Cinderford Area Action Plan
Pre-Submission Draft

Summary of representations

21 June 2011 – DRAFT

In red: Forest of Dean District Council suggested responses and notes. Where changes are proposed it is necessary to give the exact intended wording so that if he/ she agrees the Inspector can then simply recommend that we include the changes as presented.

Representations should say why they consider the AAP unsound, how it may be improved and what changes are needed. These can vary from minor alterations to wording to withdrawal of the entire AAP. Many of the representations received are however in the form of objections and do not follow the soundness route. They are however all considered and should be taken into account of in the examination.

1. Introduction

The Forest of Dean District Council (FoDDC) has appointed a consultant team led by Alan Baxter Associates and Urban Practitioners to produce an Area Action Plan and Masterplan for the Northern Quarter in Cinderford. The consultant team also includes environmental consultants, ERM. The Area Action Plan will be a Development Plan Document in the new Local Development Framework for the Forest of Dean. It contains the following key elements:

- Vision and objectives for the Northern Quarter;
- Overview of background to the AAP;
- Area Development Framework;
- Spatial development principles and policies; and
- Illustrative masterplan.

This version of the AAP expresses the Council's proposed strategy for the Northern Quarter. The document was updated since the Preferred Options document in light of the following:

- Preferred options consultation feedback (2009)
- Ongoing stakeholder engagement (2010)
- Further Consultation Report consultation feedback (2011)
- Integrated process of Sustainability Appraisal (2011)
- Additional technical baseline reports (2011)
- Assessment of proposals (HRSA, Appraisal of Flood Risk) (2011)

The formal period of representations for this document commenced on 27 April 2011 for six weeks, following its approval by Full Council in April 2011.
The purpose of this report is to summarise the responses received on the Pre-Submission draft of the AAP.

2. List of stakeholders making representations

40 representations were received on the Pre-Submission Draft of the AAP as follows. They have been grouped and numbered for ease of reference.

**National or Statutory consultees**
- NS1: Natural England
- NS2: Margareta Mojzisova - Environment Agency
- NS3: Royal Society for the Protection of Birds
- NS4: Network Rail
- NS5: Coal Authority

**Regional / county stakeholders**
- REG1: Butterfly Conservation
- REG2: Rob Niblett – Gloucestershire County Council
- REG3: Gloucestershire Wildlife Trust
- REG4: NHS Gloucestershire
- REG5: Severn Trent Water
- REG6: Welsh Water
- REG7: Mark Murphy, Gloucestershire Constabulary

**Local stakeholder groups**
- LG1: Cinderford Town Council
- LG5: Gloucestershire College
- LG2: Keith Morgan - Dean Forest Voice
- LG3: East Dean Initiative
- LG4: Forest of Dean Friends of the Earth
- LG5: Don Burgess, Federation of Small Businesses, Forest of Dean Branch

**Individual stakeholders**
- IND1: Alison Rennie
- IND2: Daphne A Lane
- IND3: K. Burford, A. Leyton, A. Leyton
- IND4: D. Burford, Elsa Hale, T Oliver, M Beckett, C Leighton
- IND5: L Thomas, J Leighton, H Leighton, J Hall, Weslee Leighton, Signed by another (name not legible)
- IND6: Greg Herbert
- IND7a: Mr I.G. Ellis
- IND7b: Mr I.G. Ellis
- IND8: Laurie Moseley
- IND9: Martin Rudland
- IND10: Mike Jones
- IND11: Wendy Corum
- IND12: Sophie Franklin
- IND13: P Morris
- IND14: Jim Swanson
3. Summary of representations

3.1 Responses in support

Several representations confirmed support for the proposals in the Pre-Submission Draft of the AAP as follows:

1. General support

The Environment Agency indicated that the changes between the previous iteration of the AAP and the current version “have significantly improved the document” and as such the Environment Agency is “supportive of the document overall”.

Natural England welcomed the AAP document and congratulated FoDDC on its production. The representation specifically stated that they have been impressed with the extent to which their views and recommendations have been taken into account and reflected in the document.

