



FOREST OF DEAN DISTRICT COUNCIL
OUR LOCAL PLAN
WORKING TOGETHER FOR A BETTER FUTURE

Forest of Dean Local Plan 2021-2041

Sustainability Appraisal Report

Interim Report for Draft Local Plan Public Consultation (Regulation 18) July 2024

Written by Local Plans Team, Forest of Dean District Council

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I. Introduction & About the SA

I.1 This report is the Sustainability Appraisal for the Forest of Dean Draft Local Plan 2021-2041 (draft plan). The purpose of a Sustainability Appraisal (SA) is to promote sustainable development through the integration of environmental, social and economic considerations in the preparation of Local Plans. It ensures that the principles of sustainable development are applied to planning policies, allocations and guidance, and provides a framework for decision making through the Plan drafting stage.

I.2 This report has been prepared in response to Section 19 of the Planning and Compulsory Purchase Act 2004 which requires a local planning authority to carry out a SA of each of the proposals in a Local Plan during the preparation of the plan. The Sustainability Appraisal stages are shown at Figure 1. They are:

Stage A: Setting the context & objectives, establishing the baseline and deciding on the scope (i.e. The scoping study)

Stage B: Development and refining alternatives and assessing effects

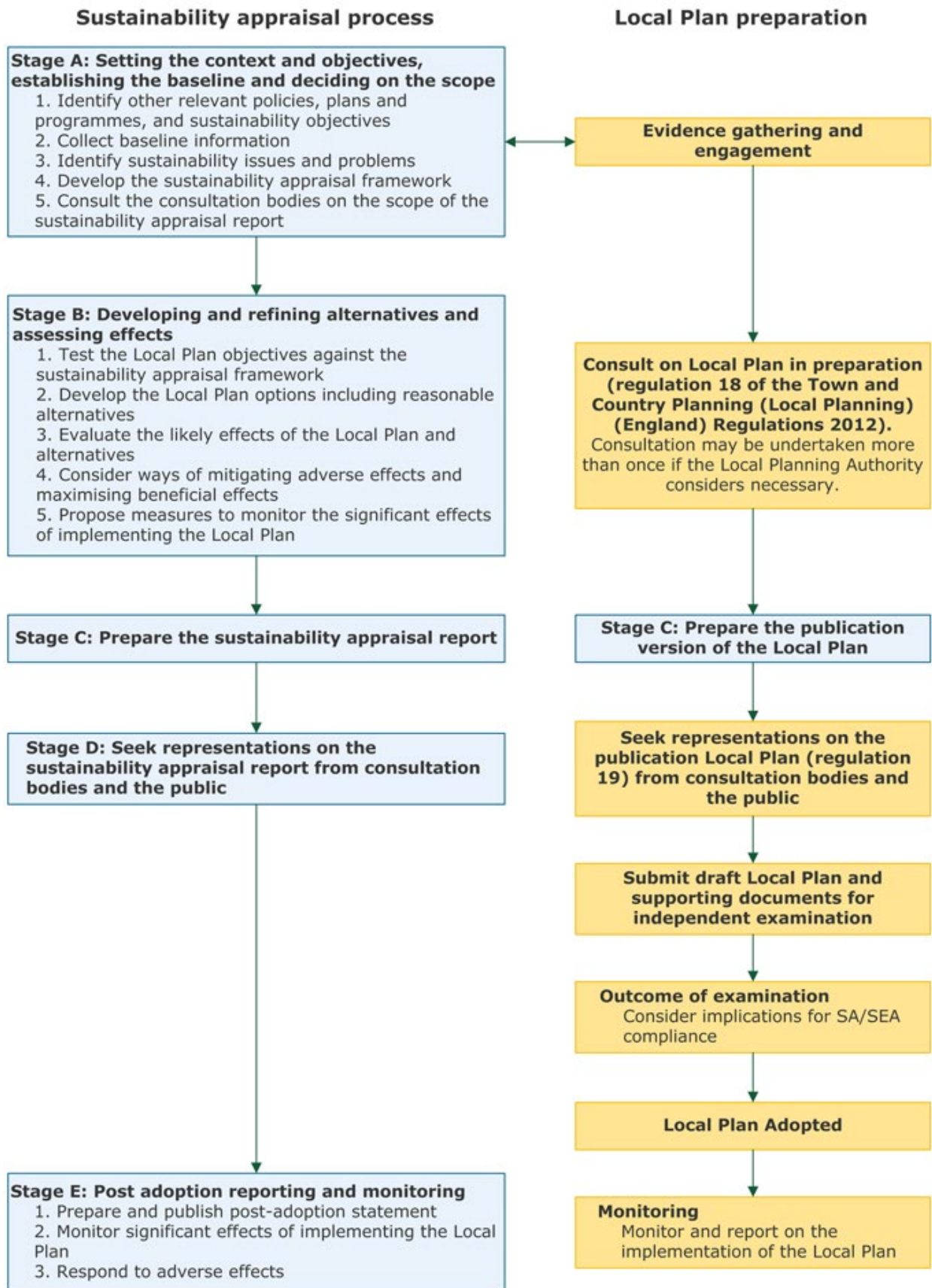
Stage C: Preparing the Sustainability Appraisal Report

Stage D: Consulting on the Local Plan and Sustainability Appraisal report

Stage E: Post adoption reporting and monitoring

I.3 This report brings together the appraisals of Stage B into the Sustainability Appraisal Report required for Stage C. It also updates the findings of Stage A.

Fig. 1 Sustainability Appraisal Process



I.4 The SA should also incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. Table I below shows how it does this.

Table I SEA requirements and how they are covered in this report

Requirement under the Environmental Assessment of Plans and Programmes Regulations 2004	Where covered
1. 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.	Section 2 of this report
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Section A.2. of the Scoping Report and Sections 3, 4 and 7 of this report.
3. The environmental characteristics of areas likely to be significantly affected.	Appendix 1 (site appraisals) and Section 6 of this report.
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.	Section A.2 of the Scoping Report, Section 3 and Section 6 of this report and Appendix 1 (site appraisals).
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.	Sections 3 and 6 of this report and Appendix 1 (site appraisals).
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).	<p>Section 4 appraises the impacts of the draft plan vision and objectives.</p> <p>Section 5 appraises alternative strategies.</p> <p>Section 6 and Appendix 1 appraise development sites.</p> <p>Section 7 and Appendix 2 appraise the impacts of the draft plan policies.</p> <p>Section 8 considers short, medium and long-term impacts.</p>
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.	Section 8 of this report.

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.	Sections 5 (strategic alternatives) and 6 (site alternatives) of this report.
9. A description of the measures envisaged concerning monitoring in accordance with regulation 17.	Section 9 of this report.
10. A non-technical summary of the information provided under paragraphs 1 to 9.	Non-technical summary - see separate document.

I.5 The SA is an iterative process and must be carried out during the various stages of the plan making process. Table 2 below therefore shows the links between the development of the plan and the sustainability appraisal process.

Table 2 Local Plan making process

Date	Local Plan development process	SA stage and web-link
2019	Start of Local Plan development process	Data collection for SA scoping stage
Sep – Oct 2019	Consultation on Issues and Options: https://www.fdean.gov.uk/planning-and-building/planning-policy/developing-our-new-local-plan/emerging-local-plan-issues-and-options/	
Feb 2020		Publication of SA scoping report (Stage A): www.fdean.gov.uk/media/rxkb4zmg/sustainability-appraisal-scoping-report.pdf .
Oct 2020	Consultation on Local Plan Preferred Option: https://www.fdean.gov.uk/planning-and-building/planning-policy/developing-our-new-local-plan/local-plan-preferred-option/	
March 2022		Consultation on SA Scoping Consultation Report and publication of responses from Statutory Consultees. https://www.fdean.gov.uk/media/y42ipqzx/sa-scoping-consultation-report-final.pdf
July 2022	Consultation on Local Plan Second Preferred Option: https://www.fdean.gov.uk/planning-and-building/planning-policy/developing-our-new-local-plan/local-plan-second-preferred-option/	
July 2022		Publication of SA for Potential Large Strategic Sites: https://www.fdean.gov.uk/media/uh4lgltx/sustainability-appraisal-for-potential-large-strategic-sites.pdf

July 2024	Consultation of Draft Local Plan https://www.fdean.gov.uk/planning-and-building/planning-policy/developing-our-new-local-plan/draft-local-plan-2041/	
July 2024		Publication of SA for Draft Local Plan https://www.fdean.gov.uk/planning-and-building/planning-policy/developing-our-new-local-plan/draft-local-plan-2041/

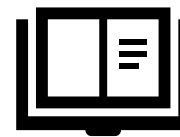
I.6 This SA report is structured as follows:

- Section 1 introduces and describes the purpose of the SA;
- Section 2 describes the emerging Forest of Dean Local Plan;
- Section 3 provides an update of the information in the 2020 SA scoping report;
- Section 4 appraises the plan objectives;
- Section 5 appraises the strategic options and reasonable alternatives;
- Section 6 appraises the development sites;
- Section 7 predicts the effects of the local plan by appraising the plan policies;
- Section 8 considers ways of mitigating adverse effects and maximising beneficial effects of the Local Plan;
- Section 9 discusses proposed monitoring of the Local Plan;
- Section 10 considers the next steps of the SA.

I.7 The Local Plan has also been subject to a Habitats Regulations Assessment, as set out in the Conservation of Habitats and Species Regulations 2010 (as amended), which will be reported in a separate document and published on the Council’s website. This SA report takes into account the findings of the Habitats Regulations Assessment.

2. Forest of Dean Local Plan

- 2.1 There is a statutory requirement for Local Planning Authorities to have an "up-to-date" Local Plan. Local Plans guide future development and set out policies against which planning applications are considered.
- 2.2 The current Forest of Dean local planning framework sets out an overall strategy to guide development across the District until 2026. It is made up of the Core Strategy (adopted in 2012) and the Allocations Plan (adopted in 2018), as well as the following Local Plan documents:
- Berry Hill, Christchurch and Edge End Neighbourhood Development Plan
 - Cinderford Northern Quarter Area Action Plan
 - Coleford Neighbourhood Development Plan
 - Longhope Neighbourhood Development Plan
 - Lydney Neighbourhood Development Plan
 - Mitcheldean Neighbourhood Development Plan
 - Alvington Neighbourhood Development Plan
 - Huntley Neighbourhood Development Plan
 - Forest Edge South Neighbourhood Development Plan (due for referendum in Autumn 2024)
 - Dymock Neighbourhood Development Plan (due for referendum in Autumn 2024)



Emerging Local Plan Development and Objectives

- 2.3 The Forest of Dean District Council has embarked on the development of a new Local Plan 2021-2041. One of the primary purposes of the Local Plan is to meet the district's housing needs up to 2041. The Government has set a housing target of 330 dwellings per year for the Forest of Dean district (or 6,600 over 20 years). The existing plan is expected to deliver about 1,400 dwellings by 2041: this means that the new Local Plan will need to identify enough suitable land to accommodate about a further 4,200 dwellings. At the current housing density target of 30 dwellings per hectare the new Local Plan will need to identify a further 140 ha of new land for housing. The appropriateness of the housing density will be assessed for each site depending on its location and the surrounding density, also taking into account the space needed for BNG (Biodiversity Net Gain). However, as a rule, housing density averages 30 dph in the Forest of Dean owing to its rural character, but can be slightly higher in more built-up locations, such as the town centres. The Plan seeks a gross area of employment area (existing and new) of ca.313ha.
- 2.4 The Local Plan also contains a suite of planning policies which relate to design, development management and protection of certain areas, values and features. This includes principles and guidance for the pattern of settlements across the district, the design of buildings and places, conservation and heritage protection, transport and infrastructure provision and ecological considerations and combating climate change. It is intended that a Design Code will be produced which will align with the emerging Local Plan.
- 2.5 The Local Plan must be developed within the revised National Planning Policy Framework (NPPF December 2023) which sets out government's planning policies for England and how these are expected to be applied. The UK Government establishes their broad guidelines and policies for a variety of different topics in the NPPF, which includes the following key sustainability issues:
- 1) The need to ensure that new housing development meets local needs;

- 2) The need to proactively support sustainable economic development;
- 3) The need to include local people in plan making;
- 4) The need to protect and enhance the vibrancy of urban areas and encourage brownfield development through regeneration;
- 5) The need to maintain the vitality of town centres;
- 6) The need to encourage the growth of communications infrastructure networks;
- 7) The need to manage growth to promote sustainable methods of transport and improve accessibility;
- 8) The need to protect the historic environment;
- 9) The need to conserve and enhance biodiversity as an integral part of economic, social and environmental development;
- 10) The need to promote sensitive and effective waste management;
- 11) Recognising the importance of open spaces, sport, and recreation and the contribution that they make to enhancing quality of life;
- 12) The need to reduce greenhouse gas emissions and increase energy efficiency;
- 13) The prudent use of natural resources; and
- 14) The need to prepare Strategic Flood Risk Assessments.

2.6 The District's Vision of (2019 – Issues and Options) which seeks a situation where:

- Young people can find jobs;
- Older people are supported as they age;
- Tourism and new businesses can grow and prosper;
- The community is healthy and active;
- There is a high quality built and natural environment to be protected; and
- Pursue a low carbon future and seek new development to be designed to adapt to climate change.

2.7 The overall vision/objectives of the new Local Plan is set out below. Many of the components of the vision are addressed by other documents, such as the FoDDC's Council Plan, but need the Local Plan to bring them about. Direct actions by the FoDDC, especially through promoting the move to net zero carbon emissions and its regeneration initiatives will be essential, as will public and private investment.

Fig.2 Local Plan's Vision

Forest Of Dean Local Plan Vision

- The district is actively engaged in pursuing a low carbon future and new development is designed to enable this while being able to adapt to climate change.
- In 2041 younger people are more likely to want stay in the district with good access to education, employment and housing.
- The needs of an ageing population have also been incorporated into the design of new development.
- It is a place where healthy lifestyles are an everyday part of living and working in the district.
- The implementation of sustainable development enhances the quality of life for residents and visitors alike.
- The diverse landscapes and heritage of the area is so distinctive that it is nationally and internationally recognised.
- A thriving tourism market is underpinned by a high quality natural and built environment.
- The lack of affordable housing has been addressed through imaginative and sustainable ways providing an appropriate range of tenures which support local communities, services and facilities.
- The area has resilient and diverse employment opportunities with strong links to good local schools embracing, in particular, industries of the future.
- The district is better connected through improved transport, digital and mobile data connections which reduce the need to travel and provide a distinctive local offer.
- The Forest of Dean is known as an amazing place to start and grow business.

Fig. 3 Draft Local Plan's Table of Contents

1 Preface	Bromsberrow Heath
	Clearwell
2 Context	Drybrook and Harrow Hill
Overview	Dymock
Vision and objectives	Edge End
Plan order	Ellwood
Context for strategic and core policies	English Bicknor
	Hartpury (including University and College)
3 Core policies	Huntley
	Kempley Green
4 Strategy	Littledean
	Longhope
5 Sustainability and climate change	Lydbrook, Joys Green and Worrall Hill
	Mitcheldean
6 Built, Natural and Historic Environment	Newland
	Newnham on Severn
7 Community and Travel	Northwood Green
	Oldcroft
8 Delivering the Strategy	Parkend
	Redbrook
9 Housing policies	Redmarley
	Ruardean
10 Economy	Ruardean Hill
Sites and settlements	Ruardean Woodside
	Sling
11 Strategic Sites and settlements	St Briavels
Cinderford	Staunton (Coleford)
Coleford	Staunton and Corse
Lydney	Tibberton
Newent	Upleadon
Beachley Barracks	Upper Soudley
Sedbury and Tutshill	Viney Hill
	Westbury on Severn
12 Other settlements	Whitecroft, Pillowell and Yorkley
Alvington	Woodcroft
Aylburton	Woolaston
Blakeney	13 Small settlements
Beachley village	Monitoring
Bream	
Brierley	14 Monitoring
Brockweir	

3. Summary and Update of Scoping Report

3.1 This section summarises the findings of the SA Scoping Report of 2020, in terms of policy requirements and updates it where appropriate.

Policy context and changes since 2020

3.2 The Scoping Report (2020) stated that the new Local Plan must enable the delivery of enough housing to meet the district's needs up to 2041. At the time of the scoping report, the district was expected to deliver more than 350 new dwellings per year and in the period up to 2041, this resulted in the need to find new land for approximately 4,000 new houses, once existing permissions have been accounted for. To calculate housing need into the future, the Council made a series of assumptions which included:

- All dwellings that were under construction would be completed, but not all of those that have gained permission would be completed; combined with existing sites, this would add a further 1,500 to the total housing delivered during the period of 2021-2041.
- Small sites (between 1- 5 houses) would add around 74 new dwellings per year, resulting in an estimated total of 1,480 up to 2041.
- Windfall sites, or unexpected sites, would continue to deliver housing at the current rate, which would deliver around 1,200 between now and 2041.
- All these things combined would add an estimated total of 4,180 houses built on small sites and windfalls or come from other sites that are already being constructed or have been permitted.
- Based on the housing targets at that time (where a target of 330 dwellings per year had been set for the Forest of Dean district by the UK government (of 6,600 over 20 years)), this meant that the new Local Plan would need to identify enough suitable land to accommodate for about a further 4,200 houses.
- This means at the current housing density target of 30 dwellings per ha, a further 140 ha of new land for housing will need to be identified in the new Local Plan.
- Furthermore, employment land and services like schools and doctors would need to be provided to all those new households. Those communities would also need transport links and hard infrastructure to support them.

3.3 It is noted that between March 2024 and May 2024, the housing target was recalculated and lowered to 6200 houses over 20 years. However, at the end of May 2024, the housing calculations returned to 6600 dwellings to be delivered between 2021 and 2041, or about 330pa.

3.4 Since the scoping report in 2020, the Forest of Dean District Council has been working towards becoming a designated Biosphere Reserve (BR). Biosphere reserves are an international landscape designation through UNESCO which recognises a defined area's special ecological values and promotes the area as a model region for sustainable development. In March 2024, the FoDDC was accepted by the UK Man and Biosphere (MAB) Community as a UK MAB candidate and the Council is currently progressing towards recruiting an officer to develop the submission for the UK MAB Committee in September 2025.

3.5 Since the Scoping Report was published in 2020, there have been several notable changes in various policies at both a national and local scale. Some of these are planning policies, whilst others are related to corporate matters, however, all are relevant to the Sustainability Appraisal.

- The National Planning Policy Framework was revised on 20th July 2021 and December 2023
- The [National Model Design Code](#) was published in June 2021

- Gloucestershire County Council adopted the [Minerals Local Plan for Gloucestershire](#) on 20th March 2020.
- [Gloucestershire Local Transport Plan](#) sets the strategic transport vision to 2041. (adopted 2020)

- Wye Valley Area of Outstanding Natural Beauty – [State of the AONB Report 2021](#)
- [Wye Valley AONB Management Plan 2021-2026](#)

- The [Alvington NDP](#) was made on 1st June 2021.
- The [Huntley NDP](#) was made on 1st October 2023.

- The FoDDC adopted the '[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.

Sustainability context - Consequences of Covid and other Local/National/International Events

3.6 The Covid-19 pandemic resulted in a quick onslaught of short-term impacts such as immediate home working, an initial drop in planning applications, a reduction in house building and people were generally staying at home. However, over time, some of the results of the Covid-19 crisis have embedded themselves into society and are now long-term.

3.7 Since the Covid-19 crisis, home working (and by default less commuting) has become more normal for certain sections of business. Employers are now having to be more flexible with allowing their employees to work from home and to a more flexible working pattern. In terms of the Forest of Dean District Council, Publica's agile working strategy means that staff commuting emissions will continue to be lower than before, but whilst common sense suggests home working saves carbon, there are many factors and assumptions at play.

3.8 Housing prices rocketed during and after the Covid crisis, with people prepared to pay more for rural housing. However, by 2023, house prices and sales began to stall. Housing numbers (number of houses gaining permission and those being constructed) have now bounced back to levels which are similar to those pre-covid.

