

**Comments Received to Further Changes Consultation December 2016 to February 2017**

<b>Ref Number</b>	<b>Full Name</b>	<b>Policy or Paragraph Number</b>	<b>Comment Summary</b>	<b>Draft Officer Response</b>
APFC005	Mrs Jane Hennell, The Canal and River Trust	Allocations Plan Further Changes December 2016	The Canal & River Trust have no comments to make at this time.	Comment noted.
APFC007	Melanie Lindsley, The Coal Authority	Allocations Plan Further Changes December 2016	The Coal Authority is pleased to see that the 'special features' sections of the proposed new site allocations identifies those sites which fall within the defined Development High Risk Area and acknowledges the requirement for development proposals on these sites to be supported by a Coal Mining Risk Assessment. The signposting to Appendix D within the policy document, where further information on this issue is provided, is also welcomed.	Comment (support for the approach in respect of mining legacy) noted.
APFC010	Mr Rob Niblett, Gloucestershire County Council	Allocations Plan Further Changes December 2016	My concern that NPPF paragraph 169 is not being complied with remains. Previous comments of May 2015 also apply to the Further Changes. I note that the only mention of archaeology in the 'AP Further changes December 2016' and 'Keynote update: Heritage December 2016' documents are in quotes from the NPPF or PPG and in relation to a condition requested for the proposed allocation at Allaston.	The site adjoins land that was the subject of archaeological investigation when the new access road was constructed and it is considered that the development of this site, should it be allocated, would need to be subject to similar investigations. The policy should be amended to reflect this. The site is however considered deliverable and is a discrete parcel of land well related to the existing development.
APFC013	Rohan Torkildsen, Historic England	Allocations Plan Further Changes December 2016	The District Council need to set out very clearly the evidence that has been gathered and applied to inform the suitability of the proposed additional land and modification and allocations. At present the LA does not appear to have done so in relation to , for example the Old depot Mitcheldean (see rep APFC14). Evidence as to whether the AP has been positively prepared, is justified, effective and consistent with national policy.	The sites have all been considered in the context of the assessment required. In the example of the proposed allocation at Mitcheldean, the site is has been previously considered in part. It is the additional land that is now proposed. Although the potential additional allocation land is visible from some area it does offer the possibility of increasing the viability of the site and providing scope for a vehicle access that is removed from the present one adjoining the churchyard. The policy refers to the safeguards that are considered necessary and the current situation, one of a vehicle depot containing large prominent buildings of little architectural merit needs to be considered alongside the possibility of new housing on the site to be developed in a manner that will improve the locality. It is not anticipated that the entire allocation will be developed and the policy requires a landscape plan. The Proposed changes text does not make clear the intention that the entire explanatory text is to be added after "CSP7", but this is the case and in addition it is recognised that further emphasis on the need to pay particular attention to the setting of the Church and the Conservation Area could be incorporated into the proposed text.
APFC019	Mrs Katherine Winterborne	Allocations Plan Further Changes December 2016	Objection to the change to the settlement boundary at Christchurch to include the 2nd field by Cy Maril.	The boundary change is not part of the current consultation having been proposed when the AP was first published. The representations are best considered in relation to the current planning application (P1706/16) as the inclusion of an area of land inside a settlement boundary still requires any proposal to be acceptable. Whilst new development is expected to take place within settlement boundaries there is no guarantee that a particular scheme will be suitable for a given site.
APFC020	Mr Charles Taylor	Allocations Plan Further Changes December 2016	Objection to the change in the settlement boundary at Christchurch to include the 2nd field by Cy Maril.	The boundary change is not part of the current consultation having been proposed when the AP was first published. The representations are best considered in relation to the current planning application (P1706/16) as the inclusion of an area of land inside a settlement boundary still requires any proposal to be acceptable. Whilst new development is expected to take place within settlement boundaries there is no guarantee that a particular scheme will be suitable for a given site.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

<b>Ref Number</b>	<b>Full Name</b>	<b>Policy or Paragraph Number</b>	<b>Comment Summary</b>	<b>Draft Officer Response</b>
<b>APFC041</b>	Ms Nicole Penfold, Gladman Developments	Allocations Plan Further Changes December 2016	Site submission land north of Berry Hill. Gladman submit that land north of Lower Lane, Berry Hill should have been identified as proposed allocation within the AP and included as an option within this current consultation. Refer to in Appendix 1 to Gladman's Matter 8 hearing statement, this site represents a logical extension for infill development. Land at Lower Lane, Berry Hill has been the subject of an outline planning application (P1482/14/OUT) and an appeal (APP/P1615/W/15/3005408). Despite being recommended for approval by the Inspector, the Secretary of State refused permission in December 2016. This decision is currently under challenge.	The site proposed was the subject of representations made previously and it is a proposal the AP Inspector is fully aware of. Its current status is that the planning permission has been refused on appeal and that there is a legal challenge. Although the AP could consider the allocation of this land independently of the planning application and appeal, the Council oppose the development of the site and it was not recommended for inclusion by the Inspector in his interim findings both because of lack of need (at that time) and by way of preference over the sites proposed by the Council. The landscape setting of the site is clearly considered in the recent appeal decision and both the Inspector and Secretary of State are clear about the potential landscape impact. (3005408, para 19-21 of S/S letter). The impact counts against the development in the planning balance. The overall balance in respect of this site should now be considered against the council's proposed further changes which provide an adequate land supply when assessed against the now revised OAN.
<b>APFC044</b>	Ms Nicole Penfold, Gladman Developments	Allocations Plan Further Changes December 2016	Gladman reiterate previous representations on the suitability of Land at Ross Road, Newent, as a sustainable location to provide up to 85 homes. Land at Ross Road represents a highly sustainable location for further residential development that is responsive to the overall role of Newent as one of the key focuses for growth in the district. Situated to west of the existing settlement Since providing our previous representations to the Council, the site at Land at Ross Road, Newent, received outline planning consent on appeal (APP/P1615/A/14/2228822). However, this was subsequently quashed by the High Court and the proposal is due to be reheard at a public inquiry commencing on the 31st January 2017. Gladman strongly submits that the site should be considered as a preferred allocation as part of the Council's Allocation Plan proposals.	This site which was opposed by the Council at a recent appeal is one where the outcome of an appeal is currently awaited. Although it could be proposed as an allocation independently of any appeal it is not supported by the Council. If it were to be permitted by the Inspector, then the AP would if timing allowed allocate the site as permitted and include it in the plan. There are alternative sites proposed at Newent and these are considered by the Council to be better location for new development.
<b>APFC055</b>	Ms Nicole Penfold, Gladman Developments	Allocations Plan Further Changes December 2016	Gladman's position regarding the OAN and proposed housing requirement remains unchanged from that at the Examination in 2016, despite the proposed increase from 320dpa to 330dpa. Gladman reiterate previous submissions that the Council should be using the 'Sedgefield' approach for calculating their five year housing land supply.	The Council's position is that the evidence submitted alongside the proposed further changes supports the housing provision of 330pa. This figure is one that the AP Inspector has commented on in a positive manner as it addresses his concerns. It was the subject of additional consideration recently but at the 2017 appeal (Ross Rd Newent- 2228822) the appellant, Gladman, did not contest it. Material has been received from Gladman which supports a larger OAN, but the Council consider that while this is noted the figure of 330pa has been established and should be used in the AP as it proceeds to adoption. If further information is required however in support of the figure of 330pa the Council would be able to provide it.