Gloucestershire County Council also identified general support for the principle of mixed use development in the Northern Quarter.

Cinderford Town Council outlined general support for the proposals.

Comment references:
LG1, NS2, NS1, REG2
Response - note the Natural England response, refer to the fact that it was received outside the period for comment and outline the current programme and measures for bat survey work. (NB this response only really deals with the bat issues; it would be useful to confirm with NE what if any their outstanding concerns are regarding other species eg. butterflies and Great Crested Newts)
2. Landscape, biodiversity and public realm

Natural England endorsed the requirements of Policy 10 in relation to Landscape, Biodiversity and Public Realm and noted the emphasis placed on important bat populations. Proposals in relation to biodiversity mitigation (including the approach to development sites and the road link) were also supported. Gloucestershire County Council supported the overall approach to ecology in the document.

Comment references:
NS1

3. Addressing deprivation

East Dean Initiative stated that the proposals would help to improve issues associated with deprivation and rectify a general sense of under-investment in the area.

Comment references:
LG3

Note and acknowledge addressing these issues is one of the key purposes of the AAP

4. Creation of a link to enable regeneration

One response indicated that the creation of a link from the A4136 at the former Northern United Colliery site joining up with the A4151 near the town would provide a much improved access which would enable the area to be opened up for sensible and sensitive quality mixed developments to promote business opportunities and housing. Gloucestershire College supported the altered road alignment. One response noted that the revised road alignment will have a reduced environmental impact and development cost as well as reducing traffic use at the Nailbridge junction.

Comment references:
LG3, LG5

Note and agree

5. New education facility

Several responses supported the location of a new educational facility in the Northern Quarter. In addition to the general principle of locating an educational facility within the Northern Quarter, Gloucestershire College supported the revised location of the educational facility in particular. The College stated that the revised site would be an attractive destination for students and noted that a new facility in this location would help to improve local skills and reduce the need for outward travel and migration.

Comment references:
LG3, LG5

Note and agree, emphasise the importance of the education use as an anchor

6. Previous consultation

One response noted that the proposals respond to the themes identified on consultation undertaken in 2005 on the Community Strategic Plan.
Comment references:
LG3
Noted

7. Heritage

Gloucestershire County Council (REG2) indicated support for the overall approach to heritage in the document.

Comment references:
REG2, IND26
Noted

8. Water supply and waste water

Severn Trent Water supports the strategy in the AAP in relation to water supply. STW also supports the waste water strategy identified in the Core Strategy. The representation identifies the need for future work in relation to capacity and infrastructure.

Comment references:
REG5
Noted, useful to note if possible that there are no overall constraints

9. NHS facility

Gloucestershire NHS confirmed that the provision of a Renal Dialysis Satellite Centre within Cinderford has now been agreed in principle and following an extensive options appraisal exercise, a preferred site has been selected at Forest Vale / New Town Road. The representation confirms that the facility would benefit from the proposals in the AAP.

Comment references:
REG4
Noted- such health uses are a welcome and appropriate part of the AAP providing both employment and an important community facility.

7. Soundness

The Environment Agency (NS2) indicated that the document is sound. The representation confirmed a series of areas which were highlighted as concerns in their previous representation on the AAP Preferred Options document and have now been addressed. These are listed as follows:

- Waste policy (amendments);
- Location of car park within functional floodplain;
- Foul drainage and water quality policy (missing);
- Flood risk policy (alterations);
- SUDs policy (additions / amendments);
- Landscape and biodiversity policy (amendments);
- Habitats policy (additions / changes);
Renewable energy policy (addition);
Mining policy (addition / changes); and
Contaminated land policy (minor addition / changes).

Natural England (NS1) confirmed that they view the Publication draft as being generally sound,

Comment references:
NS1, NS2
Noted

8. Balance of distribution of employment uses

Some responses indicated the approach to employment uses is sound.

