



Forest of Dean District Council **LOCAL PLAN**

2025-2045

Sustainability Appraisal

Regulation 18 Revised Draft Local Plan 2026 Sustainability Appraisal (SA)/Strategic
Environmental Assessment (SEA) SA Report - **APPENDICES**



Forest of Dean
— DISTRICT COUNCIL —

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Appendix I: Statement of Compliance with the SEA Directive and signposts to where key aspects of the SA/SEA are located in the SA Report

The EU SEA Directive¹ (Annex I) requires certain information to be provided in the Environmental Report. This requirement is implemented into the UK legislation through the SEA Regulations (2004)². This is Appendix I of the Sustainability Appraisal Report that constitutes the Environmental Report as required by the SEA Directive and the UK SEA Regulations.

This Appendix I sets out how the requirements of the SA have been met and signposts to where key aspects of the SA/SEA are located within this SA Report (December 2025) – and in accordance with paragraph 33 of the National Planning Policy Framework (updated December 2024)³.

SEA requirements and how they are covered in this report

Requirement under the Environmental Assessment of Plans and Programmes Regulations 2004	Where covered	Summary of Contents
I. An outline of the contents and main objectives of the plan or programme, and of its relationship (if any) with other relevant plans and programmes.	INTRODUCTION Chapters 1-3	Provides understanding of how SA has been constructed and its relationship to Local Plan and other relevant plans/programmes.
	Chapter 4 - The Forest of Dean Local Plan to 2045	Provides an overview of the context of the Local Plan.
	Chapter 14 The Vision and Objectives of the Local Plan	Sets out the Vision and main Objectives of the FoDD Local Plan.

¹ https://environment.ec.europa.eu/law-and-governance/environmental-assessments/strategic-environmental-assessment_en

² [The Environmental Assessment of Plans and Programmes Regulations 2004](#)

³ https://assets.publishing.service.gov.uk/media/67aaf8f3b41f783cca46251/NPPF_December_2024.pdf

	<p>SUSTAINABILITY CONTEXT & SUMMARY BASELINE</p> <p>Chapters 8-13</p>	Summarises the relationship with other plans and references the detailed review provided in the SA Scoping Report (2020)
	<p>SUSTAINABILITY CONTEXT & SUMMARY BASELINE</p> <p>Chapters 8-13 (in particular Chapter 10)</p>	Summarises the relevant baseline conditions for sustainability (including the state of relevant environmental aspects) in the FoDD area. The information is set out in more detail in the SA Scoping Report (2020) that also indicates the likely evolution of current conditions and trends where available. Provides likely outcomes without the plan.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	<p>SUSTAINABILITY CONTEXT & SUMMARY BASELINE</p> <p>Chapters 8-13 (in particular Chapter 10)</p>	Summarised in Chapters 8-13 of Main SA Report; where relevant and available this information is detailed in the SA Scoping Report
3. The environmental characteristics of areas likely to be significantly affected.	Appendix V (SA of Proposed Site Allocations) and Chapter 25 of this report.	Summarised in Chapter 25 of Main SA Report where relevant in terms of potential site allocations and in more detail in the Appendix V.
	<p>SUSTAINABILITY CONTEXT & SUMMARY BASELINE</p> <p>Chapters 8-13</p>	Summarises existing sustainability (including environmental problems) for the FoDDC area. This information is also detailed in the SA Scoping Report.

	INTRODUCTION – Chapter 2	This section also summarises information for Natura 2000 sites in line with Habitats Regulations Assessment requirements. Chapter 2 provides update on HRA Screening Report (available separately, February 2026)
4. Any existing environmental problems which are relevant to the plan or programme including, and in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds and the Habitats Directive.	Appendix V (SA of Proposed Site Allocations) and Chapter 25 of this report.	Summarised in Chapter 25 of Main SA Report where relevant in terms of potential site allocations and in more detail in the Appendix V.
	SA APPROACH & METHODS Chapter 5 & 6 SUSTAINABILITY CONTEXT & SUMMARY BASELINE Chapters 8-13	Provides the summary of objectives for sustainability in the FoDD area (including environmental objectives) and the implications of these objectives for the FoDD Local Plan (refers to details in the SA Scoping Report 2020); explains how the environmental considerations have been taken into account.
5. The environmental protection objectives, established at international, Community or Member State 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.	Appendix V (SA of Proposed Site Allocations) and Chapter 25 of this report.	Summarised in Chapter 25 of Main SA Report where relevant in terms of potential site allocations and in more detail in the Appendix V.
	SA APPROACH AND METHODS Chapters 5 & 6 (especially Table 2)	Details the SA Framework of Objectives that shows which of the issues listed by the SEA Regulations are progressed by which SA Objectives. This ensures that all the issues are considered during the assessment of each element of the emerging FoDD Local plan , since each

