Muddy Water’s

Dear Sir,

I sometimes look back to the time when the availability of employment was less of a challenge.

A time when I would approach a prospective employer and say, *(I can do that give us a job!)* On one occasion I started at six in the morning, with a tunnelling gang under the Severn near Aust, I did not like that much because of the water coming through the roof, so I quit at twelve O-Clock...
I then drove to a Haulage firm near Yate: and got a job driving a Tipper that afternoon, carrying stone and tarmac all over the west-country for the next few months.

Most of the jobs I held were for about on average Eight Months, I would change jobs for more money or better conditions, anything to put food on the table for my growing Family this was back in the late 1960s and early 1970s.
But all in all it is not a time I feel proud of, especially now that they talk of a wasted generation of young Adults who have never had a job and the prospects of getting one are very slim.

I achieved few qualifications, and no G.C.S.E.s or “O”- levels I just proved to the employer I could do the work that was good enough then.
But like all things Times Change sometimes for the better and employers require more evidence of your competence for employment.

The opportunities I have just described will never return. But I believe everyone should have a chance of a better future, some would say I was lucky I had plenty of jobs but if I had my time over I would have got more education, then a better job that would have provided my family with a better pension for life now.

I have never been one to put my head above the parapet! But I have been spurred on by the comment by Councillor Jane Horne, saying that there has been little support in favour of the (Master-plan) for the "Northern Quarter"

As the proposals stand, they promise desperately needed Re-generation for CINDERFORD & STEAM MILLS.
Bringing employment opportunities for the whole of the Forest of Dean, The first Purpose built College for the area, not a succession of converted Grammar schools that were never designed for that role.
The £100 Million Development would take hazardous traffic away from the route passing “Steam Mills School” and through the village and relieve the congestion at Dunk’s Corner, as far too much heavy traffic passes through this pretty area on its way to the industrial estates beyond.

I would say to the very vocal detractors of this development, we cannot carry on living in the last century. A time when I remember my Grandfather walking back from Cannop past the big Nissan hut that stood where Five Acres Garage now stands, on his way to a tin bath in front of the range in the house in Coveram Road,
It was not that good a life, I am very sure.

To those who object to the removal of the derelict buildings surviving from the Northern Pit I would say they do nothing to enhance the memory of those who toiled underground; the memorial that already stands there does a far better job. (I would add that access may be restricted at present due to state of the site as it is now, and may be only temporary)
As far as the wildlife is concerned, let’s not forget the word wild, and a sympathetic approach to the habitat will minimise their disturbance and wildlife will re-colonise the area.
In this instance I believe people are more important, others may agree.

I do not remember anyone throwing up their arms when I was involved in digging up the coal at the opencast back in the 70s. Maybe the powers that be, new to a certain degree nature will look after itself. You only have to walk around the area now to prove my point.

And at the end of the day there are many more Bats, Newts, Mayflies and Tree’s to hug.

Or have they got it in for “Cinderford” as we were once dubbed the Dirtiest Town in Britain.

I am a voter and I played my part in electing the councillors I thought would have the town’s best interests at heart. I think the work they have done in trying to improve “CINDERFORD” future have been admirable but have been spoiled by detractors who do not have our interests on their agenda.

Others did not want “Cinderford” to have a “Redland Tile” factory, (1980s) and more recently a “Tesco” or an “Asda”.

I am proud to live in “CINDERFORD” and I want a future for my Grandchildren indeed all the future generations and when I am gone I do not want to be remembered for opposing a brighter future for “The Forest of Dean” We cannot live in a Theme Park.

We Have Got To Move On.
Come on People of Cinderford Let your voices be Heard

Cinderford AAP Update

Comments on FoDDC Revised Text for Masterplan & Design Code

1.0 Introduction

Alan Baxter have undertaken a brief review of the revised text for the Masterplan & Design Code, produced by FoDDC in January 2013, and currently being consulted upon. Our broad comments are as follows:-

2.0 Comments

2.1 Executive Summary (page ii)

The Development Split should be updated to “53% Employment, 31% Residential, 12% Education & 4% Hotel & Health”

2.2 Section 2.2 Environmental and Resource Sustainability (page 6)

BREEAM “Excellent” for non-residential buildings is now potentially an unrealistically high standard. It could either be reduced to “Good” or it could be kept in for negotiation purposes. This is also mentioned on page 16 & page 26.

2.3 Section 2.7 Design Standards (page 17)

The residential space standards need updating to:-

- 1 Bed / 2 person homes – 51m2
- 2 Bed / 3 person homes – 66m2
- 2 Bed / 4 person homes – 77m2
- 3 Bed / 5 person homes – 93m2
- 4 Bed / 6 person homes – 106m2

2.4 Section 4.4 Land Use (page 29)

Some of the areas need to be updated as below:-

- Residential development – 4.5 hectares – 156 new homes
- B1 Office development – 4.1 hectares
- B2 / B8 Light Industrial / Industrial development – 3.6 hectares

2.5 Section 6.2 Character Areas (pages 44 & 45)
The “Primary Boulevard” should really be amended to “Primary Spine Road” in both the Northern United and the Forest Vale sections.

2.6 Section 7.1 Movement Framework (page 46)
The “Primary Boulevard” should really be amended to “Primary Spine Road”.

2.7 Section 7.2 Primary Boulevard (pages 46 & 47)
The “Primary Boulevard” should really be amended to “Primary Spine Road” in the headings and throughout the text.

The reference to “regular street trees” and “on-street parking” should be removed.

2.8 Section 7.4 Tertiary Link (page 48)
The sentence “creating a varied street enclosure” has been duplicated.

2.9 Section 7.6 Parking (pages 48 & 49)
In the last line of the first paragraph, the word “area” should be removed after the word “character”.

The second paragraph on page 49 should be amended to “It is anticipated that on-street parking will be used throughout the Masterplan area on all residential streets. On-street parking creates activity and vitality on the streets, while keeping cars in visual contact with the owner.”

2.10 Section 8.6 Education Block (page 52)
The last sentence of the first paragraph should be amended to “Secondly, the treatment and design of the open space outside the main entrance should spread through the footway until the edge of the carriageway.”
Hello Louise

Your original email was forwarded to all Mitcheldean Councillors on the 23 January and was included in 'Correspondence' at the monthly meeting on the 11th February. I have not been asked to forward any comments.

Kind regards,
Sandra Schwanethal
Clerk/RFO to Mitcheldean Parish Council

Dear All

I am writing to send a reminder that the consultation period for the Cinderford Northern Quarter Masterplan and Design Code ends on 4 March 2013. Please could you send any comments through to Louise Scammell – lousie.scammell@fdean.gov.uk or Wendy Jackson – wendy.jackson@fdean.gov.uk before the 4 March 2013. I have included the links to the original document below, the proposed changes are attached to this email (the documents are as per Wendy’s original email).

If you require any further information please do contact me.

Kind Regards

Louise Scammell | Regeneration Officer |
Regeneration | Forest of Dean District Council |
☎️: +44 (0)1594 812642 | ☉️: lousie.scammell@fdean.gov.uk

The new documents propose amendments to the draft Masterplan & Design Code (July 2011) – this has been sent through to you in hard copy and can be viewed from the Council’s website (3 separate sections) at:


Dear Wendy and Louise

Could I please make a request that the Family of Documents tree as shown on page 7 of the Cinderford Design Code and Masterplan is amended to take account of the emerging Biodiversity Strategy that the Council is hoping to develop? As such it won’t have a publication date associated with it but if it could be depicted on the tree in the location as shown on the attached file I’d be grateful. Many thanks.

Sarah Ayling
Biodiversity & Countryside Officer
Sustainability Team
Forest of Dean District Council

01594 812336
http://www.fdean.gov.uk/

Please note this Officer works Wednesday mornings and all day Thursdays and Fridays.
1.0 Introduction to the Masterplan and Design Code
27th February 2013

Dear Sir/Madam

I am writing to support the building of the new Cinderford Spine Road from the A4136 by the Northern United site to Cinderford taking traffic in and out of Cinderford away from the present route through Steam Mills.

The current road presents a major danger to children, parents, staff and visitors entering or leaving Steam Mills School, either by car or on foot.

People driving to or from the school with their children have to cross a stream of traffic, including heavy lorries, with a limited view up and down the road.