3.9 Another noticeable trend is that tourism uses now form the majority of the commercial enterprise planning applications in the Forest of Dean, and 'staycations' are more popular since the Covid crisis generally across the UK.

3.10 Town centre footfall in the Forest of Dean District also saw a significant drop during Covid, but has been steadily tracking upwards again since 2022.

3.11 2023/2024 has seen the UK experience a serious cost of living crisis.

Existing sustainability problems/issues as determined through the Scoping Report

3.12 The following key issues have been identified through the scoping process. Some relate specifically to the Forest of Dean district and others are more universal, but all present barriers and challenges to sustainability across its different aspects:

Environment

LANDSCAPE:

- Lack of landscape designation over Forest edge settlements;
- Agricultural buildings in visually prominent locations under permitted development;
- Decline in traditional primary industries;
- Glover review of AONB roles (2019), including the Wye Valley and Malvern Hills AONB. ***Since the Scoping Report, the review did not result in any significant changes for either of the AONBs within the Forest of Dean. However, the designation name has now changed to National Landscapes;***
- Potential new Forest edge landscape designation or Forest of Dean district Biosphere reserve; and
- Agricultural commodities undervalued, leading to declining viability of domestic primary production. This leads to increased pressure to convert good quality agricultural land to urban uses.

ECOLOGY:

- Loss of biodiversity and habitat;
- Condition of several of the districts protected areas are in decline;
- Climate change impacts on biodiversity and the natural range of native species; and
- Landscape fragmentation over different tenures and management regimes.

WATER:

- Increased flooding and wider variations in seasonal rainfall due to climate change;
- Existing storm water infrastructure is ageing and inadequate for current flood events, which may become more extreme in future;
- Climate change creating hotter, drier conditions which will impact on water supply and ecology; and
- Additional demands of new settlements and expansions on water resources. Poor water quality in several problem areas.

CARBON MANAGEMENT:

- Forest of Dean district council (FoDDC) has set an ambitious Council target for a carbon neutral district by 2030- how can the Local Plan support this?;
- Current poor quality of existing housing stock in terms of energy efficiency and insulation; and

- Some activity for renewable installations, but fairly minimal. Housing stock and built environment may be under equipped and poorly designed to respond to more extreme weather events. Financial resources to "climate proof" existing settlements is limited.

Since the Scoping Report was written, more emphasis has been put upon the need to adapt for climate change both nationally and within the district. The Council has also seen a change in political leadership, with the Green Party now holding the majority. This has led to a greater push on environment betterment overall.

AIR:

- Air Quality Management areas (AQMAs) in Chepstow (linked to Tutshill and Sedbury) and Lydney; and
- Increased traffic and congestion in key commuting pinch points like the A40 and A48.

WASTE:

- Cost of waste collection and recycling on the Council; Limited recycling capacity within the district.

HERITAGE:

- Some historical buildings at risk.

Society

HOUSING:

- Some larger schemes may come forward in the next few years which temporarily meet demand, but this is a trend unlikely to continue in the longer term. There are limited policy interventions to improve the situation; and
- However, Council officers are working proactively with Registered Providers to bring forward 100% affordable housing sites.

EDUCATION:

- Policy at a district level has limited influence over poor levels of educational attainment. Many local schools are at capacity and local children have to travel outside of their Parish to access a school place.

COMMUNITY WELL BEING:

- Societal factors leading towards sedentary lifestyles and poor diets are outside the influence of the Local Plan. The provision of active travel routes and quality open space is sometimes compromised through the development management process, and at appeal;
- Cinderford West continues to be assessed as the worst area for deprivation within the district. Regeneration efforts may not impact this enclave; and
- An ageing population means that more people have declining mobility and independence, and may be effectively marginalised by poor urban design.

LOCAL IDENTITY:

- Forest of Dean district is becoming more attractive to out commuters, which may over time result in local identity and local culture becoming diminished; and
- New housing development is relatively generic and does not respond to local vernaculars.

EMPLOYMENT:

- Leak of jobs out of the district and high levels of out commuting. Some employment sites are falling into disrepair or are partially abandoned, with low occupancy rates in some employment sites, with many vacant units.

BUSINESS AND ENTERPRISE

- Declining commodity values and rising costs for agriculture.

TRANSPORT & INFRASTRUCTURE

- Lack of investment into new infrastructure and maintaining existing networks;
- Unstable policy environment for investment into renewables;
- Strong national trend toward car born out commuting;
- Declining quality and provision of public transport;
- Very poor existing bicycle and pedestrian infrastructure; and
- Traffic congestion on larger arterial routes continues to increase, meaning freight is slowed in traffic congestion leading to lag times and increased costs to industry.

RETAIL CENTRES

- Online shopping and large out of town retail precincts continue to draw trade from local services and retail centres.

SA Framework – Objectives and How Data is Collected

3.13 The Scoping Report put forward a framework of 12 SA objectives which have been used as the basis to appraise the sustainability of the Draft Local Plan. Each planning policy has been assessed against these 12 SA objectives (see Appendix 3). With regards to the appraisal of each potential allocation site, it was considered more appropriate and streamlined to use the 12 SA objectives as a basis, but to modify the wording and criteria for each objective (see Appendix 1) and fit that into a table for data collection (see below).

3.14 If the strategy/site scores well against all or most of these SA objectives, it is most likely to be a sustainable and appropriate option which would be able to be taken forward. Conversely, if the strategy or site score badly against the SA objectives, these are the least sustainable options and should be discounted where possible.

3.15 It is noted that it is not always possible to optimise all of the SA objectives. For instance, meeting local housing needs and creating a more vibrant local economy are likely to conflict with protection of the landscape and biodiversity. Conflict areas are inevitable in the balance which is sustainable development. It is the combined effects of the objectives that should aim to achieve sustainable development. Where a balance between impacts needs to be struck, it is expected that the priorities for development, as set out in the National Planning Policy Framework, would outweigh any environmental impact, provided that such an impact was not to a significant extent.

3.16 The table below shows how the formation of the original SA objectives and the associated criteria through the Scoping Report.

Table 3 SA Framework for the draft Local Plan policies

SA objective – as per the Scoping Report (and used to appraise the planning policies)	Criteria
1. To improve the health and well-being of the populations and reduce inequalities in health.	Does the policy support healthy living? Does the policy minimise adverse effects to health, e.g. road accidents, crime?
2. To meet local housing needs, by ensuring everyone has the opportunity to live in a decent sustainably constructed and affordable home.	Does the policy provide for a mix of housing types and sizes to meet the needs of different sections of the community? Does the policy support the provision of affordable housing?
3. To provide accessible community services, recreation and leisure facilities.	Does the policy support ease of access to key services, including education, health, retail and recreation? Does the policy support the use of public transport to access key services? Does the policy help to reduce dependence on the car?
4. To facilitate the development of academic and vocational skills.	Does the policy provide improved access to educational facilities?
5. To create a more vibrant and sustainable local economy.	Will the policy encourage an increase in the range of employment opportunities? Does the policy support opportunities for higher paid and professional employment?
6. To protect and enhance the landscape.	Does the policy protect and enhance the landscape including the countryside, areas of landscape value, river valleys and green space? Does the policy provide access to areas of landscape value? Does the policy promote high quality design in keeping with the character of the area? Does the policy protect good quality agricultural land?
7. To conserve and enhance biodiversity, flora and fauna.	Does the policy support no net loss to biodiversity? Does the policy promote biodiversity net gain? Does the policy contribute to the protection of designated areas? Does the policy strengthen connectivity between wildlife habitats and promote Green Infrastructure?
8. To maintain and improve air quality.	Does the policy provide opportunities to travel by public transport? Does the policy reduce congestion?
	Does the policy seek to conserve water resources and increase water efficiency?

9. To maintain and improve water quality and to achieve sustainable water resources management.	Does the policy seek to improve the water quality of rivers, lakes and ground water?
10. To reduce carbon emissions that cause climate change and to achieve net zero.	Does the policy support energy conservation and energy efficient design? Does the policy reduce vulnerability of the built environment to the effects of climate change (e.g. flooding, extreme events) and promote carbon net zero development?
11. To reduce waste generation and achieve sustainable management of waste.	Does the policy support opportunities to reduce waste going into landfill? Does the policy reduce waste generation and achieve sustainable management of waste?
12. To safeguard historical and cultural assets.	Does the policy maintain and enhance cultural and historical assets?

Table 4 Example of the Site Appraisal table and how the SA objectives have been adapted since the scoping report to collect information about each potential site allocation

Site policy reference	EXAMPLE	Filter 1: Potential conflicts with international or national planning policy	
Site Name		Is the site SAC?	
Parish		Is the site SSSI?	
Existing Use			
Site Area & Potential capacity		Town centre by road	
Relevant Planning History		Primary School by road	
		GP by road	
Relationship to DSB		Public Transport	
Safeguarded/consultation area in Minerals Plan?		Employment Area (direct line)	

Filter 3: Sustainability Appraisal and Qualitative Assessment of Deliverability		
Site Assessment Criteria derived from SA Objectives	Comments	Aggregate Rating
Vehicular Access & Connectivity		+
Active Travel - Can walking and cycling connections with the surrounding area be achieved?		+

Climate Change - Is there a flood risk?		–
Climate Audit		TBC
Landscape - Significant physical features		0
Land quality		–
Biodiversity - existing habitat		–
Could the site form a Green Infrastructure linkage between habitat fragments?		0
Character (built and natural) - Could development harm or enhance the character of the area?		–
Heritage - Does the site include a listed building or fall within the setting of a listed building? Is the site likely to have archaeological interest?		–
FoD Officers' conclusion:		
Example text...		
Does the site meet SA criteria?		

3.17 As can be seen in Table 5 below, the criteria in the table above allows for the collection of data to inform each of the 12 SA objectives:

Table 5 How the data collected fits with the SA objectives

SA objective – as per the Scoping Report	How this information is collected through the appraisal criteria for site allocations:
1. To improve the health and well-being of the populations and reduce inequalities in health.	GP by road Active Travel – walking and cycling Vehicular Access & connectivity Public Transport Biodiversity Landscape Heritage Employment Area
2. To meet local housing needs, by ensuring everyone has the opportunity to live in a decent sustainably constructed and affordable home.	Existing use/site area/potential capacity Climate Audit
3. To provide accessible community services, recreation and leisure facilities.	Employment Area Primary School by road GP by road Town Centre by road Public Transport Vehicular Access & Connectivity

	Active Travel – cycling and walking
4. To facilitate the development of academic and vocational skills.	Primary School by road Employment Area Public Transport Vehicular Access & Connectivity Active Travel
5. To create a more vibrant and sustainable local economy.	Employment Area Public Transport Vehicular Access & Connectivity Active Travel
6. To protect and enhance the landscape.	SAC/SPA Landscape – significant physical features Biodiversity – existing habitat Character (built and natural) Heritage
7. To conserve and enhance biodiversity, flora and fauna.	SAC/SPA Landscape – significant physical features Biodiversity – existing habitat Land quality
8. To maintain and improve air quality.	SAC/SPA Landscape – significant physical features Biodiversity – existing habitat Active Travel – cycling and walking Public transport Climate Audit
9. To maintain and improve water quality and to achieve sustainable water resources management.	Climate Change – flood risk
10. To reduce carbon emissions that cause climate change and to achieve net zero.	Active Travel – cycling and walking Public transport Climate Audit
11. To reduce waste generation and achieve sustainable management of waste.	Climate Audit Existing use Site area and potential capacity Safeguarded by Minerals Plan
12. To safeguard historical and cultural assets.	Heritage

3.18 A lot of the data collection is fact driven. That is, site constraints can be detailed by using the Council's GIS system (STATMAP), which will provide factual information (is the site in a flood zone, is it designated in some way?). Distances between facilities are also factual. However, there needs to be a system where these can be appraised in a consistent manner. This has been achieved through the criteria shown below:

Table 6 Appraisal criteria for distance to key services

Sustainability criterion	>800m	800-1500m	>1500m
Distance to Health Service	>800m	800-1500m	>1500m
Distance to Primary School	>800m	800-1500m	>1500m
Distance to GP surgery	>800m	800-1500m	>1500m
Distance to Town Centre	>800m	800-1500m	>1500m
Distance to Bus &/or Train Station	>800m	800-1500m	>1500m
Distance to Employment Site	>1000m	1000-2000m	>2000

3.19 Data is then appraised by using a scoring system which ranges between double negative (very negative) to double positive (very positive). It should be noted that in some cases, the outcome of the appraisal is partially subjective. However, this has been made as consistent as possible through a single officer carrying out all of the assessments initially and then the outcomes being reviewed by several other officers of varying seniority.

Table 7 Ratings

++	Very positive
+	Positive
0	Neutral
-	Negative
--	Very negative

Consultation with Statutory Consultation bodies on the SA scoping report

3.20 The Scoping Report was sent to the statutory consultation bodies for a period of 5 weeks during March to April 2022. Table 8 below shows the consultation comments received, and changes made to the SA (and Local Plan evidence collection) in response.

Table 8 Consultee Comments to the Scoping report and Changes made in Response

Consultee	Summary of comment by consultee	Response to comment
Natural England	Advice on which plans are relevant to the natural environment and should be considered, including biodiversity plans, shoreline management plans, river basin management plans, etc. Suggestions for monitoring indicators were proposed for both	SA Stage B and the emerging local plan policies and practices will take into account all of the above advice and consideration during its next stages of development. SA filters include SAC/SPA designation & distances to designated areas.

	<p>biodiversity and green infrastructure.</p> <p>Further topics for discussion were submitted in their response, including: Consideration to the Severn Estuary Visitor Surveys 2022; Malvern Hill SSSI report in relation to location of proposed new homes in relation to the SSSI/zone of influence.</p>	<p>HRA includes Zones of Influence, and reference to both the Severn Estuary Visitor Surveys as well as Malvern Hills SSSI report.</p>
Historic England	<p>Considered that Key Issues for Sustainability underestimates the opportunities and SA wording should be more in-line with language and emphasis of NPPF. HE also questioned whether the evidence base is still relevant or whether it should be updated.</p>	<p>It is proposed to carry out a further Heritage Assessment of all of the proposed housing allocation sites to ensure that they are run through a more detailed sustainability assessment which can included the proposed questions and objectives from English Heritage. All of the evidence base will also be reviewed and considered as to how much of it requires updating and can be updated within the timescale and available resources.</p> <p>The SA has been reviewed in the light of the updated NPPF (December 2023).</p> <p>The Local Plans team has affirmed that a Conservation Area project will take place in 2024 which will provide an updated evidence base for all of the Conservation Areas.</p>
Environment Agency	<p>Did not respond to the consultation.</p>	<p>SA has focussed on flood risk. Also, the Local Plans Team has confirmed that a Water Quality Assessment and SFRA Level 2 will be commissioned.</p>

4. Stage B I: Appraisal of plan objectives

- 4.1 It is important to identify where the Local Plan Vision/Objectives and SA objectives are compatible with each other and where there are possible conflicts in order to prioritise when conflicts arise. These priorities then help with predicting the effects of the draft Local Plan. It must be remembered that there will be conflict areas. Conflict areas should not be seen as negative, they are inevitable in the balance which is sustainable development. It is the combined effects of the objectives that should aim to achieve sustainable development. Where a balance between impacts needs to be struck it is expected that the priorities for development, as set out in the National Planning Policy Framework, would outweigh any environmental impact, provided that such an impact was not to a significant extent.
- 4.2 Table 9 below compares the SA Objectives against the Local Plan Vision/Objectives. On the whole, Local Plan Vision/Objectives and SA Objectives are generally compatible, with most positive impacts being around health, housing, community and employment opportunities. This was not surprising as both set of objectives start from the principles of sustainable development. Development is generally seen to have a more negative impact on waste generation due to the increased use of resources and the Local Plan objectives do not address waste, however, the SA objectives were not seen as being contrary to waste reduction (neutral).
- 4.3 Proposed mitigation measures for any potential conflicts arising from either the draft site allocations or the proposed draft local plan policies are considered in more detail in Section 8 Stage B4 of this report.

Table 9 SA Objectives Vs Draft Local Plan Vision/Objectives

Draft Local Plan Vision/Objectives	SA Objectives											
	1. To improve the health and well-being of the populations and reduce inequalities in health.	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 carbon emissions that cause climate change and to achieve net zero.	11. To reduce waste generation and achieve sustainable management of waste.	12. To safeguard historical and cultural assets.
1. The district is actively engaged in pursuing a low carbon future and new development is designed to enable this while being able to adapt to climate change.	+	+	+	0	+	+	+	+	+	+	+	0
2. In 2041 younger people are more likely to want to stay in the district with good access to education, employment and housing.	0	+	+	+	+	0	0	0	0	0	0	0
3. The needs of an ageing population have also been incorporated into the design of new development.	+	+	+	0	0	0	0	0	0	0	0	0
4. It is a place where healthy lifestyles are an everyday part of living and working in the district.	+	+	+	+	+	0	0	+	+	+	0	0
5. The implementation of sustainable development enhances the quality of life for residents and visitors alike.	+	+	+	0	0	0	0	0	0	+	0	0
6. The diverse landscapes and heritage of the area is so distinctive that it is nationally and internationally recognised.	0	0	+	0	0	+	+	0	0	0	0	+

7. A thriving tourism market is underpinned by a high quality natural and built environment.	0	0	+	0	+	+	+	+	+	+	0	+
8. The lack of affordable housing has been addressed through imaginative and sustainable ways providing an appropriate range of tenures which support local communities, services and facilities.	+	+	+	0	+	0	0	0	0	0	0	0
9. The area has resilient and diverse employment opportunities with strong links to good local schools embracing, in particular, industries of the future.	0	0	0	+	+	0	0	0	0	0	0	0
10. The district is better connected through improved transport, digital and mobile data connections which reduce the need to travel and provide a distinctive local offer.	+	0	+	+	+	0	0	0	0	+	0	0
11. The Forest of Dean is known as an amazing place to start and grow business.	0	0	+	0	+	0	0	0	0	0	0	0

5. Stage B I: Appraisal of reasonable alternatives

- 5.1 This section discusses reasonable alternatives that were considered and assessed as part of:
1. The Local Plan Issues and Options consultation of Autumn 2019
 2. The first Preferred Option Strategy consultation of Autumn 2020
 3. The second Preferred Option Strategy consultation of Summer 2022

Alternatives in Issues and Options consultation (Autumn 2019)

- 5.2 One of the first phases of the Local Plan making process is to consider Issues and Options. It is the first opportunity for residents, businesses and other interested parties to be involved in planning for our future. The purpose of the Issues and Options stage is to identify the key planning issues and opportunities the revised Local Plan should address. The main issue is how to accommodate development that is sustainable within the district while protecting its assets for the future.
- 5.3 The Issues and Options public consultation took place in the Autumn 2019 and these are the main points raised within the documentation:

Key Issues

- 5.4 The Key Issues which may have caused challenges for development and achieving the Council's Vision within the District were identified as the following:
- Future Capacity for this plan and beyond- in particular Housing (new housing sites and land required);
 - Constraints: Statutory Forest, Areas prone to flooding, Relief, Accessibility, Landscapes, Major constraints to the largest settlements (Lydney, Cinderford, Coleford, Newent, Tutshill/Sedbury and Beachley as well as the larger villages).
- 5.5 Therefore, the Key Messages within the Issues and Options document are summarised as follows:
- The overall preferred strategy must be one of promoting a more sustainable form of development, especially in respect of selecting longer term enduring locations that reduce the need to travel and can deliver carbon neutral development;
 - The likely need for change will require strategic solutions beyond simple incremental change at various locations;
 - Environmental and physical constraints will be an even more significant determinant of strategy than in previous plans especially those arising because of the need to mitigate climate change;
 - There are carrying capacity issues throughout the district but especially around existing settlements and in the west and south and in respect of their potential to accommodate larger allocations;
 - Changes in keeping (or proportionate to) the general settlement hierarchy are generally more sustainable- It may be desirable for options to contribute to long term spatial solutions, possibly beyond the plan period;

- There is likely to be some capacity for change within existing settlements albeit for smaller scale incremental change;
- Unidentified (windfall) housing sites will continue to come forward, possibly at about the same level as is currently experienced and will be part of the incremental change that will be part of all options;
- Small unidentified housing sites are likely to continue to contribute throughout the district at a similar rate to the present allowance and will be part of the incremental change expected to be part of all options;
- Government policy may increase some elements of supply, for example that from conversions though not all of these are in sustainable locations;
- It is likely that viability will affect the deliverability of some sites identified for a variety of uses especially previously developed land where development costs are high. Sites that may be allocated in the LP will be reviewed against evidence such as the viability study as it is gathered.