		policy, proposal and site allocation is assessed against each SA Objective.
6. The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues including (a) biodiversity; (b) population; (c) human health; (d) fauna; (e) flora; (f) soil; (g) water; (h) air; (i) climatic factors; (j) material assets; (k) cultural heritage, including architectural and archaeological heritage; (l) landscape; and (m) the inter-relationship between the issues referred to in sub-paragraphs (a) to (l).	Chapter 14 (Vision & Objectives of the Local Plan), Chapters 15-23 (Strategic Options), Chapter 25 (SA of Site Allocations), Chapter 26 (SA of Policies), Chapter 27 (SA of the whole Revised Draft LP) Appendices V & VI	Summarises and appraises the impacts of the draft plan vision and objectives, the alternative strategies, appraises the development sites, draft plan policies and overall considers whether any effects are likely to be cumulative, short, medium and long-term impacts.
	Chapters 15-23 (Strategic Options), Chapter 25 (SA of Site Allocations), Chapter 26 (SA of Policies), Chapter 27 (SA of the whole Revised Draft LP) Appendices V and VI	Where potential significant negative effects are predicted the SA has sought to provide suggestions for mitigation possibilities. These are summaries in the main report and detailed in the appraisal matrices in the appendices.
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.	Chapters 15-23 (Strategic Options), Chapter 25 (SA of Site Allocations), Chapter 26 (SA of Policies), Chapter 27 (SA of the whole Revised Draft LP) Appendices V and VI	Strategic Options for Strategy are discussed (Chapter 23) highlighting potential adverse effects and methods of mitigation. The reasons for progressing/rejecting options are discussed here. Other options and alternatives, such as Residential Density, Building Regulation Standards, Biodiversity Net Gain were appraised through SA in Chapters 20 - 22.

		<p>Options for site allocations are discussed in Chapter 25 and Appendix IV, including potential effects and opportunities for mitigation.</p> <p>Options for local plan policies are discussed in Chapter 26 and Appendix V, including potential effects and methods of mitigation/recommendations.</p>
<p>8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information.</p>	<p>SA APPROACH AND METHODS</p> <p>Chapters 5 & 6</p> <p>SUSTAINABILITY CONTEXT & SUMMARY BASELINE</p> <p>Chapters 8-13</p>	<p>Outlines how the assessment was undertaken - the appraisal methodology and any difficulties encountered.</p>
<p>9. A description of the measures envisaged concerning monitoring in accordance with regulation 17.</p>	<p>Chapter 28</p>	<p>Provides methods for monitoring the sustainability (including environmental) effects of the implementation of the FoDDC Revised Draft Local Plan.</p>
<p>10. A non-technical summary of the information provided under paragraphs 1 to 9.</p>	<p>Non-technical summary - available separately.</p>	<p>Provides a non-technical summary of the main report.</p>

Appendix II: SA Scoping Report (2020)

See separate appendix document (available on the Council's website)

Appendix III: SA of First Preferred Strategic Options (2020) - fully annotated

Significance Key:

Symbol	Meaning	Sustainability Effect
++	Very positive	Development encouraged; would require no or very little mitigation and could offer betterments to existing sustainability issues
+	Positive	No sustainability constraints and development acceptable; mitigation possible
0	Neutral	Negligible effects or not applicable; little or no change to existing situation
-	Negative	Potential sustainability issues; mitigation and/or negotiation might be possible
--	Very negative	Problematical & improbable due to unknown sustainability issues; mitigation difficult/expensive/impossible.
?	Unknown	Effects are unknown without further investigation

SA of First Preferred Strategic Options 2020:

SA Objective:	Option 1: Selective planned expansion of existing settlement(s).	Option 2: Maximum incremental change to the extent of absolute constraints (do nothing approach).	Option 3: Planned New Settlement(s).	New Option 4: Mixture of Option 1 and Option 3 (Selective planned expansion of existing settlement(s) and Planned New Settlement(s)) PREFERRED OPTION
1. To improve the health and well-being of the populations and	+	-	+	++

SA Objective:	Option 1: Selective planned expansion of existing settlement(s).	Option 2: Maximum incremental change to the extent of absolute constraints (do nothing approach).	Option 3: Planned New Settlement(s).	New Option 4: Mixture of Option 1 and Option 3 (Selective planned expansion of existing settlement(s) and Planned New Settlement(s)) PREFERRED OPTION
reduce inequalities in health.	<ul style="list-style-type: none"> Sites would be in closer proximity to existing health services 	<ul style="list-style-type: none"> Unlikely sites would be near existing health services 	<ul style="list-style-type: none"> Master plan can ensure sites would be in closer proximity to existing health services and create services within the new settlement 	<ul style="list-style-type: none"> There would be existing health facilities nearby as well as newly planned ones to make the most of active travel to access them
2. To meet local housing needs, by ensuring everyone has the opportunity to live in a decent sustainably constructed and affordable home.	<p style="text-align: center;">+</p> <ul style="list-style-type: none"> Can plan to deliver the necessary housing numbers, incl. affordable. Can also ensure housing is sustainably constructed with low/zero carbon emissions. 	<p style="text-align: center;">+</p> <ul style="list-style-type: none"> Can deliver the necessary housing numbers, incl. affordable. Can also ensure housing is sustainably constructed with low/zero carbon emissions. However, the location of such housing may not be sustainable. 	<p style="text-align: center;">++</p> <ul style="list-style-type: none"> Can plan to deliver the necessary housing numbers, incl. affordable homes. Can also ensure housing is sustainably constructed with low/zero carbon emissions. Also has ability to create a wider scale low carbon energy provision for settlement (not having to plug into existing services). 	<p style="text-align: center;">++</p> <ul style="list-style-type: none"> Can plan to deliver the necessary housing numbers, incl. affordable, ensuring housing is located near to services. Can also ensure housing is sustainably constructed with low/zero carbon emissions. Also has ability to create a wider scale low carbon energy provision for settlement (not having to plug into existing services).
3. To provide accessible community services, recreation and leisure facilities.	<p style="text-align: center;">+</p> <ul style="list-style-type: none"> Can plan to deliver the services in sustainable locations, to encourage active travel and/or take advantage of existing facilities nearby. 	<p style="text-align: center;">-</p> <ul style="list-style-type: none"> Unlikely that there will be existing services nearby or that they will be provided for by developers. 	<p style="text-align: center;">+</p> <ul style="list-style-type: none"> Can plan to deliver the services. 	<p style="text-align: center;">+</p> <ul style="list-style-type: none"> Can plan to deliver the services in sustainable locations, to encourage active travel and/or take advantage of existing facilities nearby.

