



# Forest of Dean District Council **LOCAL PLAN**

## Revised Strategy Paper 2025



# Contents

I	Introduction	3
	What is the document about?	3
	Why are we reviewing the strategy now?	4
	What period will the plan cover?	5
	Local Plan Timetable - Local Development Scheme	5
	Draft Local Plan Consultation 2024	7
2	Key Issues and Constraints	8
3	Consultation and Options	10
4	Key Considerations in Options Decisions	11
5	Sustainability and the Sustainability Appraisal	12
6	Advantages and Disadvantages of each Option	23
7	Sustainability Appraisal Conclusion	27
8	How the Strategy meets the Council's Priorities	28
9	The Future Growth Strategy Recommendation	30
10	Conclusion	32

# **I Introduction**

**I.1** The Local Plan has been in development since 2019 and was the subject of 3 consultations between 2019 and 2024, prior to arriving at an agreed strategy for the Draft Local Plan consultation in July 2024. Changes to National Planning Policy Guidance (NPPF) in December 2024 and the introduction of new mandatory housing targets for Local Planning Authorities has resulted in a requirement to review the strategy. It is clear the strategy proposed in the Draft Local Plan 2024 will no longer be capable of meeting the new calculated housing need in a sustainable manner. In April 2025 the Council agreed it necessary to review the current development strategy and explore other potential strategic options so that the District may meet its housing need.

**I.2** An options consultation was undertaken between July and September of 2025, this was a chance for different policy approaches to be appraised and commented on before setting the strategic approach for the Plan. The accompanying Local Plan Option Consultation Paper 2025 is intended to provide an overview of the responses received to the consultation held between July and September 2025. The actual responses received are published separately at <https://www.fdean.gov.uk/localplanoptions>

## **What is the document about?**

**I.3** A Local Plan sets out the policies that reflect the Council's preferred spatial approach, identifying the housing, employment and community development required to meet local needs. It sets out the the distribution of development within the District and policies for protecting and conserving the natural and built environment.

**I.4** The Local Plan sets the planning framework for the District it:

- identifies the development land needed in the future
- sets out how sites will be developed and coordinated with the infrastructure needed
- helps reduce the risk of speculative planning applications
- sets out the policies used when determining planning applications.

**I.5** The spatial strategy is the key part of the Local Plan preparation, it will define where the best place for new development to be located to achieve sustainable growth. The Plan strategy will focus development in the most sustainable locations to help balance the need for development with the need to protect and enhance the environment and to help meet the plans objectives.

**I.6** The spatial strategy co-ordinates new homes and jobs with the infrastructure investment necessary to support them. It directs growth away from areas that are more sensitive to potentially harmful development and towards those that have greater potential. It guides development to minimise its carbon footprint and to address climate change.

**I.7** This paper will address the issues and options set out in the consultation document, taking into account the responses received and suggest a preferred strategy as a result. This strategy paper read in conjunction with the options consultation paper will inform the Local Plan and in particular the next stage of the Local Plan process, namely a revised Draft Local Plan.

**I.8** As the Local Plan progresses the process becomes more formal and evidence in support of the Local Plan will continue to be prepared and updated. This will include the viability study , Infrastructure delivery plan, transport evidence including modelling and Housing and Economic Needs Assessment (HENA).

## **Why are we reviewing the strategy now?**

### **Draft Local Plan 2024**

**1.9** During the summer of 2024 the Council consulted on a Draft Local Plan, this set out the policies that reflected the Council's preferred Strategy at that time. This strategy was one of concentrating development at the major centres and at locations where a new planned environment could be created. Development was proposed at the 3 strategic sites of Beachley, Lydney and Newent. In addition land was to be allocated elsewhere in the district principally at the major villages including Drybrook, Lydbrook, Mitcheldean, Newnham, Tutshill and Whitecroft. It reflects the settlement hierarchy Policy LP4 and the availability of services and suitable travel options, some of which needed to be provided or improved in order that the development envisaged could take place.

### **National Planning Policy Guidance (NPPF) 2024**

**1.10** In December 2024 a revised National Planning Policy Framework was published by the Government, it provided a new way of calculating housing need and consequently, the number of new homes needed in the Forest of Dean District. The new method increases the minimum number of homes which must be delivered from 330 new homes per year to 600 new homes per year. This has resulted in the housing requirement over a 20 year period increasing to 12,000 dwellings, it means there is a shortfall from that allocated in the the Draft Local Plan consultation document in 2024 of at least 6,000 homes.

**1.11** In addition, paragraph 78 of the NPPF places further emphasis on the Council to deliver the required need. It states that deliverable sites should include a buffer of either 5 or 20% of additional housing (depending on circumstances). This reflects the government's higher housing requirement. It highlights the importance of the Council progressing with the preparation of a local plan that seeks to deliver the revised local housing need as soon as possible. The combination of an older local plan with outdated housing policies, along with a current housing land supply of 1.93 years (as calculated up to 31st December 2024), leaves the Council exposed to speculative development and planning by appeal which could be in less sustainable or even unsustainable locations, and lacking quality of design.

**1.12** In consideration of this uplift, the previously agreed Local Plan strategy is not capable of delivering a housing requirement to meet this local need. It was therefore agreed, to review the Draft Local Plan's development strategy and explore what other potential strategic options exists to meet its housing need in the District.

### **Consultation on the 'Options to Deliver the Additional Housing Requirement'**

**1.13** As a result of the revised NPPF and the increase in the housing requirement, the Council, in April 2025, agreed to consider exploring a revised approach for the Local Plan Strategy. This was followed by a Regulation 18 consultation on the 'Options to Deliver the Additional Housing Requirement'. This closed on 11th September 2025. The responses to this consultation are set out and analysed in the accompanying paper Local Plan Options consultation.

## What period will the plan cover?

**1.14** The current agreed plan period for the Draft Local Plan covers 20 years from 2021 to 2041 and was subject to review as part of the options consultation.

**1.15** The NPPF 2024 requires that strategic policies should look ahead over a minimum 15 year period from adoption to anticipate long-term requirements and opportunities such as those arising from major improvements in infrastructure. It is unlikely that the new Local Plan will be adopted during 2027 and many responses to the recent options consultation questioned whether this is still an underestimation of the timescale, due to the length of time reported for current examinations and the number of Local Plans anticipated being submitted towards the end of 2026 within the current Local Plan process.

**1.16** Therefore it is judged to be the appropriate time to consider resetting the base date for the Local Plan to 2025 but retaining the 20 year plan period so that it would run to 2045. This is due to the need to revise the strategy, the plan period would align with the date the new method of calculating housing need was introduced by the NPPF, and takes into account the new timetable set out in the Local Development Scheme. This would ensure the plan covers at least 15 years post adoption (as per the NPPF stipulations). It would also ensure that the new method of calculating housing need would extend and be calculated for the whole of the plan period.

**1.17** This will also align with the current baseline date of the assessments of housing and employment needs which is currently being undertaken along with other Gloucestershire authorities which will provide a more up to date account of housing and employment need. The plan's assessments of development need can then look ahead not just for the minimum period but beyond.

**1.18** The plan period does not preclude policies from looking ahead beyond 2045. Strategic policies themselves generally look ahead in excess of fifteen years from adoption consistent with national planning policy. The strategic policies provide a long term framework, looking necessarily beyond 2045. Specific proposals at Beachley, Newent and Lydney and any other larger allocations will include land for development beyond the plan period and some other sites will still continue to be under construction at this date.

**1.19** However, it is a statutory requirement for all Local Planning Authorities to have an up to date Local Plan. Therefore the Council will continue to review the Local Plan policies and strategic strategies within 5 years of the adoption of the Local Plan, in line with current national guidance. NPPF (December 2024) paragraph 34 to take on board updated information, particularly about the number of new homes needed.

## Local Plan Timetable - Local Development Scheme

### New Local Plan

**1.20** The initial stages of Local Plan consultation took place in 2019. The Issues and Options Paper identified the key planning issues and opportunities the new Local Plan should address. It set out a draft vision and aims for the Local Plan. A key challenge was the need to ensure that the Local Plan delivers a sustainable strategy compatible with the Council's motion on climate change 'to help deliver carbon neutrality through all relevant strategies and plans.' The key aim is to deliver real change which will

maximise the Local Plan's contribution to achieving the FoDD's target of zero carbon by 2030. A range of generic options were suggested for consideration during the consultation.

**1.21** The Preferred Option consultation 2020 focused on the selection of a strategic option and a broad strategy for the Local Plan. The option included the establishment of new strategic development in three locations and the creation of a new settlement. This was considered to be sustainable in terms of climate change and establish a strategy which could carry on beyond the present end date of 2041.