5.6 A notable feature of the Forest of Dean is that although it comprises a large statutory forest which cannot be developed along with other designated sites (National Landscapes), the Site Appraisals (Appendix 1) demonstrates that there are numerous possible development sites in the Forest of Dean District, which actually outnumber the number of housing actually needed. The most pertinent issue is therefore finding the most sustainable locations for development, particularly given the rural nature of the district.

Options

5.7 The Options highlighted within the Issues and Options consultation document were as follows.

- 1) **Selective planned expansion of existing settlement(s).** This is limited to those where there may be sufficient scope to provide part of a strategic option by selecting particular settlements and choosing to promote them possibly alongside infrastructure improvements for a greater scale of development than would otherwise have been the case. The description of the settlements and the various main constraints that apply suggests that there are restrictions in terms of the capacity available at many of the existing settlements. An option solely relying on this strategy may therefore only be able to deliver a certain quantum of development. It may also be an option that could pre-empt any longer term strategies because the existing capacity would be exhausted.
- 2) **Maximum incremental change to the extent of absolute constraints.** This option would simply consider the ultimate capacity of settlements and allow development where possible, it could be similar to the application of the NPPF presumption in favour of sustainable development. This is an option which could also be termed dispersal although the bulk of any change is expected to be directed to existing settlements in a manner that respects the main constraints it relies on the allocation of new sites across the widest possible range of settlements. It is the option most akin to the "do nothing" option.
- 3) **Planned new settlement(s).** The identification of one or more new settlements and the promotion of a scale of development that would create a community supported by appropriate infrastructure. The option is to provide a new or substantially new settlement or settlements which will establish a sustainable long term option. It is assumed that new infrastructure appropriate to the needs of the settlement(s) will be needed but can be provided in step with its development.
- 4) **Negotiated agreement that some development will be passed to adjoining authority(ies).** An agreed major element of the FoDD required development would be met in an adjoining area. This particular option has been **discounted** from this point

onwards as there is no appetite from adjoining authorities to take some of the housing quota and furthermore, there is sufficient space within the district to provide housing.

5.8 The table below demonstrates the planning advantages and disadvantages (not just Sustainability advantages/disadvantages) of the 3 options considered to go forward at the Issues and Options Stage (omitting Option 4).

Table 10 Planning Advantages and Disadvantages of the 3 Options

Option	Advantages	Disadvantages
<p>1. Selective planned expansion of existing settlement(s).</p>	<ul style="list-style-type: none"> • allows settlements best suited to change to be identified; • enables LP policy to support selected locations, and for example, regeneration policies; • should support development in most sustainable current location(s) for example, Lydney in 2018 AP with some scope for sharing infrastructure; • will allow range of sites in terms of locations and sizes - provides for continuity; • can allow or result in a phased approach. 	<ul style="list-style-type: none"> • may not enable long term strategy; • could force allocations that have adverse impacts; • scope likely to be limited by lack of capacity in/around existing settlements; • choice of locations for development may be more driven by availability of land than being the most supportive of the LP strategy overall; • may stretch infrastructure by relying on existing provision.
<p>2. Maximum incremental change to the extent of absolute constraints (do nothing approach).</p>	<ul style="list-style-type: none"> • potentially offers a wide range of sites - size and location; • is flexible; • some sites are unlikely to be constrained by the need for additional infrastructure. 	<ul style="list-style-type: none"> • does not allow overall LP strategic approach • would not address climate change and sustainable transport improvements well; • unlikely to support major infrastructure improvements or provision; • may have a cumulative negative impact on infrastructure; • dispersed development likely to be less energy efficient; • dependant on overall requirement may force development in locations where adverse impacts occur, especially on character and landscape; • no long term strategy- may not be positively prepared; • delivery would be difficult to plan over life of LP;

		<ul style="list-style-type: none"> would not serve wider corporate aims well.
3. Planned new settlement(s).	<ul style="list-style-type: none"> allows an overall strategy to promote more sustainable development; will have scope for infrastructure delivery (e.g. GI, transport, community facilities, etc.); LP can select the best location and plan infrastructure accordingly; Can provide for a long term strategy; can complement take up of existing permissions and other sites - providing development opportunities throughout LP period; should enable a wide range of development; may offer scope for cooperation with other authorities. 	<ul style="list-style-type: none"> new settlement will have a long lead in time and less likely to have good continuity of build-out throughout the entirety of the plan; may be locally unpopular; requires very extensive and detailed supporting evidence; new settlement will require major infrastructure - must be viable; could have wider impact on rural landscape.

5.9 Following the Issues and Options stage, the Local Plan process moved onto the Preferred Options stage, whereby the different options were considered in more detail and further public consultation was carried out. The following section explains in more detail the Sustainability Appraisal outcomes for the various Preferred Options considered. It is noted that by considering the public consultation comments, this stage also included an SA appraisal of combining Options 1 and 2 as a preferred option (Option 4 – combining selective expansion and a new settlement).

Appraising the Sustainability Impacts of the Preferred Options

5.10 The sustainability impacts of the following alternatives were appraised using the SA framework of Table 3. These Options emerged over two different phases of Preferred Option consultations (as described in further detail below).

Table 11 Appraising the 4 options

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).	Option 4: Mixture of Option 1 and Option 3 (Selective planned expansion of existing settlement(s) and Planned New Settlement(s))
1. To improve the health and well-being of the populations and reduce inequalities in health.	<p style="text-align: center;">+</p> <ul style="list-style-type: none"> Sites would be in closer proximity to existing health services 	<p style="text-align: center;">-</p> <ul style="list-style-type: none"> Unlikely sites would be near existing health services 	<p style="text-align: center;">+</p> <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 	<p style="text-align: center;">++</p> <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 	<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

			plug into existing services).	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.
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 	<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 	<p style="text-align: center;">–</p> <ul style="list-style-type: none"> • Sites are likely to be in countryside locations, however, effect 	<p style="text-align: center;">–</p> <ul style="list-style-type: none"> • Sites may be in countryside locations, however, effect can be mitigated

	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.	mitigation measures.	can be mitigated through design and landscaping.	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> <ul style="list-style-type: none"> • Little opportunity to reduce wide-scale impacts, but may be able to mitigate on a piece-meal basis. 	<p style="text-align: center;">++</p> <ul style="list-style-type: none"> • Can plan to reduce and mitigate any impacts and opportunities to create greater net gain and green infrastructure. 	<p style="text-align: center;">+</p> <ul style="list-style-type: none"> • Can plan to reduce and mitigate any impacts and opportunities to create greater net gain and green infrastructure.
8. To maintain and improve air quality.	<p style="text-align: center;">–</p> <ul style="list-style-type: none"> • Development and traffic generation causes air quality issues. 	<p style="text-align: center;">–</p> <ul style="list-style-type: none"> • Development and traffic generation causes air quality issues. 	<p style="text-align: center;">–</p> <ul style="list-style-type: none"> • Development and traffic generation causes air quality issues. 	<p style="text-align: center;">–</p> <ul style="list-style-type: none"> • Development and traffic generation causes air quality issues.
9. To maintain and improve water quality and to achieve sustainable water resources management.	<p style="text-align: center;">0</p> <ul style="list-style-type: none"> • This is dependent on the measures taken for each individual site, but has potential to ensure development does not cause further pollution or 	<p style="text-align: center;">0</p> <ul style="list-style-type: none"> • 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. 	<p style="text-align: center;">0</p> <ul style="list-style-type: none"> • 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. 	<p style="text-align: center;">0</p> <ul style="list-style-type: none"> • 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.			loss of water resources.
10. To reduce carbon emissions that cause climate change and to achieve net zero.	<p>0</p> <ul style="list-style-type: none"> Limited opportunity for large scale strategic carbon offset measures, but some scope for planned local small scale measures, including home-working. 	<p>--</p> <ul style="list-style-type: none"> Carbon emissions would be significant as there has been no planned approach to how development will include strategic and local carbon offset. 	<p>Ranges between - and ++</p> <ul style="list-style-type: none"> Initially, carbon emissions would be great given the remote countryside location and lack of services. But carbon emissions can rapidly decline once the infrastructure is fully embedded. Can include home-working. 	<p>+</p> <ul style="list-style-type: none"> Some opportunity for small and large scale strategic carbon offset measures, including home-working.
11. To reduce waste generation and achieve sustainable management of waste.	<p>-</p> <ul style="list-style-type: none"> Development will always result in waste generation. 	<p>--</p> <ul style="list-style-type: none"> 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. 	<p>-</p> <ul style="list-style-type: none"> Development will always result in waste generation (although management could be wider-scale and better). 	<p>-</p> <ul style="list-style-type: none"> Development will always result in waste generation (although management could be wider-scale and better).
12. To safeguard historical and cultural assets.	<p>0</p> <ul style="list-style-type: none"> Potential to avoid development close to heritage assets. 	<p>-</p> <ul style="list-style-type: none"> Development may be in close proximity to heritage assets 	<p>0</p> <ul style="list-style-type: none"> Potential to avoid development close to heritage assets. 	<p>0</p> <ul style="list-style-type: none"> Potential to avoid development close to heritage assets.

5.11 **Option 1 (Selective Planned Expansion)** would be a positive option because it would improve the health and well-being of the population by providing housing within close proximity of existing services and facilities, including health services, such as doctor's, pharmacies, as well as leisure/recreation facilities for keeping fit and healthy (e.g. gym, swimming pool, etc.). Selective planned extension would also provide the opportunity to meet the housing needs, including the necessary affordable homes. This option also has the ability to locate new development in close proximity (even walking distance) from educational establishments, providing better academic scope for local residents. By the very fact that the selected expansion could be near existing facilities and services, this would provide a positive method of sustaining the local economy and ensuring that there are more choices for local residents who are consequently more likely to invest their income locally. Selective planned expansion around an existing town/village boundary also means that there is less of a chance of harm to biodiversity, flora and fauna. Similarly, harm to landscape is reduced as any new construction would be read in context with the existing backdrop of development. This option would be negative in terms of impact on air quality, as any additional development to an existing settlement would create a greater cumulative impact on the local air quality, because there would be additional emissions in a localised area. This is particularly important when considering access and traffic congestion. Additionally, any development creates waste and therefore achieving the most sustainable management of this is imperative.

5.12 **Option 2 (Do Nothing Approach)** would be positive only in terms of being able to provide the local housing needs and affordable homes required. However, by not having any planned development, this option would result in many negative impacts. It would not ensure that housing is in close proximity to services, or facilities to either improve health, academic skills or to support the local economy. Instead, unplanned development could have significant widescale negative impacts on the landscape, air quality and waste generation owing to the lack of strategic planning and an increased mix of traffic movements. Carbon emissions would be significant as there has been no planned approach to how development will include strategic and local carbon offset.

5.13 **Option 3 (Planned New Settlement)** would have positive impacts by providing sufficient local housing (including affordable) and access to sustainable community facilities, recreation and leisure facilities as well as education establishments and a vibrant local economy, whilst ensuring that harm to local biodiversity is sufficiently mitigated or avoided. However, it is necessary to highlight that these positive impacts are mainly in the long-term, provided that the new settlement is thoroughly master-planned and ensures that the size of the development is large enough to accommodate and maintain the much-needed services/facilities, as well as having a well-planned transport network and the necessary infrastructure being embedded from the outset. A new settlement would allow for a holistic approach to carbon reduction, but again this is very much a long-term goal. This type of development would not work in a piece-meal fashion and if that were to happen, not only would the scheme have a very negative impact on the landscape (given that the site would undoubtedly be a large swathe of greenfield), but would also result in high levels of waste and carbon production, as well as being an unsustainable location if the inhabitants could not walk/bicycle or use public transport to access services. The outcome and success or failure of such an option is very much dependent on the planning and timing of the development.

5.14 **Option 4 Mixture of Option 1 and Option 3 (Selective planned expansion of existing settlement(s) and Planned New Settlement(s))** would have all of the positive impacts of both the planned expansion and new settlement, i.e. it would provide sufficient local housing (including affordable) and access to existing and new sustainable community facilities, recreation and leisure facilities as well as education establishments. It has the potential to create a vibrant economy by developing land near existing shops and facilities whilst also master-planning for new ones which can be accessed using active travel. The negatives mainly revolve around waste and carbon. However, as with the Option 3 (Planned New Settlement), this option is only successful if well planned in advance and is not appropriate for piece-meal development. The success of such a mixed scheme is uncertain unless it is guaranteed that there is sufficient planning and finance available to create a long-term sustainable new settlement development.

5.15 **Best Preferred Strategic Option.** From a sustainability perspective, the best Preferred Strategic Option is therefore **Selective Planned Expansion** of existing settlement(s) for the reasons given above (Option 1). Plus the fact that this is a form of development which can be master-planned and has a greater chance of successfully providing continued sustainable joined up development, taking advantage of existing services whilst providing new ones in both the short and long-term. This option can provide sustainable development without the risks of a new settlement, which could prove to be unsustainable if not successful in its long-term strategic development.

Preferred Strategic Options Consultations

First Preferred Strategic Options consultation (Autumn 2020)

5.16 In Autumn 2020, following on from the Issues and Options, the Council carried out a public consultation on a preferred strategic option which included a new settlement. The Preferred Strategic Option Consultation document proposed a mixture of Option 1 (Selective planned Expansion of Existing Settlements) and Option 3 (a New Settlement) and suggested that the new settlement could provide longer-term scope for development in a sustainable fashion (with the new settlement providing around 27% of the new housing). The Preferred Strategic Option involved development at four strategic locations:

- Lydney, largely based around the existing allocated sites to the east of the town;
- Newent, predominantly to the south east of the town;
- Beachley in connection with the current but likely to be vacated MoD base; and
- A new settlement in the vicinity of where the A40 and A48 meet;

5.17 About 45% of the sites required would be from those already identified in existing plans, but the rest would need to be identified. The newly identified land will need to accommodate about 4000 dwellings along other development. The preferred option was appraised against each of its elements, Options 1 and 3:

Second Preferred Strategic Options consultation (Summer 2022)

5.18 Taking into account feedback received from the previous consultations, the Council developed a Second Preferred Option, which superseded the first. The main difference is that the New Settlement(s) (Option 3) has been excluded from the proposed strategy at this stage. It is noted, however, that a new settlement(s) may prove to be an appropriate option to be reconsidered at subsequent plan reviews, particularly nearer the end of the plan term, when housing allocation becomes significantly more complicated owing to constraints.

5.19 The Second Preferred Option Strategy proposes the following development, all of which is based upon the original Option 1 (Selective planned expansion of existing settlement(s)). The proposed option will, if it becomes part of the Local Plan, be subject to further testing and refinement to ensure that it delivers the most sustainable solution it can.

5.20 A Sustainability Appraisal of the Potential Large Strategic sites was made publicly available: <https://www.fdean.gov.uk/media/uh4lgltx/sustainability-appraisal-for-potential-large-strategic-sites.pdf>

5.21 **Second Preferred Strategic Option** - The following table provides a sustainability appraisal of components of the proposed plan:

SA Objective:	Major Development at Lydney to an enhanced role as a focal point for the FoDD.	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
1. To improve the health and well-being of the populations and reduce inequalities in health.	<p style="text-align: center;">+</p> <ul style="list-style-type: none"> Development can be located close to existing health services 	<p style="text-align: center;">+</p> <ul style="list-style-type: none"> Development can be located close to existing health services 	<p style="text-align: center;">0</p> <ul style="list-style-type: none"> Limited health services could be incorporated into masterplan. 	<p style="text-align: center;">0</p> <ul style="list-style-type: none"> Some limited health services could be incorporated or already available.
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 provide housing needs including affordable housing in a sustainable location. Encouraging active travel. Masterplan and allocation 	<p style="text-align: center;">++</p> <ul style="list-style-type: none"> Can provide housing needs including affordable housing in a sustainable location. Encouraging active travel. Masterplan and allocation 	<p style="text-align: center;">+</p> <ul style="list-style-type: none"> Can provide housing needs including affordable housing in a sustainable location. Masterplan and allocation policies can ensure wide- 	<p style="text-align: center;">+</p> <ul style="list-style-type: none"> Can provide housing needs including affordable housing in a sustainable location. Allocation policies can ensure wide-scale sustainable construction to be

	policies can ensure wide-scale sustainable construction to be delivered when needed.	policies can ensure wide-scale sustainable construction to be delivered when needed.	scale sustainable construction to be delivered when needed.	delivered when needed.
3. To provide accessible community services, recreation and leisure facilities.	<p style="text-align: center;">+</p> <ul style="list-style-type: none"> Existing services available in close proximity and opportunity to enhance/increase facilities. 	<p style="text-align: center;">+</p> <ul style="list-style-type: none"> Existing services available in close proximity and opportunity to enhance/increase facilities. 	<p style="text-align: center;">+</p> <ul style="list-style-type: none"> Masterplan provides opportunity to create facilities. 	<p style="text-align: center;">0</p> <ul style="list-style-type: none"> May have existing facilities, but likely to be limited with less scope for development of new services.
4. To facilitate the development of academic and vocational skills.	<p style="text-align: center;">+</p> <ul style="list-style-type: none"> Existing services available in close proximity and opportunity to enhance/increase facilities. 	<p style="text-align: center;">+</p> <ul style="list-style-type: none"> Existing services available in close proximity and opportunity to enhance/increase facilities. 	<p style="text-align: center;">0</p> <ul style="list-style-type: none"> Unlikely that the scheme would be large enough to create education facilities, but can use existing (which are further away to access). 	<p style="text-align: center;">0</p> <ul style="list-style-type: none"> May have existing facilities, but likely to be limited with less scope for development of new services.
5. To create a more vibrant and sustainable local economy.	<p style="text-align: center;">+</p> <ul style="list-style-type: none"> Additional development would provide additional footfall/use of existing services. Opportunity to create more businesses. 	<p style="text-align: center;">+</p> <ul style="list-style-type: none"> Additional development would provide additional footfall/use of existing services. Opportunity to create more businesses. 	<p style="text-align: center;">+</p> <ul style="list-style-type: none"> Opportunity to create businesses. 	<p style="text-align: center;">0</p> <ul style="list-style-type: none"> May have existing business which would benefit from additional footfall/use. Fewer opportunities to create more businesses.
6. To protect and enhance the landscape.	<p style="text-align: center;">-</p> <ul style="list-style-type: none"> Larger scale development with fewer choices for location of scale of 	<p style="text-align: center;">-</p> <ul style="list-style-type: none"> Larger scale development with fewer choices for location of development. 	<p style="text-align: center;">0</p> <ul style="list-style-type: none"> Existing buildings on the camp, less impact on the landscape. 	<p style="text-align: center;">+</p> <ul style="list-style-type: none"> Ability to avoid the most sensitive landscapes, and development likely

	development. Limited mitigation.	Limited mitigation.		to be small scale and in proportion.
7. To conserve and enhance biodiversity, flora and fauna.	– • Larger scale development with fewer choices for location of scale of development. Limited mitigation.	– • Larger scale development with fewer choices for location of scale of development. Limited mitigation.	– • Located close to SSSI, SAC. Limited mitigation.	+ Ability to avoid the most sensitive areas, and development likely to be small scale and in proportion.
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.	+ • More opportunity for larger scale strategic carbon offset measures. Existing infrastructure and public transport.	+ • More opportunity for larger scale strategic carbon offset measures. Existing infrastructure and public transport.	-/0 • Opportunity for large scale strategic carbon off set measures, however, existing infrastructure and public transport is poor on peninsula.	-/0 • Dependent on existing infrastructure and public transport.