SA Objective:	Option 1: Selective planned expansion of existing settlement(s).	Option 2: Maximum incremental change to the extent of absolute constraints (do nothing approach).	Option 3: Planned New Settlement(s).	New Option 4: Mixture of Option 1 and Option 3 (Selective planned expansion of existing settlement(s) and Planned New Settlement(s)) PREFERRED OPTION
4. To facilitate the development of academic and vocational skills.	<p style="text-align: center;">+</p> <ul style="list-style-type: none"> Can plan to deliver the educational services. 	<p style="text-align: center;">–</p> <ul style="list-style-type: none"> Unlikely that there will be existing services nearby or that they will be provided for by developers. 	<p style="text-align: center;">+</p> <ul style="list-style-type: none"> Can plan to deliver the educational services. 	<p style="text-align: center;">+</p> <ul style="list-style-type: none"> Can plan to deliver the educational services.
5. To create a more vibrant and sustainable local economy.	<p style="text-align: center;">+</p> <ul style="list-style-type: none"> Near existing facilities and services, providing more footfall for existing local economy and encourage new businesses. 	<p style="text-align: center;">0</p> <ul style="list-style-type: none"> Development may support existing services or potentially create new businesses, but this is highly dependent on developer. 	<p style="text-align: center;">+</p> <ul style="list-style-type: none"> Can plan to deliver the services. Can include home-working. 	<p style="text-align: center;">+</p> <ul style="list-style-type: none"> Can plan to deliver the services. Can include home-working.
6. To protect and enhance the landscape.	<p style="text-align: center;">0</p> <ul style="list-style-type: none"> The sites with less impact on the landscape may be chosen, however, there may not be much choice if settlements are already up against statutory forest or other designated area. But there would be a backdrop of existing development. 	<p style="text-align: center;">– –</p> <ul style="list-style-type: none"> Sites are likely to be in the most sensitive landscape areas with little or no mitigation measures. 	<p style="text-align: center;">–</p> <ul style="list-style-type: none"> Sites are likely to be in countryside locations, however, effect can be mitigated through design and landscaping. 	<p style="text-align: center;">–</p> <ul style="list-style-type: none"> Sites may be in countryside locations, however, effect can be mitigated through design and landscaping.
7. To conserve and enhance biodiversity, flora and fauna.	<p style="text-align: center;">+</p> <ul style="list-style-type: none"> Can plan to reduce and mitigate any impacts. 	<p style="text-align: center;">0</p>	<p style="text-align: center;">++</p> <ul style="list-style-type: none"> Can plan to reduce and mitigate any impacts and opportunities to create 	<p style="text-align: center;">+</p> <ul style="list-style-type: none"> Can plan to reduce and mitigate any impacts and opportunities to create

SA Objective:	Option 1: Selective planned expansion of existing settlement(s).	Option 2: Maximum incremental change to the extent of absolute constraints (do nothing approach).	Option 3: Planned New Settlement(s).	New Option 4: Mixture of Option 1 and Option 3 (Selective planned expansion of existing settlement(s) and Planned New Settlement(s)) PREFERRED OPTION
		• Little opportunity to reduce wide-scale impacts, but may be able to mitigate on a piece-meal basis.	greater net gain and green infrastructure.	greater net gain and green infrastructure.
8. To maintain and improve air quality.	– • Development and traffic generation causes air quality issues.	– • Development and traffic generation causes air quality issues.	– • Development and traffic generation causes air quality issues.	– • Development and traffic generation causes air quality issues.
9. To maintain and improve water quality and to achieve sustainable water resources management.	0 • This is dependent on the measures taken for each individual site, but has potential to ensure development does not cause further pollution or loss of water resources.	0 • This is dependent on the measures taken for each individual site, but has potential to ensure development does not cause further pollution or loss of water resources.	0 • This is dependent on the measures taken for each individual site, but has potential to ensure development does not cause further pollution or loss of water resources.	0 • This is dependent on the measures taken for each individual site, but has potential to ensure development does not cause further pollution or loss of water resources.
10. To reduce carbon emissions that cause climate change and to achieve net zero.	0 • Limited opportunity for large scale strategic carbon offset measures, but some scope for planned local small scale	– – • Carbon emissions would be significant as there has been no planned approach to how development will include strategic and local carbon offset.	Ranges between – and ++ • Initially, carbon emissions would be great given the remote countryside location and lack of services. But carbon emissions can rapidly decline once the	+ • Some opportunity for small and large scale strategic carbon offset measures, including home-working.

