



Sustainability Appraisal Context & Scoping Report: Consultation Response Report

October 2005

Introduction

Gloucestershire County Council as Minerals & Waste Planning Authority consulted statutory consultees and key stakeholders on its Minerals and Waste Development Framework Context & Scoping reports between 25th August and 29th September 2005. These two reports set out the Sustainability Appraisal (SA) Framework for the purposes of testing the emerging Gloucestershire Minerals and Waste Development Plan Documents and related Supplementary Planning Documents under the new Planning Act and related Regulations. The purpose of the consultation exercise was to seek the stakeholder's views on this initial stage of the SA process following Office of the Deputy Prime Minister (ODPM) Guidance (September 2004) *Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks – Consultation Paper*, Stage A6, Pg 17.

Consultees

48 consultees were sent copies of the reports, including internal consultees within the County Council, and 12 responses were received, the majority being reasonably supportive, providing constructive comments and additional baseline data. This list of consultees (see below) was produced in line with ODPM SA Guidance and Planning Policy Statement 12 (as referred to above). The reports were also made available on the County Council's website, for information purposes, and as a result, two groups (Forest of Dean Friends of the Earth and Friends of the Forest), who were not on the original consultation list, made representations which were considered.

The four SEA consultation bodies required by the SEA Directive	Representation received
The Countryside Agency	✓
English Heritage	
English Nature	✓
The Environment Agency	✓

External Stakeholders	Representation received
Government Office for the South West	
Strategic Rail Authority	
Highways Agency	
South West Regional Planning Body	✓
South East Regional Planning Body	
West Midlands Regional Planning Body	
Cheltenham Borough Council	
Gloucester City Council	
Cotswold District Council	✓
Cotswolds Conservation Board	✓
Forest of Dean District Council	
Stroud District Council	
Tewkesbury Borough Council	
Wiltshire County Council	
Swindon Unitary Authority	✓
South Gloucestershire Unitary Authority	
Herefordshire County Council	
Worcestershire County Council	
Warwickshire County Council	
Oxfordshire County Council	
Monmouthshire Unitary Authority	
North Wiltshire District Council	
Malvern Hills District Council	
Wychavon District Council	
West Oxfordshire District Council	
Vale of White Horse District Council	
Stratford-on-Avon District Council	
Welsh Assembly	
South West Regional Development Agency	
South East Regional Development Agency	

Advantage West Midlands	
Welsh Development Agency (South East Division)	
Gloucestershire Association of Parish Councils	
The Strategic Health Authority	
National Grid Transco	
Severn Trent Water	
Thames Water	
Wessex Water	
Welsh Water	

Internal Gloucestershire County Council Consultees	Representation received
Education	
Sustainable Transport	✓
Highways Development Control (DC)	
Public Rights of Way (PROW)	
Archaeology	
Landscape	✓
Ecology	✓
Gloucestershire First	
Municipal Waste Disposal	
Tourism	

Others	Representation received
Although these two groups were not on the original consultation list, representations were received and in the interests of stakeholder involvement their representations have also been considered.	
Forest of Dean Friends of The Earth (FODFOE)	✓
Friends of the Forest (FOF)	✓

Table of Comments & Minerals & Waste Planning Authority Response

Consultee / respondent: The Environment Agency, Tewkesbury - 29 th September 2005
Nb. Minerals & Waste Planning Authorities response in bold
<u>Comments:</u> ■ <i>Issue 8 - Potential for Flooding.</i> (Scoping Report Pg. 13) The phrase 'To the west of the county...' implies that the River Severn floodplain is not within Gloucestershire. This should be reworded for clarity. The Upper Thames floodplain affects the existing workings within the Cotswold Water Park area and should be included within 'Issue 8'. Flooding is not solely restricted to the floodplain and can also occur as a result of increased surface water run-off from new development. This should also be included within this issue.
Agreed, these changes will be made in the revised report.
■ <i>Issue 15 - Condition of SSSIs.</i> (Scoping Report Pg. 14) The Agency would question why locally designated sites have not been included as an issue as they are also relevant to the planning process and mentioned later in the document within Appendix 3 'Baseline Information'.
Agreed, will add locally designated sites under Issue 15.
■ <i>Issue 16 - Decline in Biodiversity & Certain Bird Species in Gloucestershire.</i> (Scoping Report Pg. 14) The figures regarding decline in bird populations for this issue are regional. It would be more spatially specific to base these figures on localised information (where available) e.g. from the Biodiversity Action Plan for Gloucestershire.
Agreed, will add localised information.
■ <i>Paragraph 6.14</i> (Scoping Report Pg. 17) First sentence should read '....565,000 people living in Gloucestershire' not 'in Gloucester'.
Agreed, will change in the revised report.
■ <i>SA Framework – Objectives</i> (Scoping Report Pg. 18 & 19). The proposed 'Headline Objectives' attempt to cover a large amount of detail that may be better expressed through a simpler over-arching headline objective with smaller

specific sub-objectives. Breaking down the objectives also ensures that key opportunities are not missed. An example of this is proposed Headline Objective 15 'To promote the increased use of renewable sources of energy and through this, as well as by other means to prepare for the impacts of climate change including increased risk of flooding'. The Agency considers this objective is trying to say too much and as a result is unclear and confused.