Comment references
IND26
Noted

9. Areas for improvement raised in the context of general support for the document

The following areas of improvement were highlighted:

1. The Environment Agency (NS2) recommended that the policy on waste be reinstated, wither as a policy in its own right, or as part of general design guidance.
   Agree to refer to waste issues in the AAP text and to pick up in any subsequent design guidance.
2. The Environment Agency (NS2) recommended minor text alterations to the flood risk policy.
3. The Environment Agency (NS2) recommended minor text alterations to the drainage / SUDs policy.
4. The Environment Agency (NS2) recommended some clarifications to the landscape and biodiversity policy in relation to buffers.
5. The Environment Agency (NS2) recommended an addition to the phasing policy.
6. The Environment Agency (NS2) recommended a minor alteration to the character area policy.
7. The Environment Agency also indicated that the Water Framework Directive (WFD) requires EA to aim to improve the ecological status of Cinderford Brook. In addition, it is noted that reference should be made in the supporting text of Policy 2 to a formal WFD compliance assessment which might be required.
   Agree to minor amendments which need to be drafted and presented at time of submission—any complications (ie where we agree to amend but want an alternative wording to that suggested) can be sorted by asking Environment Agency to agree the suggested changes and including their agreement with the submission.
8. In relation to the Habitats Regulations Assessment, Natural England (NS1) noted that further assessment is required in relation to how bat populations use the Northern Quarter which is currently being undertaken by the Council in advance of the Examination.
Agree- noting general response that the work is on going and that its scope has been agreed with NE.

9. Gloucestershire County Council (REG2) suggested that additional reference to other protected species could be made in policy 15.

Agree to expand text in policy 15 below point 4.

10. Gloucestershire County Council (REG2) questioned whether it is possible to include policy 26 within a LDF.

Response – further discussion with GCC needed to confirm whether policy 26 should be deleted. If it needs to be deleted, the Council would support retaining policy 26 wording as text in the AAP owing to the importance of the issues it covers.

11. Gloucestershire County Council (REG2) identified some additional references to be added in relation to heritage.

12. Gloucestershire County Council (REG2) also highlighted some additional transport and highways references for addition to the document.

Response – GCC points 11 and 12 are agreed in in principle but further discussion required to clarify how appropriate these comments are in accessibility terms.

3.2 Objections

A number of objections were raised and have been grouped for the purposes of this summary. The references after each objection topic can be cross-referenced against the stakeholder list above.

1. Value of wildlife, ecology and biodiversity

A significant number of responses highlighted concern that proposals would result in a detrimental impact on habitats and flora / fauna including protected / rare species. A number of responses highlighted that wildlife is valued in many different ways which are not necessarily quantifiable. Several responses highlighted that the development would have an impact on a Key Wildlife Site and an English Nature Grasslands Inventory site. Some responses indicated that the AAP does not provide sufficient mitigation strategies to protect species and minimise impact (including survey work and monitoring). Some responses also suggested that additional survey data would be required. One response noted that that there is a risk that planning applications which are steered and assessed by the AAP would not necessarily deliver the full range of ecological proposals, strategies and aspirations highlighted in the AAP (and therefore the ecological part of the policy framework needs to be as strong as possible).

Comment references:
IND1, IND2, IND3, IND4, IND5, IND6, IND9, IND12, IND14, IND16, IND17, IND18, IND19, IND20, IND21, IND21, IND22a/b, IND23, IND24, IND25, IND27, IND28, IND29, LG4, REG1, REG3,

Response - Integral to the AAP is a design and layout that offers opportunities for enhancement of biodiversity and respects the existing features. A degree of change is inevitable however and where necessary mitigation on or off site is essential. Special attention has and will continue to be given to protected species on the site.

Although mitigation strategies have been developed as the document has evolved, it is agreed that additional work is necessary. This need arises as the AAP proposals become clearer and as for
example the detailed spine road alignment is drawn. Actions such as the extensive bat survey (which has the support of Natural England) are under way and will lead to appropriate mitigation. Although bats are the main consideration due to their known location and status in terms of protection, there are other issues that are known and are being taken forward.