SA Objective:	Option 1: Selective planned expansion of existing settlement(s).	Option 2: Maximum incremental change to the extent of absolute constraints (do nothing approach).	Option 3: Planned New Settlement(s).	New Option 4: Mixture of Option 1 and Option 3 (Selective planned expansion of existing settlement(s) and Planned New Settlement(s)) PREFERRED OPTION
	measures, including home-working.		infrastructure is fully embedded. Can include home-working.	
11. To reduce waste generation and achieve sustainable management of waste.	— • Development will always result in waste generation.	— • Development will always result in waste generation. However, a mix of movements & lack of strategic management means less chance of using sustainable measures for waste generation and management.	— • Development will always result in waste generation (although management could be wider-scale and better).	— • Development will always result in waste generation (although management could be wider-scale and better).
12. To safeguard historical and cultural assets.	0 • Potential to avoid development close to heritage assets.	— • Development may be in close proximity to heritage assets	0 • Potential to avoid development close to heritage assets.	0 • Potential to avoid development close to heritage assets.

Appendix IV: Consultation Representations on the SA (from all Regulation 18 public consultations to date)

Issues and Options consultation 2019

Summary of Responses from Issues and Options consultation 2019	FoDDC Response and Action Taken (summary)
<ul style="list-style-type: none"> the SA should be informed by up-to-date environmental data, including assessments of local ecological networks; the SA should help ensure development is directed to land of least environmental value and follow the mitigation hierarchy; the SA should consider priority habitats and species under relevant legislation (e.g. Section 41 of the Natural Environment and Rural Communities Act 2006); the SA should support the enhancement of ecological networks and connectivity (e.g. river corridors, migratory routes). sustainability involves balancing economic, social and environmental objectives; the SA is seen as essential in guiding the Local Plan's spatial strategy and evaluating alternative development options; it should be used alongside other assessments like the Habitats Regulations Assessment (HRA) and Strategic Flood Risk Assessment (SFRA) 	<p>The above representations are agreed with and have been taken into account in subsequent stages of the SA. Given that this was such an early stage of the plan-making process, it was agreed that much more evidence needed to be collected.</p>

Details of Statutory Consultee (NE, HE & EA) responses (where provided) and action taken

Section of SA Report Consultee & Comments	FoDDC response and Action Taken
Environmental Agency	
We are not minded to recommend one option over another, but concur with paragraph 6.7 that whatever options are ultimately chosen need to be informed by an appropriate evidence base, including SFRA, WCSIDP, Habitats Regulations Assessment and Sustainability Appraisal.	Agreed
Natural England	
<p>Sites of Least Environmental Value In accordance with the paragraph 171 of NPPF, the plan should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes.</p> <p>It is understood that a Habitat Regulations Assessment and Sustainability Appraisal will follow in due course, once the Local Plan progresses.</p> <p>The Local Plan should be underpinned by up to date environmental evidence. This should include an assessment of existing and potential components of local ecological networks. This assessment should inform the Sustainability Appraisal, ensure that land of least environment value is chosen for development, and that the mitigation hierarchy is followed and inform opportunities for enhancement as well as development requirements for particular sites.</p>	Agreed
Historic England	
No comments relating to the SA	

First Preferred Options Consultation 2020/2021

Summary of Responses from First Preferred Options consultation 2020/2021	FoDDC Response and Action Taken (summary)
<ul style="list-style-type: none"> the new settlement option fails the economic/social and environmental principles of the SA; local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements; the SA should be informed by up-to-date environmental data; to rule out otherwise sustainable development at the plan making stage on the basis of such evidence would not accord with the soundness test of justified; it is unclear whether the SA has begun; SA should be carried out with dialogue with Natural England and neighbouring Council with regards to air quality issues; Concerns over the loss of good quality agricultural land and the SA has not taken this into sufficient account; The SA is a key evidence base document and is required for the Local Plan to be sound. 	<p>The above representations are agreed with and have been taken into account in subsequent stages of the SA. Given that this was such an early stage of the plan-making process, it was agreed that much more evidence needed to be collected.</p>

Details of Statutory Consultee (NE, HE & EA) responses (where provided) and action taken

Section of SA Report Consultee & Comments	FoDDC response and Action Taken
Natural England	
<p>The Plan has outlined key locations for large areas of development, and as part of the Plan process, through the Habitat Regulations Assessment and Sustainability Appraisal, consideration of designated sites is sought and the impacts from air quality examined.</p> <p>It is unclear whether the Council have begun their Sustainability Appraisal, as part of the Local Plan Review. Natural England would recommend dialogue with an external consultancy, who may be able to provide further advice regarding air quality. LEPUS consulting are currently working on the Gloucester, Cheltenham. Tewkesbury Joint Core Strategy Habitat Regulations Assessment, as well as engaging with South Worcestershire Councils. We would highlight this to Forest of Dean Council Local Plans Team, with regards to Sustainability Appraisal and air quality issues.</p>	<p>Noted. The SA will published at the next stage of consultation. Advice re. air quality is taken into account.</p>

Environment Agency	
No comments relating to the SA	
Historic England	
No comments relating to the SA	

Second Preferred Options Consultation 2022

Summary of Responses from Second Preferred Options consultation 2022	FoDDC Response and Action Taken (summary)
<ul style="list-style-type: none"> • There is concern that the SA lacks transparency and robust evidence, particularly in how it influenced the shift away from the original preferred strategy (which included a new settlement). • Requests clarity on timescales and the transport evidence base, including how the SA and Infrastructure Delivery Plan (IDP) support sustainable site selection. • Criticize the SA for being opaque, lacking commentary and comparative analysis. • Argue that the combined Option 1 and Option 3 (existing settlements + new settlement) performs better than Option 1 alone. • Suggest the shift away from a new settlement was politically motivated, not evidence-based. • Warn that the current strategy may not meet the tests of soundness and could be problematic at examination. • Raises concerns about the impact of proposed sites on heritage assets, especially in Lydney, Beachley, Tutshill, Newent, and Churcham. • Emphasizes the need to comply with Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990. • Notes that proposed development areas (Lydney, Beachley, Newent) haven't been fully assessed for environmental sensitivity. • Argues that the SA is invalid without first considering relocating development to avoid impacts on SACs. • Suggests the SA scoring system is unclear and proposes a quantified scoring method. • Questions the suitability of Beachley Camp for housing due to poor connectivity, flood risk, and environmental constraints. 	<p>The above representations are noted and to some extent agreed with, and have been taken into account in subsequent stages of the SA. Given that this was such an early stage of the plan-making process, it was agreed that much more evidence needed to be collected and the SA would need to be transparent and robust.</p>

