of accessibility via public transport 	Understanding Gloucestershire 2012; MAIDeN
4. To facilitate the development of academic and vocational skills	(no significant impact)	
5. To create a more vibrant and sustainable local economy	 Median annual gross full time pay Level of out commuting 	Office of National Statistics
6. To protect and enhance the landscape and protect soil quality	 Amount of Greenfield land developed 	Housing Land Availability Database
7.To conserve and enhance biodiversity, flora and fauna	 Include info needed to monitor the integrity of SPA/SAC/Ramsar sites Condition of SSSIs Population of 4 BAP butterfly popuations 	Natural England; Butterfly Conservation 2007
8. To maintain and improve air quality	Air quality in the Lydney AQMA	FoDDC
9. To maintain and improve water quality and achieve sustainable water resources management	 Surface water and groundwater status 	Environment Agency
10. To reduce emissions of greenhouse gases that cause climate change and reduce vulnerability to flooding	 Annual emissions of greenhouse gases Average household energy consumption Renewable energy projects (total KW) % of properties at 1% risk of flooding 	Office of National Statistics; Regen SW MAIDeN FODDC

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SA objective	Indicator	Source
11. To reduce waste generation and achieve sustainable management of waste	(no significant impact)	
12. To maintain and enhance cultural and historical assets	Listed buildings at risk	FODDC / English Heritage

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Appendices (Separate Documents)

APPENDIX 1 SEA Checklist

APPENDIX 2 Evidence Base

APPENDIX 3a Baseline Data (Text)

APPENDIX 3B Maps

APPENDIX 4 Objective Testing

APPENDIX 5 Consultees Recommendations

APPENDIX 6 Site Assessment - Stage 1 Site Size

APPENDIX 7 Site Assessment - Stage 2 Site Appraisals

APPENDIX 8 Site Assessment - Stage 3 Fit with Core Strategy

APPENDIX 9 Site Assessment - Stage 4 Settlement Assessment

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

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

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

APPENDIX 13 Assessment location table

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

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