Children and parents walking to the school have to use a very narrow pavement from Nailbridge, or need to cross this busy road on the bend at by the garage in Steam Mills in order to use the pavement if coming from the Cinderford direction.

The new spine road would alleviate many of these dangers by transferring most of the current traffic away from the site, making it a much safer journey to and from school for the children.

Yours sincerely,

[Name Redacted]
Governor of Steam Mills Primary School
f.a.o. Wendy Jackson
Re: Newtown Forest of Dean District Council
Clevedon
Gloucestershire
GL16 8HG

Dear Wendy Jackson,

By E-mail

Re: Cinderford Northern Quarter – Masterplan & Design Code

1. I am writing in response to the Public Consultation on the above Masterplan and Design Code.
2. I believe there are serious procedural problems with this and do not believe it can be proceeded with at this current time since:
   - The Spine Road route described (page 46) at Northern United (NU) is at variance with the Adopted AAP and further at variance from the recently approved Planning Application P1449/12/OUT. It seems evident that the many changes have totally confused both the Council and their Consultants. Clearly, the final Design Code must properly and clearly describe current intentions and the Application P1449/12/OUT must also be withdrawn and re-considered.
   - The Current Spine Road route as indicated on P1449/12/OUT is very significantly and materially different from the Public Enquiry route. As such, I do believe the Council are in a position to, or have a mandate to, adopt this without a further Public Enquiry.
   - The Masterplan and Design Code appears to be an SPD. This is incorrect since it will significantly and materially change the adopted CNQAAP. It will therefore be adopted as a DPD, as such an examination in public or Inquiry should take place.
   - The Design Code page 25 and The Cabinet Paper 17th January 2013 SD.106 claims at para. 2.1 that the road route was amended following consultation with the Gloucestershire Bat Group and Natural England (NE) and implies that this is an improvement for the maternity roost of lesser horseshoe bats. This is factually wrong. The Bat Group has not, and does not comment on Planning Issues. At a meeting held on 28th February 2011, at which both you and I were present, Natural England made it very clear, their letter dated 14th March 2011 confirms, that the then proposed Spine Road route was far more likely to impact on the bats than the Alan Baxter “Summary Note of Road Options”, March 2009 Option ‘D’, the preferred route recommended by your Consultants through Hawkwell Enclosure. Since 2011 two further changes have been made to the Alignment. In my view, as someone who has been studying horseshoe bats for over 35 years, the net result of the P1449/12/OUT route is even worse than the route so strongly objected to by NE in February 2011. The route now entails demolishing 2 of the 3 maternity roost buildings and it will effectively cut off the bats in the Artificial Roost from their identified feeding areas. No acceptable mitigation has yet been put forward.
   - Page 25 of the Masterplan and Design Code implies that the Junction of the Spine Road and A4136 was moved in the Adopted AAP. This is not correct. It remained in the same location as at the Public Enquiry route, although the alignment South of the junction was amended to an even worse location, bat-wise, since as noted above, it entails demolition of roost buildings. This was a variation of a suggestion made by a member of the public who did not even hold a Natural England bat Licence and had limited experience of this species of bat. The comparative study of routes requested by Natural England was never undertaken.
   - It is totally unclear what Spine Road route is now proposed in the Masterplan and Design Code, from the description, it seems to be the Public Enquiry route, not even the adopted AAP route. As such, it is impossible for the Council to approve or adopt this document.
   - The Masterplan and Design Code does not appear to include any Biodiversity Masterplan or Statement. This is a serious omission, particularly for such a biodiverse and sensitive site which has attracted so many serious objections to recent Panning Applications (over 100 for P1449/12/OUT). Without this document, objective comment is not possible.

3. The Summary Note of Road Options, March 2009 text is at variance with what seem to be the current proposals since on page 20, (end page 23) constraint features which are highlighted, to be
retained, namely:
- The Group of Northern United Buildings
- The Linear Park Key Wildlife Sites
- Designated forest
- Wildlife sites and species-rich grassland, wetland and woodland habitat

**Will all now be destroyed** in whole or part, under revised plans. This is wholly unacceptable.

This most sensitive and bio-diverse site should never have been selected for Development.

4. The Block Plan Dwg. No. 059_D1_32.3 in the GVA Grimley Addendum Volume 3 shows the AAP Spine Road Route. A few pages later the Alan Baxter Drawing No. 1539/301/002D shows a totally different layout as does Dwg. 059_D1_28.1, the road layout on this being different again from Alan Baxter’s Drawing. The Plan at the Addendum Vol. 1 para. 4.4 is different at least some others, but is such a confusion of lines it is impossible to understand (even for me as a Chartered Civil Engineer) what is intended. It is evident that the innumerable changes have totally even confused the Applicants and their Consultants.

**It is so unclear as to what is being applied for there is no way this Design Code can be approved.**

5. No part of the Cinderford Linear Park should be included in the Development. This was created with public money for wildlife and the enjoyment of people and must remain so, in its entirety.

6. The Phasing for Phase 1 as described at Page 58 is simply ludicrous. To suggest this will commence imminently is totally unfounded. NE have warned the Council that it is likely for bat occupation of roosts to take many years, if at all. It took some 5 years for them to occupy the current Artificial Roost.

7. No acceptable mitigation for any bat flyways has yet been proposed. The “hop-overs” and plastic trees suggested by John Associates will simply not work for this species of bat, certainly not in any timescale likely to be acceptable to HCA. Culverts under the road in exact locations may be used but Johns have already ruled these out on cost grounds. Raising the Spine Road level and adding culverts under, would also sterilise large areas of land from development. The identified **bat flyways are not being maintained** despite vague unsupported statements to say they will be. No attempt has been made to preserve all flyway routes identified despite this being highlighted as a necessity.

8. As a mitigation measure, Johns have stated that traffic on the Spine Road will be limited to a maximum speed of 30 mph, for the entire length of the road. This can only be realistically achieved with speed humps, or similar, for the entire road length. This would deter traffic from using the road, thus rendering it useless as a by-pass. This 30 mph maximum speed **MUST be written into the Design Code.**

9. No Appropriate Assessment has been compiled for any of the Site, apart from the NU area. Natural England do not agree with the conclusion reached for that. This is a serious matter. The Development is, I believe, in breach of the Habitats Directive since the correct Appropriate Assessments have not been carried out, or at the correct stage of the Project, and the ones so far attempted do not consider serious impacts or all the in-combination effects. As you will appreciate, responsibility for compliance rests with the Council, deemed the “Competent Authority”, not with Natural England.

11. In the statement made on page 237 para. 4.316e, in Volume 2 of the GVA Addendum to the Ecological Statement, it correctly states “**No Planning Application has as yet been made for the Spine Road so no fully detailed assessment can be, or has been made.**” This is clear and it should be self-evident that without this assessment, the impact of the Spine Road cannot be ascertained. Until such time as all effects have been established and an Appropriate Assessment undertaken for the whole length of the Spine Road, this Design Code must not be adopted.

12. The Requirements of **The Habitats and Species (As Amended) Regulations 2010** have not been met in that:
- ‘Alternatives’ have not been properly considered. Indeed the current Spine Road alignment is an even worse variation to the already worst option route put forward in the AAP.
- **No overriding public interest has been established.**
- I believe the development plans **WILL** impact, even after mitigation, on the SAC.
- **The best available scientific knowledge and research has not been taken into consideration.** *(ODPM Circular 06/2005)*
- **No Appropriate Assessment has been carried out.** This should not be simply left to detailed Planning Applications.
- **The “in-combination” effects have not been adequately** *(ODPM Circular 06/2005)*
• The loss of habitat for bat foraging has not been properly assessed in accordance with the Key Radial Zones for SAC’s (CCW Science Report No. 755, Billington & Rawlinson define Key Radial Zones)

• There are no proper funding arrangements to maintain new roosts. (ODPM Circular 06/2005)

• There are no proper fall-back proposals should any aspects of mitigation not be successful.

13. Surveys and reports requested by NE in 2011 have not yet been carried out or completed. Without these it is not possible to assess the impacts on wildlife. The bat survey requirements laid down by NE in Spring 2011 were not completed that Summer and no attempt was made to complete them in 2012. The Surveys remain incomplete and some objectives not even commenced.

14. The Cinderford Northern Quarter Masterplan & Design Code Publication Version January 2013 Amended plans have a boundary at variance with most of those indicated in Application P1449/12/OUT. It is unclear as to what the boundary is that is proposed.