Details of Statutory Consultee (NE, HE & EA) responses (where provided) and action taken

Section of SA Report Consultee & Comments	FoDDC response and Action Taken
Natural England	
<p>We appreciate that the consultation sets out only a possible strategy and not firm proposals for development. However, due to the limited background documents that have been provided, Natural England are unable to complete the questionnaire and provide a substantive response, as a sufficient evidence base has not yet been developed to support the Local Plan. We note the proposals to focus development in Lydney, Beachley and Newent. These proposed areas for development have not yet been assessed through the Habitat Regulations Assessment/Sustainability Appraisal process and it is unclear what criteria has been used for this consultation and therefore, which areas may be the least environmentally sensitive. Once an evidence base has been provided, which will help to inform the Plan process, we would then be able to provide an opinion.</p>	<p>Noted. The SA is an iterative process and the HRA will be carried out by draft plan stage.</p>
Historic England	
<p>We note that various potential large allocations are suggested and tested in the interim Sustainability Appraisal for Potential Large Strategic Sites (SA). It rejects certain sites and suggests others have potential. Several of these affect the significance of heritage assets, notably at the Lydney East Expansion (Lydney 13), Beachley Barracks (Tidenham 1), Land south of A48, Tutshill (Tidenham 3) and Land West, South East of Newent (Newent 1 and 7), and at Churcham (1 and 4). Where the setting of heritage assets are affected, it will be important to ensure that careful thought is given to demonstrate how harm can be avoided, ensuring Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 is satisfied which requires special regard to the desirability of preserving the setting of listed buildings; notwithstanding all other relevant national 'heritage' policy and guidance.</p>	<p>Noted and agreed. The SA is an iterative process and will take this into account. Furthermore, a Heritage Impact Assessment will be carried out prior to Regulation 19 stage of the plan process.</p>
Environment Agency	
No comments relating to the SA	

Draft Local Plan 2024

Summary of Responses from Draft Local Plan 2024	FoDDC Response and Action Taken (summary)
<p>Support: General comments re. Sustainability Appraisal -</p> <ul style="list-style-type: none"> Should ensure that the results of the SA process clearly justify its policy choices. Should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the emerging Local Plan's decision-making and scoring should be robust, justified and transparent. Note the existing sustainability problems highlighted by the SA, particularly relating to carbon management <p>Observations:</p> <ul style="list-style-type: none"> The Doughnut Economics Model and the social foundations and environmental limits set out in the decision-making wheel are closely reflected and incorporated into the Sustainability Appraisal of the Local Plan. The three pillars of sustainability are economic (usually placed first), social and environmental. Would we consider adding the fourth, 'culture' to the set? <p>Comments regarding Specific Sites: Land off Driffield Road, Lydney (LYDNEY 3 & LYDNEY 4): Support and observations:</p> <ul style="list-style-type: none"> It is not clear what the assessment criteria is for this particular part of the SA, which has then warranted a double negative score in respect of the site. <p>Glynchbrook, Redmarley (REDMARLEY 1): Support and observations:</p> <ul style="list-style-type: none"> Support the Council's methodology for the assessment of development sites as part of the Sustainability Appraisal process. Support the Council's conclusions for each site. In 	<p>All comments of support, concern and general observation are noted.</p> <p>Agreed that the results of the SA process should be robust, justified and transparent. The SA is an iterative process and is regularly reviewed and updated throughout the plan-making process. All strategies, potential allocation sites and policies are assessed comparatively and equally and it will be ensured that the outcomes of the assessments are clearly narrated.</p> <p>Comments regarding the carbon management section (3.12) of the SA report are noted. This is an ever-changing arena whereby the Government and the political leadership of the Council (Green Party) are pushing for overall improvements for the environment and in particular to reach net zero emissions. The SA will review and highlight any updates on this aspect and take carbon management into account when considering the sustainability of the strategy, the allocation sites and the policies within the Local Plan.</p> <p>Comments relating to the appraisal of specific sites will be assessed on an individual basis and reviewed where considered appropriate, taking into account the comments received during this Regulation 18 Draft Local Plan consultation. Every attempt will be made to ensure that the outcomes are clear and justified. Any further updated work</p>