For clarity the Agency would recommend this objective be reworded, similar to the examples given within the ODPM guidance on Sustainability Appraisals. Ideally this objective would then be broken down into the sub-objectives however if your Authority does not take this approach the 'Headline Objectives' will be clearer.

The suggested objective to replace Headline Objective 15 is: '*To reduce contributions to and adapt to Climate Change'* This naturally leads to sub-objectives (or the relevant indicators) such as reducing energy consumption, ensuring the use of renewable resources and energy and mitigating against increased risk of flooding.

Agreed, Objective 15 is unclear and will be amended.

■ (Scoping Report Pg. 18 & 19). As identified previously in this letter, flooding does not just occur in floodplains and flood risk cannot therefore be looked at solely as a result of climate change. If all was done to prevent the effects of climate change there still remains the need to consider existing flooding problems and the impact of new development upon it. The Agency therefore recommends a separate objective for flood risk to take this into account: '*To prevent inappropriate development in the floodplain*'.

Agreed. (See below).

■ (Scoping Report Pg. 18 & 19). The topic of water resources has not been identified within the document as either an issue or objective and the Agency considers this to be an oversight. Over the coming years, water resources will come under strain and the sustainable use of water must be encouraged to ensure a balance between society's needs and those of the environment. The protection of the water environment is considered a primary constraint to mineral development and is also a material consideration within the planning system. It should also be noted groundwater flows can be disrupted by mineral workings and surface waters depleted as a result. The following objective is therefore recommended: '*To ensure sustainable sources of water supply*'

Agree in part, that this issue requires a further objective. Rather it is proposed that a new objective will incorporate both flooding and water supply, as follows: "To prevent inappropriate development in the floodplain and to ensure that development does not compromise sustainable sources of water supply."

■ (Scoping Report Pg. 18 & 19). In respect of Headline Objective 11. the Agency would recommend this objective be amended to read as follows: *To protect and enhance Gloucestershire's environment in terms of air, soil and water quality and to apply the precautionary principle.*' The inclusion of 'enhance' strengthens the objective and reinforces the concept that planning should pursue improvements rather than merely seeking to minimise harm as advocated within PPS1.

Agreed.

■ (Scoping Report Pg. 18 & 19). The Agency considers the separate Headline Objective 10 regarding the promotion of waste minimisation to be unnecessary and should be removed and included within Objective 14.

Agreed. Objective 10 will be included within Objective 14. Objective 10 will relate to flooding and water supply as detailed above.

Consultee / respondent: English Nature – 29th September 2005

Nb. Minerals & Waste Planning Authorities response in **bold**

■ (Context Report Pg. 19 -21) Review of all relevant plans, strategies and documents: The review is comprehensive; my only comments would be that the references to PPG9 should now be replaced by references to PPS9. References should also be made to ODPM Circular 06/2005 'Biodiversity and Geological Conservation...' I would also suggest that the South West Biodiversity Implementation Plan should be added to the list of strategies.

Agreed.

■ (Scoping Report Pg. 12 -15) Sustainability Issues and Problems: In Table 4, boxes 15 & 16 reference is made to the condition of SSSIs and to the decline of farm birds. I am not entirely sure what is actually intended by this. Is the sustainability issue the general state of Gloucestershire's biodiversity? If so, then the condition of SSSIs and farmland bird populations are indicators rather than issues and this should be made clearer.

Agreed, the issue is not clear and the general state of Gloucestershire's biodiversity would be a more pertinent issue.

■ (Scoping Report Appendix 4) I was also confused by the table in Appendix 4. For section 15 it states that there is potential for Gloucestershire's SSSIs and other protected areas to be degraded or fall into a less favourable condition as

a result of minerals and waste development. I have no particular problems with the statement but I don't understand why it has been put in the column headed 'Likely Evolution without the M&W Plan. Surely the comment here should reflect the likely trends for these sites if minerals and waste development is not taking place.

Agreed, this is not clear and will be amended to reflect the fact that if minerals and waste development were not taking place on certain sites the condition of SSSIs and other protected areas would be likely to improve.

■ (Scoping Report Pg. 18 & 19) I would support the headline SA Framework objectives, particularly objectives 9 –15. However I am concerned that the SA framework does not include any SMART objectives.....without these it will be difficult to assess whether the SA Framework is actually achieving anything.

Support for the objectives is welcomed. The objectives are 'headline' i.e. broad objectives. Monitoring will take place for each document assessed against the Framework and appropriate indicators will be developed accordingly and effects monitored and publicised in the Annual Monitoring Report which will be subject to informal consultation with 'key' stakeholders in October/November 2005.

