



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 – **NON-TECHNICAL SUMMARY**



Forest of Dean
DISTRICT COUNCIL

This is the Non-Technical Summary (NTS) of the Sustainability Appraisal (SA) Report

1. This is the NTS of the SA Report documenting the processes of Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) within an integrated appraisal process for the Forest of Dean District Council Revised Draft Local Plan 2025-2045. This summary is an integral part of the SA Report that accompanies the Revised Draft Local Plan for the Regulation 18 public consultation in February/March 2026.

The Forest of Dean District Revised Draft Local Plan 2025-2045

2. The Revised Draft Local Plan 2025-2045 covers the entire administrative boundary for the Forest of Dean District, which covers land of 526.239km². The Forest of Dean District is the westernmost district of Gloucestershire, bordering on Monmouthshire in Wales. It is geographically defined by the Wye River to the west and the Severn River to the east, with the Royal Forest of Dean – a larger protected forest reserve – in the centre. To the north, the district extends to the southern extent of the Malvern Hills.
3. Since the current plan was adopted in February 2012 (Core Strategy) and June 2018 (Allocations Plan), there have been various significant changes in both the national and local contexts, including major changes to local housing need, climate change and environmental requirements. The Revised Draft Local Plan is a brand new plan and therefore comprises new chapters and policies: Strategic Policies; Housing and Communities; Settlement Allocations (Strategic Sites and Settlements); Other Settlements; Economy and Infrastructure; Environment (Built, Natural and Historic) and Monitoring. The overall development needs are set out to be a minimum of 12,631 new dwellings over the 20-year plan period and the plan also provides ca. 250 hectares of land for employment generating uses and/or intensification within existing settlements across the district, with more land identified for employment uses outside of settlement (Policy RLP.112).

Sustainability Appraisal (SA)

4. Sustainability Appraisal incorporating Strategic Environmental Assessment is an iterative and ongoing process that aims to provide a high level of protection for the environment and to promote sustainable development through the integration of environmental, social and economic considerations. The role of this SA is to inform the Forest of Dean District Council as the planning authority to inform the plan-making process. The SA evaluates and describes the likely significant effects of implementing the plan and suggests opportunities for mitigating significant adverse effects and enhancing positive effects.

5. Initially the scope of the SA is decided upon by establishing baseline conditions and context of the area, and by identify issues, problems and opportunities. From this information, a SA Framework of objectives for sustainable development is derived and this forms the basis against which the draft plan is assessed.

Sustainability Characteristics of the Forest of Dean District & Likely Evolution without the Local Plan Review

6. The population of the Forest of Dean is steadily growing, however, it has an increasingly ageing population, as younger generations move out of the District and retired people move in/remain. As a result of the 2024 NPPF, housing targets have significantly increased to 660 new dwellings per annum (previously 330 p.a.). Nevertheless, the number of people on the housing register continues to grow and demand outstrips supply. The District has areas of deprivation where life expectancy is lower than that across the district.
7. Educational attainment levels in the FoDD are worse than the average for England and lower than those in Gloucestershire as a whole. There is significant designated employment land across the whole district, but many are under-used and contain vacant units. The Forest of Dean District experiences a great deal of spill of retail trade to bigger centres outside the district and generally there is a high number of out-commuters, with residents travelling to larger centres, such as Gloucester, Bristol or beyond. Agriculture and manufacturing continue to be staple economic sectors, however, tourism is continually growing as this is a rural district with spectacular natural beauty.
8. The special landscape and range of biodiversity in the FoDD is significant. Of the total area of the district, 85% is green space and 8% is surface water. The remaining 7% is built up areas. The district contains two National Landscapes - the Wye Valley National Landscape and the southern extent of the Malvern Hills National Landscape and work is currently being carried out regarding the potential of the Forest of Dean to become designated as a Biosphere Reserve (BR).
9. The Forest of Dean district has a large number and variety of protected sites and landscapes. They include areas protected by European and national legislation as well as locally protected Local Wildlife Sites and other areas of local interest. The following five sites are European nature conservation sites: The River Wye SAC; The Wye Valley Woodlands SAC; The Wye Valley Woodland and Forest of Dean Bat Sites SAC; The Severn Estuary European Marine Site (SAC, SPA, Ramsar); Walmore Common SPA and Ramsar. There are also 47 Sites of Special Scientific Interest (SSSI) in the Forest of Dean district. The district contains 13,605 ha of woodland- 10,839 of this is designated ancient woodland (9,990 of this woodland is publicly owned, and 3,874 ha is privately owned). In total, this means Forest of Dean district currently has 24.6% woodland cover; which well over twice the national average for comparable sized districts.