**1.22** Following feedback from the consultation in 2020, it was considered that a revision of the first draft strategy was required. The Second Preferred Option 2022 was a revised strategy that placed a strong emphasis on Lydney making it the district's principal settlement, with the vision of providing a true gateway to the Forest of Dean, whilst promoting the complementary relationship between all forest towns. It recognised constraints and opportunities elsewhere and proposed further change in the form of new development, including a mixed use site at Newent, the regeneration of Beachley Barracks and supporting sustainable mixed use developments at the towns, major villages and at selected villages.

**1.23** The Draft Local Plan 2024 sets out the policies that reflected the Council's preferred spatial approach taking account of the evidence and the engagement undertaken to that date. In addition the plan contains core policies that establish the overriding principle of sustainable development and its importance to the Forest of Dean, plus policies related to construction and use of buildings, and climate adaptation. Other policies set the scene for the location of new development, covering the settlement hierarchy and protection for the countryside. Complementary policies for the protection of land, important characteristics and features of the district are included, as are policies seeking improvements in the wider environment, nature conservation and biodiversity.

**1.24** As a result of changes to the national policy and the governments proposed housing figure aimed at tackling the country's acute housing crisis and stimulating economic growth, the Council undertook a Regulation 18 consultation on the 'Options to Deliver the Additional Housing Requirement.' (Options consultation 2025) It outlines the broad approaches suggested to accommodating new housing , employment development and supporting infrastructure across the District and the preferred Strategy.

<b>Milestone and explanation of milestone</b>	<b>Date/ Expected date</b>
<b>Potential Issues and Options consultation</b>	Completed Autumn 2019
<b>Preferred Options consultation</b>	Completed Winter 2021 Autumn 2022
<b>Consultation on draft Plan (Regulation 18)</b>	Completed Summer 2024
<b>Consultation on Options to Deliver the Additional Housing Requirement. (Regulation 18)</b>	Summer 2025
<b>Consultation on revised draft Plan (Regulation 18)</b>	Winter 2025



This includes a six week consultation on a revised draft Plan, which will set out the Council's revised preferred strategy for accommodating future growth.	
<b>Publication of Submission Draft Local Plan (Regulation 19)</b> This involves the publication of the Plan in a form which the Council believes to be sound and which it intends to submit for examination. This stage includes a further six week consultation period.	Summer 2026
<b>Submission (Regulation 22)</b> This is when the plan is submitted by the Council to the Secretary of State.	Autumn 2026
<b>Examination and Main Modifications</b> The examination involves an independent Planning Inspector testing the plan for legal compliance and soundness.	Winter 2026/2027
<b>Adoption</b> The final stage in the process is the formal adoption of the Plan by the Council. Once adopted it forms part of the development plan for the area and will guide future development.	Spring 2027

### Draft Local Plan Consultation 2024

**1.25** The Local Plan is not simply about planning for new housing - it is about helping to create sustainable and healthy places, and supporting job growth. However, given the uplift in new homes required we needed to revisit our Spatial Strategy, to understand how best to try to meet the new housing requirement, as well as providing land for the associated infrastructure and services, businesses, schools, health facilities and green spaces.

**1.26** The Draft Local Plan consultation was a very valuable exercise, receiving over 1600 comments on issues such as housing, environment, climate change, sustainability and site allocations. The Local Plan must address the national and local priorities of climate change, carbon reduction, ecology and support for the community its economy and the environment. The content of the Local Plan will continue to be evaluated with regard to the comments received during the Draft Local Plan consultation 2024, the changes to the NPPF 2024, ongoing discussions with duty to cooperate bodies and in the light of an agreed revised strategy. These changes will be the subject of a Revised Draft Local Plan consultation early in 2026.

**1.27** It should be noted that we are still at an early stage in identifying the particular infrastructure requirements for potential allocations (education, healthcare, highways etc). Officers are preparing an Infrastructure Delivery Plan (IDP) and as the Local Plan makes further progress, each of the allocations will be subject to a more detailed assessment and evaluation.

### National Development Management Policies

**1.28** The Levelling Up and Regeneration Act 2023 (LURA) introduced National Development Management Policies (NDMPs) – that are intended to replace generic policies contained in local and neighbourhood plans. The understanding now is that NDMPs would be published for consultation late 2025. Depending on the final status of NDMPs, some current plan policies may no longer be necessary as local plan policies should not repeat or conflict with them. The Local Plan can be amended as necessary to ensure conformity.

## 2 Key Issues and Constraints

**2.1** The main issue for the Local Plan is how to balance conservation with the need to accommodate change in a sustainable manner. The issues relating to the District, the towns and other settlements were set out in the options consultation, they include considerations such as the statutory forest, designated sites, flooding, landscapes, topography and relief, mining activity, accessibility for example.

**2.2** A number of constraints were also identified in the options paper in relation to considering where development may be built. Constraints such as National Landscapes are statutorily recognised and rule out major development, others which generally preclude major development include Special Areas of Conservation (SACs), Sites of Special Scientific Interest (SSSI) and areas prone to flooding. These constraints will need to be considered however the requirements of the Local Plan are derived.

**2.3** In addition to nationally recognised constraints, there are some of a more local nature that may guide development choices. Typically these include areas identified as locally important landscapes, or local wildlife sites. They are designated in order to conserve locally identified assets and interests.

**2.4** We must recognise the assets that are important to the area including local and national designations. The key features are identified on the policies map<sup>1</sup> that accompanied the Draft Local Plan 2024 and we have to make decisions on the key areas that need to be conserved whilst ensuring the Local plan can deliver the identified future growth.

**2.5** Some comments received to the options paper consultation concerned surface water drainage, these matters are covered by policies in the NPPF and the new Environment Agency flood risk maps issued in spring 2025. Transport matters were also the subject of many representations, especially relating to areas that may be proposed for new settlements. It is important to gain an understanding of the local road and rail network and how they are supported by proposals in the Gloucestershire Local Transport Plan. To support this we are undertaking transport modelling work. A particular feature of this will be studies of all the routes that are heavily congested such as the A48 into Chepstow and the A40 towards Gloucester. Bus and rail networks and their capacity to support growth will be analysed to support the plan.

**2.6** As part of the transport assessments we will look at the possibility of improving the rail network and possible new stations as suggested in comments received. There is likely to be significant costs involved that is unlikely to be supported by the new development in the area. This could be investigated to improve connectivity and provide additional public transport options to support growth. The cost of improved lines and services would require further investigation to establish if there was any economic case and availability of additional funding solutions.

**2.7** Comments suggested that use of greenfield sites and the use of the best and most versatile land should be prevented. However, due to the housing requirement of 12,000 homes over the 20 year period, it is not possible to accommodate all of the homes on brownfield sites and it is necessary to explore the use of agricultural land for development. The NPPF at Paragraph 187 (b) notes the importance of best and most versatile land.

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<sup>1</sup> <https://maps.fdean.gov.uk/map/Aurora.svc/run?script=%5CAurora%5CFoD%20Aurora%20Pre%20Draft%20Local%20Plan%202041.AuroraScript%24&nocache=7975efee-df3f-abba-61ce-4b13520c4121&resize=always>



**2.8** In a strategic document such as this, it is impossible to convey the range of assets that we have. Much is available on the policies map. Information held by the Council will be used to make decisions about potential development sites and balancing the need for growth with protection of our assets has been a critical consideration.

**2.9** Difficult decisions will have to be made but unplanned growth can bring even more unacceptable consequences. We will continue to gather evidence about our assets and how they can be protected as we continue our work on the Local Plan.

**2.10** The role of the Plan is to weigh up and balance competing interests. By developing a long term strategy it gives us the opportunity to identify strategic development locations and the infrastructure to support their development in order to achieve sustainable development envisaged by the NPPF and robust self contained communities, social economic and environmental matters will continue to be assessed to seek to ensure delivery of future planned growth. To achieve a better relationship between homes, jobs and infrastructure, increasing the speed of delivery and ensuring that development does not damage the special places that we value.

### 3 Consultation and Options

**3.1** The options consultations looked at the different approaches the Local Plan could take for the distribution of houses. The key issue considered was how to accommodate the increased scale of growth and changes that are expected during the plan period in a sustainable and appropriate way. The consultation document was a chance for different strategy approaches to be appraised and commented on before setting the strategic approach. The following options were considered:

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

**3.2** The options consultation document provides a detailed overview of each of these options and discusses whether they are considered sustainable and suitable. The Sustainability Appraisal Conclusions for the proposed options consultation are available on the Sustainability webpage<sup>2</sup>.

#### **Other suggested options.**

**3.3** Combination of Options 1 and Options 2 - A number of comments received to the options consultation suggested a combination of Option 1 and Option 2, providing further expansion to the existing towns and larger settlements and then a distribution of homes around all settlements in a planned manner. This is assessed below in sections 5 and 6.