■ (Scoping Report General & Appendix 2) I am satisfied with the Monitoring Report Objectives. I am concerned though by the indicators that are proposed for the plan. I would agree that the indicators chosen for objective 9 will give a good picture of Gloucestershire's biodiversity. However the general trends and outcomes will be influenced by a range of factors; they will not necessarily be good indicators of plan specific indicators. Based on a list included in 'A Practical Guide to Strategic Environmental Assessment' (ODPM, 2005) I would suggest that the indicators should include at least two of the following:

- Reported levels of damage to designated sites/species due to development resulting from the plan.
- Achievement of Biodiversity Action Plan targets due to development resulting from the plan.
- Achievement of 'Accessible Natural Greenspace Standards' due to development resulting from the plan.
- Number/area of Local Nature Reserves resulting from the plan.
- Other indicators could also be the reported levels of damage to Key Wildlife Sites and ancient orchards as a result of the plan.

Agreed, the suggested changes will be made.

■ (Scoping Report Appendix 3) Baseline data: For objective 9 the % of SSSI in good /favourable condition is given as 95.3%. This figure doesn't tally with the figures given in Table 4 or Appendix 4. The figures as of 27th September 2005 are: Total number of sites: 121.

% of area in favourable condition: 79.27

% of area in unfavourable but recovering condition: 2.85

% of area unfavourable with no change: 13.94

% of area unfavourable and declining: 3.94

This does not represent an increase from the 1999 figure but we are anticipating a decline in the area in favourable condition as a result of more stringent assessment guidelines.

Agreed, amendments will be made to the baseline data.

■ (Scoping Report Appendix 3) I am slightly puzzled as to the relationship between the indicators referred to above and the baseline data that is being collected. The condition of SSSI does appear in both lists but the farmland bird section is not referred to in the baseline data section. Key Wildlife Sites and old orchards are referred to in the baseline data but are not used as indicators. This issue needs to be resolved.

Agreed, this will be resolved in the amended report by including the above information in both the baseline and indicators sections.

Consultee / respondent: The Countryside Agency – 12th October 2005

Nb. Minerals & Waste Planning Authorities response in **bold**

– These comments were received late but the Minerals and Waste Planning Authority were happy to consider them.

■ (Context Report Table 2) Consider publications and resources that set out the views of the agency. Such as: National and Regional State of the Countryside Reports, the Countryside Quality Counts project, the Countryside Character Network.

We have considered 'The State of the Countryside in the South West' and are aware of the useful resources available, as listed above.

■ (Context Report Table 2) As your sustainability Appraisal covers an area which includes a number of Areas of Outstanding Natural Beauty (AONB), we would also recommend that you source the relevant AONB Management Plans, which contain valuable local data.

These have been considered both for the Cotswolds and the Wye Valley.

- (Context Report Table 2) Potential impacts on rights of way, in particular National Trails should be considered.

Agreed, we will consider National Trails in the review of plans and strategies.

Consultee / respondent: Swindon Borough Council – 26th September 2005

Nb. Minerals & Waste Planning Authorities response in **bold**

- (Context Report Table 2) All plans and strategies appropriately reviewed etc – no adverse comments, or changes needed.

Comments welcomed.

Consultee / respondent: Cotswold District Council – 26th September 2005

Nb. Minerals & Waste Planning Authorities response in **bold**

- (Context Report Table 2) [Cotswold District Local Plan] Supplementary Planning Guidance for the Cotswold Water Park should be included in the list of Relevant Plans and Programmes. Please play particular note to those areas identified as Zone D – Agriculture and Forestry. Within Zone D, future gravel extraction will provide an opportunity to establish a new form of landscape.

Agreed, the SPG will be included.

Consultee / respondent: Cotswolds Conservation Board – 29th September 2005

Nb. Minerals & Waste Planning Authorities response in **bold**

- (Scoping Report Appendix 4) Environmental Issue EN 18. Possible damage to the historic environment. A useful indicator would be the number/percentage of listed buildings on English Heritage (Grade 1 and 2*) and local authority (District Council) (Grade 2) Buildings at Risk Registers. This would give a measurable indicator of the condition of historic buildings.

Agreed, these will be included.

- (Context Report Pg. 109) Detailed references are given to the Cotswolds AONB Management Plan. The page numbers given do not coincide with the page numbering of the published version of the plan. Quarries are considered on page 53 of the Plan, not 60; Aims for Sustainable resources are set out on page 54 of the Plan, not 64.

Agreed, changes will be made to correct the numbering error.

Consultee / respondent: – Gloucestershire County Council -Transport Planning Unit - 29th September 2005

Nb. Minerals & Waste Planning Authorities response in **bold**

- (Scoping Report Pg. 12 -15) In Table 4 'Sustainability Issues and Problems' and in Appendix 4 'Identifying Sustainability Issues/Problems', number 5, more up to date figures are available: Since 1985 (to 2003) traffic in the County has grown by 42% and the County Council's household surveys of 2004 revealed that 72% of journeys to work are made by car (65% car driver, 7% car passenger), 10% on foot, 3% on public transport and 5% by bicycle.

Agreed, this more up to date data will be incorporated.

- (Scoping Report Pg. 17) At para 6.14 '565,000 people living in 'Gloucestershire' not 'Gloucester'. In the same paragraph the figure for Tewkesbury population growth is missing.

Agreed, 'Gloucester' will be changed to 'Gloucestershire' and the Tewkesbury figure will be added.

- (Scoping Report Pg. 17) At 6.15 line 2 'Unit(s)' plural. In the same paragraph end of line 3 onto line 4 'to the period 2021' replaced by 'in the period to 2021'.