2. Impact on landscape

Many responses highlighted the importance of the landscape at the Northern Quarter and the need to protect Steam Mills Lake, the Linear Park and their setting. This relates to visual impact, and general disturbance of the area’s tranquillity. Some respondents highlighted how the development (including proposed cycle and pedestrian tracks) would affect the current population as well as future residents / visitors.

Responses highlighted that the construction process would have an impact on the immediate and surrounding landscape in relation to dust, disturbance and noise. One response highlighted that an attractive landscape setting is a key factor in attracting new employers and that the Council’s policy of promoting AONB status should be continued with a view to avoiding further urbanisation.

One response indicated that both the Core Strategy and the AAP require a stronger nature conservation policy and appropriate allocation relating to landscape quality.

Comment references:
IND2, IND3, IND4, IND5, IND7B, IND8, IND9, IND12, IND14, IND16, IND17, IND18, IND19, IND20, IND24, IND25, IND28, LG4, REG3

Response - The decision to proceed with the AAP is the result of an evaluation for development options for Cinderford. These are limited because of the landscape and planted forest which encircles it. The Northern Quarter (NQ) contains sensitive landscapes but equally has areas of previously developed land which are in part derelict and areas which are developed but are appropriate for redevelopment. The NQ as a whole offers developable land in an exceptional setting. The area is dominated by man made features and by the landscape which followed the open cast mining of coal. The AAP will bring major changes in the form of built development. Its masterplan and design will ensure that the new form that is created is of very high quality and is appropriate to the setting (predominantly but not exclusively woodland). The nature conservation measures, including the actual design of the overall development are an integral part of the new environment and will lead to a distinct area that is appropriate for its location, with a unique (neither urban nor rural character).

The NQ will become part of the forest environment but also has clear well defined boundaries that separate it from areas of planted forest. These already bring the type of activity that will be generated in the NQ (walkers, cyclists, vehicles). The types of uses that are being promoted and their intended locations have been carefully selected. The masterplan and the design code guide the form of development and the spaces between.

The issue of AONB is one that was examined by the Council and has now been referred to NE. The then council considered that there was merit in exploring wider AONB status for the district and asked that NE further examine the case. This is likely to take a number of years and one of the key issues will be achieving the balance of protection and enabling change. The case will be further examined but outside the plan making arena.
3. Principle of development

A number of comments questioned the principle of developing on the Northern Quarter and suggested that resources should be focused on town centre regeneration schemes. Several responses highlighted that once developed the ecological and landscape value of the Northern Quarter would be lost and could not be replaced, whereas the proposed development could take place in alternative locations.

Several responses cited the findings of the Local Plan Inquiry in relation to the Northern Arc and also argued that the proposals should conform to the adopted Local Plan. Various representations quoted extracts from the Inspectors reports and associated representations by statutory consultees such as English Nature.

Some comments raised specific issues in relation to the overall vision, themes and spatial framework for the AAP.

Some responses indicated that the proposed development would result in anti-social behaviour which would impact upon the legitimate enjoyment of the area and an ecological impact.

Comment references:
IND3, IND5, IND7b, IND9, IND10, IND12, IND16, IND17, IND19, IND20, IND21, LG2, LG4, IND26, IND28

Response - To focus on the existing town alone would not deliver more than slow incremental change. This may result in additional employment, but it would probably be of the same nature as what is there already, providing useful space but not the step change that is needed to provide a greater range of jobs or to enable a revised focus on education. Reference to the landscape and ecology matters elsewhere illustrates the care taken to ensure that the NQ is both distinctive and appropriate.

The NQ is an integral part of the council’s emerging LDF. It is a response to the need to look forward to 2026 and re assess the needs and issues that are apparent. It is intended to provide a focus for a mixed from of sustainable development in order to reinforce the role of Cinderford. It should not be seen within the Local Plan context. The Local Plan does allocate almost all of the NQ for development, though the large central core is identified for recreational use. If this were to have been implemented it would have resulted in an intensification of the use of the area.

Comments related to the possible behaviour of individuals are noted but are not considered relevant.