In conclusion I wish to object to the Masterplan and Design Code and supporting documents, since it is unclear what is being proposed; is poorly drafted; not co-ordinated; conflicts with other documents on substantive issues; does not comply with the Habitats Directive; has intrinsic procedural errors and should be going to a Public Enquiry as it is a DPD. This proposed Development should not proceed at all on this highly sensitive and bio-diverse site, especially as there are alternative industrial sites in Cinderford and elsewhere available; these documents should therefore not go forward to Adoption.

Yours sincerely,

David Priddis
(Licensed Bat Worker)

Copy: council@fdean.gov.uk  }
     planning@fdean.gov.uk  } By E-mail
     Sally King, Natural England  }
Peter Williams, Group Manager for planning & Housing.

Dear Peter

Objections to: **CINDERFORD NORTHERN QUARTER MASTERPLAN AND DESIGN CODE**

1) I object to the Plans (Section 33) in the "Masterplan & Design and note the following Code" [http://www.fdean.gov.uk/nqcontent.cfm?ai=7440&tt=graphic](http://www.fdean.gov.uk/nqcontent.cfm?ai=7440&tt=graphic) are different to those shown for P1449/12/OUT as the Miner’s Memorial is still shown INCLUDED within the AAP.

2) I have further lodged a complaint with Marie Rosenthal, of Legal & Democratic, that the Sites Inspection Panel was not allowed on the application site November 20th (other than to require our signatures, wrote out in the security caravan) – have photographs of illegal demolish then underway

3) With regards to 2) above I handed over signed Verderers Planning Objection to Homes & Community Agency Manager Jay Lambe concerning their planning application, which was identical to the one served on the District Council and Forestry at Bank House and on the same day.

4) What is alarming is that during the planning committee discussion (February 12th) Councillor David Thomson, wrongly informed the committee that no alternative plans had been submitted for Northern. This totally ignores the facts that these were submitted firstly to South West Development Agency and Forestry Commission, later when the Rainbow And Northern Unified Project – RANUP (including scoping report to Council – The Intelligence of the Forest) presented plans to Wendy Jackson. These alternative plans and their physical modelling will be available to the Homes & Community Agency and District Council and Homes & Community Agency and Forestry Commission and MP Mark Harper and Minister of State for the Environment. They will also be presented to the Houses of Parliament and Lords and Prince of Wales.

5) I further object to the abysmal way the District Council have virtually removed the Key Wildlife Sites designations (and ignored the Miner’s Memorial Woodland) from these plans and I herein request for this issues, the heritage and cultural values of determination to be respected and revisited while there is still time – otherwise the District Council will move ever closer to an annihilationism of everything that is special about Northern United.

6) Concerning Northern United a detailed mining report by Home Office Mine Surveyor Paul Morgan was commission by the Verderers and while its findings have both major safety implication and tremendous economic potential, it has been marginalised to the total detriment of the Forest of Dean.

7) Finally It is right that I report that Graham Morgan has agreed to meet and discuss at least the Northern and Meadowcliffe aspect of this Master Plan and I sincerely hope that H&CA, The District Council and Forestry Commission through Bank House Coleford - will also consider and involve organisations to determine these points openly before signing any agreement to sell off land or exchange Public Forest and Woodland to developers and therefore privatise what is legally protected public land.

Kind regards
Andrew – District Councillor for Lydbrook and Ruardean
Hello Wendy and Louise

CINDERFORD AAP MASTERPLAN AND DESIGN CODE CONSULTATION

I am writing to OBJECT after the recent consultation.

The display in the Cinderford Town Council offices has been remarkably small for a development that is supposed to be the saving of the town, today chairs were lined up in front of the display boards making viewing all but impossible. Many of the maps provided online and at Cinderford Town Council offices are too small to be read. Therefore I submit that meaningful consultation has not taken place.

The area should not have come forward for development:

The whole area has developed into a complex ecosystem so cannot be geo-engineered piecemeal. Mitigation, even if successful for the chosen species, at best displaces whatever lives now in those areas e.g. Forester Moth/ GCN/ rare butterflies and so would need a second tranche of mitigation and so on ad infinitum. Mitigation into existing neighbouring areas rich in wildlife is not acceptable.

Mitigation is proposed within the AAP development boundary e.g. the Bowson Colliery area which is designated for possible future development and so does not guarantee new habitat in the long term.

The mitigation measures make no allowance for the impact of all the additional people on the mitigated areas – walking and cycling, noise, lights, fireworks, litter etc. or for vandalisation/ destruction of reptile fences/ bat fly route fencing/ ponds etc.

None of the documents makes any attempt at costing all the proposed mitigation/ management over 10+ years. Money should be identified accurately and ring fenced by FOIDC in order to guarantee that the programme can be delivered. This has not been done.

Long term planning and financing rests with FOIDC but the FOIDC record to date is deplorable. In the adopted AAP the Council say that wildlife groups “have a key role to play in consultation and involvement” (GWT, GNS, BC, FOE, Bat Group) but FOIDC have ingored all their attempts at meaningful dialogue. (also Drybrook Council it seems).

It is bizarre that no proper mining survey has been done so that the whole project may turn out to be far too expensive and never be implemented.

The project seems to hang on a new college, at the expense of Five Acres, and even then finding has still to be found, but will it?

The route of the spine road has been subject to so many revisions that it is totally unclear where the road is likely to go.
Regeneration for Cinderford is highly desirable but investment should be made in or close to the town centre. We have lived in the area for 23 years and shop weekly in the town. The lack of any worthwhile investment is shocking and saddening but, incomprehensibly, the Councils persist with this wasteful and damaging project which was rejected by the first inspector.

Once again I OBJECT to the AAP Masterplan and Design code.

Derek Foster
f.a.o. Wendy Jackson  
Re: Cinderford Northern Quarter – Masterplan & Design Code

Dear Wendy Jackson,

Re: Cinderford Northern Quarter – Masterplan & Design Code

I am writing in response to the public consultation exercise in respect of the above Masterplan. I am disappointed to see that this terrible and very damaging scheme is still being pursued without proper evaluation and protection of the very important wildlife heritage which it will inevitably damage very considerably.

There are so many problems which have been raised and which FODDC appears to be trying to sweep under the carpet such as:

- The existing Lesser Horseshoe bat maternity roost will be demolished when an alternative maternity roost has still to be provided and proved to be viable which may take years.
- The recent publicity promoted by Forest of Dean District Council suggesting that the route of the spine road has been changed to avoid damage to the bats in this Special Area of Conservation cannot be substantiated. There have been no adequate surveys to back this claim up and the opinion of all experts, including Natural England, is that this is the most damaging route so far proposed. The FODDC appear to be deliberately trying to mislead the general public on this issue.
- No alternative site for the development has been properly considered as required under the Habitats Directive* even though this development is not of an essential nature. (i.e. required for public health or safety.)
- The ‘in combination effects’ cannot be considered adequately (also required by the Habitats Directive) because of the lack of an adequate biodiversity master plan. This holistic approach is required for all European Protected Species (EPS) such as lesser horseshoe bats, great crested newts and dormice which are all present.
- Survey work has not been to the required standard particularly with regard to juvenile bats and bat feeding areas. There are many other short-comings including failure to find red data book species such as the dormice, rare invertebrates and a significant great crested newt breeding area which have all come to light subsequently. The written documentation is of poor quality and illegible in some key areas.
- The great crested newt surveys have failed to show the full extent of this species in the development area and a key breeding site has been missed. The mitigation proposals appear to involve severe disturbance to what is already a significant GCN habitat in the mistaken belief that this will somehow be improved to act as a receptor site for the very animals which are likely to be using it anyway.
- It is likely that the type of habitat which is being lost cannot be recreated elsewhere because of the differing nature of the soils. If this scheme was to have been progressed to the time scale which is now being proposed, the new habitat for
mitigation should have been in place and proven years ago. There can be no confidence that the proposed mitigation will actually work.