<b>APFC057</b>	Lydney Town Council	Allocations Plan Further Changes December 2016	Lydney Town Council cannot support the Forest of Dean District Council's Allocations Document in its current form because we believe that it still fails to demonstrate a deliverable 5 year land supply' (it is therefore unsound)	The current position regarding the five year land supply is that the FoDDC have proposed further changes to the AP which together with the submitted version and any draft MMs previously drafted will result in a plan that provides a five year supply. The supply requires in the view of the FoDDC some additional land to be released at Lydney. The proposed further changes do not cover employment development which is provided for in the various proposed allocations and policies that the AP and the CS contain. The issue of employment provision has already been debated within the AP Examination.
<b>APFC072</b>	Mr Robin Johnson	Allocations Plan Further Changes December 2016	Deliverability of housing sites in plan. Lack of affordable homes in plan. Lack of self build and custom build homes in plan.	The AP sites are considered to provide a wide range of appropriate opportunities for development including a range of affordable and self build homes. The Council support the identification of an additional site at Allaston for 120 homes which would be expected to provide a range of accommodation and would be welcomed in the form set out in the policy. The larger site is not supported primarily due to the landscape impact of such a development.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC080	Mr Jerome Vaughan, Venaglass (Commercial) Ltd	Allocations Plan Further Changes December 2016	We support the Inspector's findings which see the retention of the site as a mixed use allocation. We acknowledge that in order to address the Inspector's Interim findings the Council has needed to increase its annual housing requirement and needed to find additional sites to meet its 5-year housing land supply requirement. We note that our site is not currently included within the Council's 5-year housing land supply trajectory. Whilst this is currently the case we consider that the site is both developable and deliverable and could therefore reasonably be identified within the Council's housing land supply trajectory.	The Council support the development of this site and welcome further discussions about how this can occur. The agent's contention that it can contribute to the five year land supply is noted and is welcome, however the Council consider that given the complexity of the issues involved it would be prudent not to incorporate any allowance in the housing trajectory for this site. The lack of any allowance does not diminish the Council's support for the site as expressed in the policy.
APFC147	Mr Phil Hardwick, Robert Hitchens Limited	Allocations Plan Further Changes December 2016	The majority of concerns identified by Pegasus previously have been addressed ,however the following issues remain or have arisen since: Using a housing requirement of 330 dwellings is considered to be unsound and artificially suppresses the housing requirement of the District over the plan period . The plan is therefore not 'positively prepared' as required by the NPPF para 47 ,156,157, in that it does not adequately plan to 'boost significantly the supply of housing' nor will it provide the numbers of homes the authority requires over the plan period. The Council's own evidence at para 15 of Draft Housing supply note Nov 2016 states 'With the end of the recession, completions rose(last 3 years averaging 339 pa) again supporting the adjustment to return to normality. The Council are therefore proposing at para 2.10 a revised annualised housing requirement less than their own completion rate over the last 3 years. The housing requirement of 330 dwellings pa will not significantly boost the supply of housing required by NPPF para 47 on adoption of the plan, it is therefore contrary to national government policy and is unsound .	It is considered that the emerging level of housing provision is at 330pa both appropriate and realistic. It is derived from a basic OAN of 280pa with allowances for increased provision for employment and affordable housing. The former is considered prudent but at present is also unlikely whilst the latter is an uplift as recommended by the AP Inspector of 10% which relies on developers being able to provide affordable housing as part of their schemes. There is no evidence to support the contention that a provision of 330pa artificially suppresses the housing requirement. Even if it did the 20% allowance within the five year supply and the planned delivery of any backlog would permit a level of completions well in excess of 330 pa (458pa or more) and this is considered well in excess of the actual level of delivery which the market appears to support. In respect of the reference to the recent level of completions (three year average 339pa), this is very close to the 330pa sought and supports that figure as realistic in terms of what can be achieved as well as the probable demand.
APFC163	Ms Nicola Packer	Allocations Plan Further Changes December 2016	I am dismayed at the lack of consultation with Natural England. I would have expected environmental impact assessments to have been made for the additional housing sites. There seems no point in allocating sites for housing if it is subsequently found that planning permission cannot be given to the suggested development because it would be too damaging to the existing ecology. The way that the further changes have been presented is difficult for a layperson, such as me, to understand. Jargon and abbreviations make the text largely unintelligible and there is no key provided to the colours used on the maps.	Natural England raises no objection to the further changes or the HRA (16th February 2017). The appropriate environmental assessment (Habitats Regulations Assessment, Strategic Environmental Assessment and Sustainability Appraisal) have been undertaken to support the plan. It is considered that, subject to appropriate detailed design, layout, construction and mitigation sites within the plan could be developed without adverse effects on integrity of the European nature conservation designations.
APFC169	Mr David Priddis	Allocations Plan Further Changes December 2016	The HRA'S carried out for these changes dated Sept 2016/Dec2016 indicate several sites have potential to impact on the bat SAC. Therefore the 'in combination' effects of these sites in addition to the previously proposed sites, should have been assessed. They were not. No further consultation from Natural England has been published. The omissions are contrary to the requirements of the Habitats Regulations.	The HRA has evaluated the potential for likely significant effects as a result of the further changes proposed. The HRA consists principally of the March 2015 publication version and September 2016 and December 2016 addendums; in light of proposed further changes to the AP. The inspector, in the interim findings and Natural England (January 2016) are satisfied with the HRA assessment process. The HRA addendums assess the impacts of the proposed AP further changes utilising that same methodology throughout. Through a precautionary approach the HRA embeds avoidance, mitigation and or cancellation requirements within AP policies where there is potential for likely significant effects. Taking into consideration these embedded measures the HRA for the AP has concluded the plan will not have an adverse effect on the integrity of European designated nature conservation sites, alone or in combination. The policy incorporations ensure that HRA will be undertaken again, with increased specificity, at planning application stages. Natural England raises no objection to the further changes or the HRA (16th February 2017).

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC172	Rebecca Underdown, Natural England	Allocations Plan Further Changes December 2016	Proposed Further Changes – No Objection Natural England note the proposed further changes to the Allocations Plan. We have no objections to these modifications. Habitats Regulations Assessment – No Objection Natural England notes that Habitats Regulations Assessments (HRA) are to be completed at project level stage, where further information about individual planning permissions can be provided. It is noted that specific wording has been provided for the proposed allocations in order to make sure that proposals demonstrate that there will be no adverse effects on the integrity of designated sites at planning application stage. It should be noted that the need to complete a project level HRA is a legal requirement. The relevant ecological surveys relating to individual planning applications must be completed and submitted, in order to fully assess the potential impacts of the proposal. The Local Authority must have assurance that there can be a positive outcome from the proposed developments. There must be assurances that solutions are achievable and that suitable mitigation can be achieved to prevent any adverse impacts to the designated sites in question.	No objections to the Further Changes to the AP and its Habitats Regulations Assessment are noted and welcomed.
APFC173	Mrs M Newton, Friends Of The Earth	Allocations Plan Further Changes December 2016	The council has not given sufficient information via the new documentation to address the need to meet their statutory obligations to conserve and enhance the natural environment containing protected species and therefore is contrary to many policies in section 11 of the NPPF, the Habitats Directive and the Habitats Regulations.	It is considered that the proposed further changes are supported by sufficient material to demonstrate that the regulations have been complied with and that the developments intended by the allocations can be satisfactorily accommodated.