<p>particular, support the Council's conclusions regarding the assessment of site Redmarley I (Glynchbrook). However, would go further to suggest that the site is more than 'Unlikely to meet SA Criteria' but is in fact 'Unable to meet SA Criteria'. This is for the following reasons: Landscape impact, character and appearance, accessibility by public transport (non-car modes), loss of good quality agricultural land, ecological impact, flood Risk and drainage.</p> <p>Beachley Barracks (TIDENHAM I): Support and Observations:</p> <ul style="list-style-type: none"> DIO suggests that the findings are clarified with regards to the site area that has been assessed as it appears the total land ownership has been used rather than the proposed development area. This is important as the total land ownership (which includes the River Wye for example) does include areas of SAC/SSSI/flood risk/listed buildings but the proposed development area is not covered by these designations so the SA ratings should reflect this and a more appropriate site boundary assessed. <p>Objections and observations:</p> <ul style="list-style-type: none"> FODDC's summary of the Beachley Barracks site (Tidenham I) raises significant concerns over its availability and whether the housing numbers identified for it are genuinely deliverable during the plan period (to 2041). There are flaws in the scoring and selection process. From the SA assessment undertaken it is clear that the site is highly constrained in terms of ecology, flooding and heritage. On account of the location of the site and the lack of sustainable transport modes available it cannot be said that this site would provide a sustainable location for development. <p>Land at Highfield Lane, Lydney LP.67 (LYDNEY 9): General Observations:</p> <ul style="list-style-type: none"> It is recommended that the SA reassesses the Site, taking account of the true extent of the proposed development and the opportunities for mitigation and green infrastructure enhancements. <p>Lydney West (LYDNEY 11) : Objections:</p>	<p>(such as technical work, masterplans, landscape appraisals, etc) over the course of the plan-making process will feed into revisions of site and policy appraisals.</p> <p>It will also be the case that some site areas will be revised to reflect different situations and the SA site appraisals will be revised accordingly.</p> <p>It is also recognised that in response to the significant uplift in housing numbers required across the district over the 20 year plan period (owing to the updated NPPF December 2024) sites which have an outcome of less than 'Meets SA Criteria' may still be selected for allocation, given the pressure on the Council to find the necessary housing numbers and the benefits of meeting housing need. Similarly, if the strategy is amended to include a new settlement(s), for example, then this will clearly have an impact on the SA assessments of potential sites for this type of development, as it is recognised that new settlement require a significant amount of infrastructure and in particular connectivity prior to construction.</p>
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<ul style="list-style-type: none"> Recommend that: (a) the Council re-assesses the Site through the SA and (b) reconsiders the Site for allocation in the DLP. Land West of Lydney It should be noted that the following documents were submitted to the SHELAA and should be referred to in undertaking the SA for the site: <p>Newent (General Comments):</p> <ul style="list-style-type: none"> The SA Report notes the public comments on the Second Preferred Options consultation included concerns over current levels of traffic congestion in Newent, the need to provide good sustainable links to the centre, and the need to improve transport facilities (para 5.24). The SA Report identifies that the main short-term, temporary effects of the Plan are expected to be mainly focused on construction, including construction traffic, increased traffic due to disruption from construction, and traffic diversions (para 8.6). <p>Conigree Court, Newent (NEWENT 11):</p> <ul style="list-style-type: none"> It is apparent that the SA has failed to pick up on the sites connections for walking and cycling to the town centre and local amenities including schools. Furthermore, the SA landscape-sensitivity assertion benefits from no site specific landscape appraisal, and its broadbrush conclusion is tantamount to a landscape impact which could be perceived by any green field development. In this regard, the SA assessment for land at Conigree Court should be revisited and reevaluated. <p>Chapel Lane, Aylburton (AYLBURTON 2):</p> <ul style="list-style-type: none"> Using the scoring from your framework, the following comments are made on each category there are MORE negatives than positives (9v7) with 2 neutrals. This is hardly convincing. <p>Former Victoria Hotel, Newnham on Severn (LP.97) (NEWNHAM ON SEVERN 2):</p> <p>Objections:</p> <ul style="list-style-type: none"> Disagree with the Sustainability Appraisal (SA) that the site returns an assessment of double negative in relation to the 'heritage' SA objective simply because it is a listed building. <p>Hartpury:</p>	
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<p>General Comments, Objections and Observations:</p> <p>Would imagine that a "Town Centre", at the very least should contain a shop selling groceries and newspapers etc., a full-time post office, and a place of worship. Hartpury has none of these.</p> <p>A regular bus service is surely more than 4 a day. You cannot realistically access either the nearest shop or the GP surgery by bus, or commute to work in Gloucester. Concerning the main highway through the village, the A417, this is regularly closed each winter due to flooding at Maisemore.</p> <p>Considerable traffic in both directions in the rush hour.</p> <p>The main sewerage system in the village has been inadequate for many years.</p> <p>Hartpury is being treated differently from all other parishes.</p> <p>The Character Appraisal is out of date.</p>	
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Details of Statutory Consultee (NE, HE & EA) responses and action taken

Section of SA Report Consultee & Comments	FoDDC response and Action Taken
Natural England	
Natural England welcomes the focus to adapting to climate change. The policy also links well with Policy LP. 15. However, this policy needs to be more robust. Could the policy reference back to the Vision and Objectives of the local plan in order to reinforce these core green threads? As one of the core policies, the lack of reference to the climate emergency is concerning. The policy would also be stronger if it explicitly notes the climate emergency as the context for the focus on climate adaptation within the local plan. It is noted that the priority 1 of the plan (2024-2028) stated adaption to climate and nature emergencies were vital (pg.11). It is suggested that the plan would be more robust if this core policy LP.3 were referenced back to, in other sections of the local plan. The Sustainability Appraisal referred to the adoption of Our Climate Emergency Strategy and Action Plan 2022-2025 at the November 2021 Cabinet Meeting. Thus, placing climate action at the forefront of the corporate priorities and the emerging Local Plan. https://www.fdean.gov.uk/environment/climate-action/our-route-to-carbon-neutral/ Could this be referenced in the policy section?	Noted. This will be considered in more detail.
Historic England	

No comments relating to the SA	
Environment Agency	
Please note that you will need to demonstrate to the Planning Inspector, the public, and all parties, that the Sequential Test has been undertaken for all the allocations that are ultimately included in the Local Plan. In practice, this means ensuring that a L2SFRA has been undertaken for the allocation sites, and that a document is produced that shows how and why the sites pass the Sequential Test. This can either be as part of the Sustainability Appraisal, or preferably a standalone document.	Agreed and understood. This will be carried out.