11. To reduce waste generation and achieve sustainable management of waste.	<p style="text-align: center;">0</p> <ul style="list-style-type: none"> • Potential to reduce waste through use of existing infrastructure & deal with it on a larger scale. 	<p style="text-align: center;">0</p> <ul style="list-style-type: none"> • Potential to reduce waste through use of existing infrastructure & deal with it on a larger scale. 	<p style="text-align: center;">–</p> <ul style="list-style-type: none"> • Isolated location – more movements. Additional waste created through re-development of site. 	<p style="text-align: center;">0</p> <ul style="list-style-type: none"> • Smaller scale development, thus less waste.
12. To safeguard historical and cultural assets.	<p style="text-align: center;">0</p> <ul style="list-style-type: none"> • Potential to avoid development close to heritage assets. 	<p style="text-align: center;">0</p> <ul style="list-style-type: none"> • Potential to avoid development close to heritage assets. 	<p style="text-align: center;">0</p> <ul style="list-style-type: none"> • Potential to avoid development close to heritage assets. 	<p style="text-align: center;">0</p> <ul style="list-style-type: none"> • Potential to avoid development close to heritage assets.
Notable planning points	<ul style="list-style-type: none"> • Well located • Offers a good range of services and amenities. • Close to some of the largest villages in the district • Development opportunities are greatest here • Will benefit the wider Forest of Dean District as well as enabling the town itself to offer a more self-contained range of quality services. • Improved connections, services and environmental measures will all be necessary. 	<ul style="list-style-type: none"> • Potential development is mainly to the south east of the town. • Needs to improve access, wider transport network and support town centre. • Could accommodate about 600 plus new dwellings • Need to include substantial green infrastructure. • Connections to the canal and its protected route and to new and existing cycle routes are expected. 	<ul style="list-style-type: none"> • Previously Developed Land. • Army camp expected to become vacant during the plan period. • Suitable for a mixed-use development with about 600 dwellings, employment and supporting development being accommodated on about 20ha out of the total 50ha land area within the camp. • This development is likely to occur during the mid or later part of the plan period. • This is a complex site in a challenging peninsular location, and there are many 	<ul style="list-style-type: none"> • The scale of change must be sustainable and in proportion with the size of the settlements, their facilities and their current and future transport connections. Housing delivery (especially affordable housing) and support for the economy are particularly. • As well as providing employment opportunities through the allocation of appropriate and well-located employment sites, the LP will also enable changes to current employment trends, such as being more IT based and with additional

	<ul style="list-style-type: none"> • Good location for living, working and visiting. • At present Lydney accommodates about 14% of the current Forest of Dean population and has a population of about 11000. 		<p>issues to address including traffic and travel as well as ecology.</p>	<p>homeworking. It is likely that the strategy will include concentration of employment facilities on a few sites.</p> <ul style="list-style-type: none"> • Recognises that many are already physically constrained and close to being severely compromised by further development, especially beyond this plan period. • Cinderford and Coleford along with the largest villages also merit support for proportional change.
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Other Options to Consider - Alternatives

5.22 There are other alternatives which can be assessed through the SA and some of the resulting data gathering will be carried out at Regulation 19 stage (see Section 10 – next steps). Examples of these are as follows:

SA Objective:	Housing Density – higher density than current 30pha	Identifying Locations for Renewable Energy (especially turbines and solar farms)	Biosphere Designation	Increasing land for Green Infrastructure -	BNG at 10%	BNG at 20%	Net Zero carbon
1. To improve the health and well being of the populations and reduce inequalities in health.	0 Overall neutral impact. Could improve affordability of decent housing, and create health benefits through community/recreation facilities. However, higher density could mean lower garden sizes (which is worse for health and wellbeing).	0 Neutral impact. Although community schemes could provide health/affordability benefits.	+ Biosphere designation will bring benefits, including better environment for recreation and health/wellbeing.	+ More GI would improve recreation/leisure, quality of living and health.	+ Increased BNG would improve environment and improve quality of living.	+ Increased BNG would improve environment and improve quality of living.	+ Net zero will improve housing standards and air quality.
2. To meet local housing needs, by ensuring everyone has the opportunity to live in a decent sustainably constructed and affordable home.	+ Higher density would result in more houses being built and a higher number of affordable homes.	+ Renewable energy could result in more affordable energy bills for local people (especially if a community scheme).	0 Neutral impact. Designation should not affect housing numbers/affordability or construction methods.	0 Given the amount of land suitable for GI throughout this rural district, it is unlikely that higher land usage for GI would impact on housing numbers. But it could have a low impact on viability.	- 10% BNG could have impact on density, amount of land required for housing and viability.	- 20% BNG is likely to have a much higher impact on density, amount of land required for housing and viability. Could therefore result in fewer houses being built.	0/_ Although it could improve housing standards (construction), Net Zero could have impact on the viability of a scheme, thus impacting density, affordable housing ratio and amount of land required.
3. To provide accessible community services, recreation and leisure facilities.	0 Neutral impact, although higher density could provide increase housing numbers and therefore contributions towards community services.	+ Renewable energy schemes (especially community ones) could help fund community schemes.	+ Biosphere may encourage community schemes through funding, particularly recreation associated with the natural environment.	+ GI could be used for recreational open space (walking/cycling, etc.).	+ 10% BNG could be used for recreational open space (walking/cycling, etc.).	+ 20% BNG could be used for recreational open space (walking/cycling, etc.).	0 Neutral impact.
4. To facilitate the development of academic and vocational skills.	0 Neutral impact, although higher density could provide increase housing numbers and therefore contributions towards education.	0 Neutral impact.	+ Biosphere may encourage educational and vocational skills through funding, particularly with regard to sustainability and natural environment.	0 Neutral impact.	0 Neutral impact.	0 Neutral impact.	0 Neutral impact.

5. To create a more vibrant and sustainable local economy.	0 Neutral impact. Dependent on development, however, if in sustainable area higher numbers of housing could support local services.	+ Renewable energy schemes (especially community ones) could help fund community schemes.	+ Biosphere may encourage a sustainable local economy (funding and skills).	0 Neutral impact.	0 Neutral impact.	0 Neutral impact.	0 Neutral impact.
6. To protect and enhance the landscape.	- Could impact landscape setting. Out of keeping.	- Harm to landscape.	+ Biosphere protects and works towards enhancing landscape.	+ Increased GI protects and works towards enhancing landscape.	+ Increased BNG protects and works towards enhancing landscape.	+ Increased BNG protects and works towards enhancing landscape.	0 Neutral impact.
7. To conserve and enhance biodiversity, flora and fauna.	0 Dependent on development, as mitigation measures/BNG could reduce impacts.	- Harm to biodiversity.	+ Biosphere protects and works towards enhancing biodiversity.	+ Increased GI protects and works towards enhancing biodiversity.	+ Increased BNG protects and works towards enhancing biodiversity.	+ Increased BNG protects and works towards enhancing biodiversity.	0 Neutral impact.
8. To maintain and improve air quality.	0 Neutral impact. Dependent on development.	0 Neutral impact.	+ Biosphere protects and works towards enhancing natural environment and therefore improving air quality.	+ Increased GI could improve air quality.	+ Increased BNG could improve air quality.	+ Increased BNG could improve air quality.	+ Net Zero measures will improve air quality.
9. To maintain and improve water quality and to achieve sustainable water resources management.	0 Neutral impact. Dependent on development.	0 Neutral impact.	+ Biosphere protects and works towards enhancing natural environment and therefore improving water quality and sustainable resource management.	+ Increased GI protects and works towards enhancing natural environment and therefore improving water quality and sustainable resource management.	+ Increased BNG protects and works towards enhancing natural environment and therefore improving water quality and sustainable resource management.	+ Increased BNG protects and works towards enhancing natural environment and therefore improving water quality and sustainable resource management.	+ Net zero measures could have positive impacts on water resources management.
10. To reduce carbon emissions that cause climate change and to achieve net zero.	0 Neutral impact. Dependent on development/construction methods. Although higher numbers of housing could increase traffic generation.	+ Renewable energy schemes would significantly reduce carbon emissions.	+ Biosphere protects and works towards enhancing natural environment and is likely to work towards achieving net zero.	+ Increased GI protects and works towards enhancing natural environment and is likely to work towards achieving net zero.	+ Increased BNG protects and works towards enhancing natural environment and is likely to work towards achieving net zero.	+ Increased GI protects and works towards enhancing natural environment and is likely to work towards achieving net zero.	+ Net zero measures are pivotal to carbon reduction.
11. To reduce waste generation and achieve sustainable management of waste.	0 Neutral impact. Dependent on development.	0 Neutral impact. Dependent on development.	+ Biosphere protects and works towards enhancing natural environment and is likely to	+ Increased GI would help reduce waste through careful management of the land.	+ Increased BNG would help reduce waste through careful management of the land.	+ Increased BNG would help reduce waste through careful management of the land.	+ Net zero measures could have positive impacts on waste management.

			consider sustainable waste management.				
12. To safeguard historical and cultural assets.	- Higher density could be out of keeping with the local heritage.	- Large scale renewables could have impact on setting of local heritage.	+ Biosphere designation could complement and lead towards enhancements of local heritage/culture.	+ Increased GI could improve setting of local heritage.	+ Increased BNG could improve setting of local heritage.	+ Increased BNG could improve setting of local heritage.	0 Neutral impact. Would depend on design of development.

Following on from the Second Preferred Option to Draft Local Plan

5.23 By 2023, housing numbers required altered back to previous levels around the Issues and Options stage. The LP currently needs to demonstrate provision for 3000 new dwellings over and above current commitments and allocations (not 4000 as was the case in 2022). The total sought to be provided for over the 2021-41 plan period is now about 6584 dwelling, as opposed to the 7440 required during 2022. This gives some greater flexibility in the allocations proposed and allows a more sustainable approach in the selection of locations for change.

5.24 The public comments received from the Second Preferred Option demonstrated that there was a mixture of support and objections for the various elements of the proposed Preferred Strategy, as bullet pointed below:

Lydney

Support

- General support of the strategy because of its ability to bring additional facilities. More generally, assets referred to include the harbour, rural nature of the town and its relative accessibility.

Concerns

- Inadequate facilities and infrastructure to support existing and planned development. Perceived inadequacies now or in future including education provision, health, lack of hospital (soon), retail, highways, and very significantly, transport (congestion and lack of public transport chiefly). Reference to the wider impacts of traffic on the A48 and access to Chepstow and Gloucester;
- Concern for the environment and the impact on the landscape and the town overall;
- Loss of agricultural land;
- Disadvantage to other centres;
- Overall scale of development proposed at Lydney and FoDDC overall was too great.

Newent

Support

- Overall general support. Specific sites including areas of land to the southeast of the town were suggested on behalf of the landowners.

Concerns

- Loss of character
- Need for infrastructure
- Current congestion
- Proposed scale
- Need to provide good sustainable links to the centre
- Health, education, retail and transport facilities needing improvement
- Loss of agricultural land

Mixed use development at other towns and major villages

Support

- Some support for additional development at Cinderford and Coleford

- Support for the limited scale envisaged in the strategy.
- Support conditional on the provision of services and overall sustainability (eg construction, energy use).

Concerns

- Loss of greenfield
- Climate change
- Unsuitability of individual locations
- Loss of character
- Lack of services
- Additional traffic
- Lack of sustainability
- Impact on ecology generally and especially bats.

Redevelopment for mixed uses of land at Beachley

Support

- The strategy includes a proposal for mixed use redevelopment of land at Beachley Camp, in recognition of its likely vacation by the MoD in 2029. This would leave a large previously developed site potentially able to be redeveloped for a range of uses;
- New development on the site would replace the existing uses and traffic generation from the first development would be compensated by the loss due to the current use ceasing;
- In view of the complexity and scale of any allocation the provision of a masterplan to guide the development is suggested;
- Development of brownfield site.

Concerns

- Overall this element of the strategy has by a small margin generated the largest single number of objections;
- The main issue is with the impact of the proposal especially traffic on the existing network;
- An alternative use suggested by the Beachley Old Boys Association (BOBA) for the whole site which has notable support in various representations;
- The relative inaccessibility of the site at Beachley. The one existing road link, the distance to a larger centre/ employment and the need to access facilities;
- Need for a reduction in private travel, an increase and support for home working and provision of public transport;
- Need for a Chepstow bypass;
- The site is unlikely to be vacated until 2029, the first development phases would not be complete until after that;
- Concern for the other infrastructure, especially health and education but also other services;
- Concern for ecological considerations, potential flood risk, overall deliverability of the scheme, and the impact on the landscape and historical features.

Sustainable development at villages

Support

- Some support for particular sites and for modest development in proportion to the settlements concerned.
- Supported a more dispersed general pattern of development, including introducing development at smaller settlements.

Concerns

- Dispersed locations are unlikely to be sustainable.
- Landscape, ecology or character of the locations concerned.

The outcome of the Second Preferred Option consultation was that FoDDC members agreed at Full Council in October 2023 that they would take forward this option as the agreed strategy.

Draft Local Plan 2021-241

5.25 The Draft Local Plan 2021-2041 has therefore been written on that basis that the Second Preferred Option was the accepted strategy by Full Council, thereby allocating land for housing in the most sustainable locations (see Appendix 1 for full list of Site Appraisals) including strategic sites in Lydney, Newent and Beachley Camp as well as providing allocations in the most sustainable village locations. The draft plan also includes policies which support the overall strategy and provides the most sustainable form of development and attempts to achieve net zero carbon (see Appendix 2 for the full list of Policy Appraisals). The Draft Local Plan 2021-2041 will be subject to public consultation during July and August 2024.

6. Stage B2: Appraisal of development sites

- 6.1 The sustainability impacts of potential strategic sites and smaller development allocation sites (for housing, employment and recreation) were appraised as part of a wider process of site assessment and selection. This section of the report discusses the wider process and how the SA findings fit within it.
- 6.2 The development site appraisals process has been iterative and has weaved its way through all of the different stages of the Local Plan process so far, picking up potential sites and assessing them along the way, taking into account planning application outcomes, SHLAA processes, sites suggested by Members as well as through public consultation. The outcome of the site appraisals has led to a list of the most sustainable locations for development (those which meet the SA criteria and have the potential to meet the SA criteria), and this has formed a sound basis to choose the most acceptable and appropriate sites to take forward into the Draft Local Plan.

Site Assessment Process

6.3 Below follows the process for carrying out the appraisals for potential development sites:

Stage 1 - Site Selection. Sites of all sizes (although generally of the size to accommodate more than 5 dwellings) were selected for assessment. These included:

- SHLAA Sites
- Existing allocated sites not implemented
- Sites suggested in Preferred Options consultations
- Sites suggested by elected Members
- Sites arising from recent/current planning applications and pre-application enquiries

Stage 2 - Site Appraisals. The sites were appraised using the framework shown in Table 3.

The selected sites were subject to a comprehensive and detailed site based assessment using a combination of the council's GIS system as well as internet searches (for public transport information and GCC Minerals plan map), which considered the following points:

- General information about the sites (land use, density that could be accommodated, relationship to the existing settlement boundary, safeguarded land for the Minerals Plan)
- Filter 1: National/International site constraints – Is the site SAC, or SSSI?
- Filter 2: Distance to services (assessing distance to health services, primary school, GP surgery, town centre, bus/train station accessibility, employment sites).
- Filter 3: Gathers more information (using GIS and site visits/photographic evidence) and assesses each site against the pre-agreed SA Objectives/Indicators. The SA Objectives are as follows: Vehicular Access & Connectivity, Active Travel (is walking/cycling achievable), Climate Change (Flood Risk), Climate Audit (TBC), Landscape (physical features on site), Land quality (grade of land), Biodiversity (existing habitat), Green Infrastructure (potential to link habitat), Character (built and natural – could development harm this) and Heritage. By using the data available, potential impacts of any future development on each site has been subjectively considered and scored (e.g. double positive impacts (++) , positive impacts (+),

neutral impacts (0), negative impacts (-), double negative impacts (--). All attempts to create consistency across the board have been made.

- Finally, an officer conclusion has been made regarding the overall sustainability of any potential development in each of the chosen sites. An outcome of whether development meets SA criteria has been considered, as below:

Table 12 Outcomes of Site Appraisals

UNABLE TO MEET SA CRITERIA	Unacceptable location for development, e.g. flood zone or adjacent to bat site, etc. Development cannot meet SA criteria.
UNLIKELY TO MEET SA CRITERIA	The site does not score well, and development is unlikely to outweigh the adverse impacts.
NOT EXCLUDED BY SA CRITERIA	These sites are neutral (may include small sites and some urban PDL)
COULD MEET SA CRITERIA	There may be some low-key issues to consider, but the site has no real contrary indications. Acceptability may depend on the design/nature of the scheme proposed.
MEETS SA CRITERIA	This category is reserved for sites where there is at least an allocation and sometimes a planning application/permission. It reflects the additional assessment which has taken place to conclude that the scheme or land concerned scores positive or double positive.

The assessment of the sites was undertaken by officers of the council with local knowledge and has been subject to a peer review throughout including the following people:

- 1) Forward Plans Manager
- 2) 4 x Planning Policy Officers
- 3) Housing Strategy & Enabling Officer
- 4) Sustainability Team Leader
- 5) Development Manager

6.4 All of the site appraisals can be read in detail in Appendix I.

6.5 It should be noted that larger sites (in particular those assessed with regards to a potential new settlement) are more likely to have negative impacts on the sustainability criteria purely because they cover a greater area and tend to be in the open countryside. When considering strategic sites (particularly for housing or employment/mixed use), this may need to be balanced against other measures, such as the ability to plumb in the necessary infrastructure and how this can be achieved.

6.6 It is additionally noted that sites have been assessed in no particular order as this has been an interactive process over the last few years. Sites have however been organised in parishes.

Collation of Site Appraisal results and Sites taken forward to Draft Local Plan

6.7 This section of the report collates the appraisal outcomes of each individual site into a table, which allows you to compare the results. It also highlights in the final column, which of the assessed sites have been chosen to be taken forward to the Draft Local Plan. The sites taken forward are those which meet the SA criteria (those where the form of development has been established by existing policy or planning applications) or have the potential (could meet) the SA criteria through appropriate detail in any planning application (design, layout, mix of

development, landscaping, water management, carbon performance, construction methods, transport provision (including Active Travel) etc.) It is important to note that each of the allocated sites will be assessed once more (prior to the Regulation 19 stage) to appraise the carbon performance of each site (climate audit, using the carbon calculator), as well as ensuring the sites can achieve the 20% biodiversity net gain (this is currently in process alongside the HRA).

- 6.8 It is also noted that many of the sites in this table, have been assessed as ‘not excluded’, ‘unable’ or ‘unlikely’ to meet the SA criteria. Some that are assessed as ‘not excluded by SA criteria’ or ‘unlikely to meet SA criteria’ may have some potential if the site is varied, possibly reduced in size/scale or a different type of proposal is applied for (such as use of land for recreation). Sites categorised as unable to meet SA criteria almost all have some absolute constraints that would prevent their further consideration.
- 6.9 There may be a need in the future to find further land for housing or employment (e.g. if the housing land supply is considered to be falling short at later stages of the plan making process) or if the public consultation for the Draft Local Plan 2021-2041 or during the later Examination of the Local Plan it is considered that some of the allocated sites are unsuitable. If that scenario occurs, the table below provides a list of sites which fair better in terms of sustainability credentials.