APFC176	Mrs Mary Newton, Dean Natural Alliance	Allocations Plan Further Changes December 2016	The council has not given sufficient information via the new documentation to address the need to meet their statutory obligations to conserve and enhance the natural environment containing protected species and therefore is contrary to many policies in section 11 of the NPPF, the Habitats Directive and the Habitats Regulations.	The HRA has evaluated the potential for likely significant effects as a result of the further changes proposed. The HRA consists principally of the March 2015 publication version and September 2016 and December 2016 addendums; in light of proposed further changes to the AP. The inspector, in the interim findings and Natural England (January 2016) are satisfied with the HRA assessment process. The HRA addendums assess the impacts of the proposed AP further changes utilising that same methodology throughout. Through a precautionary approach the HRA embeds avoidance, mitigation and or cancellation requirements within AP policies where there is potential for likely significant effects. In terms of the further changes FC1 (Sneyd Road), FC4 (Augustus Way), FC5 (Ellwood), FC13 (Drybrook), FC17 (Newnham) and FC 19 (Sedbury Lane) all have embedded requirements that detailed development proposals must demonstrate they will avoid adverse impacts on the integrity of the relevant SAC/SPA/Ramsar site. These policy incorporations ensure that HRA will be undertaken again, with increased specificity, at planning application stages. The Council considers the Habitats Regulation Assessment Handbook is best available guidance in relation to HRA. It is acknowledged that this is not all publically available however the Council has made the process it has adopted clear within the HRA documentation. The SA which incorporates SEA sets out key nature consideration designations in appendices 3a & 3b. Consideration of designated sites is embedded in the assessment framework for both policies and sites (Tables 8 & 9). The SA principally seeks to highlight overall impacts of the plan and support policy/plan refinement to improve the plan. Whilst SA does not seek to ‘weight’ one criteria above another it highlights impacts on a site/policy level enabling informed consideration of the policy/plan. Natural England raises no objection to the further changes or the HRA (16th February 2017).

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC279	Mr Walt Williams	Allocations Plan Further Changes December 2016	<p>The OAN gives a district wide quantity but it may be taken that the distribution for sustainability is as originally stated. In order to try and satisfy the need for housing in the next 5 yrs. the new sites suggested do not take into account The CS and its AP can only be satisfactory and sustainable, as per the NPPF, Apart from 80 dwellings at Poolway Farm and the remaining under construction at Owen Farm ( 156), all the major allocations for Coleford have been completed. Coleford is on target to easily fulfil, and even over-sail through infill, its allocation of 650 dwellings for the plan period. The additional sites and quantities amount to Appx 286 This is a 44% increase for this plan period in an area which had no employment potential – little employment land and no major employer looking to increase employment in the near future . This is poorly planned unsustainable development, (the FoDDC admit to the problems burden will create for Coleford and does not accord with the sustainable distribution set for the District.) The local residents of Coleford have expressed their wishes for no further large developments in the area and (apart from Poolway Farm), only small sites and infill to be allowed in this plan period. This will still over-sail the projected allocation by a substantial margin by 2016. The Coleford NDP, would wish to protect most of the proposed sites being outside of the development boundary and some within the important “green ring” protection zone. The Lower Lane application (APP/P1615/W/3005408), was refused at appeal All of the sites, except Tufthorn, fall foul of Council policy in various ways, mainly through being in the green protected zone and outside development boundaries and are being forced upon the Council through the 5 year land supply plus penalties situation. Yet the NPPF doesn’t allow unsustainable development.</p>	<p>The current evidence from the emerging requirements is that there needs to be sufficient land allocated to support an annual building rate of 330pa. To this must be added the ability to meet the backlog of 521 and also a 20% buffer leaving a requirement for land to support 458 or 521 pa over the first five years. This figure is the result of the evidence based calculation carried out in the manner supported in the NPPF. The CS contains principles that are not contradicted in the emerging AP, although the actual numbers (the housing requirement as it appeared in 2011) have changed, the strategy of concentration on the towns has not. Coleford as one of the towns has certain opportunities for additional development and inevitably some of the land to be considered is likely to be in the space between Coleford town and its surrounding settlements, within the landscape area (AP64, Locally Valued Landscape). This area has the purpose of being able to protect the open setting of the town so development which does not do this would not comply with the policy. The test for the policy is whether the development proposed detracts from the setting of the town and the sites identified in the Further changes are not considered to do this. They are acceptable as allocations. The above methodology as set out in the Council's Housing Land supply paper of December 2016 results in a need to identify land well in excess of the basic 330pa especially over the first five years. If the AP is to be sound and if it is to make land available to ensure that sufficient can be developed then the new proposed allocations or equivalent are required. Other policies of the Plan are designed to encourage employment and services and those that already exist form the basis for a sustainable location although the Council would agree that a greater range of both is desirable.</p>
APFC298	Mr Derek Foster, Dean Natural Alliance	Allocations Plan Further Changes December 2016	<p>The HRA'S carried out for these changes dated Sept 2016/Dec2016 indicate several sites have potential to impact on the bat SAC. Therefore the 'in combination' effects of these sites in addition to the previously proposed sites, should have been assessed. They were not. No further consultation from Natural England has been published. The omissions are contrary to the requirements of the Habitats Regulations.</p>	<p>The HRA has evaluated the potential for likely significant effects as a result of the further changes proposed. The HRA consists principally of the March 2015 publication version and September 2016 and December 2016 addendums; in light of proposed further changes to the AP. The inspector, in the interim findings and Natural England (January 2016) are satisfied with the HRA assessment process. The HRA addendums assess the impacts of the proposed AP further changes utilising that same methodology throughout. Through a precautionary approach the HRA embeds avoidance, mitigation and or cancellation requirements within AP policies where there is potential for likely significant effects. Taking into consideration these embedded measures the HRA for the AP has concluded the plan will not have an adverse effect on the integrity of European designated nature conservation sites, alone or in combination. The policy incorporations ensure that HRA will be undertaken again, with increased specificity, at planning application stages. Natural England raises no objection to the further changes or the HRA (16th February 2017).</p>
APFC299	Kodiak Land	Allocations Plan Further Changes December 2016	<p>Objection to the site selection process. The additional site selection process appears to be pre-selected rather than a transparent site options consultation. The Council should be considering all reasonable alternatives. Land off Bradfords Lane, Newent is a sustainable option for delivering housing, should be included. The site lies adjacent to Newent which has a wide range of services and facilities. Land at Ross Road, Newent represents a highly suitable and sustainable location to deliver residential development. The site is deliverable it is available now, an appropriate location for development, and is achievable. The site should be considered as a preferred allocation and is achievable with a realistic prospect that the housing will be delivered within five years. The site is well contained and would represent a logical extension to the town that could be readily assimilated into the landscape and its surroundings.</p>	<p>The representation relates to a site at Newent, off Bradford's Lane which was the subject of representations at the stage of the AP brief but not during the examination until now. The site is one that has previously been considered for allocation but has not been proposed for development. It was not supported in 2003 when considered at the time of the LP Inquiry, although its development was at the time supported by the Council. The site is close to Listed Buildings and its development would be harmful to the area's landscape character. In terms of providing a sufficient supply of deliverable land for housing, the Council consider its proposed sites to be more suitable.</p>

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC303	Ms F Chalice	Allocations Plan Further Changes December 2016	The most striking change appearing needed, to make this plan effective and consistent with national legislation and evidence is to make it more representative of local (and national) need. AP only focuses on the numbers of dwellings provided and quite large percentages of Affordable Housing for some geographic areas, without regard for type Unfortunately complete omission of guidance for accessibility standards/types then pulls the whole document into the spotlight of the Equality Act. None of the AP's sites or summary key issues considers the type of housing in terms of accessibility.	The desirability of providing accessible homes or ensuring that new homes can be adapted is accepted. Although not all new homes can be provided in this manner, it is appropriate to encourage developers to provide flexible accommodation and a mix of types and tenures is expected. It must comply with the current building regulations. Guidance such as "Building for Life" asks that sites are easy to get around including for persons with limited mobility, and the overall design and landscaping of a scheme should ensure this. The external layout of housing should provide for good access and landscaping and other features should be designed accordingly. Some allocations within the range proposed by the AP will be better suited to particular types of accommodation, and the individual policies emphasise this, for example the proposed allocation at Kings Meade Coleford is better suited to residents needing easy access to the centre of the town and possible to single storey housing and smaller units.