10. Heritage is also a significant asset, as the district benefits from ca. 1480 listed buildings/structures (representing approximately 11% of listed buildings in the whole of Gloucestershire), 92 nationally important archaeological sites, 27 Conservation Areas and 3 Registered Parks and Gardens.
11. The Forest of Dean district sits between the River Severn and the River Wye and contains areas of flood risk from various sources. There are also some water quality problems associated with former mine workings in the Forest of Dean, as well as concerns of over-abstraction of water for agriculture and public water supply in some catchments.
12. Without review of the Local Plan, there are likely to be some changes anyway to the sustainability characteristics of the Forest of Dean District, for example, the increasing use of electric cars, higher standards for building control and new standards for green infrastructure and biodiversity net gain (through government legislation), leading to improvements in air quality and some recovery for loss of nature and biodiversity.
13. However, the predicted increase in population, will challenge the ability of the Council and its partners to accommodate such changes for the quality of life of its citizens, and to be able to provide the right mix and type of homes in the most suitable locations. Opportunities from new development, such as improving accessibility to green space and enhancing landscape quality/character, would not be realised or optimised and insensitive development may negatively affect historical assets. The abundance of biodiversity is likely to decline, and the distribution of protected species is likely to shrink, as habitat protection would be on a piece-meal basis. Generally, infrastructure supply is likely to be fragments and water management could become worse effecting supply and exacerbating flood. High reliance on private vehicles is likely, rather than the promotion and availability of well-connected active travel measures, thus negatively impacting on air quality and existing congestion problems. Overall, without guidance from an updated Local Plan, the adverse effects from development, including cumulative effects, would not be managed effectively.

How has the Forest of Dean District Revised Draft Local Plan 2025-2045 been assessed?

14. The SA Framework, together with the baseline information, and professional judgement forms the basis for assessment. This is summarised in the table below:

SA objective
SA 1. To improve the health and well-being of the populations and reduce inequalities in health.
SA 2. To meet local housing needs, by ensuring everyone has the opportunity to live in a decent sustainably constructed and affordable home.
SA 3. To provide accessible community services, recreation and leisure facilities.
SA 4. To facilitate the development of academic and vocational skills.
SA 5. To create a more vibrant and sustainable local economy.
SA 6. To protect and enhance the landscape.
SA 7. To conserve and enhance biodiversity, flora and fauna.
SA 8. To maintain and improve air quality.
SA 9. To maintain and improve water quality and to achieve sustainable water resources management.
SA 10. To reduce carbon emissions that cause climate change and to achieve net zero.
SA 11. To reduce waste generation and achieve sustainable management of waste.
SA 12. To safeguard historical and cultural assets.

15. The significance of effects was assessed using the following categories:

Symbol	Meaning
++	Very positive
+	Positive
0	Neutral
-	Negative
--	Very negative
	Unknown

What reasonable alternatives have been considered & addressed?

16. During the plan-making process various strategy options have been identified and tested with high level appraisals being carried out using the SA framework of objectives, as follows:
17. **Issues and Options (2019) and First Preferred Strategic Options (2020) stages:**
 - Option 1 - Selective planned expansion of existing settlement(s);
 - Option 2 - Maximum incremental change to extent of absolute constraints (do nothing approach)
 - Option 3 - Planned New Settlement(s)
 - Option 4 - Mixture of Options (Selective planned expansion of existing settlement(s))
 - Option 5 - and Planned New Settlement(s) - PREFERRED OPTION
18. Comments made during the initial consultations on Issues and Options and First Preferred Strategic Options were taken into account, along with further evidence studies. The following refined strategic option was then tested through SA for the Second Preferred Strategic Options consultation (note that the option for Planned New Settlement(s) was excluded from the proposed strategy at that time):
19. **Second Preferred Options (2022) stage:** Selective planned expansion of existing settlement(s) to include:
 - Major development at Lydney to support an enhanced role as a focal point for the Forest of Dean District;
 - Development of land at Newent to support a mixed use site, improvements to circulation and transport and complimentary facilities to the centre;
 - Redevelopment for mixed uses and regeneration of land at Beachley Camp;
 - Supporting mixed use developments at major villages and towns and sustainable development at some villages.
20. **Draft Local Plan (2024) stage:** Again, comments made during the consultation were taken into account for the preparation of the following Draft Local Plan and accompanying SA report. The Draft Local Plan SA Report also included assessments of all potential allocation sites for development as well as assessments of all the draft plan policies.
21. The Council considered the comments made during the consultation on the Draft Local Plan. However, at this point in time, the NPPF was revised (December 2024), which had a significant effect on the calculation of the housing need in the district, uplifting it from 330 per annum to 660 per annum. It therefore became necessary for the SA to revisit and test further strategic options for delivering the additional housing requirement. The strategic options which were appraised were the following:
22. **Strategic Options to Deliver the Additional Housing Requirement (2025) stage:**
 - Option 1: Selective planned expansion of existing settlement(s).