Agreed, changes will be made.

- (Scoping Report Pg. 18 & 19) In Table 5 'Sustainability Appraisal Headline Objectives' number 12 '...and promote more sustainable means of transport,' could be supplemented by 'reducing the need to travel' ... through the management of waste by the proximity principle, 'encouraging the use of more sustainable modes and insisting upon appropriate and sensitive routing for vehicles carrying aggregates and encouraging the use of more sustainable alternative fuels, such as bio-diesel, LPG or Hydrogen' for all HGVs.

Partially agree. While the comments are welcomed, they are too detailed to be contained in a headline objective and would make the objective cumbersome. It is proposed that the alternative objective should read: "To reduce the adverse impacts of lorry traffic on communities, through reducing the need to travel, promoting more sustainable means of transport (including through sensitive routing and the use of sustainable alternative fuels) and to promote the management of waste in one of the nearest appropriate installations."

- (Scoping Report Appendix 3) Baseline Data, Number 12 'To reduce the adverse impacts of Lorry traffic ...'. All indicators are currently under investigation. I would make the following comments: On the number of registrations of trucks over 28T. I've had a look at the Western Traffic Area Traffic Commissioners website which contains a copy of their annual report 2004. This gives details of Licences in issue from 2003 – 04 (14,730 Western and 102,946 Nationally) but does not break these down into vehicle size or County/Authority. Transport Statistics Great Britain 2004 (DfT) has 105,000 registrations of 28T trucks at the end of 2003 in the UK. They also report that there has been a 14% increase in trucks over 28T since 1994.

Agreed, changes / additions will be incorporated in the baseline table.

- (Scoping Report Appendix 3) On the number of movements on County roads (by vehicle type and road type) Transport Monitoring have provided me with estimated traffic flows of all motor vehicles by local authority, from Department for Transport's National Road Traffic Survey, but a breakdown by vehicle and road type is not available: [Table supplied and added to baseline]

Changes / additions will be incorporated in the baseline table.

- (Scoping Report Appendix 3) On the proximity of HGV generators to local villages. Data is unavailable at the moment.

No data to add at this stage, however we will keep this matter under review.

- (Scoping Report Appendix 5) Table containing Key Messages, Issues and Objectives. Pleased to see Environmental technology highlighted as a key message. I am particularly keen to stress the contribution that alternative fuels, such as LPG and Bio-diesel can make to protection of the environment.

Agreed, the contribution that alternative fuels, such as LPG and Bio-diesel can make to the protection of the environment will be addressed in alterations to Objective 12.

- (Context Report Pg. 93) 'Gloucestershire Renewable Energy Action Plan'. The 'key objectives relevant to the plan and SA' should include 'renewable fuels for transport' as the action plan identifies bio-fuels for transport (as a form of bio-mass energy) at paragraph 1.1 at Page 6 (also page 16 and 17) 'What is renewable energy'. This would also have implications for the plan. NB. EU directive 2003/30/EC 'The Biofuels Directive' came into force in December 2004 with the objective of 20% substitution in road transport by 2020. Targets for 2005 = 2% and 2010 = 5.75%.

Agreed, this will be added.

- (Context Report Pg. 98) Local Transport Plan 2001/2 – 2005/6, 'Implications for Plan'. In the 'The plan should include ...' section, as well as 'encourage movement of freight by rail and water ...' should also include policies like 'proximity' to reduce the need/length of travel, encourage the use of alternative fuels, and choosing the most appropriate and sensitive route.

Agreed.

- (Context Report Pg. 101) Gloucestershire Economic Strategy. In the 'key objectives relevant to plan and SA' the 'wish to see an increase in the use of renewable energy, both for transportation and for domestic or commercial consumption' is identified. Therefore I think this could be included in the 'implications for the plan' – to encourage the use of alternative/renewable fuels.

Agreed.

- (Context Report Pg. 120 & 121) Cotswold District Council Local Plan (Revised Deposit 2003). Section on 'implications for the plan' containing the reference to Policy 17 could include a re-statement of the possible measures in mitigation

which will need to be insisted upon. Such as Reducing the need to travel so far by road, by locating processing facilities closer to collection points and encouraging the movement of products by rail (and water), encouraging/stipulating the use of alternative fuels, and choosing the most appropriate and sensitive route.

Agreed, this will be added.

- (Context Report Pg. 133) For both LTP 1 & 2, the Environmental key message should again include, 'alternative fuels and appropriate and sensitive routing' in addition to the modal switch from road to rail or water.

Agreed, this will be added.

- (Context Report Pg. 26 -28) Planning Policy Guidance Note 13 (Transport) includes a requirement that, 'Mineral planning authorities should encourage the establishment of voluntary mineral site transport plans in consultation with local communities' (para. 47) which has not been included in the range of possible solutions covered in the SA.

Agreed, this will be addressed as this is reaffirmed in consultation draft MPS1.

Consultee / respondent: Gloucestershire County Council Ecology – 29th September 2005

Nb. Minerals & Waste Planning Authorities response in **bold**

- (Scoping Report Pg. 10) Delete 'PPG9 Nature Conservation' as this is now replaced by PPS9 that is also listed.