APFC306	Mrs S Fellows, Land Research & Planning Associates Ltd.	Allocations Plan Further Changes December 2016	Accordingly it has been demonstrated that the MMs proposed are highly unlikely to deliver more than 15% the required HLS either in the 5 or 10 year period. The backlog issues go right back to the 2005 Local Plan and viability issues on the larger sites [Appeal Decision 2215840] in the Lydney area surely still remain even though the Appeal was in 2014. No evidence has been forthcoming from the Council that the deliverability of the HLS has improved	The overall level of housing being planned for addresses the Inspector's concerns and is derived from up to date information. That level is 330pa. The Inspector considered and reached an (interim) conclusion on the provision of affordable housing. The overall level of provision is supported by the Council who also support the Inspector's approach to addressing the need for additional affordable housing provision and provision for additional jobs. In showing how these needs can be met and in particular how the five year land supply that is derived from it can be provided for the Council has considered many possible sites including those advocated by this representation. The sites concerned have all been considered previously in the AP process and were not supported by the Council at that stage nor did the AP Inspector recommend any be incorporated into the list of allocations or change to the settlement boundary. Further study of the sites concerned show some not contiguous with any settlement boundary and some regarded as unsustainable such as the recent appeal land at Bullo (no 351, for D Larkham 3943912).
APFC145	Mr Peter Tufnell, Tufnell Town & Country Planning	Introduction	This representation is one of general concern relating to the decision making process leading to the allocation of additional land in September 2016 and further sites added in December 2016. The LPA has a duty to ensure that it promotes the best sites, i.e those that will result in the least harm and are truly deliverable. The decision making process has not been open and transparent, it has been closed and secretive. The process of site choice is something of a mystique, it has not been explained or justified . There is little evidence of a consistent cost- benefit approach.	The current consultation is an opportunity to comment on the Council's proposed sites and it follows other opportunities for comment on the plan as drafted, as published and as submitted, along with the supporting evidence. Sites that are proposed are subject to various assessments and their merits will be considered as part of the AP examination.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC295	Ms Susan Green, Home Builders Federation	Introduction	<p>It is understood that the Council's proposed housing requirement is derived from an assessment based on the approach outlined in the Inspector's Interim Findings., an uplift to support economic growth derived from updated economic forecasts (300 dwellings per annum) plus 10% adjustment to assist in meeting affordable housing needs (330 dwellings per annum). It is noted that this proposed housing requirement remains below the Inspector's Interim Findings. With the 10% adjustment for delivery of affordable housing needs this simplistic critique identifies a housing requirement of circa 357 dpa to accord with the Inspector's approach set out in the Interim Findings. It is also known that an alternative OAHN has been undertaken by Barton Willmore on behalf of Gladman Developments which calculates a housing requirement of 360 dwellings per annum based on the Inspector's Interim Findings approach. This very simplistic analysis concludes that an OAHN of 330 dwellings per annum for Forest of Dean under estimates OAHN and therefore the proposed housing requirement will not meet housing needs. In conclusion the housing requirement for Forest of Dean should be no less than 7,000 dwellings (350 dwellings per annum). However this figure is submitted without prejudicing the validity of any alternative OAHN figures calculated by other parties. It is the HBF's opinion that as set out in the National Planning Practice Guidance (NPPG) the Sedgefield approach to recouping shortfalls as soon as possible is the appropriate methodology to be applied to the Council's 5 YHLS calculation. The HBF object to the proposed introduction of a Liverpool approach to shortfalls. . The Council's 5 YHLS calculations and housing trajectory should be based on realistic assumptions which are supported by housebuilders and sense checked by the Council using empirical data.</p>	<p>The current figure of 330pa represents the AP Inspector's consideration of up to date evidence and the allowances that should be made to ensure that an adequate provision is made. An uplift of 400 for additional employment is included as is a further 10% for additional housing which could carry extra affordable provision. The level of overall provision requires a minimum five year supply of land for 458 dwellings per year to be available. This is a figure well in excess of any that the market has supported in past years and should the 330pa be too low there would be evidence in the form of completions at a higher rate. The largest allocations at Lydney which are now coming forward could have been commenced earlier had the market supported them and equally the rate of delivery proposed could be exceeded if there were a market for that enhanced rate. The provision of 330pa is supported by the Council. The Council have set out their reasons for preferring the "Liverpool" method of accounting for the so called backlog of housing delivery. The alternative can be serviced by the sites that have been identified but in terms of five year availability the supply of land is limited. Some of the sites advanced by third parties are not considered suitable and some existing allocations are supported but the rate of delivery which they can sustain is limited by the likely market. There is considerable doubt that the delivery of new homes could rise to 458pa let alone the 521 required under the Sedgefield method. The full case is contained in the material published alongside the proposed further changes. Allocations must be in step with the actual requirement, although a large margin is created over the 330pa level by the need to add the 20% buffer and also the backlog to this annual rate when making land available.</p>
APFC125	Mr Dennis Priest, Berry Hill Action Group	Paragraph 1	<p>The Allocation Plan now subject to consultation fulfils local needs, has been derived from locally derived information, and is democratic. It is therefore preferable to the proposals remotely generated, without democratic input, by opportunistic developers.</p>	<p>This is a statement in support of the AP and is noted.</p>
APFC142	Mr Peter Tufnell, Tufnell Town & Country Planning	Paragraph 1	<p>There is no policy change section/settlement heading for Longhope. There has however been a MM change for Longhope by the inclusion of additional land which followed the dismissal of an appeal. The additional allocation site in Longhope has not been the subject of proper public consultation and should be included in the current round of public participation.</p>	<p>The Longhope site was discussed at the examination and proposed as a draft MM following an appeal decision which was clear in that the site should be able to be developed in the manner proposed by the appellant subject to some additional ecological work. Since that date further discussions have taken place and the site is considered able to be allocated in the general form proposed in the draft MM. The proposed further changes sites in contrast have not been the subject of public consultation and so the recent exercise was necessary.</p>

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC140	Mr Peter Monk	Paragraph 2.10	<p>FCAP 2.10 does not explain that the OAN figure of 6600 includes provision for older person housing whether in specialised care homes such as nursing homes; or in the form of retirement or sheltered housing; or in the type of housing called "housing with care" or "extra care". Allowing local people who move into them release existing housing to continue to live independently behind their own front doors, so should be counted against the overall housing need that the allocations plan seeks to address. Land to the north of Newnham which is part of the larger FC17 site, can provide over 40 units of extra care and custom-build housing after allowing for enhancement of an existing village footpath, providing a new emergency access route to the primary school and a reserve site for school expansion. The FCAP and MM are unsound in that Forest of Dean District Council disregards the suitable Newnham site for older persons housing, in favour of allocating older person housing including bungalows to a new site (Site FC3) next to a golf course on the edge of Coleford, without any explanation. The Forest of Dean District Council's paper on "Older Peoples Housing" dated 10 October 2016 (ED 062a) does not identify the policy approach to older persons housing in the District or issues relating to older people. I would ask that the very detailed submission submitted in June 2015 (ID 158) is responded to in full. The FCAP should be amended to provide for development of at least 40 older person extra care or sheltered bungalow units, including up to 3 custom-build houses on the part of the FC17 site that is west of Unlawater Lane, is in a single ownership, and can be accessed from the existing without adversely affecting the special character of the area.</p>	<p>The AP would include independent but supported housing in its overall requirement and sites that are allocated are able to provide a variety of accommodation including that suitable for older persons. The site at Newnham is considered able to provide a variety of homes. It remains the case that there is much less demand for some types of purpose built accommodation allocations are best considered as flexible to changing needs rather than being more specific. Nursing Homes and care homes are best considered on an individual basis with some being new build and others conversions. In principle some allocated housing sites would also be suitable but these are also best considered on an individual basis.</p>