Table 13 Site Appraisal Results

Site Reference (see Appendix to view each site)	Existing Use	Potential capacity (at 30 per ha)	Relationship to DSB	Safeguarded/consultation area in Minerals Plan?	Filter 1: Potential conflicts with international/national policy		Filter 2: Distance to services rating					Filter 3: Sustainability Appraisal and Qualitative Assessment of Deliverability										Officer Conclusion	Site taken forward to Draft Local Plan?		
					SAC? (Y – Red, N – Green)	SSSI? (Y – Red, N – Green)	Town centre by road	Primary school by road	GP by road	Public Transport	Employment Area (direct line)	Vehicular Access & Connectivity	Active Travel	Flood Risk	Climate Audit	Landscape – significant physical features	Land Quality	Biodiversity – existing	GI potential	Character - natural and built	Heritage				
ALVINGTON 1 – Court Lane		13			N	N							+	+	-	TBC	0	-	-	0	-	-			
ALVINGTON 2 – Garlands Road		60			N	N							-	+	-	TBC	0	-	-	0	+	-			
AYLBURTON 1 – Chapel Lane		66			N	N							+	-	+	TBC	-	-	-	0	-	0			
AYLBURTON 2 – Chapel Lane (smaller)		33			N	N							+	-	+	TBC	-	-	-	0	-	0			Y
AYLBURTON 3 – Business Park		employment			N	N							++	+	+	TBC	0	0	-	0	++	++			Y
AYLBURTON 4 – Taurus Crafts		employment			N	N							++	+	+	TBC	0	0	-	0	++	+			Y
BLAKENEY 1 – Clarks Lane		212			N	N							+	+	-	TBC	-	0	-	+	--	--			
BLAKENEY 2 – Brownings Farm		28			N	N							0	+	-	TBC	-	0	-	+	--	--			
BLAKENEY 3 -South of Awre Road		50			N	N							0	+	0	TBC	-	0	-	0	-	-			
BLAKENEY 4 – South of Colsty Meadow		27			N	N							-	+	+	TBC	-	0	-	+	-	--			
BROMSBERROW 1 – Croft Farm		51			N	N							++	0	+	TBC	+	-	-	0	--	-			
BROMSBERROW 2 – Dyke House Lane		161			N	N							++	0	+	TBC	+	-	-	0	-	-			
BROMSBERROW 3 – West of Bromsberrow Heath		1740			N	N							++	-	0	TBC	-	-	0	0	-	-			
BROMSBERROW 4 – North of Business Park (Area 1)		12			N	N							++	-	+	TBC	-	-	0	0	+	+			
BROMSBERROW 5 - North of Business Park (Area 2)		56			N	N							++	-	+	TBC	-	-	0	0	+	+			
BROMSBERROW 6 - North of Business Park (Area 3)		37			N	N							++	-	+	TBC	-	-	0	0	+	+			
BROMSBERROW 7 – North of Beech Lane		45			N	N							++	-	+	TBC	-	-	0	0	-	+			
CHURCHAM 1 – Land south of A40		New settlement			N	N							++	++	0	TBC	0	-	-	++	-	--			
CHURCHAM 2 – Land south of A40 (larger)		New settlement			N	N							++	++	-	TBC	0	-	-	++	-	--			
CHURCHAM 3 – Birdwood Farm/Birdwood House Farm		New settlement			N	N							++	++	+	TBC	-	-	-	0	-	-			
CHURCHAM 4 – Leycourt Farm & Sainthill		New settlement			N	N							+	+	--	TBC	0	-	+	++	-	-			
CHURCHAM 5 – Stone End Business Park		employment			N	N							++	+	++	TBC	++	0	-	0	++	+			Y
CINDERFORD 1 - St Whites Farm #1		217			N	N							+	+	+	TBC	-	+	-	0	--	+			
CINDERFORD 2 - St Whites Farm #2		534			N	N							+	+	+	TBC	-	+	-	0	--	+			
CINDERFORD 3 - St Whites Farm #3		36			N	N							+	+	+	TBC	-	+	-	0	0	+			
CINDERFORD 4 – Land adj to St Whites Farm		760			N	N							+	+	+	TBC	-	+	-	0	--	+			
CINDERFORD 5 – Station St		160			N	N							++	++	+	TBC	++	++	0	0	++	+			Y
CINDERFORD 6 – Sneyd Wood Road		17			N	N							+	+	+	TBC	-	+	0	0	0	+			

Site Reference (see Appendix to view each site)	Existing Use	Potential capacity (at 30 per ha)	Relationship to DSB	Safeguarded/consultation area in Minerals Plan?	Filter 1: Potential conflicts with international/national policy		Filter 2: Distance to services rating					Filter 3: Sustainability Appraisal and Qualitative Assessment of Deliverability										Officer Conclusion	Site taken forward to Draft Local Plan?
					SAC? (Y/N)	SSSI? (Y/N)	Town centre by road	Primary school by road	GP by road	Public Transport	Employment Area (direct line)	Vehicular Access & Connectivity	Active Travel	Flood Risk	Climate Audit	Landscape – significant physical features	Land Quality	Biodiversity – existing	GI potential	Character - natural and built	Heritage		
CINDERFORD 7- Rear of Colliers Court/Football ground		74			N	N						+	+	+	TBC	0	+	0	0	-	+		Y
CINDERFORD 8 – NQ #1		employment			N	N						++	+	++	TBC	++	+	-	++	+	+		Y
CINDERFORD 9 – NQ #2		230 - mixed			N	N						+	+	0	TBC	0	+	-	++	0	+		Y
CINDERFORD 10 – Newtown Rd		30			N	N						+	+	0	TBC	+	+	0	0	++	+		
CINDERFORD 11 – The Dilke		39			N	N						+	+	+	TBC	+	+	-	+	+	0		
CINDERFORD 12 – St Whites playing field		37			N	N						+	+	+	TBC	+	+	-	0	--	0		
CINDERFORD 13 -Valley Rd		50			N	N						+	+	+	TBC	++	+	-	+	++	+		Y
CINDERFORD 14 – Land to east of Coomb Drive		162			N	N						-	0	+	TBC	-	0	--	+	--	+		
CINDERFORD 15 – Sneyd Wood/St Whites		59			N	N						+	0	+	TBC	+	+	--	0	++	+		Y
CINDERFORD 16 – Forest Vale		employment			N	N						++	+	-	TBC	+	+	--	0	++	+		Y
CINDERFORD 17 – Lightmoor Works		employment			N	N						+	+	++		+	+	-	+	+	-		Y
COLEFORD 1 – North of Coalway Rd		423			N	N						+	+	+	TBC	--	-	0	0	--	0		
COLEFORD 2 – Lower Berry Hill		1504			N	N						+	++	+	TBC	--	-	0	+	--	-		
COLEFORD 3 – Ellwood Rd, Milkwall		48			N	N						+	++	+	TBC	0	-	-	+	0	+		Y
COLEFORD 4 – Poolway Farm		140			N	N						++	++	-	TBC	0	-	0	+	0	0		Y
COLEFORD 5 – Poolway Farm extension		100			N	N						++	++	-	TBC	-	-	0	+	-	0		
COLEFORD 6 – Poolway and land to north		537			N	N						++	++	-	TBC	-	-	0	+	--	0		
COLEFORD 7 – Kings Meade		48			N	N						++	++	+	TBC	+	-	0	0	+	0		Y
COLEFORD 8 – North Rd, Broadwell		70			N	N						++	++	+	TBC	+	-	0	0	+	+		Y
COLEFORD 9- Bixhead/Jugshole		90			N	N						+	+	+	TBC	+	-	-	0	--	0		
COLEFORD 10 – Victoria Rd		140			N	N						--	+	+	TBC	+	-	--	+	--	--		
COLEFORD 11 – Newland St		140			N	N						+	+	-	TBC	--	-	--	+	--	--		
COLEFORD 12 – Staunton Rd (larger)		510			N	N						++	+	+	TBC	-	-	-	0	-	0		
COLEFORD 13 – Great Oaks		600			N	N						++	+	+	TBC	-	-	-	0	-	0		
COLEFORD 14 – South of Poolway Rd		153			N	N						++	++	+	TBC	-	-	-	0	-	+		Y
COLEFORD 15 – Maze Walk		11			N	N						-	0	+	TBC	-	+	-	0	-	0		
COLEFORD 16 – Broadwell Farm		124			N	N						+	++	+	TBC	-	-	-	0	-	+		
COLEFORD 17 – Staunton Rd		510			N	N						++	++	+	TBC	-	-	-	0	-	0		
COLEFORD 18 – South of Railway Dr		30			N	N						++	++	++	TBC	++	+	-	0	++	0		Y

Site Reference (see Appendix to view each site)	Existing Use	Potential capacity (at 30 per ha)	Relationship to DSB	Safeguarded/consultation area in Minerals Plan?	Filter 1: Potential conflicts with international/national policy		Filter 2: Distance to services rating					Filter 3: Sustainability Appraisal and Qualitative Assessment of Deliverability								Officer Conclusion	Site taken forward to Draft Local Plan?			
					SAC? (Y/N)	SSSI? (Y/N)	Town centre by road	Primary school by road	GP by road	Public Transport	Employment Area (direct line)	Vehicular Access & Connectivity	Active Travel	Flood Risk	Climate Audit	Landscape – significant physical features	Land Quality	Biodiversity – existing	GI potential			Character - natural and built	Heritage	
COLEFORD 19 – Five Acres		81			N	N							+	++	++	TBC	++	++	-	+	++	++		Y
COLEFORD 20 – Land off B4228		employment			N	N							++	++	++	TBC	++	-	-	0	+	++		Y
COLEFORD 21 – Tufthorn Ind. Estate		employment			N	N							++	++	++	TBC	++	++	-	0	++	++		Y
COLEFORD 22 – Cannop Depot		employment			N	N							++	++	++	TBC	+	++	-	0	++	++		Y
DRYBROOK 1 – Mannings Farm		110			N	N							+	+	0	TBC	0	-	-	0	0	0		Y
DRYBROOK 2 – Drybrook Farm		18			N	N							+	+	0	TBC	+	-	-	0	+	+		Y
DRYBROOK 3 – Rear of Drybrook Farm		76			N	N							+	+	0	TBC	0	-	-	0	+	+		Y
DYMOCK 1 – Bayfield Gardens		82			N	N							-	+	0	TBC	0	--	-	0	+	-		
DYMOCK 2 – Land adj Ann Cam		84			N	N							0	-	+	TBC	0	--	-	0	--	+		
DYMOCK 3 – Land opposite Beauchamp Arms		129			N	N							+	+	--	TBC	0	-	-	0	--	-		
DYMOCK 4 – Station Terrace		223			N	N							0	0	-	TBC	0	--	-	0	--	-		
DYMOCK 5 – Station Terrace (smaller)		66			N	N							0	0	-	TBC	0	--	-	0	--	-		
HARTPURY 1 – Land adj Cackleberries/Over Old Rd		89			N	N							+	0	+	TBC	0	-	-	0	+	-		Y
HARTPURY 2 – Land off A417		27			N	N							++	0	+	TBC	-	-	-	0	--	-		
HARTPURY 3 – Land at Broad St		87			N	N							++	0	0	TBC	0	-	-	0	--	0		
HARTPURY 4 – Land south of Corsend Rd		130			N	N							+	+	0	TBC	0	-	-	0	--	0		
HARTPURY 5 – Land adj Hartpury Primary		78			N	N							++	+	0	TBC	0	-	-	0	0	0		Y
HARTPURY 6 – Russell’s Nursery		15			N	N							++	0	+	TBC	0	-	-	0	0	+		Y
HARTPURY 7 – Land off Foley Rise		27			N	N							+	+	+	TBC	0	-	-	0	+	+		Y – in part
HARTPURY 8 – Land off Broad St		90			N	N							++	0	+	TBC	-	-	--	0	0	+		Y
HARTPURY 9 – Hartpury College/Uni					N	N							++	0	++	TBC	-	-	--	0	+	--		Y
HUNTLEY 1 – Huntley Golf Course		740			N	N							++	+	+	TBC	0	-	-	+	+	+		
HUNTLEY 2 – Golf course (smaller)		194			N	N							++	+	+	TBC	0	-	-	+	+	+		
HUNTLEY 3 – Eastern are of golf course		546			N	N							++	+	+	TBC	0	-	-	+	-	+		
HUNTLEY 4 – South of A40		215			N	N							++	+	+	TBC	0	-	-	0	--	+		
HUNTLEY 5 – West of Newent Lane		84			N	N							++	+	+	TBC	0	-	-	0	--	--		

Site Reference (see Appendix to view each site)	Existing Use	Potential capacity (at 30 per ha)	Relationship to DSB	Safeguarded/consultation area in Minerals Plan?	Filter 1: Potential conflicts with international/national policy		Filter 2: Distance to services rating					Filter 3: Sustainability Appraisal and Qualitative Assessment of Deliverability										Officer Conclusion	Site taken forward to Draft Local Plan?	
					SAC? (Y/N)	SSSI? (Y/N)	Town centre by road	Primary school by road	GP by road	Public Transport	Employment Area (direct line)	Vehicular Access & Connectivity	Active Travel	Flood Risk	Climate Audit	Landscape – significant physical features	Land Quality	Biodiversity – existing	GI potential	Character - natural and built	Heritage			
KEMPLEY 1 - Fishpool		913			N	N							-	-	+	TBC	0	-	-	+	-	-		
LITTLEDEAN 1 – Beech Way		27			Y	N							+	++	+	TBC	0	-	-	0	+	0		Y
LITTLEDEAN 2 – Land off George Lane		132			N	N							-	-	+	TBC	0	+	-	0	-	-		
LITTLEDEAN 3 – Land off Eltons Way		145			N	N							0	+	+	TBC	0	-	-	0	-	-		
LITTLEDEAN 4 – Land adj Sutton Road		70			N	N							-	+	+	TBC	0	-	-	+	-	-		
LITTLEDEAN 5- Land adj Sutton Rd (smaller)		34			N	N							-	+	+	TBC	0	-	-	+	0	-	Y	
LITTLEDEAN 6 -Old Rectory		15			N	N							-	-	+	TBC	0	-	-	+	+	-		
LITTLEDEAN 7 – Land at Margarets		55			N	N							++	++	+	TBC	0	+	-	+	-	-		
LITTLEDEAN 8 – Land adj to Littledean Jail		58			N	N							+	++	+	TBC	-	-	-	+	-	-		
LONGHOPE 1 – Land at the Wend		107			N	N							+	++	+	TBC	-	-	-	0	-	-		
LONGHOPE 2 – Land west of Church Rd		94			N	N							+	+	-	TBC	-	-	0	0	+	-		
LONGHOPE 3 – East of Church Rd		185			N	N							-	0	-	TBC	-	-	0	+	-	-		
LONGHOPE 4 – Longhope Brook		32			N	N							+	++	-	TBC	-	-	-	+	-	-		
LONGHOPE 5 – Land off Longhope School		43			N	N							+	++	-	TBC	-	-	-	+	-	-		
LONGHOPE 6 – Highbank		9			N	N							-	++	+	TBC	-	0	-	0	-	-		
LYDBROOK 1 – Stowfield (cable works)		tbc			Y	Y							++	0	-	TBC	++	++	-	+	++	+	Y	
LYDBROOK 2 – Former Wye Garage		26			N	N							++	++	-	TBC	++	++	-	+	++	0	Y	
LYDBROOK 3 – Sawmills		21			N	N							0	-	+	TBC	++	++	+	0	++	++		
LYDNEY 1 – Holms Farm		30+			N	N							+	++	++	TBC	0	++	-	+	-	+	Y	
LYDNEY 2 – Augustus Way		200			N	N							+	+	++	TBC	0	+	0	0	-	+	Y	
LYDNEY 3 – Driffield Road		500			N	N							+	+	++	TBC	-	-	0	0	-	+		
LYDNEY 4 – Driffield Farm		160			N	N							0	0	++	TBC	-	-	0	0	-	+	Y	
LYDNEY 5 – JD Normans Factory		50			N	N							++	++	++	TBC	0	0	0	0	+	++		
LYDNEY 6 –West of Ind. Estate		50			N	N							+	-	-	TBC	+	+	-	+	-	0		
LYDNEY 7 – Land at Rock House		30			N	N							0	0	++	TBC	+	+	0	0	+	++		
LYDNEY 8 –Augustus Way (larger)		200			N	N							+	+	+	TBC	0	+	0	0	-	+	Y – in part	
LYDNEY 9 – Highfield Lane		39			N	N							0	++	++	TBC	0	-	0	0	+	0	Y	
LYDNEY 10 – West of Allaston Rd		147			N	N							0	0	++	TBC	0	0	0	0	-	+		
LYDNEY 11 – West expansion		mixed			N	N							0	+	-	TBC	-	-	-	0	-	-		

Site Reference (see Appendix to view each site)	Existing Use	Potential capacity (at 30 per ha)	Relationship to DSB	Safeguarded/consultation area in Minerals Plan?	Filter 1: Potential conflicts with international/national policy		Filter 2: Distance to services rating					Filter 3: Sustainability Appraisal and Qualitative Assessment of Deliverability										Officer Conclusion	Site taken forward to Draft Local Plan?	
					SAC? (Y/N or Adjacent)	SSSI? (Y/N)	Town centre by road	Primary school by road	GP by road	Public Transport	Employment Area (direct line)	Vehicular Access & Connectivity	Active Travel	Flood Risk	Climate Audit	Landscape – significant physical features	Land Quality	Biodiversity – existing	GI potential	Character - natural and built	Heritage			
LYDNEY 12 – East expansion		mixed			N	N						0	+	-	TBC	-	-	-	0	-	-			Y
LYDNEY 13 – Lydney Marsh		limited			N	N						+	++	-	TBC	-	-	-	0	-	-			Y-rec
LYDNEY 14 – South side of A48		recreation			N	N						+	++	-	TBC	-	-	-	+	-	-			
LYDNEY 15 – Mead Lane Ind. Estate		employment			N	N						+	++	-	TBC	0	+	-	0	++	++			Y
LYDNEY 16 – Between Mead Lane and A48		employment			N	N						++	++	-	TBC	-	++	-	0	0	++			Y
LYDNEY 17 – Pine End Works		mixed			Adjacent	Adjacent						+	++	0	TBC	++	++	-	0	++	-			Y
LYDNEY 18 – Lydney Ind.Estate		employment			Adjacent	Adjacent						+	++	0	TBC	++	++	-	0	++	-			Y
LYDNEY 19 – Railway Station		railway			N	N						+	++	-	TBC	++	++	-	0	++	+			Y
MITCHELDEAN 1 – Land off Gloucester Rd		107			N	N						++	++	+	TBC	-	-	-	0	-	-			
MITCHELDEAN 2 – North of Abenhall Rd		37			N	N						-	++	+	TBC	-	-	-	0	-	-			
MITCHELDEAN 3 – North of Carisbrook Rd		162			N	N						++	++	+	TBC	-	-	-	+	-	+			Y
MITCHELDEAN 4 – North of Lining Wood		61			N	N						++	+	+	TBC	-	-	-	+	-	+			
MITCHELDEAN 5- Silver Street		158			N	N						+	++	+	TBC	-	0	-	0	-	-			
MITCHELDEAN 6 – Behind Old Coach depot		11			N	N						0	++	+	TBC	-	0	-	+	-	-			
MITCHELDEAN 7 – Old Coach depot (St Michaels Close)		12			N	N						0	++	+	TBC	++	0	-	+	++	-			Y
MITCHELDEAN 8 – Old Coach depot & land to rear		67			N	N						0	++	+	TBC	-	0	-	+	-	-			
MITCHELDEAN 9 – Building 5 Vantage Point		47			N	N						+	++	+	TBC	0	++	-	-	0	0			
MITCHELDEAN 10 – Vantage Point		employment			N	N						+	++	+	TBC	0	++	-	-	0	0			Y
MITCHELDEAN 11 – High St (George hotel)		9			N	N						+	++	+	TBC	++	0	-	0	++	-			Y
NEWENT 1 – South east of Newent		mixed			N	N						+	++	0	TBC	-	-	-	0	+	-			Y – in part
NEWENT 2 – Water Treatment Works		204			N	N						+	+	0	TBC	0	-	-	0	+	-			
NEWENT 3 – Factory, Horsefair Lane		57			N	N						+	++	0	TBC	+	-	-	0	+	0			Y
NEWENT 4 – Ross Rd/Horsefair Lane		244			N	N						+	++	0	TBC	-	-	-	0	-	-			
NEWENT 5 – Culver Street		138			N	N						-	++	+	TBC	-	-	-	0	-	-			
NEWENT 6 – 17 The Scarr		74			N	N						-	-	+	TBC	-	-	-	0	0	0			
NEWENT 7 – Land west of Newent (larger)		840			N	N						+	+	+	TBC	-	-	-	0	-	-			
NEWENT 8 – South east of Newent (smaller #1)		1350			N	N						+	++	0	TBC	+	-	-	0	+	-			Y – in part
NEWENT 9 - South east of Newent (smaller #2)		651			N	N						+	++	0	TBC	+	-	-	0	+	-			Y – in part
NEWENT 10 – Ross Road to Watery Lane		840			N	N						+	+	+	TBC	-	-	-	0	-	-			
NEWENT 11 – Conigree Court		1050			N	N						+	0	+	TBC	-	-	-	+	-	-			
NEWENT 12 – Cleeve Mill Lane		57			N	N						+	+	++	TBC	0	-	-	0	++	+			Y