Agreed, this will be addressed.

- (Context Report) In the PPS9 Biodiversity and Geological Conservation add for consistency – 'Also including – Government Circular: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System'. Table 1 and Table 3 on pages 3 and 125 of the Context Report respectively will also need to reflect this change too.

Agreed.

- (Context Report & Scoping Report) Table 1 of the Scoping Report and Table 1 and Table 3 of the Context Report combines two separate EU Directives into one called 'EU Habitats Directive & Birds Directive' this is an acceptable treatment but the text should make it clear we are dealing with two different Directives as follows:
EU Directive on the Conservation of Wild Birds (79/409/EEC)
EU Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (92/43/EEC)
See the Govt. Circular that accompanies PPS9 for more details.

Agreed.

- (Context Report Pg. 132) Under the box "Biodiversity Action Plan for Gloucestershire", the column 'Social' should you add "Protect the public's enjoyment of wildlife and provide a better and healthier living environment." Under the column Economic you should add "Contributes to the tourism and leisure industry" The latter phrase could also be used for the 'Gloucestershire Landscape Character Assessment' document too. A similar treatment is needed for the 'UK BAP' and 'PPS9'.

Agreed, will be added.

- (Context Report) Add 'South West Biodiversity Implementation Plan' to all relevant tables in Scoping & Context Reports and treat similarly to UK BAP (see above). Also for information only that the Cotswold Water Park BAP is being reviewed and a Draft Consultation version is expect sometime in 2006.

Agreed.

- (Scoping Report Appendix 3) There are other datasets that could be considered (e.g. Key Wildlife Sites and LNRs) but many others (e.g. for species) would require some development/investigation. Major ones, i.e. SSSIs and International Sites already included.

The baseline will be regularly updated as new information becomes available.

- (Context Report Pg. 8 & 9) There is an omission against the Birds and Habitats Directive. Under 'Implications for the Plan' we should mention presence of a European Protected Species. EPS should also be mentioned in column one which is just about sites at present. ALSO delete PPG9 on page 19 AND update PPS9 (now Final Version) if necessary.

Agreed.

Consultee / respondent: Gloucestershire County Council Landscape – 26th September 2005

Nb. Minerals & Waste Planning Authorities response in **bold**

- (Context Report Pg. 132) The document is summarised as follows: "Protect beautiful and valued landscape in the county." The key message should be "Direct development to harmonise with existing diverse County Landscape character."

Agreed, changes will be made.

- (Context Report Pg. 132) In the column 'social' could you add, " Protect the public's enjoyment of the landscape's visual amenity."

Agreed.

Update: Gloucestershire County Council Minerals & Waste Planning Policy Team

- (Scoping Report Pg. 18 & 19) Objective 12 will be changed to reflect the new PPS10. Reference to 'the proximity principle' will be deleted and the objective will now read: "To reduce the adverse impacts of lorry traffic on communities, reducing the need to travel, promoting more sustainable means of transport (including through sensitive routing and the use of sustainable alternative fuels) and to promote the management of waste in one of the nearest appropriate installations."

Changes have also been made to this objective following comments from Gloucestershire County Council's Transport Planning Unit.

Consultee / respondent: Forest of Dean Friends of the Earth – 29th September 2005

Nb. Minerals & Waste Planning Authorities response in **bold**

- (Scoping Report Pg. 13) Table 4 no.7 deals with areas of deprivation and social exclusion. The Forest of Dean is not an Area of Deprivation or an Area of Need – as accepted by the Panel of Inspectors and Gloucestershire CC. The way this item is presented gives a misleading impression that the Forest of Dean is a significantly deprived and socially excluded area whereas the District actually is placed approximately half way in the Indices of Deprivation, thus by that configuration half of England is a significantly deprived and socially excluded area. In fact even Cinderford and Littledean did not qualify for funding from the Coalfield Community Campaign funding allocation from its Community Chest because by the Indices of Deprivation they were not sufficiently deprived areas to allow them to apply for that funding. As it stands the last sentence should be deleted as it gives the misleading impression that the Forest of Dean is a deprived area. FODFOE would argue that it may be misleading to say that there are significant areas of deprivation in the County and would welcome the opportunity to look at the data by which this statement is made. Dependent on the evidence FODFOE is likely to argue that Table 4 no.7 should be deleted in its entirety. FODFOE recommend that this item be reconsidered with a view to deletion.

The paragraph in question states facts and is balanced. It points out that Gloucestershire is ranked as one of the least deprived counties in England and the main focus of comment regarding areas of deprivation and social exclusion is Cheltenham and Gloucester. The Forest of Dean is not the focus of the commentary and is mentioned only in relation to its Rank Average Score. However in order to make statements less open to incorrect interpretation it will be amended as follows: "...Gloucester is the most deprived district in the County, ranking 139th most deprived English district according to the Rank of Average Score measure out of 354 English districts. The Forest of Dean is the next most deprived at 195th. The least most deprived is the Cotwolds at 314th (Indices of Deprivation 2004, issued by ODPM).