4. Principle of college locating in the Northern Quarter

Various comments indicated that the college should remain in its current location and the proposed relocation would not be economic or would impact on ecology as highlighted above and could create anti-social behaviour. Several comments indicated that the current location is able to serve its catchment more appropriately than the proposed location in the Northern Quarter.

Some responses objected to the speculative promotion of a college or educational uses on the site as an attempt to secure funding.

Some responses indicated that the Cinderford is not an appropriate location for the college as it is not sufficiently accessible, or centrally located for the entire catchment.
One response indicated that the type of educational facility promoted would not provide sufficiently technical courses to be of value.

Comment references:
IND1, IND7a/b, IND8, IND9, IND11, IND13, IND19, IND24, IND25, IND26, IND28

Response - Comments related to the possible behaviour of individuals are noted but are not considered relevant.

The NQ offers an accessible and attractive location for development. It lies within an area where there is a great desire to improve educational attainment and to retain younger and more qualified persons in the local job market. At the same time there are major changes in further education both in respect of the institutions themselves and in the way it may be delivered. The role of the NQ is to be able to facilitate some of this change (by making land available) in a manner that enables new or existing institutions to enhance their delivery.

5. Impact of biomass plant

One representation stated that further work was required to demonstrate that the biomass proposals would be acceptable in terms of impacts associated with air pollution and traffic generation.

Comment references:
LG4

Response - The proposal will be evaluated in greater detail if/when this proposal is taken up. All the above considerations are relevant. For the AAP the Council is satisfied that the site could be used in the manner proposed.

6. Principle of development on Forest Waste

Several representations objected to the proposals on the ground that they implied development of Forest Waste which is understood to be protected and subject to legal and practical restrictions. Objections to the AAP in this regard overlapped with feedback on the Core Strategy which sets the strategic context, and establishes a principle for the type of development identified in the AAP. Some responses specifically objected to the sale or trade of land parcels by the Forestry Commission.

Comment references:
IND 7a/b, IND10, IND24, LG2

Response - It will be necessary to look at each comment but in general the response is that the AAP proposes to allocate an area of land, much of which is owned by the Forestry Commission. This land includes areas of Forest waste which are regarded by those making comments as any unenclosed areas within the Statutory Forest. Forest Enterprise has a different definition.

The Council and its partners Forest Enterprise are confident that the land can be made available and that the land could therefore be developed. In addition, the Council is confident that the identification of the land concerned for the development proposed represents the best option for the Core Strategy. It is brought forward through the AAP in order to be able to achieve the desired mix of uses and quality of development.
There is a legal context to the development of land in the forest which has been the subject of much debate, but the conclusion of this is that the land can be developed, can be made available and may be the subject of exchange when it is developed.

Further discussion at the time of the examination of the Core Strategy and the AAP would be welcome on the issue.

8. Ground conditions:
Some responses indicated that ground conditions in the Northern Quarter including the legacy of mineshafts make the area inappropriate for development.

Comment references:
IND1, IND5, IND9, IND12, LG4

Response - much of the background work that has been carried out on the NQ since its development was mooted in 2002 relates to the ground conditions. Whilst there are areas that are constrained, the development proposed is broadly compatible with the known constraints. As proposals become more detailed then additional site investigation can be carried out.

9. Impact on tourism:

There is a concern that impact on landscape, habitats and ecology would also have a negative impact on tourism in the area.

Comment references:
IND1, IND4

Response - this is not agreed. Whilst the development proposed will change the area, it will improve the appearance of much of it. It also includes proposals which serve recreation and tourism and provide better facilities. Improved transport (public and private) will also benefit tourist.

10. Flood risk:

The location of part of the site within a floodplain was an objection for several stakeholders. One representation highlights the need for consideration of groundwater issues in relation to flooding.

Comment references:
IND5, IND9, IND12, LG4

Response - the impact of flooding has been fully considered as evidenced by the views expressed by the EA and the continued dialogue that is taking place with them in support of the AAP.