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TIBBERTON 1 – Land opposite Wynford Villas, Taynton		29			N	N						+	0	0	TBC	-	-	-	0	-	-		
TIDENHAM 1 – Beachley Barracks		mixed			Y	Y						0	+	-	TBC	+	++	-	++	+	-		Y
TIDENHAM 2 – Sedbury Park		954			N	N						+	+	0	TBC	+	-	-	+	-	-		
TIDENHAM 3 – Land south of A48, Tutshill		567			N	N						++	+	0	TBC	+	-	-	+	0	0		Y
TIDENHAM 4 – Land off Sedbury Lane		165			N	N						0	+	+	TBC	+	0	-	0	0	0		
TIDENHAM 5 - Land north of A48, Tutshill		347			N	N						+	+	+	TBC	+	-	-	0	-	0		
TIDENHAM 6 – By the Lookout Tower		203			N	N						-	+	+	TBC	--	0	-	0	--	0		
TIDENHAM 7 – Land adj to Wyedean School		77			N	N						0	+	+	TBC	0	-	-	0	+	0		Y
TIDENHAM 8 – Land north of A48 (smaller)		70			N	N						+	+	+	TBC	+	-	-	0	--	0		
TIDENHAM 9 – Land east of Tutshill		1044			N	N						+	+	+	TBC	--	-	-	0	--	0		
TIDENHAM 10 – Dayhouse Quarry		Employment			N	N						++	+	++	TBC	+	+	-	+	0	0		Y
WEST DEAN 1 – Woodside, Bream		37			N	N						+	++	++	TBC	-	++	-	0	--	+		
WEST DEAN 2 – Land off B4231, Bream		39			N	N						0	++	+	TBC	-	--	-	0	--	+		
WEST DEAN 3 – Rear of Winding Wheel, Bream		42			N	N						0	+	++	TBC	-	++	-	+	0	+		
WEST DEAN 4 – Breams Eaves, Bream		5			N	N						0	+	+	TBC	0	++	-	0	-	+		
WEST DEAN 5 – Princess Royal Rd, Bream		32			N	N						0	+	++	TBC	-	++	-	0	-	+		
WEST DEAN 6 – Alameda, Mayfair, Bream		15			N	N						++	+	0	TBC	0	+	-	0	+	+		
WEST DEAN 7 – Mapole Villa/Barn, Bream		29			N	N						+	+	++	TBC	-	+	-	0	-	+		
WEST DEAN 8 – Broadmeads, Bream		22			N	N						++	+	0	TBC	-	+	-	0	--	+		
WEST DEAN 9 – Between Coleford & Highbury Rd		60			N	N						++	+	+	TBC	--	-	-	0	--	+		
WEST DEAN 10 – Rugby Club, Bream		30			N	N						+	+	+	TBC	0	+	-	0	+	+		Y
WEST DEAN 11 – Lydney Rd (Ryelands), Bream		37			N	N						++	+	++	TBC	0	+	-	0	+	++		Y
WEST DEAN 12 – Land off Ryelands Rd, Bream		15			N	N						+	+	++	TBC	-	+	-	0	+	++		Y
WEST DEAN 13 – Whitemead Park, Parkend		Employment/tourism			N	N						++	0	-	TBC	0	+	--	+	+	++		Y
WEST DEAN 14 – Main Rd, Pillowell		20			N	N						+	++	++	TBC	--	-	--	+	--	-		
WEST DEAN 15 – Land adj to Miners Arms, Sling		19			N	N						+	+	++	TBC	+	+	--	+	+	++		Y
WEST DEAN 16 – New Dunn Business Park, Sling		employment			N	N						+	+	++	TBC	+	+	--	+	++	++		Y
WEST DEAN 17 – Lydney Rd, Yorkley		83			N	N						0	+	++	TBC	--	+	-	0	--	++		
WEST DEAN 18 – Yorkley Court, Yorkley		484			N	N						--	-	++	TBC	--	+	--	+	--	0		
WEST DEAN 19 – Adj to Pump House, Yorkley		21			N	N						+	+	++	TBC	-	+	--	0	0	++		
WEST DEAN 20 – Lorry Park, Yorkley Slade		20			N	N						+	+	++	TBC	++	-	--	0	+	++		

Site Reference (see Appendix to view each site)	Existing Use	Potential capacity (at 30 per ha)	Relationship to DSB	Safeguarded/consultation area in Minerals Plan?	Filter 1: Potential conflicts with international/national policy		Filter 2: Distance to services rating					Filter 3: Sustainability Appraisal and Qualitative Assessment of Deliverability										Officer Conclusion	Site taken forward to Draft Local Plan?	
					SAC? (Y/N)	SSSI? (Y/N)	Town centre by road	Primary school by road	GP by road	Public Transport	Employment Area (direct line)	Vehicular Access & Connectivity	Active Travel	Flood Risk	Climate Audit	Landscape – significant physical features	Land Quality	Biodiversity – existing	GI potential	Character - natural and built	Heritage			
WEST DEAN 21 – South side of Bailey Hill, Yorkley		8			N	N							+	++	++	TBC	0	+	-	0	0	++		
WEST DEAN 22 – Rear of Health Centre, Yorkley		13			N	N							-	++	++	TBC	0	+	-	+	-	++		
WEST DEAN 23 – Blakeney Walk, Yorkley		55			N	N							+	++	++	TBC	0	-	-	0	0	0		
WEST DEAN 24 – Blakeney Walk (smaller), Yorkley		27			N	N							+	++	++	TBC	0	-	-	0	0	0		
WEST DEAN 25 – Scovill, Whitecroft		105			N	N							+	++	0	TBC	++	++	-	0	++	+		Y
WEST DEAN 26 – South east of Scovill, Whitecroft		399			N	N							+	-	++	TBC	-	-	-	+	-	+		
WEST DEAN 27 – Adj to Royal Oak, Whitecroft		137			N	N							-	+	-	TBC	-	-	-	0	-	+		
WESTBURY ON SEVERN 1 – Lower Ley		New settlement			N	N							-	-	-	TBC	-	-	-	0	-	-		
WESTBURY ON SEVERN 2 – Broadoak		5			N	N							++	0	-	TBC	-	-	-	0	-	0		
WESTBURY ON SEVERN 3 – The Court Farm		67			N	N							++	+	-	TBC	-	-	-	0	-	-		
WESTBURY ON SEVERN 4 – Adj Colchester Close		63			N	N							+	+	-	TBC	-	-	-	0	0	0		
WESTBURY ON SEVERN 5 – Land adj Chaxhill Hall		242			N	N							++	+	0	TBC	-	-	-	+	-	0		
WESTBURY ON SEVERN 6 – Stantway Farm		489			N	N							0	0	0	TBC	-	-	-	0	-	-		
WESTBURY ON SEVERN 7 – Grange Court		New settlement			N	N							+	+	-	TBC	-	-	-	+	-	-		
WESTBURY ON SEVERN 8 – Frewins, Northwood Green		14			N	N							0	0	-	TBC	-	-	-	0	0	+		
WESTBURY ON SEVERN 9 – Wintles Hill		13			N	N							++	0	+	TBC	-	-	-	0	-	+		
WESTBURY ON SEVERN 10 – Chaxhill		17			N	N							++	+	0	TBC	-	-	-	0	-	-		
WESTBURY ON SEVERN 11 – ‘New Town’ at Chaxhill		New settlement			N	N							+	+	0	TBC	-	-	-	+	-	-		
WESTBURY ON SEVERN 12 – Grange Court (smaller)		40			N	N							+	+	+	TBC	-	-	-	0	-	+		
WESTBURY ON SEVERN 13 – Adj to Arden Farm		15			N	N							++	+	-	TBC	-	-	-	0	-	-		
WESTBURY ON SEVERN 14 – Land at Dean Grange		24			N	N							++	+	-	TBC	-	-	-	0	-	0		

Site Reference (see Appendix to view each site)	Existing Use	Potential capacity (at 30 per ha)	Relationship to DSB	Safeguarded/consultation area in Minerals Plan?	Filter 1: Potential conflicts with international/national policy		Filter 2: Distance to services rating					Filter 3: Sustainability Appraisal and Qualitative Assessment of Deliverability										Officer Conclusion	Site taken forward to Draft Local Plan?
					SAC? (Y/N)	SSSI? (Y/N)	Town centre by road	Primary school by road	GP by road	Public Transport	Employment Area (direct line)	Vehicular Access & Connectivity	Active Travel	Flood Risk	Climate Audit	Landscape – significant physical features	Land Quality	Biodiversity – existing	GJ potential	Character - natural and built	Heritage		
WOOLASTON 1 – Land adj Main Road		181			N	N						+	+	0	TBC	.	.	.	0	..	0		
WOOLASTON 2 – Land at Woolaston		663			N	N						+	+	0	TBC	0	..	0		
WOOLASTON 3 – Land at Burnt House Farm		19			N	N						+	+	0	TBC	0	.	.	0	0	0		
WOOLASTON 4 – Land west of Woolaston (smaller)		177			N	N						0	+	0	TBC	0	..	0		
WOOLASTON 5 – Netherend Farm		23			N	N						0	+	0	TBC	.	.	.	0	++	0		
WOOLASTON 6 – Rear of Homelea, Netherend		12			N	N						0	+	0	TBC	.	.	.	0	++	++		Y

7. Stage B3: Predicting the effects of the draft Local Plan – Appraisal of Policies

7.1 This section of the report discusses the appraisal of the sustainability impacts of the draft Local Plan policies. All of the policies within the Draft Local Plan have been assessed against the following sustainability objectives/indicators:

Indicators/SA Objectives Key:

SA Objective/Indicator 1 - To improve the health and well-being of the populations and reduce inequalities in health.

SA Objective/Indicator 2 – To meet local housing needs, by ensuring everyone has the opportunity to live in a decent sustainably constructed and affordable home.

SA Objective/Indicator 3 – To provide accessible community services, recreation and leisure facilities.

SA Objective/Indicator 4 – To facilitate the development of academic and vocational skills.

SA Objective/Indicator 5 – To create a more vibrant and sustainable local economy.

SA Objective/Indicator 6 – To protect and enhance the landscape.

SA Objective/Indicator 7 – To conserve and enhance biodiversity, flora and fauna.

SA Objective/Indicator 8 – To maintain and improve air quality.

SA Objective/Indicator 9 – To maintain and improve water quality and to achieve sustainable water resources management.

SA Objective/Indicator 10 – To reduce carbon emissions that cause climate change and to achieve net zero.

SA Objective/Indicator 11 – To reduce waste generation and achieve sustainable management of waste.

SA Objective/Indicator 12 - To safeguard historical and cultural assets.

Table 14 Ratings for Policy Appraisals

Each policy has been subjectively considered and scored using the ratings below:

++	Double positive
+	Positive
0	Neutral
-	Negative
--	Double negative

7.2 All attempts to create consistency across the board have been made.

- 7.3 Finally, an officer conclusion has been made regarding whether the policy has sufficient sustainability credentials to be taken forward. In this case, it can be seen that every policy is considered acceptable to be taken forward, however, some recommendations to improve the policy have been made where appropriate (see section below).
- 7.4 What is highly noticeable from assessing each policy in terms of the sustainability criteria, is that all of the policies have been written with care to ensure that there are no negative impacts arising from the policy text and objective. Most of the policies have generally neutral impacts on many of the indicators, depending on each individual development (which would be assessed at the time of any future planning application being submitted). However, it is also clear that the policies have been written to provide positive and very positive outcomes on many of the indicators, demonstrating that the policies seek to create a betterment overall, rather than simply attempting to mitigate potential development harm.
- 7.5 In line with national planning policy (NPPF) and the Forest of Dean Council's climate emergency strategy, each policy has been written to ensure that sustainability, climate and biodiversity are at the heart of the Local Plan, with attempts to require higher levels of sustainability requirements than even the government requires. An example of this is the 20% Biodiversity Net Gain (BNG) requirement (instead of the 10% national requirement).
- 7.6 Table 15 below collates all of the data from the individual sustainability appraisal of the each policy. The detailed policy appraisals can be viewed in full in Appendix 2.

Table 15 Collation of data from individual policy appraisals

Policy	Objective 1 – Health & wellbeing	Objective 2 – Local Housing	Objective 3 - Services	Objective 4 - Education	Objective 5 - Economy	Objective 6 - Landscape	Objective 7 – Biodiversity	Objective 8 – Air Quality	Objective 9 – Water Quality	Objective 10 – Carbon Emissions	Objective 11 – Waste	Objective 12 - Heritage	Take Policy Forward? (Y/N)
LP.1 Sustainable Development	+	0	+	0	0	0	++	0	+	++	0	0	Y
LP.2 Construction and Use of Buildings	+	+	0	0	0	0	0	+	0	++	++	0	Y
LP.3 Climate Adaptation	++	++	+	0	0	0	+	++	+	++	+	0	Y
LP.4 Settlement Hierarchy	+	+	+	+	+	++	++	+	0	+	0	+	Y
LP.5 Development in the Countryside (outside settlements)	+	0	++	0	++	+	+	+	+	+	0	0	Y
LP.6 Mixed Land Uses	+	0	+	0	++	+	++	+	0	++	0	0	Y
LP.7 Infrastructure	+	0	+	0	0	+	++	+	+	+	0	0	Y
LP.8 Nature Conservation – Protected Sites	0	0	+	0	0	+	++	+	0	+	0	0	Y
LP.9 Habitat and Species Protection	+	0	+	0	0	++	++	++	0	++	0	+	Y
LP.10 Green Infrastructure	+	0	++	0	+	++	++	+	++	++	0	+	Y
LP.11 Green Infrastructure Allocations	+	0	+	0	0	++	++	+	+	+	0	0	Y
LP.12 Biodiversity and Biodiversity Net Gain	+	0	0	0	0	+	++	+	0	+	0	0	Y
LP.13 Biodiversity Generally	+	0	0	0	0	+	++	+	+	+	0	0	Y
LP.14 Renewable Energy	+	0	0	0	+	+	+	+	0	++	+	+	Y
LP.15 Design Principles	++	+	+	0	0	++	+	+	+	++	+	+	Y
LP.16 Historic Character and Distinctiveness	0	0	0	0	0	++	0	0	0	0	0	++	Y
LP.17 Locally Distinctive Areas	0	0	0	0	0	++	0	0	0	0	0	+	Y
LP.18 Land of Recreation and Amenity Value	++	0	++	0	+	++	+	+	+	+	0	+	Y
LP.19 New Recreation Land and Uses	++	0	++	0	0	+	+	+	+	+	0	0	Y

LP.20 Locally Valued Landscapes	+	0	+	0	+	++	+	0	0	0	0	+	Y
LP.21 Flooding and Water Conservation	+	+	0	0	0	+	+	+	++	+	+	0	Y
LP.22 Site Conditions	+	+	0	0	0	+	+	+	++	+	++	0	Y
LP.23 Community Facilities	+	0	++	++	++	0	0	0	0	+	0	0	Y
LP.24 Active Travel	++	0	++	0	0	0	0	++	0	++	0	0	Y
LP.25 Cycle Routes	++	0	++	0	+	+	+	+	0	+	0	0	Y
LP.26 Town Centre	+	0	0	0	+	+	0	+	0	0	0	0	Y
LP.27 Strategic Sites	++	++	++	++	++	++	++	+	0	++	++	0	Y
LP.28 Other Housing Sites	0	++	++	0	+	0	0	0	0	++	0	0	Y
LP.29 Housing Delivery	++	++	0	0	0	+	+	0	0	0	0	0	Y
LP.30 Sites for Gypsies, Travellers and Travelling Showpeople	+	+	+	0	+	+	0	0	+	0	0	0	Y
LP.31 Affordable Housing	+	++	0	0	0	0	0	0	0	0	0	0	Y
LP.32 Affordable Housing on Exception Sites	+	++	0	0	0	+	+	0	0	0	0	0	Y
LP.33 Development proposals for First Homes Exception Schemes	0	++	0	0	0	+	0	0	+	0	0	+	Y
LP.34 Accessible and Adaptable Homes	++	++	0	0	0	0	0	0	0	0	0	0	Y
LP.35 Self and Custom Build	+	++	+	0	0	0	0	0	+	+	0	0	Y
LP.36 Proposals for purpose built or specialist accommodation	++	++	++	0	0	0	0	0	0	0	0	0	Y
LP.37 New Housing (small groups or single dwellings)	0	+	0	0	0	+	+	0	+	+	+	0	Y
LP.38 National Described Space Standards	++	++	0	0	0	0	0	0	0	0	0	0	Y
LP.39 Economic Development	0	+	0	0	++	+	+	0	0	0	0	0	Y
LP.40 Employment Generating Uses – Identified Sites	+	+	+	0	++	0	0	0	0	+	0	0	Y
LP.41 The reinstatement of the Herefordshire and Gloucestershire Canal	+	0	+	0	+	+	+	0	+	0	0	++	Y
LP.42 Dean Forest Railway	0	0	++	0	++	0	0	0	0	0	0	++	Y
LP.43 Employment Sites Away from Settlement Boundaries	+	0	0	+	+	+	+	0	+	+	0	+	Y
LP.44 Land at Stowfield, Lydbrook	+	+	0	0	++	++	++	0	++	0	++	0	Y
LP.45 Cinderford Northern Quarter	0	++	0	0	++	+	+	0	0	0	0	0	Y
LP.46 Causeway Road, Cinderford	++	+	+	0	0	0	0	0	0	+	0	0	Y
LP.47 Station Street	+	++	+	0	0	0	0	0	0	+	0	0	Y
LP.48 St Whites Farm	+	++	+	0	0	0	0	0	0	+	0	0	Y
LP.49 Valley Road	+	++	+	0	++	0	0	0	0	+	0	0	Y
LP.50 Forest Vale Employment Area	0	0	+	0	++	0	0	0	0	0	0	0	Y
LP.51 Cinderford Town Centre	0	+	++	0	++	+	+	0	0	0	0	0	Y
LP.52 Poolway Farm	+	++	+	0	0	++	++	0	0	+	0	+	Y
LP.53 North Road	+	++	0	0	0	++	+	+	0	0	0	0	Y