- (Scoping Report Pg. 12) Table 4 no.1 and Page 13 Table 4 no.2 FODFOE would wish to see the evidence base for these 2 items as costs of housing in comparison to salary vary across the county and from county to county across England as a whole as does income. The statements used to justify no.1. and no.2 do not appear to be sufficient to justify including "High house prices" and "Low average income" as Sustainability Issues and problems.

Disagree "High house prices" and "Low average income" are justified as Sustainability issues and problems. Regarding Sustainability Issue No.1, in 1999, a house in Gloucestershire, on average, cost 5.7 times the average salary. By 2003, houses cost 8.7 times the average salary. The percentage of households unable to buy a house in the County in the lowest quartile of house prices is significantly higher than the percentage for England as a whole. Cheltenham, which has some of the highest prices in the County, has the largest percentage that is unable to buy, while the Forest and Tewkesbury have the lowest district percentages. However, these are still

well above the national level. (Source: New Earnings Survey: workplace based statistics by SOC 2000 occupation (NOMIS). ONS Crown Copyright Reserved. Land Registry: Land Registry Property Prices. Crown Copyright. Provided by Gloucestershire Labour Market Information Unit).

Regarding Sustainability Issue No. 2. The figure quoted is correct. In 2003 the average income in Gloucestershire was £19,857. In England and Wales it was £20,694. (Source: New Earnings Survey: workplace based statistics by SOC 2000 occupation (NOMIS). ONS Crown Copyright Reserved. Provided by Gloucestershire Labour Market Information Unit).

■ (Scoping Report Pg. 17) Para 6.14, the figures quoted as future projections for population growth need to be revised to bring it into line with PPS 3/7 which states that in rural areas housing growth should be to meet local need whilst the PUAs continue to take inward migration, therefore Cheltenham would not decline and the Forest of Dean should not be a significant area of growth.

Paragraph 6.14 on page 17 contains figures which are slightly out of date. The paragraph will be amended according to the more up-to-date figures that the County Council has recently submitted in its 'First Detailed Advice' to the South West Regional Assembly (SWRA) with regard to the Cheltenham and Gloucester Joint Study Area element of the RSS. The SWRA are considering the Advice received from all the strategic authorities and will decide what is to be included in the Draft RSS. The Draft RSS will be considered by Members of the Regional Assembly on 10th March 2006 before being submitted to Government Office for the South West. The SWRA propose to undertake public consultation on the emerging RSS in the Spring/Summer of 2006. Representations on levels of development in the county should be directed to the SWRA.

■ (Scoping Report Pg. 18) Paras 6.16 and 6.17, please refer to comments on Table 4 no.7 with regard to the comment "particularly the Forest of Dean" which should be deleted with regard to the reference to "significant problems of isolation and low household incomes in some rural communities." With reference to 6.17 use of 2002 statistics this needs to be brought up to date using the 2003 figures. Consideration should be given to the numbers of retired people in the Forest of Dean giving a misleading picture when linking average income to the need for employment. The 2004 Indices of Deprivation on Income Domain should be reviewed in line with the Income support domain and Child Support domain. The Forest of Dean is above the National Average in the Income Domain on the 2004 Indices of Deprivation.

The sentence "The County's Rural Economy Advisory Panel has highlighted significant problems of isolation and low household incomes in some rural communities, particularly in the Forest of Dean." Will be amended to "...particularly in some parts of the Forest of Dean." This is factually accurate as some parts of the Forest of Dean do have significant problems of isolation.

■ (Context Report Pg. 87) Policy EC2 – Further comments (as above) on the inappropriateness of calling the Forest of Dean an area of special need.

Part of the purpose of the Context Report and the Scoping Report is to 'scope' what is contained in other relevant plans and programmes. It is not within our remit to change the content of RPG10. RPG10 is now the Interim Regional Spatial Strategy (RSS). A new RSS is currently being prepared by the South West Regional Assembly. RPG10 (the Interim RSS) is currently part of the development plan; the Context Report merely reflects its content. While we cannot alter policy in RPG10 we will alter our wording on pg. 87 of the Context Report to read "Consider the development of policies that promote economic regeneration in the areas of Gloucestershire highlighted under Policy EC2 of RPG10." and "Check to ensure that the SA Framework considers the particular needs of the areas of Gloucestershire highlighted under Policy EC2 of RPG10." An amendment will also be made to the table heading on pg. 85 of the Context Report. This will indicate that RPG10 will be replaced by the RSS for the South West, likely in 2007.

■ (Context Report Pg. 102) Objective 2. Delete the Forest of Dean from Objective 2 and from implications for the plan with regard to quarrying for reasons stated in the Scoping Report. We believe that the high quality landscape of the Forest of Dean in conjunction with its rich biodiversity and European designated sites are far more important to the income of local people as tourism earners than quarrying.

Part of the purpose of the Context Report and the Scoping Report is to 'scope' what is contained in other relevant plans and programmes, thus we are unable to 'delete the Forest of Dean from Objective 2' of The Rural Economic Strategy for Gloucestershire which was developed during 2003 by a Rural Economy Advisory Panel on behalf of the Gloucestershire First Partnership. The text relating to 'implications for plan' provide the balance of economic issues in terms of employment and the potential detriment to tourism.