- Option 2: General distribution of housing around all existing settlements (planned sharing of the housing numbers across all settlements).
- Option 3: Maximum incremental change to the extent of absolute constraints.
- Option 4: Planned New Settlement(s).
- Option 5: Negotiated agreement that some development will be passed to adjoining Authority(ies).
- Option 6: Combination of Option 1 (Selective planned expansion of existing settlement(s)) and Option 4 (Planned New Settlement(s)). – PREFERRED OPTION

23. Comments received during the consultation period indicated that there were other combinations of options which could be appraised, this was acknowledged and subsequently carried out:

- Combination of Option 1 & Option 2 (in part) (Selective planned expansion of existing settlement(s)) and General distribution of housing around all existing settlements (planned sharing of the housing numbers across all settlements))
- Combination of Options 1, 2 and 3 (in part) (Selective planned expansion of existing settlement(s)), General distribution of housing around all existing settlements (planned sharing of the housing numbers across all settlements) and Maximum incremental change to the extent of absolute constraints).

24. Option 1 had the least negative impacts on the majority of the SA topics, however, this Option alone would not provide the necessary sites to accommodate the significant uplift in housing delivery numbers or provide long-term flexibility for future plans. Option 2 had mixed impacts, some being positive in terms of providing for the housing need, however, some of the impacts on other topics, such as landscape were negative owing to the fact that development would be distributed across the district even in the rural areas where there are few services or infrastructure to meet the development needs. Option 3 also had some positive effects in terms of providing the housing numbers as well as services, but again, there would be significant negative effects on several SA objectives owing to the fact that development in some less sustainable areas could explode beyond what the settlements are capable of accommodating. Option 4 was judged to have a mix of neutral and positive impacts on many topics, however, it is caveated that this strategy must be masterplanned to mitigate negative impacts on issues such as landscape harm and carbon emissions. Infrastructure must be provided at the right stage of development and new settlements take a long time to embed, thus relying on this option alone would not provide continual housing delivery throughout the entire plan. Option 5 was considered to have the most significant negative effects on many of the topics, owing to the fact that development would take place outside of the district and could not therefore provide positive local benefits, such as housing, economic development, education, services, etc. Option 6 (Combination of Option 1 and Option 4) was the preferred option as this aligns with the identified local housing need and allows for a buffer, whilst having the better opportunities to mitigate negative impacts.

25. The combination of Option 1 & Option 2 was considered to have mainly neutral impacts, however, many of the smaller and rural settlements would be significantly impacted upon by increase in development. The combination of Options 1, 2 and 3 (in part) (Selective planned expansion of existing settlement(s)) would have mixed impacts, but the negative effects on landscape, air quality, climate change, waste and heritage assets would be more significant.

26. **Identifying and Appraising Further Strategic Options stage:** Alongside the above, the following strategic options were identified and appraised against the SA objectives Framework:

27. Housing Density:

- Option 1 - Housing Density – 30 dph as average across the district
- Option 2 - Housing Density – higher density than 30dph across the district
- Option 3 - As Option 1 but with >30 dph in towns and/or new settlements

Option 3 is considered the preferred approach, as the identified housing need could be accommodated with fewer negative impacts on rural character/landscape/heritage of the settlements and district as a whole. It would provide better opportunities for viable development in some appropriate locations for higher density and result in the need for less site area for development. It is a measured approach that can be adapted to suit the individual site/location.