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2 [Sustainability appraisal - Forest of Dean District Council](#)

## 4 Key Considerations in Options Decisions

**4.1** The greatest demands for land in the Local Plan will be for new housing development. The Local Plan will need to allocate land for new homes but this will be part of a suite of policies and proposals that address the needs of other objectives such as sustainability and climate change, the impact on the environment, on the local economy and community.

**4.2** The Local Plan options will need to be evaluated against the following:

1. **Climate change/ carbon reduction** The overarching theme of the Local Plan is to deliver the greatest benefits in carbon reduction that can be achieved whilst meeting the needs of the FODD. Some options will inevitably perform better than others in this respect. The ability to reduce the need to travel, and to introduce new public transport and active travel measures are important as is the need to use new infrastructure economically and provide for efficient energy use. It is important to evaluate the long term performance of any option including its ability to deliver beyond the current plan period.
2. **The impact of development on the landscape-** individual and cumulative impacts on local and wider landscapes, and on individual settlements need to be taken into account. Some sites may be able to bring an enhancement while at the other extreme sites that may still be able to proceed may require extensive mitigation.
3. **Settlement hierarchy** -The settlement hierarchy is based on the principle that the scale of any development should be in keeping with the level of facilities and services that can be easily accessed. This includes access to transport and employment but it is accepted that "self containment" will vary greatly. New allocations should be based on the principle that they are in proportion with the level of services that exist or can be provided and should be in step with the hierarchy as it is or will be as the plan is implemented. Many LPs have an underlying strategy of supporting and promoting new development in keeping with the available services. The Draft Local plan continues this from the adopted allocations plan with its emphasis on the towns then major villages, although the actual allocations provides for greater change in Lydney and Newent, in order to deliver a mixed form of development in the most sustainable location.
4. **Timing and pacing of development-** The Local Plan needs to identify a range of sites so that the annual requirement of new dwellings may be delivered over the whole plan period. This may be achieved by phasing of allocations (adding dates to the allocations policies) so that some will not come forward until a certain year. The policy may provide some flexibility but early applications for development may be hard to resist. Timing of development may also be affected by the nature of the allocations themselves. Large sites may take several years to be completed. At present some sites proposed in the Draft Local Plan that are currently available are being built out or the subject of planning applications but will not be completed for a number of years. Others may take several years to come forward. A range of site types in a variety of suitable locations in keeping with the needs of the area is required to ensure a supply of sites throughout the plan period.

## 5 Sustainability and the Sustainability Appraisal

**5.1** One of the key aims of the planning system is to create sustainable communities by bringing housing, jobs and services closer together in order to provide high quality places that support the overall well being of communities reducing the need to travel. These sustainable communities should be capable of accommodating a degree of self containment by having a range of services broad enough to fulfil the day to day needs of the residents.

**5.2** A sustainable development prioritises and builds on the efficient use of existing provisions, minimises environmental impact, and promotes social well-being. This means considering factors like proximity to public transport and active travel routes, proximity to employment opportunities and existing community facilities and services; access to green spaces, and the efficient use of land and existing infrastructure to support the day to day needs of the community.

**5.3** Any new sustainable community development must also deliver economic land to meet future requirements, moving us towards a more sustainable and greener economy, and must create sustainable and healthy places, well served by infrastructure, with good connections between homes and jobs.

**5.4** The likely performance of the Local Plan is assessed during its development through a Sustainability Appraisal (SA). The SA is used to evaluate and amend the Local Plan policies and proposals as they evolve in order to achieve the best overall results.

**5.5** A sustainability appraisal (SA) is a systematic process that evaluates the potential environmental, economic and social impacts of proposals against reasonable alternatives. It is conducted during the preparation of local plans to ensure the sustainability considerations are integrated into decision making frameworks. The purpose of the appraisal is to promote sustainable development by assessing how plans and projects contribute to sustainability goals. It helps inform and guide the planning process, ensuring that sustainability is a core consideration. 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.

**5.6** The Sustainability Appraisal 'Further Interim Report for the Local Plan Options to Deliver the Additional Housing Requirement' should be read in conjunction with this Document and can be found in the Local Plan supporting documents using the following <https://www.fdean.gov.uk/media/5awdx3yk/sa-further-interim-report-2025.pdf>

**5.7** New options or combination of options have been suggested through the Options consultation and therefore have been assessed through the Sustainability process. These were a combination of options 1 and 2 and Also a combination of options 1, 2 and 3.

### Combination of Option 1 (Selective planned expansion of existing settlement(s)) and Option 2 (General distribution of housing around all existing settlements (planned sharing of the housing numbers across all settlements))

Sustainability Appraisal Objective:	Combination of Option 1 & Option 2 (in part)
	(Selective planned expansion of existing settlement(s)) and General distribution of housing around all existing settlements (planned sharing of the housing numbers across all settlements))
1. To improve the health and well-being of the populations and reduce inequalities in health.	<p><b>0</b></p> <p>Mixed outcome. Some sites would be near existing health services (under Option 1 selection), however, others (particularly at the numerous smaller more rural settlements) would not be in close proximity. For the Option 2 element (distribution) there would be less potential to select most sustainable sites, to design/connect up active travel routes (for healthy living) or to masterplan and therefore less opportunity to design out crime and risk of accidents.</p>
2. To meet local housing needs, by ensuring everyone has the opportunity to live in a decent sustainably constructed and affordable home.	<p><b>0</b></p> <p>Mixed Outcome. Housing numbers could be accommodated across the district, however, owing to the fact that many of the housing locations would be small sites (distributed under Option 2 element), this may not provide as many affordable housing units as larger sites or provide a sufficient mix of housing types and sizes to reduce inequalities. Nevertheless, it would allow some smaller scale of development across the smaller villages which may create vibrancy and provide housing for local people.</p>
3. To provide accessible community services, recreation and leisure facilities.	<p><b>0</b></p> <p>Mixed outcome. Some sites (Option 1) would be near existing facilities to take advantage of them and reduce dependence on the car (or increase use of public transport). However, others (particularly at the numerous smaller more rural settlements under Option 2 distribution) would not be in close proximity. Less scope for planning delivery of such facilities.</p>
4. To facilitate the development of academic and vocational skills.	<p><b>0</b></p> <p>Mixed outcome. Some sites would be near existing educational facilities (Option 1 element), however, others (particularly at the numerous smaller more rural settlements for Option 2 distribution) would not be in close proximity. Less scope for planning delivery of such facilities and for improving access to them.</p>
5. To create a more vibrant and sustainable local economy.	<p><b>0</b></p> <p>Mixed outcome. Development may support existing services or potentially create new businesses, but this is highly dependent on the location and the developer. Some potential for providing an increased range of employment opportunities, including higher paid and professional (under Option 1 element).</p>
6. To protect and enhance the landscape.	<p><b>0</b></p> <p>Mixed outcome. Under the Option 1 element there is the potential to avoid sites (particularly the larger strategic sites) which have the most impact on the landscape. Furthermore, this element of the option would allow for the promotion of high quality design to protect/enhance the landscape and also have potential to avoid the sites which have the highest agricultural land quality value.</p> <p>However, the sites selected under Option 2, are likely to the smaller more rural sites, therefore having a more potential to cause harm to landscape, dependent on the size and scale of development.</p>
7. To conserve and enhance biodiversity, flora and fauna.	<p><b>+/0</b> Mixed Outcome</p> <p>Some opportunity to reduce and mitigate impacts supporting no net loss to biodiversity and promoting biodiversity net gain and GI for sites selected under Option 1.</p> <p>However, sites selected under Option 2 (distribution) will offer little opportunity to reduce wide-scale impacts on biodiversity and have less ability to plan/design for GI.</p>
8. To maintain and improve air quality.	<p><b>0/-</b></p> <p>Mixed outcome.</p>

<b>Sustainability Appraisal Objective:</b>	<b>Combination of Option 1 &amp; Option 2 (in part)</b>
	<p>Development and traffic generation causes air quality issues through increased traffic and congestion. However, potential to select sites (under Option 1) with improved opportunities to travel by public transport.</p> <p>However, those sites selected under Option 2 have less potential to improve opportunities to travel by public transport or reduce congestion.</p>
9. To maintain and improve water quality and to achieve sustainable water resources management.	<p><b>0</b></p> <p>This is dependent on the measures taken for each individual site, but has potential to ensure development has the ability to conserve water resources, increase water efficiency and improve water quality as much as possible.</p>
10. To reduce carbon emissions that cause climate change and to achieve net zero.	<p><b>0</b></p> <p>Limited opportunity for large scale strategic carbon offset measures, but some scope for planned local small-scale measures to support energy conservation and energy efficient design to reduce effects of climate change (can ensure housing is sustainably constructed with low/zero carbon emissions through the implementation of high quality design and planning policy/design guidance).</p>
11. To reduce waste generation and achieve sustainable management of waste.	<p><b>-</b></p> <p>Development will always result in waste generation. Small-scale measures could be implemented through planning policy and design guidance to reduce waste generation and achieve better sustainable management of it, but this is mainly developer-led.</p>
12. To safeguard historical and cultural assets.	<p><b>0</b></p> <p>Mixed outcome. Some sites may be closer to heritage assets than others, depending on the settlement, but generally less opportunity to avoid harmful development in some cases, thus maintaining cultural and historical assets.</p>

**5.8** It could be argued that Options 1 and 2 are mutually exclusive and therefore by enacting either of these options, it would result in the other being unable to come into play.