LP.54 Ellwood Road, Milkwall	+	++	0	0	0	++	++	+	0	+	0	0	Y
LP.55 Kings Meade	+	++	0	0	0	0	0	0	++	0	0	0	Y
LP.56 Poolway Road, Broadwell	+	+	+	0	0	+	+	0	0	0	0	0	Y
LP.57 Coleford Town Centre	+	+	++	0	++	+	+	0	0	++	0	++	Y
LP.58 South of Railway Drive	+	+	+	0	+	0	0	0	0	+	0	0	Y
LP.59 Locally Valued Landscape Coleford (LVL)	0	0	0	0	0	++	+	0	0	0	0	0	Y
LP.60 Five Acres Mixed Development	++	0	++	++	++	0	0	0	0	0	0	0	Y
LP.61 Employment Land off B4228 Coleford	0	0	0	0	++	+	+	0	0	0	0	0	Y
LP.62 Harbour Area Regeneration, Harbour, Lakes and Industrial Areas	+	+	+	0	++	+	+	0	+	+	0	+	Y
LP.63 Lydney East	+	++	+	+	+	+	++	0	+	0	0	0	Y
LP.64 Land South of the Bypass adjoining Station Link Road	+	0	++	0	0	+	+	0	0	+	0	0	Y
LP.65 Land off Augustus Way and Court Road, Lydney	+	++	+	0	0	+	++	+	++	+	0	0	Y
LP.66 Land off Driffield Road	+	++	0	0	0	+	++	+	++	+	0	0	Y
LP.67 Land at Highfield Lane	+	++	0	0	0	+	++	+	++	+	0	0	Y
LP.68 Land at Holm's Farm	0	++	0	0	0	0	++	0	++	0	0	0	Y
LP.69 Mead Lane	0	0	+	0	++	0	0	0	0	0	0	0	Y
LP.70 Land between the A48 and Mead Lane	0	0	+	0	++	0	0	0	0	0	0	0	Y
LP.71 Lydney Railway Station	+	0	++	0	++	0	0	++	+	++	0	+	Y
LP.72 Lydney Town Centre	+	+	++	0	++	+	+	0	0	0	0	0	Y
LP.73 Lydney Town Centre Highway Strategy	0	0	0	0	0	0	0	+	0	0	0	0	Y
LP.74 South East Newent	++	++	++	++	++	++	++	++	++	++	0	0	Y
LP.75 Cleeve Mill Lane	0	++	0	0	0	0	0	0	0	0	0	0	Y
LP.76 North of Ross Road, Newent	+	++	+	0	++	0	0	0	0	0	0	0	Y
LP.77 Newent Town Centre	0	+	++	0	++	0	0	0	++	0	0	++	Y
LP.78 Beachley Camp	+	++	++	++	++	++	++	+	0	++	0	++	Y
LP.79 Land South of the A48 at Tutshill	+	++	+	0	0	++	+	+	0	+	0	+	Y
LP.80 Land Adjoining Wyedean School	+	++	+	0	0	++	++	0	0	+	0	0	Y
LP.81 Chapel Lane, Aylburton	+	++	0	0	0	++	0	0	0	+	0	0	Y
LP.82 Aylburton Business Park	0	0	+	0	++	0	0	0	0	0	0	0	Y
LP.83 Land off Ryelands Road, Bream	+	++	0	0	0	0	0	0	0	0	0	0	Y
LP.84 Land at Rugby Club, Bream	++	++	++	0	+	0	0	0	0	0	0	0	Y
LP.85 Land at Lydney Road, Bream	+	++	+	0	0	0	++	0	0	+	0	0	Y
LP.86 Drybrook Farm, Drybrook and to the Rear of High Street Drybrook	+	++	+	0	0	++	++	0	0	+	0	0	Y
LP.87 Land at Over Old Road, Hartpur	+	++	+	0	0	+	0	0	0	0	0	0	Y

LP.88 Land south of Broad Street, Hartpury	+	++	+	0	0	0	+	0	0	0	0	0	Y
LP.89 Hartpury University and College	0	0	++	++	+	++	+	0	0	+	0	+	Y
LP.90 Sutton Road, Littledean	+	++	0	0	0	0	++	0	0	+	0	0	Y
LP.91 Beech Way, Littledean	0	++	0	0	0	0	0	0	0	0	0	0	Y
LP.92 Former Wye Garage	0	++	0	0	0	0	0	0	0	0	0	0	Y
LP.93 Land off Carisbrook Road	+	++	0	0	0	+	++	0	0	0	0	0	Y
LP.94 St Michaels and High St	0	++	0	0	0	0	0	0	0	0	0	++	Y
LP.95 Vantage Point	0	0	+	0	++	0	0	0	0	0	0	0	Y
LP.96 Land to the North of Newnham	++	++	++	0	0	++	++	+	0	0	0	0	Y
LP.97 Former Victoria Hotel	0	++	0	0	0	0	0	0	0	0	0	+	Y
LP.98 High Street Newnham	0	0	0	0	0	0	0	0	0	0	0	++	Y
LP.99 The Miners Arms Sling	0	++	0	0	0	0	+	0	0	0	0	0	Y
LP.100 Land at New Dunn Business Park, Sling	0	0	+	0	++	0	0	0	0	0	0	0	Y
LP.101 Whitecroft Road	0	++	++	0	+	0	0	0	0	0	0	0	Y
LP.102 Homelea Netherend	0	++	0	0	0	0	0	0	0	0	0	0	Y
LP.103 Monitoring	0	++	0	0	++	0	0	0	0	++	++	0	Y

8. Stage B4: Considering ways of mitigating adverse effects and maximising beneficial effects of the Draft Local Plan

- 8.1 Where neutral or adverse effects are identified (Stages B2 and B3 of the report) the SA examines ways of improving, reducing or mitigating those effects. It is difficult to evaluate the precise effects of the Local Plan. 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 will have already taken place and will continue to do so until the Local Plan is submitted for examination.
- 8.2 Within this context it is important to bear in mind that the Local Plan will not be used in isolation. It will be used alongside National Planning Policy, Neighbourhood Development Plans and other legislative/regulatory requirements. A forthcoming Design Code will also have a role to play.

Proposed Changes to Policies

- 8.3 The assessment of each Draft Local Plan policy can be found in Appendix 2. At the end of each policy assessment there is a section called 'Possible Changes to the Draft Policy/Mitigation and Recommendation'. This section provides recommendations to assist the planning policy team in writing the best planning policies possible. For example, it may include recommendations to make the policy clearer, or more robust, or to be tweaked to ensure that it is more sustainable or does not conflict with other policies. The planning policy team then has the option to take on board these recommendations (or not). Changes to the policies can then be tracked both before and after adoption (particularly for the post-adoption SEA report) and provide an overview of how the SA has had an influence over the environmental credibility of the final plan policies.
- 8.4 Table 16 below provides details of where recommendations have been made for some of the policies and provides a means of tracking how the policies are modified over time. Note that the final column (called changes made to policy) will be completed over the next phases of the local plan preparation (Reg 19 and beyond):

Table 16 SA suggestions for possible changes to the draft policy/mitigation and recommendations

Policy	SA suggestions for possible changes to draft policy/mitigation and recommendation	Changes made to policy (to be completed at later stages of plan making process and post adoption)
LP.1 Sustainable Development	<ul style="list-style-type: none"> • Take policy forward. • Reference to Brundtland definition required. • Remove 'encourage' from 'encourage and facilitate' or instead use 'promote and prioritise'. • Refer to holiday lets also. Find a way to encourage/support tourism without giving it preferential treatment. • Refer to e-bike facilities in new developments. • Needs Environmental Cost Benefit Analysis. 	
LP.2 Construction and Use of Buildings	<ul style="list-style-type: none"> • Take policy forward. • Remove # • Include green roofs, solar pv for heating. • Net zero policy should include embedded carbon, operational carbon and off-setting. Estate heating systems. • Refer to Design Codes. 	
LP.3 Climate Adaptation	<ul style="list-style-type: none"> • Take policy forward • Refer to Design Codes 	
LP.4 Settlement Hierarchy	<ul style="list-style-type: none"> • Take policy forward. • Remove acronyms e.g. GI and provide full wording • Expand on GI - what is GI? Where? What light-touch would be acceptable? • Definitions of large/small villages. 	
LP.5 Development in the Countryside (outside settlements)	<ul style="list-style-type: none"> • The policy could include heritage assets. • Take policy forward. 	
LP.6 Mixed Land Uses	<ul style="list-style-type: none"> • Take policy forward. 	

LP.7 Infrastructure	<ul style="list-style-type: none"> • Take policy forwards. • Refer directly to reduced dependency on cars, not just "travel" as there are sustainable modes of travel. 	
LP.8 Nature Conservation – Protected Sites	<ul style="list-style-type: none"> • Take policy forward. • Use more robust wording 	
LP.9 Habitat and Species Protection	<ul style="list-style-type: none"> • Take policy forward. • Typo – Authority’s (delete space) • Definition required for ‘wholly exceptional’ and ‘suitable compensation’ • Requirement for a local list of irreplaceable habitats. 	
LP.10 Green Infrastructure	<ul style="list-style-type: none"> • Take policy forward • Change policy name to ‘Green and Blue Infrastructure’ • Explain ‘missing connections’, ‘flood storage’ and ‘wildlife corridor’. 	
LP.11 Green Infrastructure Allocations	<ul style="list-style-type: none"> • Take policy forward • Include list of major sites 	
LP.12 Biodiversity and Biodiversity Net Gain	<ul style="list-style-type: none"> • Take policy forward. • Remove wording ‘where avoidable’. • Amend wording so it’s more robust – ‘FoD expects developers to provide 20%’ 	
LP.13 Biodiversity Generally	<ul style="list-style-type: none"> • Take policy forward. • Add in ‘other suitable measures’ • Extend requirements to industrial and agricultural buildings. • Amend wording to include ‘all development’ rather than just new housing/major development. • Refer to supplementary guidance re. retrofitting and extensions. 	
LP.14 Renewable Energy	<ul style="list-style-type: none"> • Take policy forward. • Consider cumulative effect of solar farms on productive farmland/landscape. • Policy could require an independent land assessment. • Include a hierarchy of where PV can be placed? (roof/buildings first, then gardens, etc.) • Solar to be prioritised on all new developments, additional solar where possible, prioritisation of solar farms that incorporate growing food. • Encourage agri-voltaics & tiltable panels. 	

LP.15 Design Principles	<ul style="list-style-type: none"> • Take policy forward. • Fabric first policy is best! • Inclusion of requirement for embedded carbon assessment? • Consideration of length and impact of construction process (reduced by modular construction) • Whole life carbon assessment (including energy loss when building is demolished/dismantled) 	
LP.16 Historic Character and Distinctiveness	<ul style="list-style-type: none"> • Take policy forward. • Remove 'forest' from first bullet point to refer to district-wide settlements. 	
LP.17 Locally Distinctive Areas	<ul style="list-style-type: none"> • Take policy forward. • Need a list of LDAs • Clarify that this policy refers to sites within settlement policies. 	
LP.18 Land of Recreation and Amenity Value	<ul style="list-style-type: none"> • Take policy forward. • List of Important Open Areas required for clarity. • Remove acronyms and replace with 'green and blue infrastructure'. 	
LP.19 New Recreation Land and Uses	<ul style="list-style-type: none"> • Take policy forward. 	
LP.20 Locally Valued Landscapes	<ul style="list-style-type: none"> • Take policy forward. 	
LP.21 Flooding and Water Conservation	<ul style="list-style-type: none"> • Take policy forward. • Should the policy name some of the main national policies/guidance, such as the SMP? • Policy needs to be stronger in its maintenance & perpetuity • Add in natural flood management - addition of trees for floods, bogs and reed beds; ensure an adequate drainage system for new build development; ensure run-off is slower after building-out development • Ensure risk is not increased elsewhere. • Add definition / explanation of sequential test in the policy pre-amble 	
LP.22 Site Conditions	<ul style="list-style-type: none"> • Take policy forward. • Provide clarification of 'mineral sterilisation'. 	
LP.23 Community Facilities	<ul style="list-style-type: none"> • Take policy forward. • Could strengthen policy wording to be more prescriptive. 	
LP.24 Active Travel	<ul style="list-style-type: none"> • Take policy forward. 	
LP.25 Cycle Routes	<ul style="list-style-type: none"> • Take policy forward. 	

	<ul style="list-style-type: none"> • Remove the first heading 'Christchurch/Berry Hill Cycle Route' as it's repeated below. • Change name of policy to 'Active Travel' to incorporate shared footpaths with cycle routes. • Remove 'that may benefit' from 1st para. • Update the list of active travel routes once identified through Active Travel Assessment. 	
LP.26 Town Centre	<ul style="list-style-type: none"> • Take policy forward. • Policy needs to be stronger to look to the future - climate adaptation - add to the environmental improvements - more trees and green space • Consider retro-fitting nature corridors in town centres • Encourage trees in pots and installation of water features for cooling. • Addition of "will only be permitted in exceptional circumstances" to the policy - to refer to the conversion of ground floor space to residential • Addition of external blinds on shop fronts/windows (refer to Design Code?) • Include sufficient outdoor space associated with residential use - space to be allocated - garden space, not just balconies. 	
LP.27 Strategic Sites	<ul style="list-style-type: none"> • Take policy forward. • Need to insert data (dwellings and ha) and remove #. 	
LP.28 Other Housing Sites	<ul style="list-style-type: none"> • Take policy forward. • Should Beachley be deleted from the table, as it's already in the strategic sites? • Be consistent with 'new' or 'new site' 	
LP.29 Housing Delivery	<ul style="list-style-type: none"> • Take policy forward. • Remove #. • Can policy encourage food production within garden plots, or local community gardens, or greater connectivity between protected areas through using green corridors? • Could policy include 'multi-generational' aspects? • Clarification of 'on an exceptional basis' – what weight is given to this. 	
LP.30 Sites for Gypsies, Travellers and Travelling Showpeople	<ul style="list-style-type: none"> • Take policy forward • Insert data instead of #. Allocated sites should be included. 	

LP.31 Affordable Housing	<ul style="list-style-type: none"> • Take policy forward. 	
LP.32 Affordable Housing on Exception Sites	<ul style="list-style-type: none"> • Take policy forward. • Increase dwellings up to 10 – but this needs to be a true exception 	
LP.33 Development proposals for First Homes Exception Schemes	<ul style="list-style-type: none"> • Take policy forward. • Remove [KCI] reference. • Reconsider the word ‘may’ in point 6. 	
LP.34 Accessible and Adaptable Homes	<ul style="list-style-type: none"> • Take policy forward. 	
LP.35 Self and Custom Build	<ul style="list-style-type: none"> • Take policy forward. 	
LP.36 Proposals for purpose built or specialist accommodation	<ul style="list-style-type: none"> • Take policy forward. 	
LP.37 New Housing (small groups or single dwellings)	<ul style="list-style-type: none"> • Take policy forward. • Change policy name to ‘New Housing ‘One Planet’ Development • Clarify the use of ‘carbon positive’. • Define ‘sustainable transport’ 	
LP.38 National Described Space Standards	<ul style="list-style-type: none"> • Take policy forward. • Should policy cover external amenity space and bin storage? • Could policy require windows in all bedrooms? 	
LP.39 Economic Development	<ul style="list-style-type: none"> • Take policy forward. • Replace # • Include local economies and circular economies 	
LP.40 Employment Generating Uses – Identified Sites	<ul style="list-style-type: none"> • Take policy forward. • Replace the # with data. • Be consistent with full stops. 	
LP.41 The reinstatement of the Herefordshire and Gloucestershire Canal	<ul style="list-style-type: none"> • Take policy forward. 	
LP.42 Dean Forest Railway	<ul style="list-style-type: none"> • Take policy forward. • Need to exchange # (Policy number for Railway Station Area). • Could policy be more robust. 	
LP.43 Employment Sites Away from Settlement Boundaries	<ul style="list-style-type: none"> • Take policy forward. • Check if BI use class is still correct (changes to use classes). 	

	<ul style="list-style-type: none"> Remove 'but does not need to be' from Dayhouse Quarry section and add known issues of the site into the policy (removal of hedgerow and lighting). 	
LP.44 Land at Stowfield, Lydbrook	<ul style="list-style-type: none"> Take policy forward. Change AONB to National Landscape Typo on Wye Vally (should be Wye Valley) Insert LP number (remove #) Remove 'the' from 'of the and be compatible with' Level up the Affordable Housing with the 35% in the table. 	
LP.45 Cinderford Northern Quarter	<ul style="list-style-type: none"> Take policy forward. Policy map needs to show Area A and Area B. 	
LP.46 Causeway Road, Cinderford	<ul style="list-style-type: none"> Take policy forward. 	
LP.47 Station Street	<ul style="list-style-type: none"> Take policy forward. Amend wording to 'The development will provide pedestrian and cycle access..' 	
LP.48 St Whites Farm	<ul style="list-style-type: none"> Take policy forward. Amend wording to 'allocated for about 50 dwellings and to potentially include.. 	
LP.49 Valley Road	<ul style="list-style-type: none"> Take policy forward. 	
LP.50 Forest Vale Employment Area	<ul style="list-style-type: none"> Take policy forward. 	
LP.51 Cinderford Town Centre	<ul style="list-style-type: none"> Take policy forward. Should there be more on active travel within policy? Need to protect COU to residential, however, may be approved in exceptional circumstances. Consistency across all town centre policies. 	
LP.52 Poolway Farm	<ul style="list-style-type: none"> Take policy forward. Is there potential to include open space for allotments? 	
LP.53 North Road	<ul style="list-style-type: none"> Take policy forward. 	
LP.54 Ellwood Road, Milkwall	<ul style="list-style-type: none"> Take policy forward Policy could include reference to iron workings and water management. Policy could support use of cycle route into Coleford. 	
LP.55 Kings Meade	<ul style="list-style-type: none"> Take policy forward. 	
LP.56 Poolway Road, Broadwell	<ul style="list-style-type: none"> Take policy forward. 	

LP.57 Coleford Town Centre	<ul style="list-style-type: none"> • Take policy forward. • Add 'where it's evidence to be popular/required... support the creation/integration of pedestrian zones'. Include pedestrian prioritisation? • See Cinderford TC policy in relation to residential use not being permitted at ground level 'unless in exceptional circumstances'. Consistency across Town Centre policies. • Potentially restrict the number of 'services' in the town centre to allow for more retail? 	
LP.58 South of Railway Drive	<ul style="list-style-type: none"> • Take policy forward. 	
LP.59 Locally Valued Landscape Coleford (LVL)	<ul style="list-style-type: none"> • Take policy forward. 	
LP.60 Five Acres Mixed Development	<ul style="list-style-type: none"> • Take policy forward. • Does additional low carbon connectivity need to be referenced? 	
LP.61 Employment Land off B4228 Coleford	<ul style="list-style-type: none"> • Take policy forward. • Reference to bat SAC 	
LP.62 Harbour Area Regeneration, Harbour, Lakes and Industrial Areas	<ul style="list-style-type: none"> • Take policy forward. • Include requirement for masterplan. 	
LP.63 Lydney East	<ul style="list-style-type: none"> • Take policy forward. 	
LP.64 Land South of the Bypass adjoining Station Link Road	<ul style="list-style-type: none"> • Take policy forward. 	
LP.65 Land off Augustus Way and Court Road, Lydney	<ul style="list-style-type: none"> • Take policy forward. • Replace # with numbering 	
LP.66 Land off Driffield Road	<ul style="list-style-type: none"> • Take policy forward. 	
LP.67 Land at Highfield Lane	<ul style="list-style-type: none"> • Take policy forward. • Stronger wording to ensure access is off Centurion Road. 	
LP.68 Land at Holm's Farm	<ul style="list-style-type: none"> • Take policy forward. 	
LP.69 Mead Lane	<ul style="list-style-type: none"> • Take policy forward. 	
LP.70 Land between the A48 and Mead Lane	<ul style="list-style-type: none"> • Take policy forward. 	
LP.71 Lydney Railway Station	<ul style="list-style-type: none"> • Take policy forward. • Masterplan requirement. • Additional of transport hub, more wet weather cover, café facilities.. 	