28. Biodiversity Net Gain:

- Option 1: National BNG (at 10%) and GI standards
- Option 2: Over and above national BNG (15-20%) and GI standards

Option 2 is considered the preferred approach, being flexible to achieve the most effective impact rather than simply mandating an enhanced quantified approach. For example, the policy could request 20% unless demonstrated that viability cannot be achieved for the scheme.

29. Building Regulation Standards:

- Option 1: National Future Homes & Building Standards
- Option 2: Over and above proposed Building Regulations (including UK Net Zero Carbon Buildings Standard)

Option 2 is considered the preferred approach provided there are no adverse effects on viability and land values that might deter developers investing/building in the city.

30. **Revised Draft Local Plan (2026) stage:** Throughout all of this process, the SA has made suggestions for mitigating likely negative effects and for enhancing any likely positive effects to inform the plan-making. Comments from the previous consultation have been taken into account and the current Revised Draft Local Plan has been refined using the findings from the SA, including strategic options, planning policies and site allocations.

What are the Likely Significant Effects of the Revised draft Local Plan Review to 2045? How could negative effects be mitigated?

31. Owing to the NPPF revisions of December 2024 altering the method of calculating Local Housing Need (LHN), the Forest of Dean District (FODD) has seen an uplift of 82% in its LHN resulting in the Council now needing to meet 600 dwellings per annum, or 12,000 over the 20-year plan period. This has put significant pressure on the emerging local plan to accommodate this number of new dwellings as well as providing employment, services and infrastructure in the most sustainable way possible. Taking into account these local circumstances, alternative strategy options were considered in detail (as referenced in previous section) and the preferred option of a mixture of selective planned expansion of existing settlements and planned new settlement(s) was agreed. This revised draft local plan therefore seeks to allocate the larger strategic housing/mixed use sites at Lydney, Newent, Beachley (MOD camp), Cinderford, Coleford with villages taking a proportionate share where possible. The draft revised local plan also indicates the creation of 2 new planned settlements at West of Severn (Churcham parish) and Glynchbrook (Redmarley parish).
32. Many of the likely sustainability effects of the draft plan as a whole are interconnected. The key strategic objectives of the Local Plan 2025-2045 align with the Local Plan policies to show how the plan can help deliver its visions and objectives, thus providing thriving communities, improving sustainable economy and infrastructure and protecting the environment (tackling climate change) and the District's sense of place.
33. Overall, most of the Local Plan policies make some form of contribution towards improving health and well-being of the population of the Forest of Dean District and to minimise inequalities. This is done through the provision of good quality housing (including affordable) of all types and tenures, as well as support for employment and communities, providing active travel methods and also importantly by providing a good quality environment.
34. Good quality housing is well established as contributing to better health and wellbeing – both physical and mental. Housing policies cover the needs of different types of people, including the young, older persons, those with special needs and travellers providing adaptability and flexibility to be able to adapt to changing needs. These will be identified in the Housing and Economic Needs Assessment (HENa) work in the evidence base. Policies also include national space standards and high quality design principles – all with significant positive effects.
35. The location and type of new development can have effects for communities and the revised draft local plan allocates sites for new development where they are within good access of services and facilities. Development sites were also chosen to be accessible to public transport, cycling and walking routes, thus having positive effects for reducing dependence on car travel and increasing sustainable and active travel. In the case of the

two planned new settlements, the chosen sites and the planning policies seek to offer higher levels of self-sufficiency through master planning, transport networks/active travel and the integration of infrastructure and services, prioritising sustainable travel with positive effects for health and wellbeing.