**5.9** However, after further consideration, there may be some scope for only part of each of the individual options to be combined. For example, the Option 1 element could provide a large portion of development for the strategic sites selected from the most sustainable towns and larger settlements. Any left-over housing numbers which have not been provided for using Option 1 could then be subject to Option 2, i.e. a sharing/distribution of the remaining housing numbers across the other settlements in the District (namely the medium to smaller settlements).

### **The positive effects (in sustainability terms) of this combination of options include:**

**5.10** Mainly, this option results in neutral SA impacts. This option results in a mixture of positive results from the elements which are from Option 1, whilst balancing the more negative impacts of general distribution across the smaller settlements. This combination of options provides the ability to select development of appropriate scale in the most sustainable locations for the larger strategic sites, taking advantage of the facilities nearby such as education, health, retail and recreation as well as the infrastructure which is already in place in the larger towns/villages, without overburdening those settlements, but instead encouraging business and an increased range of employment opportunities, all with a long-term cumulative positive effect on SA Nos. 1, 3, 4 & 5.

**5.11** Sites selected under Option 1 can also provide a mix of housing types and sizes to better meet the needs of different sectors and reduce inequalities as well as designing out crime, which are positive effects for SA No. 2. Whereas those sites selected under Option 2 conditions, which are dispersed



around smaller more rural sites, have less potential to provide as many affordable housing units or a mix of housing types. Nevertheless, it would allow some smaller scale of development across the smaller villages which may create vibrancy and provide housing for local people and reduce inequalities. As such, this combination of options can have long-term positive effects for SA No.2.

**5.12** Again, the sites selected under Option 1 and potentially some of those under Option 2 have potential to reduce dependency on the private car, encouraging use of public transport and active travel, and introducing low/zero carbon off-set measures, all of which have long-term positive effects on SA No. 1 for healthy living along with SA Nos. 3,4 and 10.

**5.13** Such an option can also promote biodiversity net gain and be designed to strengthen connectivity for wildlife habitat and create GI in particular for the sites which are selected under Option 1 (namely the larger strategic sites) which is a positive effect on SA No. 7.

**The negative effects (in sustainability terms) of this combination of options include:**

**5.14** The scale of the existing settlement and the various constraints (such as Statutory Forest, Flooding, protected Ecology, etc.) that apply suggests that there will be restrictions in terms of the capacity available at many of the existing settlements. Additional pressure would be put on infrastructure, and where that is already weak, this could become unsustainable. Traffic generation and congestion would cause additional air quality issues and development would of course leads to waste generation with only limited opportunities for sustainable waste management, which are negative effects on SA Nos. 8 and 11.

**5.15** Some of the many smaller and rural settlements in the district would be significantly changed by an increase in development (under Option 2 element) which would be out of scale and character and not supported by any infrastructure, services (health, education, employment, retail), public transport or active travel choices. In the case of the sites dispersed over the smaller rural settlements this 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. There is also likely to be lack of employment or social facilities in those Option 2 locations and would result in a higher dependency on private transport, all having a long-term cumulative negative effects on SA Nos. 1, 3, 4 and 5. These smaller rural settlement sites would also result in fewer opportunities to support energy efficiency to reduce effects of climate change (carbon dependency) whilst simultaneously making it difficult to conserve biodiversity or provide biodiversity net gain (BNG) or promote green infrastructure (GI), both causing negative effects on SA Nos. 7 and 10.

**5.16** Overall, some of the negative effects of this combination of options could however be mitigated, firstly by selecting the larger and most strategic sites under the Option 1 element. Furthermore, the provision of improved infrastructure (and funding for it), the design of schemes to create active travel routes for healthy living (positive effect on SA No. 1) and improved public transport to reduce traffic generation and to improve carbon offset (positive effects for SA Nos. 3 and 10) could be accommodated across sites selected under Option 1 and to a more limited extent, those under Option 2. This combination of options is able to deliver a larger quantum of development than Option 1 alone. And by being a combination, some of the negative effects of Option 2 can be off-set by the best selection of sustainable sites under Option 1. However, it may also be a combination of options that would not ensure a longer-term sustainable strategy because the existing capacity would be exhausted.

**Combination of Option 1 (Selective planned expansion of existing settlement(s)), Option 2 (General distribution of housing around all existing settlements (planned sharing of the housing numbers across all settlements) and Option 3 (maximum incremental change to the extent of absolute constraints)**

<b>Sustainability Appraisal Objective:</b>	<b>Combination of Options 1, 2 and 3 (in part)</b>
	(Selective planned expansion of existing settlement(s)), General distribution of housing around all existing settlements (planned sharing of the housing numbers across all settlements) and Maximum incremental change to the extent of absolute constraints)
1. To improve the health and well-being of the populations and reduce inequalities in health.	<p><b>0</b></p> <p>Mixed outcome. Some sites would be near existing health services (under Option 1 selection), however, others (particularly at the numerous smaller more rural settlements) would not be in close proximity. For the Option 2 element (distribution) there would be less potential to select most sustainable sites, to design/connect up active travel routes (for healthy living) or to masterplan and therefore less opportunity to design out crime and risk of accidents.</p>
2. To meet local housing needs, by ensuring everyone has the opportunity to live in a decent sustainably constructed and affordable home.	<p><b>+0</b></p> <p>Mixed Outcome. Housing numbers could be accommodated across the district, particularly if some of the settlements were developed to the extent of absolute constraints. It would allow some smaller scale of development across the smaller villages which may create vibrancy and provide housing for local people.</p> <p>However, many of the housing locations would be small sites (distributed under Option 2 element), and this may not provide as many affordable housing units as larger sites or provide a sufficient mix of housing types and sizes to reduce inequalities in those areas</p>
3. To provide accessible community services, recreation and leisure facilities.	<p><b>0</b></p> <p>Mixed outcome. Some sites (Option 1 and to a degree a limited number of sites under Option 3) would be near existing facilities to take advantage of them and reduce dependence on the car (or increase use of public transport). However, others (particularly at the numerous smaller more rural settlements under Option 2 distribution) would not be in close proximity. Less scope for planning delivery of such facilities.</p>
4. To facilitate the development of academic and vocational skills.	<p><b>0</b></p> <p>Mixed outcome. Some sites would be near existing educational facilities (Option 1 element and to some degree a limited number of sites under Option 3), however, others (particularly at the numerous smaller more rural settlements for Option 2 distribution) would not be in close proximity. Less scope for planning delivery of such facilities and for improving access to them.</p>
5. To create a more vibrant and sustainable local economy.	<p><b>0</b></p> <p>Mixed outcome. Development may support existing services or potentially create new businesses, but this is highly dependent on the location and the developer. Some potential for providing an increased range of employment opportunities, including higher paid and professional (under Option 1 element and to a limited degree those sites selected under Option 3).</p>
6. To protect and enhance the landscape.	<p><b>0/-</b></p> <p>Mixed outcome.</p> <p>Under the Option 1 element there is the potential to avoid sites (particularly the larger strategic sites) which have the most impact on the landscape. Furthermore, this element of the option would allow for the promotion of high quality design to protect/enhance the landscape and also have potential to avoid the sites which have the highest agricultural land quality value.</p> <p>However, the sites selected under Option 2, are likely to the smaller more rural sites, therefore having a more potential to cause harm to landscape, dependent on the size and scale of development.</p>