APFC148	Mr Phil Hardwick, Robert Hitchens Limited	Paragraph 2.10	<p>The Council argue within ED067 that where there is sufficient provision over the plan period and where the use of the Sedgfield approach results in delivery rates that are unrealistic, then the Liverpool approach should be used. However within the same document the Council identify that with the proposed additional allocations a 5y land supply would be able to be demonstrated using the Sedgfield approach. This conclusion therefore undermines the application of the Liverpool approach, and the Sedgfield approach must be applied in order to accord with national guidance (NPPF 3-330)</p>	<p>It is agreed that the situation regarding a given land supply can change quickly. However for the purpose of establishing such a supply, it is appropriate to first establish a requirement through the process of examination and the present figure supported by the AP is 330pa. The intention of the Council's submissions is to show that both methods of addressing a backlog can be accommodated although for reasons set out in the housing background paper the "Liverpool" method is preferred. It is worth noting that the purpose of the AP is to deliver against the figure of 330 pa over the plan period and this means maintaining a supply throughout the plan period, and ensuring that the sites allocated make a contribution. The five year supply would support a build rate of 458pa even under the Liverpool approach, which would cope with a demand well in excess of any recorded in the area and some 38% above 330pa. Guidance is that plans should provide for their needs in a sustainable manner and ensuring the benefits that may accrue to the development as allocated can be realised is part of the justification for the approach taken. It is recognised that as with the examples quoted there may be circumstances where "Liverpool" is justified and provides for a better outcome. Although the Council presents the sites in the further consultation in two groups, all are considered able to deliver as indicated and the AP Inspector is therefore able to consider them individually and make recommendations accordingly.</p>
APFC323	Edenstone Homes	Paragraph 2.10	<p>This representation also seeks to confirm support for changes to paragraphs 2.10 and 2.11 of the Allocations Plan.</p>	<p>Support noted . This site is now the subject of a planning application for 166 homes and although the principle of its development is supported there may be detail issues yet to resolve as part of the application process. The Council at present assume a delivery of 110 within the five year period, although if a higher number were to be permitted then that number would be available and possibly deliverable within five years (the current application is a full application from a housebuilder).</p>

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC328	David Wilson Homes	Paragraph 2.10	It is considered that our client's site to the east of Huntley would represent a suitable additional allocation to assist the Council in achieving this aim. The site is located adjacent to the existing village with the A40 running to the south of the site and relates well to the existing built development of the village. The site is currently used as a golf course. A larger site, of which this site forms a part, was previously promoted through the FoDDC SHLAA estimating the larger site could accommodate 191 dwellings and that it should be considered further by the Council (site no. 439 – SHLAA 2012/2013). The residential development of the site would also offer the opportunity for the delivery of further services and facilities within the village of Huntley, thereby increasing the number of local amenities available to existing local residents and increasing the sustainability of the settlement. Given the above it is considered that the allocation of land to the east of Huntley should be included within the Allocations Plan in order to ensure its soundness.	A larger and different site is proposed to that supported by the Council at Huntley. This is justified by the need to identify additional land because of past under provision. The Council consider that it has made workable proposals in the further changes published in December 2016 that together with the sites that have already been proposed will meet the required level of provision. Even if this were not the case the suggested site is in excess of 5ha with perhaps an implied capacity of 150 units. It is considered to be much larger than an appropriate scale of development in a service village with a plan horizon of only 10 years. In a recent appeal decision (3136129, Newent Lane Huntley, 2016) the Inspector commented that a scheme of up to 60 dwellings was "too great a scale of development" (para23) and then considered that scheme not sustainable (24). The current representation is potentially over double this scale and can only be considered an unsustainable one out of scale with the expectations in a service village such as Huntley. The council in contrast support a scheme of about 12 dwellings at Huntley. The actual site of the Council's proposed allocation is also one that can be developed without a prominent incursion into the open countryside.
APFC331	Stop Allaston Development (SAD)	Paragraph 2.10	The objection relates simply to the ability of the plan to deliver a greater number of houses within the first 5y's of the plan period. Allocating sites will not improve the economics of the local housing market. I note that albeit a little cautiously, the Inspector acknowledges this at paragraph 10 response to the Council's proposals in response to his interim findings. Both Liverpool and Sedgfield methods have been accepted by Inspectors, depending on the circumstances. In this instance in practice the backlog is extremely unlikely to be met during the first 5ys and should be spread over the remaining plan period. It is impractical to expect many of the newly allocated sites to deliver dwellings early in the Plan period. It appears that a number of the sites now brought forward in response to the Inspectors initial findings are highly questionable' probably due to the hurried way in which the process of identification and assessment inevitably had to be undertaken. I also question if the increase in housing allocations to meet the apparent 5yr backlog is absolute necessary. Council seem confident that whilst the 5y's is not fully available it is not dangerously low. Indeed judging from background reports the land supply is not the problem that it once was.	It is agreed that the situation regarding a given land supply can change quickly. However for the purpose of establishing such a supply, it is appropriate to first establish a requirement through the process of examination and the present figure supported by the AP is 330pa. The intention of the Council's submissions is to show that both methods of addressing a backlog can be accommodated although for reasons set out in the housing background paper the "Liverpool" method is preferred. It is worth noting that the purpose of the AP is to deliver against the figure of 330 pa over the plan period and this means maintaining a supply throughout the plan period, and ensuring that the sites allocated make a contribution. The five year supply would support a build rate of 458pa even under the Liverpool approach, which would cope with a demand well in excess of any recorded in the area and some 38% above 330pa. Guidance is that plans should provide for their needs in a sustainable manner and ensuring the benefits that may accrue to the development as allocated can be realised is part of the justification for the approach taken. It is recognised that as with the examples quoted there may be circumstances where "Liverpool" is justified and provides for a better outcome.
APFC001	Mr Alan Powell	Paragraph 2.11	The existing figure for housing provision (4800) is sufficient to comply with Government demands. Increasing this figure by over a third is unnecessary and the new total is too large for an area characterised by a largely rural nature.	The Further Changes are proposed in direct response to the revised housing requirement for the Plan which is considered appropriate and to the need to identify land which is considered deliverable within five years. In order to provide a land supply which accords with government guidance a substantial "buffer" is required so that the required rate of development can be supported.
APFC002	Mr Alan Powell	Paragraph 2.11	It's suspicious that such a dramatic increase in the proposed housing stock is being made at this late stage. The initial Allocations Plan consultation was well publicised, but this proposed alteration has received virtually no publicity.	The Plan changes received similar publicity to the original submission and were open to comment from December 19th to February 13th. The need for the higher number became apparent during the examination as a result of addressing the Inspector's concerns. This involved the consideration of a revised plan period (to coincide with the Core Strategy), an update of the demographic requirement and the addition of allowances for employment and affordable housing. These resulted in a higher requirement for land especially when translated into the five year land supply. The Council support these changes and consider them necessary in the process of arriving at a sound plan.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC329	David Wilson Homes	Paragraph 2.11	It is considered that our client's site to the east of Huntley would represent a suitable additional allocation to assist the Council in achieving this aim. The site is located adjacent to the existing village with the A40 running to the south of the site and relates well to the existing built development of the village. The site is currently used as a golf course. A larger site, of which this site forms a part, was previously promoted through the FoDDC SHLAA estimating the larger site could accommodate 191 dwellings and that it should be considered further by the Council (site no. 439 – SHLAA 2012/2013). The residential development of the site would also offer the opportunity for the delivery of further services and facilities within the village of Huntley, thereby increasing the number of local amenities available to existing local residents and increasing the sustainability of the settlement. Given the above it is considered that the allocation of land to the east of Huntley should be included within the Allocations Plan in order to ensure its soundness.	A larger and different site is proposed to that supported by the Council at Huntley. This is justified by the need to identify additional land because of past under provision. The Council consider that it has made workable proposals in the further changes published in December 2016 that together with the sites that have already been proposed will meet the required level of provision. Even if this were not the case the suggested site is in excess of 5ha with perhaps an implied capacity of 150 units. It is considered to be much larger than an appropriate scale of development in a service village with a plan horizon of only 10 years. In a recent appeal decision (3136129, Newent Lane Huntley, 2016) the Inspector commented that a scheme of up to 60 dwellings was "too great a scale of development" (para23) and then considered that scheme not sustainable (24). The current representation is potentially over double this scale and can only be considered an unsustainable one out of scale with the expectations in a service village such as Huntley. The council in contrast support a scheme of about 12 dwellings at Huntley. The actual site of the Council's proposed allocation is also one that can be developed without a prominent incursion into the open countryside.