36. The plan also seeks to promote and protect recreation land and uses and to provide additional green and blue infrastructure through both policies and site allocations, thus having positive effects on health and wellbeing as well as protecting and enhancing the natural environment.
37. Aiming to address the effects of climate change is a golden thread running through the plan with policies that reflect the requirements for net zero carbon and building standards, as well as policies to provide additional measures on adapting to climate changes both through design and construction methods. These policies and guidelines will ensure that potential negative effects are avoided where possible and opportunities for mitigation/ improvements for positive effects are included.
38. The Revised Draft Local Plan 2025-2045 seeks to retain as much existing employment within the District as possible, whilst also providing opportunities for growth within existing employment sites, new sites, rural locations and town centres. Employment opportunities are promoted and protected in all of the town centres through policy whilst policies for the specific employment sites provide detail on appropriate growth. Larger mixed use development sites support and require the inclusion of employment of some form as well as educational facilities and community services. Overall, the plan will have significant positive effects to create a more vibrant and sustainable local economy.
39. The Local Plan recognises that the rural nature of the district is highly prized and should be protected. Alongside policies specifically related to landscape, the plan also highlights that the natural environment is used for recreation purposes and benefits the local economy through tourism. Furthermore, most of the site allocations include reference to the requirement of either preserving existing landscaping, or enhancing it. Both policies and site allocations support the protection of heritage assets. The larger strategic sites are more detailed in what is required – all having positive effects.
40. There is potential for the overall scale of new development to have negative effects on nature and biodiversity, particularly as the Forest of Dean is special in terms of its natural environment and enjoys high-quality biodiversity, with numerous designated sites (SAC, SPA, Ramsar sites and SSSI) across the district. However, policies in the plan continue to protect national and locally important biodiversity, providing guidance on enhancing the green/blue infrastructure network and also comprising a requirement of at least 10% biodiversity net gain (to meet national requirement) which rises to 20% (for development over 2.5ha or 100 new dwellings), subject to viability. Requirements for lighting to reduce impacts on wildlife and light pollution are also set out. All of the above result in positive effects for nature and biodiversity.

41. There are strong policies in the Plan to reduce pollution and waste and to improve water management (and avoiding impacts of flooding). Policies on topics such as design principles, active travel, cycle routes, sustainable design/construction/low carbon energy, climate adaptation, site conditions and waters and rivers all promote good design and management principles to achieve positive effects.
42. All of the above factors are interconnected and contribute to helping the Forest of Dean achieve its ambitions for addressing the climate crisis through mitigating potential negative effects and encouraging possibilities for positive effects.

Were there any difficulties encountered?

43. No significant technical difficulties encountered during the preparation of the SA, however, there are inherent difficulties in predicting the likely future baseline and assumptions were made using professional judgement. Some uncertainties about opportunities for mitigation have been raised, such as judging effects on climate change (including flooding), landscape and biodiversity. Further difficulties encountered were the significant changes to national legislation over the plan-making period, in particular those which gave rise to sudden uplift in housing delivery (in particular NPPF 2024), which had effects on baseline indicators as well as finding the most sustainable locations for development with the least negative effects.

How has the SA influenced the Revised Draft Local Plan?

44. The SA has made suggestions for improving the sustainability of the Plan, especially at the early stages of the plan preparation, in particular with the assessments of the strategic options for delivery of development and the potential site allocations for development. Overall, the findings of the SA were carefully taken into consideration as the draft Local Plan has developed further.

Consultation

45. Public consultation at Regulation 18 has been carried out at various points along the plan-making process for the Forest of Dean District Council Local Plan and this has included the publishing of the SA where applicable:
 - Issues and Options public consultation paper (Sept 2019)
 - Publication of SA scoping report (Feb 2020)
 - Local Plan First Preferred Option public consultation paper (Oct 2020);
 - Consultation on SA Scoping Report (March 2022);
 - Local Plan Second Preferred Option consultation paper including publication of SA for Potential Large Strategic Sites report (July 2022);

- Draft Local Plan consultation paper including publication of SA for Draft Local Plan report (July 2024);
- Options to deliver the Additional Housing consultation paper (the Preferred Strategy Nov 2025) and publication of SA Further Interim Report for the Local Plan Options to deliver the Additional Housing Requirement report.

46. Comments were received from the statutory environmental bodies, as well as from other consultees and these have been taken into account during the preparation of this SA report. This Revised Draft Local Plan 2025-2045 is being published for a further Regulation 18 public consultation in February 2026 and this SA Report accompanies the revised draft Plan.

Monitoring Proposals

47. Local planning authorities are required to produce annual Authorities Monitoring Reports (AMRs) including indicator and targets against which the progress of the Plan can be assessed. There is also a requirement to monitor the predictions made in the SA and Government advises Councils to prepare a monitoring strategy that incorporates the needs of the two processes to make best use of shared information and resources. A monitoring framework can be found in full within the main SA report.

Next Steps

48. Any comments on this Regulation 18 SA will be included in the Regulation 19 draft Plan, which is expected to be published in Summer 2026.