Sustainability Appraisal Objective:	Combination of Options 1, 2 and 3 (in part)
	Furthermore, sites selected under Option 3 (to extent of absolute constraints) are much more likely to have negative effects on the landscape, by way of cumulative development where landscape is sensitive.
7. To conserve and enhance biodiversity, flora and fauna.	<p><b>+/0</b> Mixed Outcome</p> <p>Some opportunity to reduce and mitigate impacts supporting no net loss to biodiversity and promoting biodiversity net gain and GI for sites selected under Option 1.</p> <p>However, sites selected under Option 2 (distribution) will offer little opportunity to reduce wide-scale impacts on biodiversity and have less ability to plan/design for GI. Furthermore, development to the extent of absolute constraints (Option 3) can result in harm or further pressure on biodiversity and the potential to provide GI.</p>
8. To maintain and improve air quality.	<p><b>0/-</b> Mixed outcome.</p> <p>Development and traffic generation causes air quality issues through increased traffic and congestion. However, potential to select sites (under Option 1) with improved opportunities to travel by public transport.</p> <p>However, those sites selected under Option 2 and/or 3 have less potential to improve opportunities to travel by public transport or reduce congestion.</p>
9. To maintain and improve water quality and to achieve sustainable water resources management.	<p><b>0</b></p> <p>This is dependent on the measures taken for each individual site, but has potential to ensure development has the ability to conserve water resources, increase water efficiency and improve water quality as much as possible.</p>
10. To reduce carbon emissions that cause climate change and to achieve net zero.	<p><b>0/-</b></p> <p>Limited opportunity for large scale strategic carbon offset measures, but some scope for planned local small-scale measures to support energy conservation and energy efficient design to reduce effects of climate change (can ensure housing is sustainably constructed with low/zero carbon emissions through the implementation of high quality design and planning policy/design guidance).</p> <p>However, the sites selected under Option 3 have a little or no planned approach to how development will include strategic and local carbon offset to support energy conservation and reduce vulnerability to climate change.</p>
11. To reduce waste generation and achieve sustainable management of waste.	<p><b>-/-</b></p> <p>Development will always result in waste generation. Small-scale measures could be implemented through planning policy and design guidance to reduce waste generation and achieve better sustainable management of it, but this is mainly developer-led.</p> <p>For sites which are selected under Option 3, there is more of a lack of strategic management of development, and therefore less chance of implementing sustainable measures for reducing waste generation and achieving sustainable management.</p>
12. To safeguard historical and cultural assets.	<p><b>0/-</b></p> <p>Mixed outcome. Some sites may be closer to heritage assets than others, depending on the settlement, but generally less opportunity to avoid harmful development in some cases, thus maintaining cultural and historical assets.</p> <p>Sites selected under Option 3 could be closer to and cause further harm or put more pressure to heritage assets.</p>

**5.17** It could be argued that Options 1, 2 and 3 are mutually exclusive and therefore by enacting any one of those options, it would result in the others being unable to come into play.

**5.18** However, after further consideration, there may be some scope for only part of each of the individual options to be combined. For example, the Option 1 element could provide a large portion of development for the strategic sites selected from the most sustainable towns and larger settlements. Any left-over housing numbers which have not been provided for using Option 1 could then be subject to Option 2, i.e. a sharing/distribution of the remaining housing numbers across the other settlements in the District (namely the medium to smaller settlements). Finally, Option 3 could come into play in this scenario by allowing some of the aforementioned settlements (whether large or small) to be developed to their ultimate capacity.

**The positive effects (in sustainability terms) of this combination of options include:**

**5.19** Mainly, this option results in neutral SA impacts, rather than positive ones. This option results in a mixture of positive results from the elements which are from Option 1 and to a limited extent those under Option 3, whilst balancing the more negative impacts of general distribution across the smaller settlements. This combination of options provides the ability to select development of appropriate scale in the most sustainable locations for the larger strategic sites, taking advantage of the facilities nearby such as education, health, retail and recreation as well as the infrastructure which are already in place in the larger towns/villages, without overburdening those settlements, but instead encouraging business and an increased range of employment opportunities, all with a long-term cumulative positive effect on SA Nos.1, 3,4 & 5.

**5.20** Sites selecting under Option 1 and to some degree those under Option 3 can also provide a mix of housing types and sizes to better meet the needs of different sectors and reduce inequalities as well as designing out crime, which are positive effects for SA No. 2. Whereas those under Option 2 which are dispersed around smaller more rural sites have less potential to provide as many affordable housing units or a mix of housing types. Nevertheless, it would allow for some smaller scale development across the smaller villages which may create vibrancy and provide housing for local people and reducing inequalities. As such, this combination of options can have long-term positive effects for SA No.2.

**5.21** Again, the sites selected under Option 1 and potentially a more limited number of those under Option 2 and 3 have potential to reduce dependency on the private car, encouraging use of public transport and active travel, and introducing low/zero carbon off-set measures, all of which have long-term positive effects on SA No. 1 for healthy living along with SA Nos. 3,4 and 10.

**5.22** Such an option can also promote biodiversity net gain and be designed to strengthen connectivity for wildlife habitat and create GI in particular for the sites which are selected under Option 1 (namely the larger strategic sites) which is a positive effect on SA No. 7.

**The negative effects (in sustainability terms) of this combination of options include:**

**5.23** The scale of the existing settlement and the various constraints (such as Statutory Forest, Flooding, protected Ecology, etc.) that apply suggests that there will be restrictions in terms of the capacity available at many of the existing settlements. Additional pressure would be put on infrastructure, and where that is already weak, this could become unsustainable. Traffic generation and congestion would cause additional air quality issues and development would of course lead to waste generation with only limited opportunities for sustainable waste management, which are negative effects on SA Nos. 8 and 11.

**5.24** Some of the many smaller and rural settlements in the district would be significantly changed by an increase in development (under Option 2 element) which would be out of scale and character and not supported by any infrastructure, services (health, education, employment, retail), public transport or active travel choices. In the case of the sites dispersed over the smaller rural settlements 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. There is also likely to be lack of employment or social facilities in those Option 2 locations and would be a higher dependency on private transport, all having a long-term cumulative negative effects on SA Nos. 1, 3, 4 and 5. These smaller rural settlement sites and any settlements which are developed to the extent of absolute constraints (under Option 3 element) would also result in fewer opportunities to support energy efficiency to reduce effects of climate change (carbon dependency) whilst simultaneously making it difficult to conserve biodiversity or provide biodiversity net gain (BNG) or promote green infrastructure (GI), both causing negative effects on SA Nos. 7 and 10. Sites selected under Option 3, i.e. development that could take place to the absolute constraints of the settlement, are more likely to be located in the more sensitive landscape areas with limited or no scope for mitigation measures, not protecting the landscape or areas of landscape value, having negative effects on SA No.6. Similarly, those sites selected under Option 3 are more likely to be in close proximity to heritage, thereby not always maintaining cultural and historical assets with little chance of mitigation, having long-term negative effects on SA Nos. 11 and 12.

**5.25** Overall, some of the negative effects of this combination of options could however be mitigated, firstly by selecting the larger and most strategic sites under the Option 1 element. Furthermore, the provision of improved infrastructure (and funding for it), the design of schemes to create active travel routes for healthy living (positive effect on SA No. 1) and improved public transport to reduce traffic generation and to improve carbon offset (positive effects for SA Nos. 3 and 10) could be accommodated across sites selected under Option 1 and to a more limited extent, those under Option 2 and Option 3. This combination of options is able to deliver a larger quantum of development than Option 1, 2 or 1 and 2 alone. And by being a combination, some of the negative effects of Options 2 and 3 can be off-set by the best selection of sustainable sites under Option 1. However, it may also be a combination of options that would not ensure a longer-term sustainable strategy because the existing capacity would be depleted.

**Option 6: Combination of Option 1 (Selective planned expansion of existing settlement(s)) and Option 4 (Planned New Settlement(s))**

Sustainability Appraisal Objective	Option 6: Combination of Option 1 (Selective planned expansion of existing settlement(s)) and Option 4 (Planned New Settlement(s))
<b>1. To improve the health and well-being of the populations and reduce inequalities in health.</b>	<p style="text-align: center;"><b>++</b></p> <ul style="list-style-type: none"> <li>· There would be existing health facilities nearby as well as newly planned ones.</li> <li>· Can also promote/support healthy living and reduce inequalities more readily because of better selection of more sustainable sites as well as masterplanning for the new settlement element.</li> <li>· More potential to better design out crime and risks of accidents.</li> <li>· Better potential to design a scheme which includes active travel routes (for healthy living).</li> </ul>