Appraising the Local Plan Options to Deliver the Additional Housing Requirement (2025)

Summary of Responses from Issues and Options consultation 2019	FoDDC Response and Action Taken (summary)
<p>This consultation on the Sustainability Appraisal (SA) for the Forest of Dean Local Plan has generated significant feedback, with respondents expressing diverse views about the methodology and outcomes. The majority of respondents expressed concerns about the SA methodology, particularly regarding its transparency, weighting of criteria, and perceived bias toward certain options (especially Option 4 - New Settlements). Many questioned how trade-offs between conflicting objectives were resolved and felt the SA gave too much weight to housing numbers while not adequately considering environmental impacts, biodiversity, and heritage. There were also substantial concerns about infrastructure delivery feasibility and the impact of new settlements on rural character and car dependency.</p> <p>A significant number of respondents specifically questioned the SA's apparent favorability toward Option 4 (New Settlements) despite previously identifying sites like Glynychbrook as unsuitable in earlier assessments. Those supporting the SA methodology generally appreciated its structured approach and agreed with the conclusion that a combination of existing settlement expansion and new settlements (Option 6) represents the most sustainable approach. Professional stakeholders provided more technical critiques of specific objective assessments and the evidence base supporting the SA's conclusions.</p> <p>Keys Themes</p> <p>Transparency and Methodology Concerns (High confidence - 87 responses)</p> <p>Many respondents criticized the lack of transparency in how sustainability criteria were weighted and how conflicting objectives were balanced. The methodology was described as "not readily transparent," with unclear scoring mechanisms that made it difficult to understand how conclusions were reached. As one respondent noted: "It does not make clear how each objective is weighted relative to the others, or how conflicting results are reconciled to reach an overall conclusion." Several respondents felt the methodology appeared designed to favor predetermined outcomes rather than objectively assessing options.</p> <p>Perceived Bias Toward Option 4 (High confidence - 65 responses)</p>	<p>The SA has been carried out by assessing the options in a consistent and comparable manner. It is recognised that some of the results of SA can be subjective, however, they have been checked by several professional officers as well as a qualified Environmental Consultant who has acted as a 'critical friend' for the SA. The SA has been carried out in a transparent manner where the methodology and all SA outcomes that are available have been published. Every attempt has been made to ensure that scoring mechanisms are consistent (using the RAG ratings and scorings) however, it is recognised that there may be disagreement by different parties over the final conclusions. Where considered appropriate, the SA methodology can be strengthened to ensure that it is clearer how scores are interpreted.</p> <p>The SA is carried out using the SA Objective Framework against which to assess criteria. Trade-offs between conflicting objectives have been resolved by considering and weighing up the frequency and severity of likely negative effects against the frequency and intensity of likely positive effects and thereby making a subjective and clear conclusion. Often the conclusion will set out where 'trade-offs' could be made and how mitigation could improve the overall sustainability of an option. It is noted that some people have commented on there being too much weight given to housing</p>

A significant number of respondents believed the SA showed undue preference toward Option 4 (New Settlements) despite substantial concerns about its sustainability. Many pointed to contradictions with previous assessments, particularly regarding the Glynchbrook site, which was previously deemed unsuitable but now appears favored. Respondents questioned: "How can a site that was unsuitable in July 2024 become suitable just because housing targets have increased?" The apparent shift without clear justification undermined confidence in the assessment's objectivity.

Environmental Impact and Biodiversity Concerns (High confidence - 58 responses)

Many respondents felt the SA gave insufficient weight to environmental considerations, biodiversity, and landscape impacts. There was particular concern about the permanent loss of agricultural land, wildlife habitats, and rural character. Several respondents expressed surprise that a Green Party-led council would appear to favor large greenfield developments. As one stated: "This appraisal lends too much weight on housing numbers and shows little regard for the biodiversity or heritage of the area."

Infrastructure and Services Viability (Medium confidence - 42 responses)

Respondents questioned the assumption that new settlements would successfully deliver required infrastructure and services. Many cited examples of developments where promised infrastructure was delayed or never materialized. Concerns were raised about the "wishful thinking" nature of assuming services would be delivered without proof of funding or viability assessment. As one respondent stated: "The requirement for major new infrastructure from scratch, with serious viability risks if funding is delayed."

Car Dependency and Climate Impact (Medium confidence - 38 responses)

Many respondents challenged the SA's assessment of transport sustainability, particularly regarding new settlements. They argued that new settlements, especially those near the M50 (Glynchbrook), would increase car dependency and undermine climate targets. One respondent noted: "Increased car dependency for decades, undermining climate targets." Several questioned how the SA could consider such developments sustainable given their likely reliance on private vehicles.