	<ul style="list-style-type: none"> • Can additional land be allocated or parking to encourage train use? 	
LP.72 Lydney Town Centre	<ul style="list-style-type: none"> • Take policy forward. • Should there be more on active travel within policy? Acknowledge potential of future car-free development. • Refer to AQMA (Air Quality Management Area) 	
LP.73 Lydney Town Centre Highway Strategy	<ul style="list-style-type: none"> • Take policy forward. 	
LP.74 South East Newent	<ul style="list-style-type: none"> • Take policy forward. • Need to use capital letters at start of each sentence. • Capital letter on 'This will be developed' 	
LP.75 Cleeve Mill Lane	<ul style="list-style-type: none"> • Take policy forward. • Typo - Insert space between 45dwellings. 	
LP.76 North of Ross Road, Newent	<ul style="list-style-type: none"> • Take policy forward. 	
LP.77 Newent Town Centre	<ul style="list-style-type: none"> • Take policy forward. • Should there be more on active travel within policy? • Consistency between town centre policies, re. residential use of ground floor 'in exceptional circumstances'. 	
LP.78 Beachley Camp	<ul style="list-style-type: none"> • Take policy forward. • Replace the # with a number. 	
LP.79 Land South of the A48 at Tutshill	<ul style="list-style-type: none"> • Take policy forward. 	
LP.80 Land Adjoining Wyedean School	<ul style="list-style-type: none"> • Take policy forward. 	
LP.81 Chapel Lane, Aylburton	<ul style="list-style-type: none"> • Take policy forward. 	
LP.82 Aylburton Business Park	<ul style="list-style-type: none"> • Take policy forward. • Remove 'and expansion' from policy. 	
LP.83 Land off Ryelands Road, Bream	<ul style="list-style-type: none"> • Take policy forward. 	
LP.84 Land at Rugby Club, Bream	<ul style="list-style-type: none"> • Take policy forward. 	
LP.85 Land at Lydney Road, Bream	<ul style="list-style-type: none"> • Take policy forward. 	
LP.86 Drybrook Farm, Drybrook and to the Rear of High Street Drybrook	<ul style="list-style-type: none"> • Take policy forward. • Insert space between '97 dwellings' in policy. • Add more detail 'needs to be suitably landscaped and encourage pedestrian/public space' and 'in the development of housing, consideration has to be had for development of community space' 	

LP.87 Land at Over Old Road, Hartpury	<ul style="list-style-type: none"> • Take policy forward. 	
LP.88 Land south of Broad Street, Hartpury	<ul style="list-style-type: none"> • Take policy forward. 	
LP.89 Hartpury University and College	<ul style="list-style-type: none"> • Take policy forward. 	
LP.90 Sutton Road, Littledean	<ul style="list-style-type: none"> • Take policy forward. • Add cycle access. 	
LP.91 Beech Way, Littledean	<ul style="list-style-type: none"> • Take policy forward. • Could expand on policy with regards to water, landscape, ecology (however, it is noted there is already permission on the site). 	
LP.92 Former Wye Garage	<ul style="list-style-type: none"> • Take policy forward. • Could expand on policy with regards to water, landscape, ecology (however, it is noted there is already permission on the site). 	
LP.93 Land off Carisbrook Road	<ul style="list-style-type: none"> • Take policy forward. • Typo - Capital letter on 'Development' • Typo – Full stop at end of paragraph. 	
LP.94 St Michaels and High St	<ul style="list-style-type: none"> • Take policy forward. 	
LP.95 Vantage Point	<ul style="list-style-type: none"> • Take policy forward. 	
LP.96 Land to the North of Newnham	<ul style="list-style-type: none"> • Take policy forward. 	
LP.97 Former Victoria Hotel	<ul style="list-style-type: none"> • Take policy forward. 	
LP.98 High Street Newnham	<ul style="list-style-type: none"> • Take policy forward. • Typo – Turn bold text to normal text and use capital letter for 'Proposals' 	
LP.99 The Miners Arms Sling	<ul style="list-style-type: none"> • Take policy forward. 	
LP.100 Land at New Dunn Business Park, Sling	<ul style="list-style-type: none"> • Take policy forward. 	
LP.101 Whitecroft Road	<ul style="list-style-type: none"> • Take policy forward. 	
LP.102 Homelea Netherend	<ul style="list-style-type: none"> • Take policy forward. 	
LP.103 Monitoring	<ul style="list-style-type: none"> • Take policy forward. A monitoring policy of this kind will be beneficial to understand how each policy is working and whether there needs to be future changes/amendments to the policies to benefit the overall sustainability of development within the District. 	

Conclusion on Appraisal Findings

8.5 This section of the report pulls together the finding for the appraisal of the Draft Local Plan (the strategy, the allocation sites and the local plan policies) and makes some conclusions about what the short/medium/long-term and cumulative impacts of the Draft Local Plan may be. This section may be expanded on further at the Regulation 19 stage.

Short-term impacts of the Draft Local Plan:

8.6 The main **short-term, temporary** effects of the Local Plan are expected to be mainly focused around construction. With an increase in housing, (in both strategic sites and those in the most sustainable villages) it is expected that there will be a temporary/short-term impact by way of:

- increased traffic due to disruption from construction (traffic lights, diversions, etc.);
- decrease in ability to use active travel (footpaths through sites etc.);
- increased construction traffic;
- increased noise from construction and related traffic;
- increase in carbon from traffic as well as construction methods and materials;
- increased waste from the building sites, increased water usage for construction, short-term impacts on biodiversity until mitigation measures are installed;
- increase in dust particles;
- reduction in health and wellbeing for nearby occupants.

Medium-term impacts of the Draft Local Plan:

8.7 The main **medium-term, long-term and permanent** effects are expected to be mainly focused around the following:

- a more vibrant economy owing to employment growth as the plan strives to accommodate more land for employment and to intensify existing employment land;
- improvements to town centre through town centre policies seeking to retain and promote retail/financial and professional businesses to ground floor shop frontages as well as providing opportunities and a means for environmental improvements through development applications;
- a settling of traffic disruption and creation of more infrastructure to support additional housing;
- steady increase in Biodiversity Net Gain;
- steady increase in Green and Blue Infrastructure;
- more local housing provision and affordable housing;
- increase in keeping young people in the district with the prospect of more housing and jobs and potentially keeping a more skilled workforce within the district;
- potential for less out-commuting for employment;
- more choice of active travel routes and access to public transport;
- increase in recreational and community facilities;
- potential increase in education choices within the district, especially with increase in employment (apprenticeships) and the creation of primary school if large strategic site goes ahead at Beachley (although this is more likely to be long-term).

Overall/Cumulative Impacts of the Draft Local Plan 2041

8.8 Table 17 below summarises the main expected **cumulative** impacts of the plan (both policies and site allocations) .

Table 17 Cumulative Impacts of the Draft Local Plan

SA Objective/Indicator:	Cumulative Impacts of the Draft Local Plan Policies	Cumulative Impacts of the site allocations
<p>1. To improve the health and well-being of the populations and reduce inequalities in health.</p>	<p>The majority of the general policies contribute positively to supporting health and wellbeing by providing access to services and the environment.</p>	<p>The site specific allocation policies will generally have a positive effect. The strategic sites generally promote recreation, active travel, access and housing sites within towns without will improve accessibility and reduce per person air pollute due to reduced reliance on private vehicles. There are cycling policies connecting towns and services (LP.25).</p>
<p>2. To meet local housing needs, by ensuring everyone has the opportunity to live in a decent sustainably constructed and affordable home.</p>	<p>The general policies have a positive effect overall although some policies such as LP.12 Biodiversity Net Gain, LP.10 Green Infrastructure and LP.38 Nationally Described space Standards and even LP.2 Construction of buildings may have less positive effects on achieving the objective. These policies reflect potential constraints on housing development and may result in a</p>	<p>The LP provides for ca. 6600 new dwellings. Site specific allocation policies will generally have a positive effect, particularly around sites providing for housing and affordable housing.</p> <p>Potential negative effects could stem from allocated employment sites and recreation sites and policies which do not promote new housing.</p>

	<p>reduction in potential housing numbers, in particular affordable housing, and viability of a scheme. It turn this would slow the rate of housing development indirectly.</p>	
	<ul style="list-style-type: none"> • The plan proposes ca. 6600 new dwellings over the plan period <ul style="list-style-type: none"> • LP.31 and 32 provide for affordable housing • LP.35 Self and Custom Build 	
<p>3. To provide accessible community services, recreation and leisure facilities.</p>	<p>The policies mainly have a positive effect in promoting accessibility to community facilities, recreation and leisure facilities.</p>	<p>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. All of the strategic site locations provide for recreational and community facilities:</p> <p>LP.63 – Lydney East – neighbourhood centre, public park recreation and land for primary school.</p> <p>LP.74 South East Newent – community, education and retail facilities. Active travel. Land for Primary school. Pedestrian and cycle connections and multi function recreation space.</p> <p>LP.78 Beachely Camp – local centre, primary school, place of assembly. Green space.</p> <p>Negative effects are expected from intensive employment sites or sites that are more isolated from facilities or have fewer facilities (in villages) for example LPI02 Homelea, Netherend. However, the are site allocations are generally in the towns and larger villages.</p>
	<ul style="list-style-type: none"> • LP.24 and LP.25 Active Travel and Cycle Routes <ul style="list-style-type: none"> • LP.18 and 19 Recreation land and Uses 	

<p>4. To facilitate the development of academic and vocational skills.</p>	<p>The policies would have an overall neutral effect. Policies could improve the range of employment and skills development opportunities attracting a more diverse employment sector.</p>	<p>Generally, site policies will have a neutral effect. Some site policies will have positive effects, such as LP.89 Hartpury University and college, which supports that particular educational establishment. Other larger strategic sites (LP.27), such as Beachley, Newent and Lydney East, include land for primary school use.</p>
	<ul style="list-style-type: none"> • LP.23 Community Facilities • LP 27 Strategic sites • LP89 Hartpury University and College <ul style="list-style-type: none"> • LP.60 Five Acres • Positive impacts on access to educational facilities may be seen through improvements to active travel, cycle routes and general infrastructure (LP.24, LP.25 and LP.7) 	
<p>5. To create a more vibrant and sustainable local economy.</p>	<p>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 section. This is supported by a number of site specific policies in the rest of the document which promote specific sites for employment, tourism and recreation. A more vibrant economy is encouraged owing to employment growth as the plan strives to accommodate more land for employment and to intensify existing employment land.</p> <p>The plan's policies seek improvements to town centre through town centre policies aiming to retain and promote retail/financial and professional businesses to ground floor shop frontages as well as providing opportunities and a means for environmental improvements through development applications.</p>	<p>27 of the allocations are specific employment sites and all have positive impacts on employment.</p>

	44 of the policies will have positive impacts.	
	<p style="text-align: center;"> LP.5 Development in the Countryside LP.6 Mixed Land Uses LP.23 Community Facilities LP.27 Strategic Sites LP.39 Economic Development LP.40 Employment Generating Uses – Identified Sites </p>	
6. To protect and enhance the landscape.	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 (net gain) and enhancement of the landscape.	Larger sites and employment could impact on landscape more negatively, however, they have been assessed as being neutral as it will depend highly on each individual application. Plus, biodiversity net gain is now in process and this will ensure more natural habitats for each development site.
	<ul style="list-style-type: none"> • LP.10 Green Infrastructure <ul style="list-style-type: none"> • LP.11 GI allocations • LP.12 Biodiversity and Biodiversity Net Gain <ul style="list-style-type: none"> • LP.15 Design Principles • LP.20 Locally Valued Landscapes • LP.18 Land of Recreation and Amenity Value <ul style="list-style-type: none"> • LP.17 Locally Distinctive Areas • Good quality agricultural land is kept in primary production • Character of landscapes is safeguarded, and designated areas are maintain and/or improved to favourable condition 	
7. To conserve and enhance biodiversity, flora and fauna.	The majority of the policies in the LP will have a neutral impact, however, some have positive and very positive impacts, such as those related to nature conservation and biodiversity (see list below).	Some site policies (especially large sites) could have variable impacts, however, much will depend on the planning application and the level of mitigation and biodiversity net gain that will be involved.

	<ul style="list-style-type: none"> • LP.1 Sustainable Development <ul style="list-style-type: none"> • LP.3 Climate Adaptation • LP.8 Nature Conservation – protected sites <ul style="list-style-type: none"> • LP.9 Habitat and Species Protection <ul style="list-style-type: none"> • LP.10 Green Infrastructure • LP.11 Green Infrastructure Allocations • LP.12 Biodiversity and Biodiversity Net Gain <ul style="list-style-type: none"> • LP.13 Biodiversity Generally <ul style="list-style-type: none"> • LP.15 Design Principles 	
<p>8. To maintain and improve air quality.</p>	<p>With more housing and associated increase in traffic, this could have cumulative impacts on air quality, particularly if public transport and active travel is not significantly increased.</p> <p>Air quality is a focus of the general planning policies focussed on active travel, cycle routes, climate change measures, renewable energy, green infrastructure and biodiversity.</p>	<p>The majority of the site allocations have a neutral impact on air quality and would be dependent on the details in each future planning application. However the Lydney Town Centre Highway Strategy is specific to improving air quality.</p>
	<p>LP.1 Sustainable Development LP.2 Construction and Use of Buildings LP.3 Climate Adaptation LP.8 Nature Conservation – Protected Sites LP.9 Habitat and Species Protection LP.10 Green Infrastructure LP.11 Green Infrastructure Allocations LP.12 Biodiversity and Biodiversity Net Gain LP.13 Biodiversity Generally LP.14 Renewable Energy LP.24 Active Travel LP.25 Cycle Routes</p>	

<p>9. To maintain and improve water quality and to achieve sustainable water resources management.</p>	<p>Most of the general policies would have a neutral effect with some having positive effects (see list below). Water efficiency measures and rainwater harvesting/grey water recycling systems have been included.</p>	<p>Generally site policies will have a neutral effect. The LP assumes that flood risk assessments and SUDS will be used as part of development proposals. No housing allocations have been made in flood zones. Larger site allocation policies also require GI and open space to provide ponds/water attenuation.</p>
<p style="text-align: center;">LP.21 Flooding and Water Conservation LP.15 Design Principles LP.2 Construction and Use of Buildings LP.3 Climate Adaptation</p>		
<p>10. To reduce carbon emissions that cause climate change and to achieve net zero.</p>	<p>More traffic created by increased housing could have a negative impact on climate change. However, the plan provides for increased active travel as well carbon emisisions being reduced to achieve Council's corporate goal of carbon neutrality by 2030.</p>	<p>The impact of the LP site allocation policies is a mixture of neutral and positive. The larger sites include site allocations tend to have carbon change elements written within them expecting to see development which can reduce carbon emissions through construction, renewable energy as well as access to means of active travel.</p>
<p style="text-align: center;">LP.1 Sustainable development LP.2 Construction and Use of Buildings LP.3 Climate adaptation policies LP.14 Renewable energy policies LP.15– Design principles Opportunities to develop renewable energy sources Increased climate resilience of natural and built environment and adaptation and preparation for changing climatic conditions.</p>		
<p>11. To reduce waste generation and achieve sustainable management of waste.</p>	<p>The general policies would have a neutral effect with the exception of policies LP.2, LP.3, LP.14, LP.15, LP.21 and LP22 and LP.27 which have positive/very positive impacts through construction, climate adaptation,</p>	<p>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.</p>

	renewable energy and design principles to reduce waste.	LP.44 Land at Stowfield, expects environmental impacts from development are acceptable and should not be adversely affected by contamination from past uses.
	<p style="text-align: center;">LP.2 Construction and Use of Buildings LP.3 Climate Adaptation LP.14 Renewable Energy LP.15 Design Principles LP.21 Flooding and Water Conservation LP.22 Site Conditions LP.27 Strategic Site</p>	
12. To safeguard historical and cultural assets	<p>The general policies will generally have a positive effect on cultural and historical assets.</p> <p>The plan is positive for the safeguarding of historical and cultural assets mainly through the policy provisions of LP.16 – Historic Character and Distinctiveness.</p> <p>Other policies, such as Town Centre policies also ensure the protection of heritage assets and allocations have been made to ensure that heritage assets will not be impacted upon.</p>	<p>Generally site policies will have a neutral effect with approximately one third of the sites contributing positively to the objective when they protect historical and cultural assets or policies take these assets into consideration when proposed development nearby.</p> <p style="text-align: center;">LP.16 will regulation mitigation.</p>
	<p style="text-align: center;">LP.41 Reinstatement of Herefordshire/Gloucestershire canal LP.42 Dean Forest Railway LP.16 – Historic Character and Distinctiveness.</p>	

9. Stage B5: Proposed monitoring

9.1 This section of the report considers a framework by which the actual impacts of the plan can be monitored. More work will be carried out on this section at the Regulation 19 stage, but the following table gives an indication of how this could be achieved:

Table 18 Proposed Monitoring of the Plan and Expected Plan Targets

SA Objective/Indicator:	Impact to be monitored	Plan Targets
1. To improve the health and well-being of the populations and reduce inequalities in health.	<ul style="list-style-type: none"> • Proportion of journeys made by walking, cycling public transportation • Proportion of journeys made by private transport/ car • Average journeys/year/person • No. of applications approved for recreation/leisure uses • Levels of obesity • Green Infrastructure 	<ul style="list-style-type: none"> • Increase in active travel • Decrease for car travel • Decrease • Increase • Decrease • Increase
2. To meet local housing needs, by ensuring everyone has the opportunity to live in a decent sustainably constructed and affordable home.	<ul style="list-style-type: none"> • No. of home developed both inside and outside of DSB • No. of affordable homes delivered/year. • Tenure of affordable housing achieved. 	<ul style="list-style-type: none"> • 330 dwellings/year average • 35% average • 67% for rent & 33% home ownership
3. To provide accessible community services, recreation and leisure facilities.	<ul style="list-style-type: none"> • No. of applications approved for recreation/leisure uses • Levels of obesity • No. of applications for community uses 	<ul style="list-style-type: none"> • Increase • Decrease • Increase
4. To facilitate the development of academic and vocational skills.	<ul style="list-style-type: none"> • No. of applications for educational purposes • Request details from GCC regarding school numbers • Educational attainment levels 	<ul style="list-style-type: none"> • Increase • Lower oversubscription • Increased
5. To create a more vibrant and sustainable local economy.	<ul style="list-style-type: none"> • Area of new employment land/planning applications for employment • Employment data (record businesses on each business parks) • % of workforce in employment • Out-commuting • Retail floorspace 	<ul style="list-style-type: none"> • Increased • More new businesses than loss of business per annum • Increased % • Lower out-commuting • Increased
6. To protect and enhance the landscape.	<ul style="list-style-type: none"> • Area of greenfield development • No of applications and area of land approved for housing inside and outside of DSB • Monitor density of housing approved. 	<ul style="list-style-type: none"> • Decrease & restricted to exception sites for outside DSB

	<ul style="list-style-type: none"> Green and Blue Infrastructure 	<ul style="list-style-type: none"> 30dph average Increase
7. To conserve and enhance biodiversity, flora and fauna.	<ul style="list-style-type: none"> BNG (No. of applications with BNG provision (and % of BNG provided)) Green and Blue Infrastructure 	<ul style="list-style-type: none"> 20% (and increased land used year on year, low levels of buying credits) Increase
8. To maintain and improve air quality.	<ul style="list-style-type: none"> Air quality in AQMA 	<ul style="list-style-type: none"> Reduction in NOx
9. To maintain and improve water quality and to achieve sustainable water resources management.	<ul style="list-style-type: none"> Flooding incidents recorded Water quality Applications review of SUDs provision Water use (dwellings & businesses) 	<ul style="list-style-type: none"> None Good/high quality High quality SUDs Reduced
10. To reduce carbon emissions that cause climate change and to achieve net zero.	<ul style="list-style-type: none"> Per capita CO2 emissions Monitor planning applications for construction methods to reduce carbon (Passivhaus applications) Renewable Energy Schemes 	<ul style="list-style-type: none"> Reduce Increased Passivhaus (or equivalent) Increase
11. To reduce waste generation and achieve sustainable management of waste.	<ul style="list-style-type: none"> No of applications for re-use of buildings Construction methods 	<ul style="list-style-type: none"> Increase Increased carbon efficiency construction and lower embodied carbon.
12. To safeguard historical and cultural assets	<ul style="list-style-type: none"> No. of listed buildings at risk No. and outcome of planning applications associated with heritage assets and assess mitigation 	<ul style="list-style-type: none"> Less than previous BAR report Reduce approvals for developments affecting heritage assets and increase appropriate mitigation.

10. Next steps

10.1 The draft Local Plan and this SA Report will be subject to public consultation from 8th July until 19th August 2024. Any comments can be sent to the Local Plans Team at localplans@fdean.gov.uk.

10.2 The SA process will then continue until the next plan preparation stage, which will be Regulation 19 Pre-publication draft of the Local Plan. It is intended that the SA will include the following by the time of publication for Regulation 19:

- Reg 19 SA will carry out a carbon audit on the allocation sites taken forward the carbon calculator which is currently in the process of being built for this purpose.
- Reg 19 SA will assess density and the need for more land area to provide for Biodiversity Net Gain, especially as the local plan policy seeks 20%
- Reg 19 SA will look more closely at GI locations and assess any potential site allocations for such purposes.
- Reg 19 SA will pick up on any new/modified policies and site allocations since Reg 18 stage and appraise as necessary.

Appendix 1 – Site Appraisals (see separate document)

Appendix 2 – Policies Appraisals (see separate document)

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