<b>2. To meet local housing needs, by ensuring everyone has the opportunity to live in a decent sustainably constructed and affordable home.</b>	<p><b>++</b></p> <ul style="list-style-type: none"> <li>· Can plan to deliver the necessary housing numbers on a larger scale, incl. affordable and provide a mix of housing types and sizes to better meet the needs of different sectors of the community and thus reduce inequalities.</li> </ul>
<b>3. To provide accessible community services, recreation and leisure facilities.</b>	<p><b>+</b></p> <ul style="list-style-type: none"> <li>· Can plan to deliver the services in sustainable locations, and/or to take advantage of existing facilities nearby, and reduce dependence on the car. Better potential for schemes to be designed so the key services are more easily accessible through the use of public transport.</li> </ul>
<b>4. To facilitate the development of academic and vocational skills.</b>	<p><b>+</b></p> <ul style="list-style-type: none"> <li>· Can plan to deliver the educational services required and/or improve access to existing educational facilities.</li> </ul>
<b>5. To create a more vibrant and sustainable local economy.</b>	<p><b>+</b></p> <ul style="list-style-type: none"> <li>· Can plan to deliver the services. Can include home- working. Increased potential for providing and increased range of employment opportunities, including higher paid and professional.</li> </ul>
<b>6. To protect and enhance the landscape.</b>	<p><b>-</b></p> <ul style="list-style-type: none"> <li>· Sites may be in countryside locations, however, effect can be mitigated through high- quality design and landscaping with the aim of protecting landscape value</li> <li>· Good quality agricultural land (BMVL) may be negatively impacted.</li> </ul>
<b>7. To conserve and enhance biodiversity, flora and fauna.</b>	<p><b>+</b></p> <p>Can plan to reduce and mitigate any impacts supporting no net loss to biodiversity and promoting biodiversity net gain. Opportunities to create greater net gain and green infrastructure, strengthening connectivity between wildlife habitats.</p>
<b>8. To maintain and improve air quality.</b>	<p><b>0</b></p> <ul style="list-style-type: none"> <li>· Development and traffic generation causes air quality issues through increased traffic congestion</li> <li>· However, opportunities through masterplanning to create opportunities to travel by public transport.</li> </ul>
<b>9. To maintain and improve water quality and to achieve sustainable water resources management.</b>	<p><b>0</b></p> <ul style="list-style-type: none"> <li>· This is dependent on the measures taken for each individual site, but has potential to ensure development has the ability to conserve water resources, increase water efficiency and improve water quality as much as possible.</li> </ul>
<b>10. To reduce carbon emissions that cause climate change and to achieve net zero.</b>	<p><b>+</b></p> <ul style="list-style-type: none"> <li>· Some opportunity for small and large scale strategic carbon offset measures.</li> </ul>



	<ul style="list-style-type: none"> <li>· Can ensure housing is sustainably constructed with low/zero carbon emissions through the implementation of high-quality design and planning policy/design guidance</li> <li>· Masterplanning for new settlement element allows for large-scale design for energy conservation and efficiency through high quality design and can introduce measures such as large-scale net zero heating/cooling systems (not having to plug into existing services).</li> <li>· Can also ensure housing is sustainably constructed with low/zero carbon emissions through the implementation of high-quality design and planning policy/guidance.</li> <li>· The Selected Planned Expansion element provides some scope for planned local small-scale measures to support energy conservation and energy efficient design to reduce effects of climate change</li> </ul>
<b>I 1. To reduce waste generation and achieve sustainable management of waste.</b>	<p style="text-align: center;">-</p> <ul style="list-style-type: none"> <li>· Development will always result in waste generation. However, both small-scale and large-scale measures could be implemented through masterplanning (new settlement element), planning policy and design guidance to reduce waste generation and achieve better sustainable management of it.</li> </ul>
<b>I 2. To safeguard historical and cultural assets.</b>	<p style="text-align: center;">0</p> <ul style="list-style-type: none"> <li>· Potential to avoid development close to heritage assets, thus maintaining cultural and historical assets.</li> </ul>

### **Option 6: Combination of Option 1 (Selective planned expansion of existing settlement(s)) and Option 4 (Planned New Settlement(s))**

The option of a combination of Selective Planned Expansion of existing settlements and Planned New Settlement(s), provides the benefits of both of the options and gives greater scope to avoid, reduce and mitigate potential environmental, social and economic harm. The findings of the strategic SA may be summarised as follows:

#### **The positive effects of this combination of options includes:**

The ability to select development of appropriate scale in the most sustainable locations, taking advantage of the facilities nearby such as education, health, retail and recreation as well as the infrastructure which is already in place in the larger towns/villages, without exceeding the capacity or cohesion of those settlements, but instead encouraging business and an increased range of employment opportunities, all with synergistic long-term positive effects on SA Nos. 3,4 &5. High quality design will ensure better active travel options (for healthy living) whilst also designing out crime and risks of accidents (positive effects on SA objective No.1).

Whilst at the same time, designing a new settlement(s) can provide a longer-term sustainable strategy to provide the necessary housing/mixed development along with infrastructure and services in a larger-scale manner. Masterplanning could ensure that sites would be in closer proximity to health and educational services (or new ones created within the new settlement(s)), larger housing numbers can

be provided (including affordable housing, wider mixes of housing better able to meet needs of different sectors, and helping to reduce health inequalities with positive effects for SA Nos 1, 2 and 3.

There is a larger scope to reduce or mitigate negative impacts to biodiversity and to create large swathes of green infrastructure, strengthening connectivity for habitats and species with potential major positive effects in the longer term for SA objective No 7.

Positive effects would also include wider scale carbon reduction measures (through high quality construction methods and possibly a district heating system) with positive effects for net zero objectives and SA No 10 that could be cumulative in the longer term. The combination of both options also allows the Local Plan to continue to support the role and functions of existing settlements without overly pressuring them from even further large housing allocations, than if Option 1 were chosen alone.

### **The negative effects of this combination of options include:**

It is recognised that initially the introduction of development on greenfield land (often open countryside) has an immediate damaging impact on the local landscape, however, new settlements have the potential to be designed so that masterplans and design coding ensure that the new settlement is of high quality. Impacts on traffic generation, congestion and air quality, can be mitigated in part by considering connectivity, improving public transport (less dependency on the private car) and increase active travel potential (more positively effecting SA Nos. 1, and 3), and home-working options when selecting sustainable locations for development. Waste generation and impacts on water quality are negative effects of all types of development in all locations, however mitigation could include the provision of a wider-scale sustainable management plan right from the design stage (thus having a more positive effect on SA Nos 9 and 11).

### **Summary**

Given that the sustainability effects of this combined option are generally positive, and mitigation measures can go a significant way to improve any potential negative effects this is considered to be the **Most Sustainable Option** and is therefore the SA's **favoured** option above the other options tested. Furthermore, from a planning point of view, this option has the best opportunity to provide the local housing need (and associated development) across the whole plan period and beyond.

## 6 Advantages and Disadvantages of each Option

**6.1** 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.

**6.2** The following table sets out the planning advantages and disadvantages of the alternative options in the consultations paper July 2025 and those suggested through the consultation responses.

Option	Advantages	Disadvantages
Option 1: Selective planned expansion of existing settlement(s).	<ul style="list-style-type: none"> <li>• allows settlements best suited to change to be identified;</li> <li>• enables Local Plan policy to support selected locations, and for example, regeneration policies;</li> <li>• should support development in most sustainable current location(s) with some scope for sharing infrastructure;</li> <li>• will allow range of sites in terms of locations and sizes - provides for continuity;</li> <li>• can allow or result in a phased approach over the plan period.</li> </ul>	<ul style="list-style-type: none"> <li>• may not enable long term strategy;</li> <li>• could force allocations that have adverse impacts;</li> <li>• scope likely to be limited by lack of capacity in/around existing settlements;</li> <li>• choice of locations for development may be more driven by availability of land than being the most supportive of the Local Plan strategy overall;</li> <li>• may stretch infrastructure by relying on existing provision.</li> </ul>
Option 2: General distribution of housing around all existing settlements (planned sharing of the housing numbers across all settlements).	<ul style="list-style-type: none"> <li>• potentially offers a wide range of sites - size and location;</li> <li>• some sites are unlikely to be constrained by the need for additional infrastructure;</li> <li>• each settlement takes their share (no Nimbyism);</li> <li>• benefits of housing and employment are dispersed equally across the district.</li> </ul>	<ul style="list-style-type: none"> <li>• does not allow overall Local Plan strategic approach;</li> <li>• would not address climate change and sustainable transport improvements well;</li> <li>• unlikely to support major infrastructure improvements or provision;</li> <li>• may have a cumulative negative impact on infrastructure; • dispersed development likely to be less energy efficient;</li> <li>• may force development in locations where adverse impacts occur, especially on character and landscape;</li> <li>• no long term strategy- may not be positively prepared;</li> <li>• dispersed smaller sites would not provide same level of affordable housing or S106 contributions;</li> <li>• would not serve wider corporate aims well.</li> </ul>
Option 3: Maximum incremental change to the extent of absolute constraints (do nothing approach).	<ul style="list-style-type: none"> <li>• potentially offers a wide range of sites - size and location;</li> <li>• is flexible;</li> <li>• some sites are unlikely to be constrained by the need for additional infrastructure</li> </ul>	<ul style="list-style-type: none"> <li>• does not allow overall Local Plan strategic approach;</li> <li>• would not address climate change and sustainable transport improvements well;</li> <li>• unlikely to support major infrastructure improvements or provision;</li> <li>• may have a cumulative negative impact on infrastructure;</li> <li>• dispersed development likely to be less energy efficient;</li> <li>• dependent on overall requirement may force development in locations where adverse</li> </ul>