- The long-term maintenance of new habitat for mitigation has not been addressed. There needs to be guaranteed funding to meet this very considerable cost over the next 20 years.
- The continued quiet enjoyment of national walking routes (Gloucestershire Way and Wysis Way) has not been adequately considered.
- English Heritage assessed The Northern United pit head (whose buildings are to be demolished) as of “a high degree of local and regional significance.” It is part of our Forest’s regional heritage and should be conserved.
- A Derelict Land Grant given to the District Council should guarantee continued full public access for the Cinderford Linear Park and this is being flouted.
- The proposed development land is part of a ‘Premier Heritage Forest’ and should not be used for commercial developments of this nature. The nation has demonstrated its passion for protecting our forests and their wildlife.

I wish to object to this Masterplan and Design Code.

Yours sincerely,
David Dewsbury.
Dear Wendy Jackson,

CINDERFORD AAP MASTERPLAN AND DESIGN CODE CONSULTATION

I am writing to OBJECT after the recent consultation.

Many of the maps provided online and at Cinderford Town Council offices are too small to be read, therefore no meaningful consultation has taken place.

The route of the spine road has been subject to so many revisions that it is totally unclear where the road is likely to go. It appears to be currently in the most sensitive breeding area for the nationally threatened Wood White butterfly.

The area should not have come forward for development:
The whole area has developed into a complex ecosystem so cannot be geo-engineered piecemeal. Mitigation, even if successful for the chosen species, at best displaces whoever lives now in those areas e.g. Forester Moth/ GCN/ rare butterflies and so would need a second tranche of mitigation and so on ad infinitum. Mitigation into existing neighbouring areas is not acceptable.

Mitigation is proposed within the AAP development boundary e.g. the Bowson Colliery area which is designated for possible future development and so does not guarantee new habitat in the long term.

The mitigation measures make no allowance for the impact of all the additional people on the mitigated areas – walking and cycling, noise, lights, fireworks, litter etc. or for vandalisation/ destruction of reptile fences/ bat fly route fencing/ ponds etc. Much of the wildlife is there because of the undisturbed areas and low impact of walkers and fishermen.

Long term planning and financing rests with FODDC but the FODDC record to date is poor. In the adopted AAP the Council say that wildlife groups " have a key role to play in consultation and involvement ( GWT, GNS, BC, FOE, Bat Group ) but FODDC have ignored all their attempts at meaningful dialogue.

Regeneration for Cinderford is highly desirable but investment should be made in or close to the town centre. Councils persist with this wasteful and damaging project which was rejected by the first inspector.

Once again I OBJECT to the AAP Masterplan and Design code.
Louise Scammell

From: Peter Tonks
Sent: 04 March 2013 16:44
To: Louise Scammell
Subject: Re: Unclassified: Cinderford Northern Quarter Masterplan and Design Code

Louise,
The references you gave were excellent, and I now understand much more about the detailed proposals, thank you very much.
As this is the last day for formally commenting on the Masterplan as part of the Consultation Procedure I will make my comments below:

**Cinderford Northern Quarter Master Plan and Design Code Document.**

I have the following comments:

1. **Steam Mills Bypass**
   No traffic data is provided to justify the need for a bypass.
   Traffic outside any school is always a concern but I consider that the traffic density on Steam Mills Road is relatively light compared to other A roads in the Forest. The traffic in the vicinity of Mitcheldean, Westbury and Minsterworth schools for example is of far greater concern.
   The proposed bypass meanders excessively with numerous junctions before pitching up on the Northern United site much too far along the A4136. This tortuous detour would add about a mile to the journey from Cinderford town centre to Drybrook or Mitcheldean and be deeply resented by local people.
   The suggested location of the proposed college would create a massive amount of traffic at the very times that children are arriving and leaving Steam Mills School.
   The proposed "Secondary Street Link to Steam Mills" would create a “Rat Run” for vehicles reluctant to use the bypass. This route runs from close to the proposed college site and joins Steam Mills Road about a hundred metres from the school entrance.
   In short, this whole scheme will make traffic problems outside Steam Mills School worse.
   This could only be alleviated by closing Steam Mills Road to through traffic, a move I believe would be widely resented.
   Building this bypass would presumably require land remediation to address subsidence and is likely to prove very expensive and poor value for money. No costings for the road are provided as part of the consultation package.
   I consider the bypass should not be built.

   It would be better and far cheaper to provide road improvements including a roundabout outside Steam Mills School and to completely redesign the junction between the A4136 and the A4151 at Nailbridge.

2. **New Residential Development at Steam Mills West.**

I do not consider that this housing development is appropriate for the site:

Housing should not be included as part of an industrial development.
The location is on the flood plain. This is bad planning as has been seen in Gloucester, Tewkesbury and elsewhere. The Guardian reported on 5th January this year that “Government scientists rate increased flooding as the greatest threat posed by global warming to the UK.” as extreme weather conditions become more likely. We don’t still build on flood plains do we? Installing the minimum 10 metre buffer zone is not the answer.

The proximity of two brooks as well as the lakes makes it a dangerous place for children to live and play. The southern half of the development seems to be surrounded by water on all sides.

3. **Linear Park**

The area allocated to housing should be retained as part of the linear park. It should be sympathetically developed to provide a formal welcoming northern gateway to the linear park. This open space, together with a visitor centre could provide a much needed local amenity and visitor attraction to Cinderford, which is currently sadly lacking for a town of its size. It would maintain the concept of separation between Steam Mills and Cinderford. It would go considerably further towards achieving one of the Themes of the Vision to “enhance the Biodiversity of the Site” That vision with the current proposal looks somewhat cynical.

The overall proposal should include an overriding principal that any part of the Linear Park encroached on by development should be replaced by at least an equivalent area of new open space adjoining or close to the the remainder of the Linear Park.

4. **Cost of the Project**

No costing information is provided as part of the Masterplan or indication of where the funding will be coming from. Large projects of this type have been known to stall when funding dries up.

At a time of severe austerity and cutbacks for district and county council budgets this project seems to exist in a bubble.

With figures of up to £100 million being mentioned in the press, the public are entitled to some detailed facts.

If the project is reliant on private involvement and finance to create the jobs then which companies have indicated their wish to participate and in what way.

Peter Tonks

4th March 2013

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**From:** Louise Scammell <Louise.Scammell@fdleanor.gov.uk>  
**To:**  
**Sent:** Wednesday, 20 February 2013, 11:48  
**Subject:** Unclassified: Cinderford Northern Quarter Masterplan and Design Code

Dear Mr Tonks

Further to our conversation this morning please find below the link to the Cinderford Northern Quarter Masterplan and Design Code.


The proposed amendments to the Masterplan and Design Code are Item 33 – there are 2 documents (one with text, one with plans). The proposed amendments are to the original document; which is Item 32 (this is in 3 parts due to the size of the document).

The consultation period ends on the 4 March 2013, if you do have any comments please do send them to me before this date.
Dear Louise

Cinderford Northern Quarter – Masterplan and Design Codes

I write on behalf of my client, the Homes and Communities Agency ('the HCA'), to provide comments on the current consultation version of the Masterplan and Design Codes document which supports the Cinderford Northern Quarter AAP.

The HCA welcomes the Council’s intention to update and adopt the Masterplan/Design Codes document and considers it a sign of the importance of the AAP to the future regeneration of Cinderford. The HCA has taken note of the changes which have been made and it supports these changes.

A considerable amount of work has already been undertaken to inform the adopted AAP and further site investigation and masterplanning work will soon be undertaken by the HCA as it supports the delivery of the AAP including inter alia the new campus for Gloucestershire College and also the planned new spine road. As such, the HCA is supportive of the guidance in Section 11 which allows planning applications to provide further detailed information and refine / expand upon the approach set out in the masterplan (which adhering to the broad parameters established by the adopted AAP).
I trust that these representations will be taken into account by the Council as it moves forward with the Masterplan/Design Codes document.

However, if you have any queries regarding the contents of this letter, please do not hesitate to contact me.