APFC332	Stop Allaston Development(SAD)	Paragraph 2.11	The objection relates simply to the ability of the plan to deliver a greater number of houses within the first 5y's of the plan period. Allocating sites will not improve the economics of the local housing market. I note that albeit a little cautiously, the inspector acknowledges this at paragraph 10 response to the Council's proposals in response to his interim findings. Both Liverpool and Sedgfield methods have been accepted by Inspectors, depending on the circumstances. In this instance in practice the backlog is extremely unlikely to be met during the first 5 y and should be spread it over the remaining plan period. It is impractical to expect many of the newly allocated sites to deliver dwellings early in the Plan period. It appears that a number of the sites now brought forward in response to the Inspectors initial findings are highly questionable probably due to the hurried way in which the process of identification and assessment inevitably had to be undertaken. I also question if the increase in housing allocations to meet the apparent 5 y backlog is absolutely necessary. Council seem confident that whilst the 5y's is not fully available it is not dangerously low. Indeed judging from background reports the land supply is not the problem that it once was.	It is agreed that the situation regarding a given land supply can change quickly. However for the purpose of establishing such a supply, it is appropriate to first establish a requirement through the process of examination and the present figure supported by the AP is 330pa. The intention of the Council's submissions is to show that both methods of addressing a backlog can be accommodated although for reasons set out in the housing background paper the "Liverpool" method is preferred. It is worth noting that the purpose of the AP is to deliver against the figure of 330 pa over the plan period and this means maintaining a supply throughout the plan period, and ensuring that the sites allocated make a contribution. The five year supply would support a build rate of 458pa even under the Liverpool approach, which would cope with a demand well in excess of any recorded in the area and some 38% above 330pa. Guidance is that plans should provide for their needs in a sustainable manner and ensuring the benefits that may accrue to the development as allocated can be realised is part of the justification for the approach taken. It is recognised that as with the examples quoted there may be circumstances where "Liverpool" is justified and provides for a better outcome.
APFC126	Mr Kenneth Brooks	Paragraph4		No comment made, request to be notified of outcome noted.
APFC009	Mr Rob Niblett, Gloucestershire County Council	Policy FC AP9 Herefordshire and Gloucestershire Canal	Support.	The County Council's support is noted.
APFC011	Mr Rob Niblett, Gloucestershire County Council	Policy FC AP9 Herefordshire and Gloucestershire Canal	Policy AP9 – it is welcomed that the revised proposed wording includes 'biodiversity benefits' as an example of an expected benefit of the canal restoration. We assume that there will be a quick review of the HRA for the Site Allocation Plan changes to see if any may cause a likely significant effect on any European Site.	The impact of the further proposed changes has been considered and support for the "biodiversity" addition to the policy is noted.
APFC012	Mr Graham Chorlton	Policy FC AP9 Herefordshire and Gloucestershire Canal	The canal scheme should be changed such that it is not a continuous waterway, but rather restoration of some still recognisable sections of waterway to be used for recreation/wildlife. At places where the canal and road cross it may be necessary to use traditional low level swingbridges or accept a break in the canal. A break being the preferred option. There should be a 100m spacing between my property and any proposed canal route. Complete restoration of the canal would be harmful to many residents and agricultural owners. Restoration of individual shorter stretches would be a better option giving greater value to community with minimum disruption .	The AP seeks to protect land in order that the canal could be reinstated. It contains safeguards about how this may be achieved and makes clear that in order to carry out work various permissions will be required. The design of any new structures is subject to agreement as would be the entry onto third party land. The construction process would need to be well regulated and that would include control over any import of material. It is likely that the canal will be restored over a long time but the establishment of a continuous waterway is supported and the present policy is considered necessary to enable that eventual outcome.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

<b>Ref Number</b>	<b>Full Name</b>	<b>Policy or Paragraph Number</b>	<b>Comment Summary</b>	<b>Draft Officer Response</b>
<b>APFC030</b>	Mr Edward Keene	Policy FC AP9 Herefordshire and Gloucestershire Canal	The restoration of the canal in its original form is impossible to achieve. An amended route would serve no purpose. Its inclusion in the local plan is causing a blight on residences and businesses. The Canal Trust seem to be intent on destroying natural habitats and using the canal to create sporadic housing development schemes. A completed restored scheme would cause habitats to be lost and a drain to natural resources such as water which we have to safeguard.	The AP seeks to protect land in order that the canal could be reinstated. It contains safeguards about how this may be achieved, and makes clear that overall benefits are being sought from the restoration. The policy makes clear that in order to carry out work various permissions will be required. The design of any new structures is subject to agreement as would be the entry onto third party land. The construction process would need to be well regulated and that would include control over any import of material. It is likely that the canal will be restored over a long time but the establishment of a continuous waterway is supported and the present policy is considered necessary to enable that eventual outcome. The further changes to the AP are proposed in order to ensure the policy does achieve its aims, although the principle was accepted and supported by the Inspector earlier in the examination, he sought some changes to make the policy more effective.
<b>APFC031</b>	Mr Edward Keene	Policy FC AP9 Herefordshire and Gloucestershire Canal	The restoration of the canal in its original form is impossible to achieve. An amended route would serve no purpose. Its inclusion in the local plan is causing a blight on residences and businesses. The Canal Trust seem to be intent on destroying natural habitats and using the canal to create sporadic housing development schemes. A completed restored scheme would cause habitats to be lost and a drain to natural resources such as water which we have to safeguard.	The AP seeks to protect land in order that the canal could be reinstated. It contains safeguards about how this may be achieved, and makes clear that overall benefits are being sought from the restoration. The policy makes clear that in order to carry out work various permissions will be required. The design of any new structures is subject to agreement as would be the entry onto third party land. The construction process would need to be well regulated and that would include control over any import of material. It is likely that the canal will be restored over a long time but the establishment of a continuous waterway is supported and the present policy is considered necessary to enable that eventual outcome. The further changes to the AP are proposed in order to ensure the policy does achieve its aims, although the principle was accepted and supported by the Inspector earlier in the examination, he sought some changes to make the policy more effective.
<b>APFC127</b>	Mrs Patricia Brooks	Policy FC AP9 Herefordshire and Gloucestershire Canal	The included maps labelled as Additions 07.12.2016 show the canal crossing several minor roads and B roads. This will require raising of either the roads concerned or the canal by metres in places. Doing this may well adversely affect wildlife, agriculture and local residents whose plans may well be blighted by uncertainty of such a long term project. Refinement of the route may become necessary partly because no consultation with the most of the landowners has taken place. Without a positive outcome from consultation should the reinstatement of the canal even be considered? To make the proposal a positive one all the landowners should be consulted and then a fully thought out plan developed before seeking inclusion in an Allocation Plan.	The Plan policy protects land from other development in order to enable the canal restoration. The support for this is long standing, having been written into the previous two Plans (1996 and 2005). The new policy does not prescribe a particular form of development and makes clear when permission will be required for carrying out the works involved. The consent of land owners is necessary to enter land and that is entirely separate from any planning consideration. Whilst the policy protects land as shown on the policies map from other development it does allow for agreed diversions to be protected too and these may be substituted for other land. It can therefore take account of the outcomes of any consultation which agree such changes.