11. New road

Several representations stated that the new road is not needed and will have a negative impact on species, habitats and landscape. One response supported the principle of a bypass road but indicated that the proposed alignment would create traffic problems. Other responses indicated concern that the new road might not be safe from the perspective of safety and congestion.

Comment reference:
IND8, IND15, IND24, LG4, IND27, IND28
Response - The impact of the road and the development as a whole is a major consideration in compiling the AAP. The general route of the road has been established and does not now bisect an area of planted forest which was otherwise unaffected by the AAP proposals. The precise route may still be refined as part of the present exercise involving the study of the local bat population. The intention of the road is to provide an overall benefit in the form of an alternative access for some traffic to Cinderford whilst also serving the NQ. The road should be designed in accord with the principles in the design code which minimises intrusion and creates a “street” through the more build up part of the NQ. Safety and its fit in the environment are key considerations.

12. Soundness:

Some representations suggested that the AAP is unsound in relation to impact on species and other elements of the evidence base. Comments by Natural England on the Core Strategy being “unsound” were also cited. One response suggested that the consultation was flawed as documentation did not make the issue of development on “Forest Waste” clear. The need for an Appropriate Assessment (see below) was also cited as a reason for the plan being judged as unsound. One representation indicated that the generation of options through the AAP /SEA process did not test sufficient alternatives.

Specific policies relating to the various topics listed in this section were also highlighted as being unsound.

Comment reference:
IND8, IND10, LG4, NS3, REG3, IND26, IND27, IND28, NS5

The principle that the AAP is considered unsound should underlie the representations which are not in support of the AAP. These should say why it is considered unsound and what changes are thought necessary.

It is considered that there is sufficient clarity about the development of Forest Waste. The proposal is to allocate land including forest waste for development. This is the main exception to the Core Strategy and the Local plan’s protective policies where land may be allocated by the development plan.

Response - The issue of appropriate assessment is considered elsewhere and the response is essentially to agree with NE that there will be a need for a comprehensive assessment of the impact of development proposals to be made at a time when the detail of these is greater than it is now and in the context of additional information, including a bat survey that is now been assembled. It is further agreed with NE that the AAP so far contains sufficient supporting material which makes it in the opinion of the Council able to be considered sound.

13. Alternative proposals

Some responses indicated that resources that have been devoted towards current and historic proposals could have been spent on alternative projects /areas in the District such as town centres and the Lydney area. FODFOE suggested an alternative model based on a model of “Life Support” which promotes the role of nature in achieving a wide range of goals and objectives.

Comment reference:
IND 10, IND12, LG4
Response - alternatives are noted, however the AAP should be viewed in the context of the Core Strategy which proposes a different form of regeneration based strategy for Lydney which includes substantial new development, support for Coleford and for Newent to bolster their role as market towns. There is much to be supported in the FODFOE proposals for the area however they do need to be assessed in the context of the need to address the need for future employment housing and education. The general theme of using the environment for education is very likely to be taken up within the AAP proposed educational facility.

14. Definition of area as deprived

One representation interrogated the use of the Indices of Multiple Deprivation to justify the approach taken in the proposals.

Comment references:
IND8, LG4

Response - the material supplied is noted. It shows the relatively deprived nature of the area which includes the NQ.

15. Need for appropriate assessment:

One response stated that the HRSA document needs to be supplemented by an Appropriate Assessment before the AAP can be adopted.

Comment reference:
NS3, LG4

Response - the issue of appropriate assessment is considered elsewhere and the response is essentially to agree with NE that there will be a need for a comprehensive assessment of the impact of development proposals to be made at a time when the detail of these is greater than it is now and in the context of additional information, including a bat survey that is now been assembled.

16. Need for a hotel:

Some representations indicated that there is no need for a hotel and that an additional facility would impact on existing locally run enterprises.

Comment references:
IND7a

Response - the balance of considerations is that there is a shortage of certain kinds of accommodation in the district and that this means a loss of potential revenue for the area.