Yours sincerely

Matthew S Morris BSc(Hons) DipTP MRTPI
Director – Planning, Development & Regeneration
For and on behalf of GVA Grimley Ltd

cc: Jay Lambe (HCA) (by e-mail)
FOREST OF DEAN FRIENDS OF THE EARTH

Wendy Jackson
Regeneration
Forest of Dean District Council
Council Offices
High St
Coleford
Gloucestershire
GL168HG

4 March 2013

Public Consultation on the Cinderford Northern Quarter Masterplan and Design Code

Lack of suitable procedures for public consultation

Forest of Dean Friends of the Earth (FODFOE) consider the public consultation conducted by the Forest of Dean District Council on the Cinderford Northern Quarter Masterplan and Design Code January 2013 and Cinderford Northern Quarter Masterplan amended plans (maps) to be flawed and unacceptable as a procedure for public consultation for the following reasons:-

- A formal notice should have been placed in the local newspaper to include details of consultation particularly where comments should be sent and with the start and finish date, an article is not acceptable as a stand alone public notice.
- On the fdean website the public consultation process on the above document is not evident. There is no information on the start and finish date, to whom one sends submissions.
- There is no guidance with regard to how respondents should address the documentation and no pointer that the maps included in the second item are part of the consultation.
- The maps and keys are too small even at a high resolution to be readable to enable comments.
- Some of the deletion boxes are blank therefore one is unaware of what has been deleted and therefore unable to comment.
- These consultation documents are classified as SPD yet it is significantly changing the adopted CNQAAP and is to be adopted as a DPD, therefore an Examination in Public or Inquiry should take place.
- Participants of the examination in public should have been informed by letter of this consultation taking place.
- On the 17 January 2013 the Cabinet approved paper SD 106 the Cinderford Northern Quarter Area Action Plan - Masterplan and Design Code Publication which contains “3.1. A consultation programme has been prepared for the Cinderford AAP – Masterplan and Design Code, which seeks to continue engagement with key statutory organisations and local interest groups. Despite the listing of FODFOE as being a group that would be consulted, the
FODFOE submissions to the Core Strategy and CNQAAP DPD and engagement in the Examination in Public on both documents and the Masterplan referring to the continuation of engagement with FODFOE, FODFOE did not receive notification of this round of public consultation.

- Omission of necessary documentation. The presentation of material for public consultation is flawed and therefore unacceptable as the Cinderford Northern Quarter Masterplan and Design Code and maps are not accompanied by a Habitats Regulation Assessment and Appropriate Assessment, the Biodiversity Strategy and an Environmental Statement, documents presented and accepted by the Forest of Dean District Council as valid documents necessary for the consideration of planning application P1449/12/OUT. As the Cinderford Northern Quarter Masterplan and Design Code and maps are to control development on the Cinderford Northern Quarter Area Action Plan site, which includes P1449/12/OUT site and P1448/12/OUT site, the omitted documents cited above are necessary for the consideration of the Cinderford Northern Quarter Masterplan and Design Code and maps.

Forest of Dean Friends of the Earth consider that this flawed and unacceptable procedure of public consultation on this suite of documents invalidates any movement to formal adoption by the Forest of Dean District Council of the Cinderford Northern Quarter Masterplan and Design Code and maps. Forest of Dean Friends of the Earth request that the public consultation process on these documents be reviewed to include the omissions of procedure and documentation stated above and the public consultation be repeated for a further six weeks.

The Cinderford Northern Quarter Masterplan and Design Code and maps are flawed and therefore not acceptable for adoption by the FODDC for the following reasons:-

In 1.2 Family of Documents addition

1. “and the emerging Biodiversity Strategy as presented in Figure 1.1.”

This addition with reference to “as presented in Figure 1.1” is inaccurate as the Northern Quarter Masterplan amendments does not contain a Figure 1.1. The numbering for the Figures start at 3.6. The only Figure 1.1 appears to be in the July 2011 Masterplan and design code. Here Figure 1.1 refers to Family of Documents which does not contain a reference to Biodiversity Strategy.

This addition should be changed to

“and the Biodiversity Strategy now published for public consultation and to accompany this 2013 Masterplan and Design code.”

Reason:
The Biodiversity Strategy presented and accepted by the Forest of Dean District Council as a valid document complete in itself and necessary for the consideration of planning application P1449/12/OUT is evidently considered to be at a level acceptable as sound evidence. Therefore this document, the Biodiversity Strategy must accompany the 2013 Masterplan and Design code for this consultation to be an up to date consultation.
The Biodiversity Strategy is a significant change to the adopted CNQAAP. It contains a new site and proposals not examined at the CNQAAP examination in public and to date has not been made available for public consultation.

2. "Landscape and Biodiversity strategy
The landscape and biodiversity strategy principles in this document present a broad but joint approach for the two aspects a Biodiversity Strategy is being developed and will require implementation on and off site at detailed design stages."

This implies that the principles for the Landscape and Biodiversity Strategy contained within the Masterplan and Design Code rests on the Biodiversity Strategy yet this document central to the Masterplan and Design Code at the present time does not accompany these documents for public consideration or consultation.

delete "a Biodiversity Strategy is being developed and will require implementation on and off site at detailed design stages."

ADD "a Biodiversity Strategy has been developed which because of the significant change to the adopted CNQAAP and being central to the principles in this document is out for public consultation."

Reason see reason point 1.

3. 11 DELIVERY
11.1 Phasing
The implementation of the Masterplan will be phased broadly in accordance with Figures 11.1 to 11.4, balancing the amount of land uses being released to the market and creating a development which grows naturally over time without feeling unfinished. The proposed phasing is indicative and relates in the first instance to the release of development plots and associated infrastructure. It does not include the remediation of the site and biodiversity mitigation and enhancement measures, which have to be prepared in more detail in the emerging Biodiversity Strategy and will be required to be implemented and established prior to development of site areas and routes.

Delete "in the emerging Biodiversity Strategy"
ADD "dependant on the outcome of the public consultation on the Biodiversity Strategy."

Reason see reason point 1.

4. Adopted AAP, February 2012
Delete "The adopted version of the Cinderford AAP incorporates a revised spine road alignment to that presented in the Submission document and at the Examination in Public. The Adopted AAP road alignment responds to concerns from statutory consultees and local nature conservation groups regarding the proximity of the northern end of the proposed road and its perceived impact on protected bat species in this location. At the southern end of the proposed route, there is a change to the junction arrangement with Broadmoor Road to meet highway design standards. These changes to the primary road route have a significant effect on the baseline maps for both the AAP and the Masterplan and Design Code. The illustrative plans to accompany the Masterplan and Design Code have been updated accordingly."

ADD "The Adopted AAP incorporates a revised spine road alignment to that presented in the Submission document and at the Examination in Public. The Adopted AAP road alignment responds to concerns from statutory consultees and local nature conservation groups regarding the proximity of the northern end of the proposed road and its perceived impact on protected bat species in this location. At the southern end of the proposed route, there is a change to the junction arrangement with Broadmoor Road to meet highway design standards. These changes to the primary road route have a significant effect on the baseline maps for both the AAP and the Masterplan and Design Code. The illustrative plans to accompany the Masterplan and Design Code have been updated accordingly."

Reason see reason point 1.
ADD “Significant concerns have been raised as to the alignment of the primary road route by statutory consultees and local nature groups therefore the routing is to be reviewed and public consultation take place on the Transport Options Assessment March 2009 in the light of the weighting needed to be given to the lesser Horseshoe Bat maternity roost SAC and other EU, Red Data book and BAP species when reconsidering the routing and whether this site and the proposed development uses are appropriate.”

Reason: The consideration of the original route options was undertaken without the knowledge of necessary wildlife survey work and without a HRA and AA. The site was adopted into the Cores Strategy without a necessary AA which under legal challenge.

The whole of the CNQAAP site is a very complex site, a mosaic of habitat types which provides a home for many species which have links to or rely upon other species in a classic, interlaced whole ecosystem with the basis arising from the soils, plants and invertebrates. Many of these species are EU protected species, a Lesser Horseshoe Bat maternity roost vital to the maintenance of the SAC, 12 different species of bat, all species of newt including Great Crested Newts, all species of reptile including adders, the dormouse, BAP species the Wood white and Small Pearl bordered butterfly, the Grizzled and Dingy Skipper, birds such as linnet, bullfinch, song thrush, reed bunting, tree pipet, goshawk, common lizards, toads and frogs. In a survey for the area 210 terrestrial and 114 aquatic invertebrates were identified 1 a red data book species and 6 nationally important species. This is to name but a few.