■ (Context Report Pg. 118) The Local Plan is unadopted. It should be noted that the Planning Inspector noted the ongoing work by the Countryside Agency on Landscape Character Assessment and the possible designation of a new AONB area for the Forest of Dean within the lifetime of the Local Plan and the Waste and Minerals Local Plan[s]

The Context Report and the Scoping Report form a Framework which can be updated as and when relevant plans and programmes are adopted e.g. When PPGs are replaced by PPSs. The table will be amended to make clear that the plan is unadopted, (although it is a material consideration), and when the Forest of Dean adopts its Local Plan the Framework will be amended.

- (Context Report & Scoping Report – general) As an individual I would like to register that I feel there is a Human Rights issue if individuals are not allowed to comment on the above documents which will guide the whole strategy for the Minerals and Waste Local Plans that will affect the quality of life and quiet enjoyment of the individual. I feel that it is particularly applicable in the way the Forest of Dean is named as an area of Need. As an individual I request the deletion of all the references to the Forest of Dean as an Area of Need suffering from low income and social exclusion from the Sustainability Appraisal.

The Minerals and Waste Planning Authority has carefully considered the individual representation and made appropriate changes. There are a number of opportunities for individuals to be involved and to make their views known, through the Statement of Community Involvement (SCI) process and through consultation on Minerals and Waste documents at issues and options stages and at final submission stages. In the case of submission documents they will include consultation upon Sustainability Appraisals.

Consultee / respondent: Friends of the Forest – 29th September 2005

Nb. Minerals & Waste Planning Authorities response in **bold**

- (Context Report Pg. 13) Table 4 item 7 deals with areas of deprivation and social exclusion. Despite it being above the national 55th percentile, the false impression is given that the Forest of Dean (FOD) is a significantly deprived and socially excluded area. To assume this would mean that more than half [of the] districts nationally have to be considered to be so classified. This is not HMG's policy. Friends of the Forest raised this misconception in its evidence to the GCC structure Plan Third Alteration EIP, as a consequence of which, following upon the EIP Panel's report, GCC revised the wording of the document, and removed the reference to an Area of Special Need in the FOD District. Although GCC have decided not to proceed further with the Third Alteration Structure Plan, the evidence that the FOD District is not a significantly deprived or socially excluded area is still valid. It is also worth noting that in true multiple deprivation terms, using HMG's 2004 deprivation indices report, nowhere in the FOD District even at Super Operational Area level (a sub-ward population group of roughly 1500 persons) is there anywhere that is below the 20th percentile value. This contrasts with other parts of Gloucestershire; e.g. Gloucester and Cheltenham have 16 and 6 respectively below the lowest 20th percentile.

Please see comments for the Forest of Dean Friends of the Earth representation on Item 7, Table 4, Page 13.

- (Scoping Report Pg. 17) Para 6.14. The values quoted do not align with HMG's desires or current thinking being developed as part of the South West Regional Spatial Strategy 2006 – 2026. Nor do they link in with the later SWRDA Regional Economic Strategy policy document that has recently been published in draft covering the period 2006 – 2015. The paragraph needs to be revised to take account of them.

Paragraph 6.14 on page 17 contains figures which are slightly out of date. The paragraph will be amended according to the more up-to-date figures that the County Council has recently submitted in its 'First Detailed Advice' to the South West Regional Assembly (SWRA) with regard to the Cheltenham and Gloucester Joint Study Area element of the RSS. The SWRA are considering the Advice received from all the strategic authorities and will decide what is to be included in the Draft RSS. The Draft RSS will be considered by Members of the Regional Assembly on 10th March 2006 before being submitted to Government Office for the South West. The SWRA propose to undertake public consultation on the emerging RSS in the Spring/Summer of 2006. Representations on levels of development in the county should be directed to the SWRA.

- (Scoping Report Pg. 18) Para 6.16 and 6.17. Great play is often made that the mean salary earned by persons from the FOD District is less than of others in the County. This gives the false impression of greater affluence in those other Districts. In reality, the spread of incomes is less in the FOD District, and as a result the income of FOD District lowest earners is significantly higher than in several other Gloucestershire Districts, and the income of the highest earners in the FOD District is somewhat lower. In reality, most people in the FOD are no better or worse off than in the rest of the Country or nationally.

The paragraphs will be updated with the latest available figures. Parts of the Forest of Dean do have significant problems of isolation. According to the 2004 Indices of Deprivation 17 Super Output Areas in the Forest of Dean are in the top 10 % most deprived in terms of the National rank of geographical barriers. In terms of average incomes: In 2003 Gloucestershire's average income was below the average for England and Wales. In 2003 the Forest of Dean had the lowest average income of Gloucestershire's six districts.

- (Scoping Report Appendix 4) Ec Item 7. Same comments as those made in connection with Page 13, Table 4, Item 7.

Addressed under comments in connection with Page 13, Table 4, Item 7.

- (Scoping Report Appendix 4) En Items 18 & 19. The absence of any comments in the "Likely Evolution without M&W Plan" column for both these items is noted. Are we to infer that whatever is in the Plan it will be damaging to both the historic environment and detrimental to the landscapes of the county?