Option	Advantages	Disadvantages
		<p>impacts occur, especially on character and landscape;</p> <ul style="list-style-type: none"> <li>• no long term strategy- may not be positively prepared;</li> <li>• delivery would be difficult to plan over life of Local Plan;</li> <li>• would not serve wider corporate aims well.</li> </ul>
Option 4: Planned New Settlement(s).	<ul style="list-style-type: none"> <li>• allows an overall strategy to promote more sustainable development;</li> <li>• will have scope for infrastructure delivery (e.g. GI, transport, community facilities, etc.);</li> <li>• Local Plan can select the best location and plan infrastructure accordingly;</li> <li>• can provide for a long term strategy for this plan and beyond;</li> <li>• employment and services can be designed in to the appropriate scale;</li> <li>• can complement take up of existing permissions and other sites - providing development opportunities throughout Local Plan period;</li> <li>• should enable a wide range of development;</li> <li>• may offer scope for cooperation with other authorities, especially crossborder.</li> </ul>	<ul style="list-style-type: none"> <li>• 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;</li> <li>• may be locally unpopular;</li> <li>• requires very extensive and detailed supporting evidence;</li> <li>• new settlement will require major infrastructure - must be viable;</li> <li>• could have wider impact on rural landscape.</li> </ul>
Option 5: Negotiated Agreement that some development will be passed to adjoining Authority(ies)	<ul style="list-style-type: none"> <li>• the housing numbers required could be met in whole or in part by a different authority</li> <li>• less of an impact on the environment within the FoDD (landscape, water, air, etc.)</li> <li>• local community may prefer this strategy if they believe there would be less impact on them in terms of landscape harm and traffic generation</li> <li>• potential for less traffic generation</li> <li>• local plan would not have to allocate so many houses</li> <li>• potentially less pressure on the FoDD current infrastructure</li> </ul>	<ul style="list-style-type: none"> <li>• absolutely dependent on agreement with neighbouring authorities – currently no appetite for it</li> <li>• would not provide sufficient local housing within the FoDD, especially affordable housing to meet local needs</li> <li>• would not serve wider corporate aims well</li> <li>• would not provide a sustainable or strategic approach</li> <li>• would not positively encourage the local economy</li> <li>• would not positively impact on providing facilities/services (shops, health, education, etc.)</li> <li>• does not provide for development after the plan period (what next?)</li> <li>• the FoDDC and the local communities of the FoD would have no or little input on where the development would be located or how it is sustainability constructed.</li> </ul>
Combination of Option 1 & Option 2 (in part) (Selective planned expansion of existing settlement(s)) and General distribution of housing around all existing settlements	<ul style="list-style-type: none"> <li>• allows settlements best suited to change to be identified, particularly for the larger strategic sites;</li> <li>• enables Local Plan policy to support selected locations, and for example, regeneration policies;</li> <li>• should support development in most sustainable current location(s) with some scope</li> </ul>	<ul style="list-style-type: none"> <li>• could force allocations that have adverse impacts, particularly for those sites selected under Option 2;</li> <li>• scope likely to be limited by lack of capacity in/around existing settlements;</li> <li>• choice of locations for development may be more driven by availability of land than being the most supportive of the Local Plan strategy overall;</li> </ul>

Option	Advantages	Disadvantages
(planned sharing of the housing numbers across all settlements))	<p>for sharing infrastructure, particularly for the larger strategic sites;</p> <ul style="list-style-type: none"> <li>• will allow a wider range of sites in terms of locations and sizes - provides for continuity;</li> <li>• can allow or result in a phased approach over the plan period;</li> <li>• or the sharing of development over the Option 2 element (smaller more rural settlements) each settlement takes their share (no Nimbyism);</li> <li>• benefits of housing and employment are dispersed more equally across the district.</li> </ul>	<ul style="list-style-type: none"> <li>• may stretch infrastructure by relying on existing provision;</li> <li>• the sites selected under the Option 2 element (dispersal) may not work towards/allow overall Local Plan strategic approach;</li> <li>• would not address climate change and sustainable transport improvements well for the sites selected under Option 2 (smaller, more rural locations);</li> <li>• unlikely to support major infrastructure improvements or provision for those sites selected under Option 2;</li> <li>• dispersed development likely to be less energy efficient for those sites selected under Option 2;</li> <li>• may result in development in locations selected under Option 2, where adverse impacts occur, especially on character and landscape;</li> <li>• dispersed smaller sites element of this option would not provide same level of affordable housing or S106 contributions;</li> </ul>
<p>Combination of Options 1, 2 and 3 (in part)</p> <p>(Selective planned expansion of existing settlement(s)),</p> <p>General distribution of housing around all existing settlements (planned sharing of the housing numbers across all settlements) and Maximum incremental change to the extent of absolute constraints)</p>	<ul style="list-style-type: none"> <li>• allows settlements best suited to change to be identified, particularly for the larger strategic sites;</li> <li>• enables LP policy to support selected locations, and for example, regeneration policies;</li> <li>• has potential to support development in most sustainable current location(s) with some scope for sharing infrastructure, particularly for the larger strategic sites;</li> <li>• will allow a wider range of sites in terms of locations and sizes – capacity will be greater using the Option 3 element, thus provides for more continuity and flexibility;</li> <li>• can allow or result in a phased approach over the plan period;</li> <li>• for the sharing of development over the Option 2 element (smaller more rural settlements) each settlement takes their share (no Nimbyism);</li> <li>• benefits of housing and employment are dispersed more equally across the district.</li> </ul>	<ul style="list-style-type: none"> <li>• could force allocations that have adverse impacts, particularly for those sites selected under Options 2 and 3;</li> <li>• choice of locations for development may be more driven by availability of land than being the most supportive of the LP strategy overall;</li> <li>• may stretch infrastructure by relying on existing provision;</li> <li>• the sites selected under the Option 2 element (dispersal) and Option 3 (to extent of absolute constraints) may not work towards/allow overall LP strategic approach;</li> <li>• would not address climate change and sustainable transport improvements well for the sites selected under Options 2 (smaller rural settlements) &amp; potentially Option 3;</li> <li>• unlikely to support major infrastructure improvements or provision for those sites selected under Option 2 and potentially Option 3;</li> <li>• dispersed development likely to be less energy efficient for those sites selected under Option 2 and Option 3;</li> <li>• may result in development in locations selected under Options 2 &amp; 3, where adverse impacts occur, especially on character and landscape;</li> <li>• dispersed smaller sites element of this option would not provide same level of affordable housing or S106 contributions;</li> </ul>

Option	Advantages	Disadvantages
<p>Option 6: Combination of Option 1 (Selective planned expansion of existing settlement(s)) and Option 4 and Planned New Settlement(s))</p>	<ul style="list-style-type: none"> <li>• allows an overall strategy to promote more sustainable development;</li> <li>• will allow range of sites in terms of locations and sizes - provides for continuity;</li> <li>• better prospect of deliverability throughout the plan period;</li> <li>• can provide for a long-term strategy for this plan and beyond;</li> <li>• infrastructure, employment and services can be designed in, whilst also taking advantage of existing infrastructure in larger more sustainable existing settlements;</li> <li>• may offer scope for cooperation with other authorities, especially cross border;</li> <li>• allows settlements best suited to change to be identified;</li> <li>• should support development in most sustainable current location(s) with some scope for sharing infrastructure;</li> <li>• can allow or result in a phased approach over the plan period.</li> </ul>	<ul style="list-style-type: none"> <li>• new settlement aspect may be locally unpopular;</li> <li>• new settlement in particular requires very extensive and detailed supporting evidence;</li> <li>• new settlement will require major infrastructure</li> <li>- must be viable;</li> <li>could have wider impact on rural landscape.</li> </ul>



## 7 Sustainability Appraisal Conclusion

### The Most Sustainable Strategic Option

**7.1** From a strategic plan-making point of view, the Most Sustainable Strategic Option is therefore Option 6: Combination of Option 1 (Selective planned expansion of existing settlement(s)) and Option 4 (Planned New Settlement(s)). By having a mixture of Selective Planned Expansion of existing settlements and Planned New Settlement(s), this provides the benefits of both of the options and provides greater scope to avoid, reduce and mitigate potential environmental, social and economic harm. Selected development of appropriate scale can take advantage of the services and infrastructure which is already in place in the larger towns/villages, without overburdening those settlements. Whilst a new settlement can provide a longer-term sustainable strategy to provide the necessary housing/mixed development along with infrastructure and services in a larger-scale manner.