By bringing this site forward for development and the proposed new routing as shown on the accompanying maps, the most important United Kingdom Lesser Horseshoe Bat SAC is to be subjected to the experimental manoeuvre of relocating a maternity roost vital to the maintenance of the SAC and the demolition of an existing maternity roost to allow for the routing to proceed. This decision has been made without having first undertaken the consideration of alternative sites for this development, the in-combination effects of all other proposals, undertaken all survey work to the standard set by the Waddenzee judgement and assessing need as defined within the sphere of the Habitats Directive and Regulations. This is contrary to Article 2, 3 and 4 of the Habitats (as amended) Directive 2010, regulation 61 of the Habitats (as amended) Regulations and the Assessment of Plans and Projects Significantly Affecting Natura 2000 sites Methodological Guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC, required before making a decision to adopt the new road alignment and the development of the whole CNQAAP site as contained in the Masterplan and Design Code and maps. This also applies to other species related to and found on the site such as Great Crested Newt, Adders and Dormouse. Inadequate consideration was given to Red Data book and BAP species on the wider CNQAAP site which are all protected by the Wildlife and Countryside (amended) Act 1981.

The high biodiversity value of the Cinderford Area Action Plan (CAAP) site has been clearly made by FODFOE and all the representations submitted to this consultation by Mr. David Priddis, Mr. Simon Glover, Mr. David Dewsbury and Tom Langton are endorsed and adopted by FODFOE and should be considered as part of this FODFOE submission.
5. PAGE 27
the visitor centre, and will provide access to the secondary and the tertiary street network. In response to ecological requirements, the alignment of the north-western section of this route has been adjusted. Further habitat surveys will be required as detailed design proposals are prepared.
Delete: “In response to ecological requirements” and “route has been adjusted.
ADD to: “The alignment of the north-western section of this route has been deferred for further survey work and public consultation.”

Reason: see reason to point 4.

6. To date a mitigation strategy has been implemented to encourage the use of an artificial roost outside of the derelict Northern United areas. This has been successful and will be used to guide further replacement roost requirements.
Delete: “This has been successful and will be used to guide further replacement roost requirements.”
ADD “The adoption of this roost took a significant amount of time despite being close to the NU maternity roosts and the deterioration of those buildings because of the lack of maintenance”

7. Appendix 2
Design Code Assessment Matrix
The Assessment Matrix has been developed Alan Baxter & Associates LLP for several local authorities and development agencies as a transparent tool to assess Design Codes. This provides a standard framework for assessment and also allows for the facilitating of a swift and iterative assessment process.
Other than the statement above included in full the Matrix was not presented for public scrutiny.

For the reasons set out above FODFOE considers the procedures and documentation totally inadequate for public consultation on significant changes to the Adopted CNQAAP which is presented within this suite of documents presented as a SPD and is to be adopted as a DPD. FODFOE believe that the deficiencies are so great that the procedures and omissions in documentation and content of documentation should be reviewed and represented for public consultation and that an Examination in Public or Public Inquiry should be held because of the significance of the changes proposed for the site and the surrounding area and the controversial nature of the proposals within the Biodiversity Strategy. To be clear FODFOE do not consider that the Masterplan and Design Code with maps can be adopted in light of the above.

Yours sincerely,

Mary Newton
Planning Officer
Forest of Dean Friends of the Earth
Comments from Glos Constabulary to note.

From: Murphy, Mark  
Sent: 04 March 2013 12:38  
To: Wendy Jackson  
Cc: Nigel Gibbons  
Subject: Cinderford Northern Quarter - Masterplan + Design Code

Wendy,
I’ve been reading through the Masterplan and Design Code and was pleased to see the continued reference to Secured by Design and other principles for designing out crime. I can fully appreciate the difficulty in creating a design brief which is open enough to encourage a creative response from the architects; however some areas of the design should have specific requirement and others need to have a clear direction in order to strengthen the entire development:

I am therefore proposing the following amendments in blue text to improve security, enhance community safety and restrict anti-social behaviour or crime.

Page 8  
**Promoting Sustainable Transport**
Safe, secure routes with security anchors housed within sheltered cycle parking will be provided adjacent to residential units, employment sites and other community amenities.

Page 16  
**Quality Places**
- Car parking
- Maximum parking as set as the minimum parking provision of the local authority. Design in accordance with Manual for Streets, Car parking: what works where guide and the Park Mark: Safer Parking Scheme (Owned by Association of Chief Police Officers - ACPO and managed by the British Parking Association - BPA)
- Guidance and standard through all design stages

Page 22  
**3.4 Opportunities**
Improve the legitimate links from the site to its surroundings through clear gateways, new streets and cycle and pedestrian links;

Page 30  
**4.5 Movement and Public Transport**

**Vehicular Movement**
In areas used by protected bats species, lighting will have to be designed in order to reduce the disturbance of the bats. This could include the reduction of lighting to a safe minimum, baffle boards, use of bollard rather than pole lighting, utilising the latest lighting technologies and sympathetic directional lighting.

Page 43  
**6.2 Character areas**

**Northern Quarter Centre**
The associated car park site could incorporate additional campus buildings and should be landscaped to encourage natural surveillance while reducing the visual intrusion to the lakeside.

7.2 Primary Boulevard
Northern United
The western side of the street will contain a shared cycle/footway, while the eastern side will have a kerb, 2m cycleway and then provide pedestrian/ cycle only access into the forest.

7.5 Non-car
Paths
They ensure a safe, permeable pedestrian and cycle network throughout the Masterplan area.

7.6 Parking
At planning application stage it is strongly recommended that the English Partnerships publication Car Parking: What Works Where (2006) and the Guidance Note: Residential Parking - The Chartered Institution of Highways and Transportation Institute of Highway Engineers (2012) is used to inform different parking typologies for different sections of the Masterplan.

Commercial car parks
In addition, the landscaping design should increase the opportunities for passive surveillance through the car park, while reducing the external visual impact of car parks.

In curtilage
A variety of parking options should be taken to ensure that this does not result in streets dominated by parking spaces in the front or large parking courts are used to the rear of dwellings.

Residential Block 2
To the rear of the apartment block there is the potential for a small parking court.

Commercial blocks (light industry)
Access to the centre of the block will be provided through a secure gateway from the street, where a rear courtyard will provide the open space, storage and warehouse space required of light industrial land uses.

Hotel
Secondly, vehicular access should be to the rear of the building, where safe and secure undercroft parking will be at basement level.

Appendix 1

Please feel free to get in touch should you wish to discuss these changes.

Regards
Mark Murphy
Crime Prevention Design Advisor
Community Engagement
Police Headquarters
No 1 Waterwells
Quedgeley
Cinderford Northern Quarter Masterplan and Design Code
Comments submitted by Emma Shibli on behalf of Gloucestershire County Council
Monday 4 March 2013

General comments

Transport Infrastructure - Key concern is that that the proposed Cinderford Northern Quarter Link Road (Primary Boulevard) doesn’t link directly into Forest Vale Spine Road, as we want to encourage easy access to the industrial sites. The timing and delivery of this (Phase 1) is instrumental to wider success and timeline of delivery of the Cinderford Northern Quarter Masterplan.

Archaeology - Although list archaeological sites/structures of significance there is no indication of how the impact of the development proposals on these sites will be mitigated.

Minerals - Need to take account of mineral resources in the Cinderford Northern Quarter Area and in particular fireclay and coal. See Policy 31 of the APP. Supporting text provides the context for this
Assess the presence and economic viability of minerals resources in this area. Work alongside Gloucestershire County Council as Mineral Planning Authority and the Coal Authority to avoid inappropriate sterilisation of valuable minerals resources within the area.

Fig 4.11 Cycling Network should be as comprehensive as possible and all highway should be designed to accommodate the needs of cyclists and all other highway users. Ensure that segregated facilities aren’t over emphasised especially in new build. Segregation may be suitable if traffic volumes and HGV numbers indicate it. But presumption is in favour of cyclists being provided for on carriageway with other traffic which is safer and more convenient for both pedestrians and cyclists. Cyclists should not be sharing footways with pedestrians as a 1st principle but only where it confers an absolute advantage in terms of safety and convenience – particularly in terms of route integrity and connection to road based facilities/ the road such as at intersection with A4136 where segregated facilities will be necessary. See Gloucestershire County Council Cycle Facilities guidelines (2012) http://www.gloucestershire.gov.uk/extra/CHttpHandler.ashx?id=51715&p=0

Page 10

Sustainable Tourism could more strongly recognise the significant and unusual potential that Cinderford has to link with sustainable walking and cycling tourism. Although walking and cycling will be ‘fundamental in the design of the new Northern Quarter’ the area around Cinderford is of national importance to recreational cycling and is at the hub of the Sustrans National Cycle Network. Measures could be encouraged to offset the impacts of topography and to integrate Cinderford with the local cycle culture for economic and social benefit.