17. Population projections and urbanisation

One response stated that the policy of housing growth and urbanisation is at odds with alternative projections which suggest a natural reduction in population in the District. The level of residential growth and associated impacts (e.g. traffic generation) is also a source of concern.

Comment reference:
IND8, IND28
Response - this suggested natural decline in population is based on there being no consideration of migration which at the present time results in a small net increase in population (deaths exceed births). It should not be ignored as there is no reason to or means to prevent the free movement of persons who chose to locate in the area. The AAP and CS seek to meet their needs as shown in the evidence base.

18. Industrial and residential uses:

One response objected the incorporation of residential uses as this would create tensions with employment generating uses.

Comment reference:
IND15

Response - there is potential for conflict if uses are not considered in a comprehensive manner. One purpose of the AAP is to do this and the supplementary masterplan shows how the area can be developed without conflicts.

19. Consultation:

Some representations stated that the consultation questions in the document were too leading and complicated. Another response indicated that the consultation might not be in conformity with the SCI and suggested that previous suggestions have not received a clear response.

Comment reference:
IND15

Response – Noted. The whole AAP was open to comment and the questions serve to highlight particular areas - further discussion about the AAP is welcome, and the examination process will provide the opportunity for the Inspector to examine in greater detail any issues that he/she considers appropriate.

20. Deliverability

Several representations indicated that some of the proposals in the AAP might not be deliverable and should therefore not be included within the LDF. Another response questioned the viability of the college location and indicated that too much weight had been placed on an education facility within the overall regeneration strategy for the Northern Quarter which is a concern from a delivery perspective. One representation stated that the AAP placed an overreliance on the private market which could be an issue as the project might stall when only partially complete. One representation highlighted a concern about deliverability in the context of the economic climate.

Comment references:
IND10, IND13, IND26, IND28, LG5

Response - see comments above regarding education facility - the AAP was published with the nature of this being open, but it is acknowledged that such a use is the lynch pin of the whole development in its ability to lead the mixed uses and meet the established needs of the area.
21. Additional evidence base documents:

FODFOE highlighted a series of documents for the evidence base and examination library.

Comment references:
LG4

Noted

22. Guidance in relation to mining

The Coal Authority raised an objection in relation to the removal of policy guidance relating to mining and development on unstable ground which is considered to make the AAP unsound. (It should be noted that supporting text has been retained in the AAP in relation to mining and related issues, but an objection from the Mineral Planning Authority, GCC, led the formal policies being removed from the AAP).

Comment reference
NS5
Response - further discussion is suggested, the AAP should highlight the issues and should also refer to the role of the Coal Authority.

23. Economic and commercial viability

One response raised a number of queries in relation to retail and commercial issues such as affordable housing phasing, needs assessments, the office market, the type of hotel, retail provision and service infrastructure provision.

Comment reference
LG5
Response - need detail in order to respond.

24. Community safety and design

One representation highlighted a general need for greater references to community safety throughout the document. Phasing of the development parcels was also highlighted as a concern as a lack of coherent design could lead to criminal behaviour. Opportunities to promote current design standards at the time of any application were also promoted. Greater emphasis on Secured by Design principles and other standards was also highlighted.

Comment reference
REG7

Response - Agree to add a reference to Secured by Design and to add this to the masterplan too. Note other points, and amend where possible (need detail)

3.3 No comments made

Some stakeholders declined to make any formal objection or statement of support. These included:
4. Next steps

The comments above will be set out in full in a comments and responses table to be prepared as part of the Statement of Compliance / Consultation which will be submitted to the Planning Inspectorate. This can be viewed on the Council's website, please follow the attached web link:

http://www.fdean.gov.uk/nqcontent.cfm?a_id=7440&tt=graphic

Following the publication of the AAP and the receipt of the final submissions, the evidence, reports and details of the consultations compiled during the process will be examined by a government inspector. The inspector will review the AAP to make sure that it is 'sound'.

The inspector will then issue a report about the AAP and recommend binding changes to the document. The council must adopt the changes recommended by the inspector and adopt it a full council meeting.