**7.2** A strategy reliant of either the extension to existing settlements, or the development of sustainable new settlements alone, will not achieve the number of new dwellings now required and distributed over the plan period. Options to develop the land surrounding existing settlements and towns, as well as the infrastructure that support them (highways, drainage and services) are becoming exhausted, and will not be capable of delivering or subsequently supporting the total 12,000 new dwellings required up to 2045.

**7.3** The combination of the two options would address concerns about the capacity available at many of the existing settlements and the quantity of development individual settlements can sustain. It may also ensure a longer-term sustainable strategy for individual settlements because the available sites would not be exhausted.

## 8 How the Strategy meets the Council's Priorities

**8.1** This document shows how the possible alternative strategies for the Forest of Dean District Local Plan have been considered in respect of the plan's vision and objectives. It includes a broad assessment of the options and relates them to the wider local and national planning environment, to the adjoining areas and to the Forest of Dean District Council's corporate objectives.

**8.2** The Local Plan is intended to bring local solutions to address the needs of the area and must show how it addresses the Council plan objectives and do as much as possible to achieve them. The 3 key priorities of the council plan are set out below:

**Thriving communities - Our objective is to foster resilient and inclusive communities that are motivated and competent to adapt to the challenges and opportunities posed by the climate and nature emergencies**

**8.3** The Local Plan seeks partnership and community led initiatives that promote community cohesions, sustainable living, biodiversity and environmental education. Development can provide resources for local communities. It seeks to empower local communities through positive engagement.

**8.4** Future growth can secure investment in green spaces, affordable housing and travel infrastructure that can improve the quality of life. The proposed growth strategy can encourage resilient, well-connected and active communities. In terms of health and well being support development may facilitate access to leisure and cultural activities for all. The Local Plan can enable access to resources to address identified specific needs.

**Decarbonisation and nature recovery Our objective is to protect and enhance the natural environment of the Forest of Dean and to be carbon neutral by 2030.**

**8.5** Climate Change decarbonisation and nature recovery are at the heart of our Local Plan. The preferred option guides development to those areas where there is the infrastructure or potential to develop infrastructure to support new development and support are low carbon transport options.

**8.6** Policies in the Local Plan will seek to encourage renewable energy projects such as wind, solar, hydroelectric power and battery storage. This will facilitate our transition to clean energy resources for the future. The emerging Local Plan encourages public transport, cycling and walking by improving infrastructure and offering incentives for eco-friendly commuting. Sustainable transport initiatives in the Local Plan will contribute to the decarbonisation agenda.

**8.7** Policies within the plan shall contribute to and enhance the natural and local environment. It will seek to protect and enhance valued landscapes, site of biodiversity or geological value by recognising the intrinsic and beauty of the countryside. The benefits of the best and most versatile agricultural land will be respected where necessary and balanced with other competing growth needs. Established communities will have the chance to help shape their neighborhoods, maintaining their distinct identities and protecting and improving those aspects of the area that make it a pleasant place to live.

**Sustainable Economy Objective is to foster economic prosperity while ensuring environmental sustainability and social well-being.**

**8.8** The Local Plan designates land for business, industrial, and commercial uses to support job creation and economic growth. Employment growth will be concentrated at accessible locations in the District. Where there is housing growth improved access to services, facilities, jobs and infrastructure will be

encouraged. The emerging Local Plan will aim to provide for a strong, diverse vibrant local economy that enables balanced economic growth, coupled with enhancing skills and job opportunities across the District.

**8.9** Policies will also seek to improve the safety, vitality and viability of our town centres which can link to and support the needs of their rural hinterlands. Any proposed new communities will help to meet the housing and employment needs of the District whilst delivering a step change in services and facilities available to the local area. Any new villages would be expected to follow garden city principles with a mix of uses, design quality and an accessible layout within a green setting to encourage a truly sustainable pattern of living for new and existing local residents.

## 9 The Future Growth Strategy Recommendation.

**9.1** The overall aims of the Local Plan are largely set by the FoDDC Council plan, especially in terms of climate change, supporting the economy, the environment and fostering inclusive communities.

**9.2** Section 6 sets out the advantages and disadvantages of each of the proposed options for a revised strategy. It also considers a combination of the Options 1 and 4 as the preferred option to address the overall aims of the Local Plan as well as its delivery targets. A third submitted through the consultation process which would deliver against the targets is also evaluated.

**9.3** The Local Plan needs to meet the Council's social, economic and environmental objectives in the Council Plan and be able to provide for the required level of development spread over the whole plan period. The LP policies must therefore balance the identified growth needs protection and enhancement of the environment in a sustainable form.

**9.4** The likely need for development is such that the incremental approach of adding to existing settlements would place undue strain on existing services or be unable to accommodate the level of change that will be required within the existing settlement hierarchy, without harm to their character and sense of place. This sets the choice for the strategy as one involving selective expansion of existing settlements or settlements.

**9.5** In reality the scope for selective expansion is severely limited by the primary constraints affecting several of the larger settlements including towns. It would also allow for the completion of existing committed development such as at Lydney. This can only take place at a rate which can be supported by the market for new dwellings and the current committed sites are considered able to sustain this at current build rates for 10 years. Smaller site allocations throughout the District and existing committed sites will help the Local Plan process by ensuring development in the early years of the plan period.

**9.6** A strategy which involved a new settlement or settlements would need to include elements of a more incremental approach in order to provide a supply spread over the plan period. This may in part be accounted for by the existing commitments that are rolled forward. Those that have planning permission would need to be honoured, those that do not will need to be reviewed and reassessed.

**9.7** The two options that should be considered further and in conjunction with each other would therefore both include a measure of continuity sites, whether existing commitments or additional allocations or both and would allow for new sites to be allocated where they were supported. They would each need a substantial element of new land to be identified in order to meet the need of the Local Plan. This should both deliver the balance of the need and contribute to the overall aims of the Local Plan by ensuring that the development proposed is able to address them.

**9.8** Of the two options, a strategy based on existing settlements alone would be unlikely to perform as well against the principles of sustainable development because it would not enable the concentration of infrastructure, and the selection of the site or sites would risk being dependent on existing transport networks. It could be more flexible to changing circumstances and would avoid the Local Plan depending on a single element. It would be unlikely to provide for a long term future in that delivery of the current Local Plan requirement is likely to absorb all of the land options. A new settlement strategy would be able to provide growth sufficiently over the plan period.

**9.9** Overall planning policy within the County and the wider area is looking to providing a more sustainable future expected by the NPPF in paragraph 7 and 8 and 11 (a&b) and a strategy capable of delivery over a long period. A Local Plan for the FoDD which does this is more likely to deliver its part of wider objectives and bring associated benefits.

## 10 Conclusion

**10.1** The following sets out the main elements of the spatial Strategy for new development which is in conformity with NPPF expectations. They are made to deliver growth as required in the District in the most sustainable manner.

1. **Town Growth:** Concentrate housing, employment, and infrastructure investment in the main towns (i.e. Coleford, Cinderford, Newent, Lydney), where services, transport links, and employment opportunities are strongest.
  - Focusing mixed use, housing and employment growth at the four towns. This will support the continued growth of Lydney to enhance its role as the largest settlement. New development at Newent will require improved public transport links and services to meet its own requirements and at Coleford to support its services and Cinderford to support its continued regeneration. The allocations will provide associated employment services, open and greenspace. This will include development of areas previously allocated and or under construction and development is likely to continue through the plan period.
2. **Larger and Small Settlements:** Allow modest growth in larger and some smaller villages with good accessibility and existing facilities, supporting local needs and rural vitality.
  - Focus development within the rural areas to the larger villages, helping to maintain their vitality and the sustainability of local services and supporting appropriate development at some of the smaller settlements to help meet the local needs of the rural communities.
3. **Reuse of an Existing Brownfield Site at Beachley Barracks for a Mixed Use Development:** The allocation will provide for homes and mixed commercial and employment generating uses, community facilities including a primary school appropriate health provision and a place of assembly. The scheme must demonstrate that it can be satisfactorily provided for in term of transport and active travel.
4. **New Communities:** Identifying one or more new settlements and promote a scale of development that would create a new sustainable community supported by the appropriate infrastructure.
  - Allocation of strategic mixed use (housing and employment) growth at one or two new settlements to provide jobs close to where people live.
5. **Outside Settlement Boundaries:** Limit development to rural exception sites, and agricultural diversification, thereby conserving landscape character and avoiding unsustainable and isolated development in the open countryside.