Page 38

Public transport hub – Lack of detail, (RTPI, shelters, lay-bys etc).

Page 52

Paths – minimum widths for paths (2m for pedestrians and 3m for cyclists) should be stipulated.

Page 52

Secondary links - reference should be made to Manual for Gloucestershire Streets in respect of design criteria for streets.
Tertiary links - reference should be made to Manual for Gloucestershire Streets in respect of design criteria for shared surface streets. Would also suggest that all of the streets being shared surface may not be appropriate and that a mix of types may be more suitable.

Page 54/49

7.6 In curtilage parking - reference should be made to Manual for Gloucestershire Streets in respect of minimum dimensions, especially if also pedestrian route to dwelling or adjacent to boundary structures.

Garages – reference should be made to Manual for Gloucestershire Streets in respect of minimum internal dimensions of garages and that there use should be controlled by way of a planning condition.

Page 55

7.6 Parking courts – Suggest that ‘small number of dwellings’ is better defined (no more than 5 dwellings having a parking court).

Page 59 10.0

Materials and planting strategy – the need to consult GCC where planting is proposed on (or close to) the proposed streets should be included.

Lighting Strategy – the need to consult GCC as adopting street lighting authority should be included.

Page 60

10.2 should refer to GCC’s enhanced materials policy in the Manual for Gloucestershire Streets and in particular commuted sums.

Page 63 (Delivery)

Phase 1 is questionable. Given we are already in 2013, delivery of the entire Spine Road by 2015 appears overly optimistic.

Page 66

Is the intention that either FoDCC adopt the street and roads or a Management Company? The normal process would be for GCC (as the Local Highway Authority) to adopt the network but we cannot insist on this. However, to avoid the need for a (very large) APC Bond to be required, we will need the maintenance of the streets to be secured by way of a planning condition and require the construction specification to be agreed and the works inspected (at the Developers’ cost).

The design of the streets would not be dependent upon the adopting authority. The design will need to achieve the objectives of the NPPF irrespective of which organisation finally takes responsibility for their maintenance.

Given the likely timescales involved, assume that the provision of suds will be a legal requirement and the GCC will be the approving and adopting authority.
None of the evidence base is in Cinderford library, bar maps and design code and Council offices are limited as to what they provide by way of opening hours. Most is given online. Therefore much of the public is limited, or totally excluded, from this consultation, including physically disabled and elderly and full-time workers without IT skills and/or access. The whole consultation process should be stopped and slowed until those issues alone are covered, including for the partially sighted and those with reading impairments (many impairments do not affect IQ), otherwise this whole exercise is constrained under the Disability Discrimination, Data Protection and Freedom of Information Acts. Indirection discrimination is also evident in the form of any planning applications and those associated with the Masterplan only being advertised via the purchase of the Forester, at select retailers, when the Review is available to advertise in and freely delivered to everyone’s home, disabled and cash-restricted or not. These comments were forwarded to Wendy Jackson, part way through the week beginning 25 Feb 2013.

Because of the above constraints, I have not had time to read all documents and give notice more comment is likely to follow. I am concerned about the FODDCs acceptance of research studies that I have read so far for the Masterplan and Core Strategy documents, namely Baxter, 2011 and NEMS in GVA, 2008. If these and their interpretations are treated as valid by the Council, my instinct is there maybe floors in projections of need for housing and adverse impact on habitat and town vitality also, as those are more complex. However, please read as there are comments towards positive ways forward too. For the time being, I object to -

The Constraints - section 3.2 is so limited, eg - The baseline report should be fully referenced, with a date and then detailed in a reference section at the back of the document like all normal publications, inc, who wrote it for who, further date and publishers/where can it be found. Tracking should be easy for readers and this whole document makes it hard to track, cross-reference, and therefore put into context for informed comment.

The Spine road - Or the Northern Colliery demolition, when it clearly states in this section the NQ site is "with no clear character". The NU site could be nurtured for the character it does have / turned into a study area for bats (instead of having to wait 5 years for re-roosting) and for recent heritage and industrial archaeology, with the assistance of local environmental scientists (Bath is not local), artists and blacksmiths.

It appears that "unacceptable damage to the assets of the area" - habitat - (12.16 Inspector 2003) are pending. The Highways' engineers and Forestry Commission preference for a road running North to South at Hawkwell, rather than at NU. A west turn then at the crossroads easily facilitates a circuit road around the west outcrop development. I understand from Regeneration that the fear then is that S106 income will be forfeited in excluding NU. This is a short term economic gain that does not outweigh habitat and environment EU concerns and further local heritage. This is particular when an alternative, as above, is viable and would bring back on board estranged organisations like Bat Conservation and Friends of the Earth who in their own right could bring educated visitors and funding streams - over the longer term.

The original preferred option did not cut across land and used existing roads.
The "Constraints from the mining legacy..." point in 3.2 is made too small. P61 at the end is more thorough, although it leaves out the vast number of shafts having to be considered or whether Freeminers have been consulted about the last sentence:

"locations of all former mine shafts in areas to be developed need to be determined, initially from record plans, old maps and aerial photographs. Physical and geophysical investigation techniques will then need to be used to determine if any remaining voids exist. Any such voids will then need to be filled prior to any building construction in the vicinity. There are so many old shaft locations on the site, so a strategy of trying to avoid building near shaft locations does not appear to be practical here. The north-east part of the site, near Steam Mills Road, may also have remains of early shallow bell. Pit workings and the whole of this area will need careful investigation for voids.

It is not thought that it would be practical or economical for any further working of coal beneath the site to be undertaken."

"(eg Natural England Grassland Inventory Sites)" being deleted unless it is no longer on an inventory for 2012/13;"

Section 3.6 Evolution - Consultation - Concerned that this section only goes back to May 2009. Much consultation was done prior to this, including with the first Inspector. EDI, 2004 in Halcrow 2007, showed an overwhelming wish for the town's fabric to be upgraded and the town regenerated (400 respondents - the biggest sample of valid confidence) and this was backed by the first Inspector. There is no explanation of the focus shift from town centre first approach, to NQ. All info gathering then appears to shrink and some is distorted in it's interpretation of whether the samples are valid or whether confidence can be given to them (Baxter, 2011 - see sample sizes and pie charts). For example, there were 345 letters of objection (100% confidence) re the NU planning applications. A letter covering 2 applications and including 4 objections in each, constitutes only 1 count to the FOIDC. Baxter would have given the same letter 4 counts at least, 8 at most. You see Baxter gave weight to each theme / parts of an individual's overall comments. A sample size for the population of Cinderford, at very least, must be 367 whole individuals (Raosoft, 2013) and it appears Baxter is simply unable to demonstrate that.

It seems to be a habitual to mark out-commuting for work and shopping as negative - it may well be in urban areas. BUT THIS IS A FOREST. I moved here 14 years for the love of the area and because I only had small local services blighting the view. I'm ok with leaving it to shop at a multinational or to work. NEMS in GVA 2008 asked what shoppers wanted and although a sample of 100 is statistically irrelevant for Cinderford, 27 of 100 wanted increase in range and independent shops and only 9 of 100 wanted a larger supermarket. I have yet to see the study that asks, re work, Do you want it any other way?

Town - I can't immediately see in the Masterplan where it addresses the first Inspector's wish of the Local Plan, "achieve economic regeneration by addressing the town's weaknesses". Particularly, the mining work and expense at NQ, surely shrinks the economic and practical comparisons made against the use and refurbishment of town centre sites, that were previously thought of as not viable. 6 sites have been highlighted in the town centre as having "positive impact" or "benefits" for the centre (from p75, GVA, 2008). I believe the one site not highlighted as positive is the only one being developed (by Trilogy/ASDA on Steam Mills Road).

To my mind, if I worked at NQ and needed to do a main shop, it would be easiest to travel to ASDA and no further into the centre. Net 3000 sqm has also been passed, which is over 3/4 of the average floorspace for the whole of Cinderford to 2021 (GVA, 2008). If the population increases and this doesn’t take account of the local shoppers profile. The average floorspace capacity is only relevant if the population increases across Britain and that population shops like
an urban shopper. From the only local study I can find so far, I understand the FoD has levelled and indeed decreased (Moseley, 2010). Another retail application was refused consent in Cinderford (Sainsbury) on it being over capacity at the same net size, 3000 sqm, during the same period for the same town. It can only be assumed that the latter was correctly assumed to be over capacity based on Constant Market Share (a level, not an increase in population) - but again in GVA, 2008.