Support for Combined Approach (Medium confidence - 28 responses)

Some respondents, particularly professional stakeholders and developers, supported the SA's conclusion that a combination of existing settlement expansion and new settlements (Option 6) represents the most sustainable approach. They agreed that existing settlements alone couldn't accommodate all required growth, and that new settlements offer opportunities for

numbers while not adequately considering environmental impacts, biodiversity and heritage. It is recognised that the purpose of this particular consultation and therefore the options assessed for this Interim SA has been to find the most sustainable strategy to accommodate the significant uplift in housing and therefore housing has taken a pivotal role. Even so, the strategy and the SA must and does take into account other types of development and also assesses environmental impacts on different options for development. Without that it will not conform to the SEA regulations.

Concerns about infrastructure delivery and impacts of new settlements are recognised as well as the need for updated evidence. The SA will clearly take into account any future evidence documents, such as Infrastructure Delivery Plan, Transport Modelling, Strategic Flood Risk Assessments, Housing and Economic Needs Assessment, Viability Assessments, etc. as soon as the results of these become available. The SA is an iterative process and will therefore continue to be updated to reflect information gathered and public comments received until submission of the local plan.

With regards to the perceived favourability towards Option 4 (New Settlements), it is confirmed that each Option has been carried out systematically and without bias. No Option has been 'favoured' above another or 'pre-determined'. Each has been considered using the same SA Objective Framework. It is recognised that some individual new settlement sites, such as Glynchbrook do not have a favourable outcome in the sites assessment (as published in the

<p>comprehensively planned sustainable communities. As one stated: "Option 6 can allow some quicker wins in terms of housing delivery using existing settlements and services, but also allows the creation of well-planned new communities for the medium/longer term."</p> <p>Evidence Base and Data Concerns (Medium confidence - 25 responses)</p> <p>Several respondents, particularly those with professional backgrounds, criticized the limited evidence base supporting the SA's conclusions. They noted the absence of traffic impact assessments, housing needs analysis for specific locations, and detailed environmental studies. As one respondent stated: "The SA is based on too much subjective opinion and not enough data. There is no housing needs analysis demonstrating that new development on the scale of a new settlement is needed."</p> <p>Alternative Options Assessment (Low confidence - 18 responses)</p> <p>Some respondents suggested the SA didn't adequately explore all reasonable alternatives or combinations of options. Several argued for greater consideration of brownfield sites, expansion of existing settlements, or more balanced distribution of growth. Some professional stakeholders questioned whether Option 5 (development in adjoining authorities) was properly assessed given the context of local government reorganization and cross-boundary opportunities.</p> <p>Technical Compliance Concerns (Low confidence - 12 responses)</p> <p>A small number of respondents, mainly professional stakeholders, raised concerns about the SA's compliance with regulatory requirements and best practice. Issues included the need to update SA objectives to reflect current national policy, the absence of dedicated transport and accessibility objectives, and the need for more robust monitoring frameworks.</p>	<p>draft local plan 2024). The reason for this is because every potential development site (of whatever size or location) has been assessed against current sustainability criteria without taking into account how a new settlement could be masterplanned and brought forward with the necessary infrastructure. Clearly, any large development site in the open countryside would not currently be a sustainable option without any consideration of creating/improving the infrastructure/services in the right places/scale in order to formulate a self-sustaining settlement. The Option 4 assessment of this current Interim SA, however, does acknowledge that measures such as masterplanning and sufficient funding into infrastructure requirements can make a huge difference to the sustainability performance of developments on a larger scale, particularly in a more remote location.</p> <p>The comments which give examples of where the promise of infrastructure has been delayed or never materialised in the past are acknowledged and this is naturally a very serious matter. However, the SA can only take into account the likely effects of options and if/how any negative effects could be mitigated. The potential for investment/funding for necessary infrastructure is a real possibility (albeit sometimes difficult to bring about at the most appropriate point in time), but nevertheless, it is something which should still be considered. It will be down the Council and developers to ensure that the necessary infrastructure is brought forward at the right time. All relevant environmental considerations have been taken into account in the Options assessments.</p>
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	<p>However, it should also be noted that the SA of Options is at a high strategic level. Once the strategy has been agreed on, the SA will continue to assess both potential development sites and planning policies and that is the point where much more detailed information will be used to make the most appropriate sustainable decisions with regards to impact on the environment/landscape. Furthermore, the next iteration of the SA will include alternative options such as brownfield development and assessments of development around the existing towns/villages.</p> <p>Car dependency is pivotal to sustainability, carbon management and climate impact as a whole. The SA gathers information to consider whether certain types of development will likely increase car dependency or whether there are mitigating factors which could reduce it. Active travel and public transport potential is therefore one method of reducing car dependency and therefore the necessary infrastructure and services to ensure it must be provided. As such, any option which includes a new settlement must take this into account and masterplan/ integrate the necessary infrastructure and services to allow good levels of self-sufficiency so that out-commuting is kept as low as possible.</p> <p>All comments include technical advice/critique will be taken into account and where considered appropriate the SA will be amended accordingly. Equally, every attempt will be made to ensure that the SA is robust and complies with the regulatory requirements and best practice.</p>
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Details of Statutory Consultee (NE, HE & EA) responses and action taken

Section of SA Report Consultee & Comments	FoDDC response and Action Taken
Natural England	
No comments relating specifically to the SA.	
Historic England	
No comments relating specifically to the SA	
Environment Agency	
No comments relating specifically to the SA	

Appendix V: SA of the Proposed Site Allocations (available separately on the Council's website)

See separate appendix document (available on the Council's website)

Appendix VI: SA of the Revised Draft Local Plan Policies

See separate appendix document (available on the Council's website)