Text will be added in these columns.

■ (Scoping Report Appendix 5) Effective Protection of the Environment – Natural resource protection and environmental enhancement. Fine words, but it is left both unclear and uncertain how the key messages are going to be achieved, particularly those relating to the Forest of Dean. See also our preceding comments re page 54, items 18 & 19.

The key messages feed into the development of the Objectives which will make up the Framework. Minerals and Waste Documents when tested against these Objectives should certainly provide for the effective protection of the environment throughout Gloucestershire including the Forest of Dean.

■ (Context Report Pg. 87) Re item relating to Policy EC2. Same comments as for Scoping Report Page 13, Table 4 Item 7.....It is our opinion, and that of the SW Regional Assembly (e.g. as set out in the SW Regional Spatial Strategy 2006 – 2026 that will replace RPG10 before the Gloucestershire Minerals and Waste Development Framework is scheduled to become active) that any case for the retention of a FOD Area of Special Need is no longer valid. The item should therefore be deleted from this document.

RPG10 is currently in place as part of the development plan. When a draft of the RSS is available next year it's contents will be considered and amendments (as necessary) will be made to the SA Framework. The County Council has recently submitted its 'First Detailed Advice' to the South West Regional Assembly (SWRA) with regard to the Cheltenham and Gloucester Joint Study Area element of the RSS. The SWRA are considering the Advice received from all the strategic authorities and will decide what is to be included in the Draft RSS. The Draft RSS will be considered by Members of the Regional Assembly on 10th March 2006 before being submitted to Government Office for the South West. The SWRA propose to undertake public consultation on the emerging RSS in the Spring/Summer of 2006. Representations on issues of concern to Friends of the Forest should be submitted to the SWRA during the consultation period.

■ (Context Report Pg. 102) Objective 2. For the reasons given in relation to Page 87, item Policy EC2, and the Scoping Report Page 13 Table 4, item 7 etc....The high quality landscapes and other attributes of both the Forest of Dean and the Cotswolds are significant earners for the County by way of both tourism and as attractors of small-scale high intellectual property businesses. There is evidence from other parts of the UK that the loss of both landscape quality and other forms of environmental attributes can have a significant harmful effect on these earning factors. Large-scale minerals extraction, increased by heavy vehicle movements would contribute to this.

Part of the purpose of the Context Report and the Scoping Report is to 'scope' what is contained in other relevant plans and programmes. The Rural Economic Strategy for Gloucestershire was developed during 2003 by a Rural Economy Advisory Panel on behalf of the Gloucestershire First Partnership. Widespread consultation took place including two open meetings at the University of Gloucestershire, both attended by over 200 people. Gloucestershire First approved it in January 2004. The commentary on the strategy is balanced considering both the economic importance of mineral sites and also the possible detrimental effect on the tourist industry.

■ (Context Report Pg. 118) FOD Local Plan – Revised Deposit (2003). It does not appear that this section has fully taken on board the Inspector's recommendations and the modifications that have been incorporated since the public inquiry. Nor is it recognised that the plan is still unadopted. It is also noteworthy that the Local Plan (LP) latest revision provides little recognition to the high quality landscapes and other environmental attributes possessed by the FOD, or of the results of the Countryside Agency's recently funded Landscape Character Assessment and Landscape Strategy studies of the FOD District. These are serious omissions that were recognised in part by the Planning Inspector, who noted the ongoing work by the Countryside Agency and the possible designation of a new AONB within the Forest of Dean District within the intended lifetime of the LP.

The Context Report and the Scoping Report form a Framework which can be updated as and when relevant plans and programmes are adopted e.g. When PPGs are replaced by PPSs. The scoping at this stage cannot realistically consider all the various revisions of local plans. The table will be amended to make clear that the plan is unadopted and when the Forest of Dean adopts its Local Plan the Framework will be amended as necessary.

■ (Context Report Pg. 118) FOD Community Plan (2004 – 2009) (Draft). In the context of the Environment, FOF's comments made in regard to Page 118 and the FOD Local Plan apply also to the Community Plan document, and its mention in this section of the Context Report. To date, inadequate weighting has been given to the total environmental worth of the Forest of Dean's landscapes biodiversity, heritage and culture compared with short term economic gain; even when the latter has been clearly unsustainable. This short-termism is now totally contrary to HMG's wishes as set out in Planning Policy Statements suite and other related policy/strategy documents. It is imperative that the Gloucestershire Minerals and Waste Development Framework does not repeat the historical imbalance.

The Context Report and the Scoping Report merely reflect the content of plans as they are and there is the possibility that once the Community Plan is adopted, changes can be made to the Framework. When taken as a whole it is contended that sufficient account is taken of landscape, biodiversity, heritage and cultural significance across Gloucestershire, including the Forest of Dean.

Details of the Revised Context and Scoping Reports

The revised Context and Scoping reports will be available for information purposes on Gloucestershire County Council's website from early November 2005, as will this Response report. It is intended that they will be regularly updated, particularly in terms of the baseline data. Should you have any questions or queries on the SA of Gloucestershire's Minerals and Waste Development Framework please contact:

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