**Town and NQ -** None of the first developer’s S106 are to go to centre enhancements that will mitigate adverse effect / unfair competition on the centre. Plus, the ‘gateway’ model by Halcrow, 2007, of a tree-lined avenue along upper Steam Mills Road, suggested to assist the negative concept that the town was not compact enough and physically visually poor (EDI, 2004), is now not viable according to Highways. The only link will be via transport - there may be minimal visual link if banners and planters are used. Therefore, not only does the high street (vacancy level 15%) need to compete with ASDAs discount buying power, it will have limited Change of Use opportunities under planning, because the NQ site also offers additional commercial, office, college and tourism space.

This could be turned around by using education’s wish to relocate to Cinderford and tourism. If the service sectors were accommodated well, in any of the newly refurbished sites shown above, students (inc environmental and health degree courses) may be attracted to and kept in Cinderford by it’s particular Fringe art, music and film scene. Plenty of universities and colleges have a campus spread throughout a town (Sheffield Hallum/Collegiate Crescent, Oxford and market towns). This means a student lives and studies amongst the shops and services; picking up their milk and catfood, etc, on the way between buildings for lectures or vocational classes. And travelling out to the ‘field’, 2kms away, to study wildlife etc. At the moment neither the Dialysis Unit or College are offering degrees, fringe or shopping benefits. Indeed most of the ‘field’ will be concreted over.

Going back to the Masterplan, my suggestion of reduced use at NQ (different use of Northern Colliery); the need to provide employment (particularly service sector) and education (particularly higher eduction (EDI, 2004); the first Inspector’s report; the Local Development Plan and Core Strategy, it makes sense to me to provide services in the town first - establish the pipeline (GVA, 2012) - and then move on to out of town developments. The NQ scheme has already lost the town centre H&CA funding (SWRDA) by not having contracts in place at it's closure and appears cap-in-hand to developers with S106s. Mostly, by focusing only on education up to vocational and A level and employment in, say, contact centre, industrial units and out-posted leisure and tourism, the development is capping youth aspirations with lower end economic goals in education and employment in the Royal Forest of Dean. ***** Very importantly.

DEFRA, 2005, believed “the greatest economic asset that most rural areas possess is the quality of their landscape”. For, in the main, they provide a quality places to live and work for academics, professionals and investors as well as all the work force. Quality of the environment is a key reason for investing in an area and for Councils to apply for AONB status (Hatherley, 2013). This makes me object to the degree of sprawl of NQ - that could be more compact, as well as the town itself being so. Development 2km away, serves to push an urban theme in a forest, and away from it's already sprawling town. Imagine what 14m could do for the fabric of a town. It is feasible a re-allocation, or part re-allocation could be submitted to Coalfields.

I see no reference to the Independent Forestry Panel report, 2012/3 (ie, purposeful minimal intervention for study), or any consultation with disability or carer groups (HOOF is a local group and Young Carers has been easily accessible at Artspace).

Regards, Fran Challllice
DEFRA, Nov 2005, "Productivity in Rural England", Rural Economics Unit


GVA, Oct 2008, "Retail Study", commissioned by FODJC, online and fdean site

GVA, 2012, "Retail Trends" and "Refurbishment v Redevelopment", online


MOSELEY L, 2010, Forest of Dean Population and the Core Strategy to 2031, via letter of request

RAOSOFT, 2013, Sample size calculator, online
Dear Planning and Wendy Jackson,

I object to the the Northern Quarter Masterplan, Design Code AND MAPS that have to be responded to today.

For the realisation of the value of all biodiversity sites in the area under consideration there is need to enhance habitat, not just mitigate against habitat loss. Wildlife must be given the chance to generate greater numbers for all species. This will need corridors for movement and reacting to climate change.

Also re the Cinderford Area Action Plan, the site of Northern United and associated lands at the Northern Quarter, Cinderford, form an integrity of flora and fauna which includes protected species, eg Lesser Horseshoes Bats and other bats, Great Crested Newts and Dormice. The established quality bio-diversity across the Northern Quarter area has taken much time to evolve and should be left in place and allowed to develop further over time. There is no need for their destruction by the developments proposed to be at Northern United and the rest of the Northern Quarter whether presented as one project or presented for planning in a piecemeal series.

The valuable ecological mix is something which is of value to the Forest of Dean as an enhancer of its tourism economy. Cinderford, in particular, should benefit economically from what this has to offer to tourists and to environmentally aware people, including those who may wish to study such an ecological richness, whether for qualifications or for scientific understanding or for their profession. This site's environmental value is an extra which can not be replaced. Building developments can always be established from new, but this biodiversity offering once interfered with is lost.

A Government Inspector adjudicating on a previous plan for this area, now known as Northern Quarter, but then called the Northern Arc turned that plan down with the statement that the regeneration should take place in the centre of the town of Cinderford. Similarly the proposals in these planning applications could be located in the town or much closer than the area considered which is in country outside even of the edge of the town and its central built-up area.
A Business Centre could be set up in Cinderford itself enabling people to develop businesses which do not rely on bringing vehicles out to the Forest of Dean, ie knowledge based industry. With the rising cost of fuel, the Forest of Dean, with its inaccessibility for vehicle intensive operations compared to other locations just off motorways or in industrial conurbations, will be relatively unattractive to vehicle intensive operations. Such a centre could provide facilities also for people who spend time working from home, as well as those needing business support.

There could be such Business Centre in all the Forest Towns, at which and from which there is a resourcing of people to enable people to work from their home community. Such centres could be thought of as Business Community Centres, and provide expertise to people not travelling to work daily and provide the social aspect of being in the office.

Also an in-depth Tourist Centre could be set up in Cinderford itself which would promote the riches of heritage and wildlife of the Northern Quarter. At such a centre visitors to the Forest of Dean could have an observation facility which uses video/webcam to allow uninterfering viewing of this high quality bio-diversity site - quoted as the best in Gloucestershire and having a nationally very important breeding site for Lesser Horseshoe Bats.

This putative hotel’s location could be somewhere which itself had its own intrinsic value, such as a view over the River Severn. There are such vantage points much closer to the centre of Cinderford than this Northern Quarter. One could envisage such a location having a much greater spiritually uplifting self-promotion than a hotel down in the woods at Northern United. Why plonk an hotel on top of something which should be preserved for visitors to see? The bio-diversity site should be allowed to thrive not destroyed by short-sighted development taking over its place, nor jeopardised by supposed sensitive development around it which will simply disturb and disrupt habitat. In fact a Quality In-depth Tourist Centre could even be adjacent to this putative hotel.

There is already a college existing approximately 5 miles away. There is embedded energy in the construction of the present college. That would be energy wasted/lost due to demolition. The demolition itself would use up energy. The present college can continue to serve its present purpose and also provide further educational resource for the community, eg as an educational centre with a remit to include the needs of new parents, the needs of people having to retrain and many other positive community uses for its site.

Cinderford could be a beacon for the rest of the UK by using its quality and allowing that a central place in the life of local people and in fact all peoples UK or wider afield to come to Cinderford to see what can be done by valuing the riches you have, and as an extra they could see the Forest of Dean. We could show ‘planners’ that the future can hold a respect for and symbiotically co-exist with the environment - that includes the health supporting aspect of being out there in the environment and the fresh air that we have here in the Forest.

I also consider that they cannot be adopted due to lack of formal procedures suitable for public consultation:

- A formal notice should have been placed in the local newspaper stating start & finish date, an article is not acceptable as stand alone public notice.
- On the fdean website there is no information stating start & finish date & to whom one sends submissions.
- There is no guidance with regard to how respondents should address the documentation & no pointer that the maps included in the second item are part of the consultation.
- The maps & keys too small even at a high resolution to be readable to comment on & so on!!
• The consultation doc is classified as SPD yet it is significantly changing the adopted CNQAAP & is to be adopted as a DPD, therefore an exam.in public or Inquiry should take place.
• Participants of the exam.in public should have been informed by letter of the consultation taking place.

Unfortunately at deadline time so for now please take note of concerns so far expressed.
Martin Rudland