<b>APFC129</b>	Mr Kenneth Brooks	Policy FC AP9 Herefordshire and Gloucestershire Canal	Map - H&GC Safeguarding Route NEWENT 07 12 16 Safeguarding the route is of concern. One of the displays at H&CG Trust exhibitions is an illustration showing the proposed embankment 4M high and 40M wide which will be built to enable the canal to cross the B4215 at the position shown on the above named map. Whilst this is not detailed here I feel it is worth pointing out that one of the HGCT's volunteers has suggested creating locks to take the canal over the road which would reduce the need for such a large embankment. The area is already prone to flooding of the Ell Brook and anything which protects the area including its wildlife and visual impact should be encouraged. Include locks in the plan to minimise impact locally.	The AP seeks to protect land in order that the canal could be reinstated. The further changes proposed seek to clarify this and ensure that a continuous route can be protected. It contains safeguards about how this may be achieved, and makes clear that overall benefits are being sought from the restoration. The policy makes clear that in order to carry out work various permissions will be required. The design of any new structures is subject to agreement as would be the entry onto third party land. The construction process would need to be well regulated and that would include control over any import of material. Landscape and other impacts of any proposed structures would be considered as part of any planning application and the policy makes this clear.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC182	Mr G A Savage	Policy FC AP9 Herefordshire and Gloucestershire Canal	Originally the policies map included previously deleted canal diversions and ancillary layers This has now been toggled off but must be deleted from the map. The combined single route with discontinuity links as now presented by the FoDDC planning authority on the policies map is considered to be generally acceptable as this avoids major deviations from the original canal route as originally proposed by the H&GCT. Differences and labelling which exist between the Further Changes Policies Map and the Further changes document must be addressing. This can be resolved by simply changing the map key legend references indicated in figure 1 to read H & G Canal Safeguarding – original route and H&G Canal Safeguarding Proposed discontinuity link. Both the further Changes Policies Map December 2016 and the relevant inset map included in 58 page Allocations Plan Further Changes document show a discontinuity of the protected canal route within the bounds of Dymock, on the South side. This gap also needs to be filled with a link. The planning consent in Dymock should be shown on policies Map.	The additional layer was removed from the on line mapping and it is agreed it was not well labelled, it was from the draft plan of 2014 which has been replaced. The other labelling issues referred to will be addressed in the final Policies map and where needed in the text of the AP. Support is noted for the proposed plan published in December 2016. The "gap" at Dymock exists because the line of the canal is now covered by an implemented planning permission which now enables the two sides to be linked. Much of the physical work (creation of a basin) has been completed and details can be seen on the planning application, P1219/12 and on the latest OS map.
APFC184	Mr P G Savage	Policy FC AP9 Herefordshire and Gloucestershire Canal	Originally the policies map included previously deleted canal diversions and ancillary layers This has now been toggled off but must be deleted from the map. The combined single route with discontinuity links as now presented by the FoDDC planning authority on the policies map is considered to be generally acceptable as this avoids major deviations from the original canal route as originally proposed by the H&GCT. Differences and labelling which exist between the Further Changes Policies Map and the Further changes document must be addressing. This can be resolved by simply changing the map key legend references indicated in figure 1 to read H & G Canal Safeguarding – original route and H&G Canal Safeguarding Proposed discontinuity link. Both the further Changes Policies Map December 2016 and the relevant inset map included in 58 page Allocations Plan Further Changes document show a discontinuity of the protected canal route within the bounds of Dymock, on the South side. This gap also needs to be filled with a link. The planning consent in Dymock should be shown on policies Map.	The additional layer was removed from the on line mapping and it is agreed it was not well labelled, it was from the draft plan of 2014 which has been replaced. The other labelling issues referred to will be addressed in the final Policies map and where needed in the text of the AP. Support is noted for the proposed plan published in December 2016. The "gap" at Dymock exists because the line of the canal is now covered by an implemented planning permission which now enables the two sides to be linked. Much of the physical work (creation of a basin) has been completed and details can be seen on the planning application, P1219/12 and on the latest OS map.
APFC185	Robert Taylor	Policy FC AP9 Herefordshire and Gloucestershire Canal	Originally the policies map included previously deleted canal diversions and ancillary layers This has now been toggled off but must be deleted from the map. The combined single route with discontinuity links as now presented by the FoDDC planning authority on the policies map is considered to be generally acceptable as this avoids major deviations from the original canal route as originally proposed by the H&GCT. Differences and labelling which exist between the Further Changes Policies Map and the Further changes document must be addressing. This can be resolved by simply changing the map key legend references indicated in figure 1 to read H & G Canal Safeguarding – original route and H&G Canal Safeguarding Proposed discontinuity link. Both the further Changes Policies Map December 2016 and the relevant inset map included in 58 page Allocations Plan Further Changes document show a discontinuity of the protected canal route within the bounds of Dymock, on the South side. This gap also needs to be filled with a link. The planning consent in Dymock should be shown on policies Map.	The additional layer was removed from the on line mapping and it is agreed it was not well labelled, it was from the draft plan of 2014 which has been replaced. The other labelling issues referred to will be addressed in the final Policies map and where needed in the text of the AP. Support is noted for the proposed plan published in December 2016. The "gap" at Dymock exists because the line of the canal is now covered by an implemented planning permission which now enables the two sides to be linked. Much of the physical work (creation of a basin) has been completed and details can be seen on the planning application, P1219/12 and on the latest OS map.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC186	Mr John Teire	Policy FC AP9 Herefordshire and Gloucestershire Canal	Originally the policies map included previously deleted canal diversions and ancillary layers This has now been toggled off but must be deleted from the map. The combined single route with discontinuity links as now presented by the FoDDC planning authority on the policies map is considered to be generally acceptable as this avoids major deviations from the original canal route as originally proposed by the H&GCT. Differences and labelling which exist between the Further Changes Policies Map and the Further changes document must be addressing. This can be resolved by simply changing the map key legend references indicated in figure 1 to read H & G Canal Safeguarding – original route and H&G Canal Safeguarding Proposed discontinuity link. Both the further Changes Policies Map December 2016 and the relevant inset map included in 58 page Allocations Plan Further Changes document show a discontinuity of the protected canal route within the bounds of Dymock, on the South side. This gap also needs to be filled with a link. The planning consent in Dymock should be shown on policies Map.	The additional layer was removed from the on line mapping and it is agreed it was not well labelled, it was from the draft plan of 2014 which has been replaced. The other labelling issues referred to will be addressed in the final Policies map and where needed in the text of the AP. Support is noted for the proposed plan published in December 2016. The "gap" at Dymock exists because the line of the canal is now covered by an implemented planning permission which now enables the two sides to be linked. Much of the physical work (creation of a basin) has been completed and details can be seen on the planning application, P1219/12 and on the latest OS map.
APFC187	M H Bentley	Policy FC AP9 Herefordshire and Gloucestershire Canal	Originally the policies map included previously deleted canal diversions and ancillary layers This has now been toggled off but must be deleted from the map. The combined single route with discontinuity links as now presented by the FoDDC planning authority on the policies map is considered to be generally acceptable as this avoids major deviations from the original canal route as originally proposed by the H&GCT. Differences and labelling which exist between the Further Changes Policies Map and the Further changes document must be addressing. This can be resolved by simply changing the map key legend references indicated in figure 1 to read H & G Canal Safeguarding – original route and H&G Canal Safeguarding Proposed discontinuity link. Both the further Changes Policies Map December 2016 and the relevant inset map included in 58 page Allocations Plan Further Changes document show a discontinuity of the protected canal route within the bounds of Dymock, on the South side. This gap also needs to be filled with a link. The planning consent in Dymock should be shown on policies Map.	The additional layer was removed from the on line mapping and it is agreed it was not well labelled, it was from the draft plan of 2014 which has been replaced. The other labelling issues referred to will be addressed in the final Policies map and where needed in the text of the AP. Support is noted for the proposed plan published in December 2016. The "gap" at Dymock exists because the line of the canal is now covered by an implemented planning permission which now enables the two sides to be linked. Much of the physical work (creation of a basin) has been completed and details can be seen on the planning application, P1219/12 and on the latest OS map.
APFC188	Tim and Beth Goulding	Policy FC AP9 Herefordshire and Gloucestershire Canal	Originally the policies map included previously deleted canal diversions and ancillary layers This has now been toggled off but must be deleted from the map. The combined single route with discontinuity links as now presented by the FoDDC planning authority on the policies map is considered to be generally acceptable as this avoids major deviations from the original canal route as originally proposed by the H&GCT. Differences and labelling which exist between the Further Changes Policies Map and the Further changes document must be addressing. This can be resolved by simply changing the map key legend references indicated in figure 1 to read H & G Canal Safeguarding – original route and H&G Canal Safeguarding Proposed discontinuity link. Both the further Changes Policies Map December 2016 and the relevant inset map included in 58 page Allocations Plan Further Changes document show a discontinuity of the protected canal route within the bounds of Dymock, on the South side. This gap also needs to be filled with a link. The planning consent in Dymock should be shown on policies Map.	The additional layer was removed from the on line mapping and it is agreed it was not well labelled, it was from the draft plan of 2014 which has been replaced. The other labelling issues referred to will be addressed in the final Policies map and where needed in the text of the AP. Support is noted for the proposed plan published in December 2016. The "gap" at Dymock exists because the line of the canal is now covered by an implemented planning permission which now enables the two sides to be linked. Much of the physical work (creation of a basin) has been completed and details can be seen on the planning application, P1219/12 and on the latest OS map.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC189	Mr Cyril Amos	Policy FC AP9 Herefordshire and Gloucestershire Canal	Originally the policies map included previously deleted canal diversions and ancillary layers This has now been toggled off but must be deleted from the map. The combined single route with discontinuity links as now presented by the FoDDC planning authority on the policies map is considered to be generally acceptable as this avoids major deviations from the original canal route as originally proposed by the H&GCT. Differences and labelling which exist between the Further Changes Policies Map and the Further changes document must be addressing. This can be resolved by simply changing the map key legend references indicated in figure 1 to read H & G Canal Safeguarding – original route and H&G Canal Safeguarding Proposed discontinuity link. Both the further Changes Policies Map December 2016 and the relevant inset map included in 58 page Allocations Plan Further Changes document show a discontinuity of the protected canal route within the bounds of Dymock, on the South side. This gap also needs to be filled with a link. The planning consent in Dymock should be shown on policies Map.	The additional layer was removed from the on line mapping and it is agreed it was not well labelled, it was from the draft plan of 2014 which has been replaced. The other labelling issues referred to will be addressed in the final Policies map and where needed in the text of the AP. Support is noted for the proposed plan published in December 2016. The "gap" at Dymock exists because the line of the canal is now covered by an implemented planning permission which now enables the two sides to be linked. Much of the physical work (creation of a basin) has been completed and details can be seen on the planning application, P1219/12 and on the latest OS map.
APFC190	Mrs Elizabeth Amos	Policy FC AP9 Herefordshire and Gloucestershire Canal	Originally the policies map included previously deleted canal diversions and ancillary layers This has now been toggled off but must be deleted from the map. The combined single route with discontinuity links as now presented by the FoDDC planning authority on the policies map is considered to be generally acceptable as this avoids major deviations from the original canal route as originally proposed by the H&GCT. Differences and labelling which exist between the Further Changes Policies Map and the Further changes document must be addressing. This can be resolved by simply changing the map key legend references indicated in figure 1 to read H & G Canal Safeguarding – original route and H&G Canal Safeguarding Proposed discontinuity link. Both the further Changes Policies Map December 2016 and the relevant inset map included in 58 page Allocations Plan Further Changes document show a discontinuity of the protected canal route within the bounds of Dymock, on the South side. This gap also needs to be filled with a link. The planning consent in Dymock should be shown on policies Map.	The additional layer was removed from the on line mapping and it is agreed it was not well labelled, it was from the draft plan of 2014 which has been replaced. The other labelling issues referred to will be addressed in the final Policies map and where needed in the text of the AP. Support is noted for the proposed plan published in December 2016. The "gap" at Dymock exists because the line of the canal is now covered by an implemented planning permission which now enables the two sides to be linked. Much of the physical work (creation of a basin) has been completed and details can be seen on the planning application, P1219/12 and on the latest OS map.
APFC191	Mrs Anne Evans	Policy FC AP9 Herefordshire and Gloucestershire Canal	Originally the policies map included previously deleted canal diversions and ancillary layers This has now been toggled off but must be deleted from the map. The combined single route with discontinuity links as now presented by the FoDDC planning authority on the policies map is considered to be generally acceptable as this avoids major deviations from the original canal route as originally proposed by the H&GCT. Differences and labelling which exist between the Further Changes Policies Map and the Further changes document must be addressing. This can be resolved by simply changing the map key legend references indicated in figure 1 to read H & G Canal Safeguarding – original route and H&G Canal Safeguarding Proposed discontinuity link. Both the further Changes Policies Map December 2016 and the relevant inset map included in 58 page Allocations Plan Further Changes document show a discontinuity of the protected canal route within the bounds of Dymock, on the South side. This gap also needs to be filled with a link. The planning consent in Dymock should be shown on policies Map.	The additional layer was removed from the on line mapping and it is agreed it was not well labelled, it was from the draft plan of 2014 which has been replaced. The other labelling issues referred to will be addressed in the final Policies map and where needed in the text of the AP. Support is noted for the proposed plan published in December 2016. The "gap" at Dymock exists because the line of the canal is now covered by an implemented planning permission which now enables the two sides to be linked. Much of the physical work (creation of a basin) has been completed and details can be seen on the planning application, P1219/12 and on the latest OS map.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC192	Mr Harry J Bowers	Policy FC AP9 Herefordshire and Gloucestershire Canal	Originally the policies map included previously deleted canal diversions and ancillary layers This has now been toggled off but must be deleted from the map. The combined single route with discontinuity links as now presented by the FoDDC planning authority on the policies map is considered to be generally acceptable as this avoids major deviations from the original canal route as originally proposed by the H&GCT. Differences and labelling which exist between the Further Changes Policies Map and the Further changes document must be addressing. This can be resolved by simply changing the map key legend references indicated in figure 1 to read H & G Canal Safeguarding – original route and H&G Canal Safeguarding Proposed discontinuity link. Both the further Changes Policies Map December 2016 and the relevant inset map included in 58 page Allocations Plan Further Changes document show a discontinuity of the protected canal route within the bounds of Dymock, on the South side. This gap also needs to be filled with a link. The planning consent in Dymock should be shown on policies Map.	The additional layer was removed from the on line mapping and it is agreed it was not well labelled, it was from the draft plan of 2014 which has been replaced. The other labelling issues referred to will be addressed in the final Policies map and where needed in the text of the AP. Support is noted for the proposed plan published in December 2016. The "gap" at Dymock exists because the line of the canal is now covered by an implemented planning permission which now enables the two sides to be linked. Much of the physical work (creation of a basin) has been completed and details can be seen on the planning application, P1219/12 and on the latest OS map.
APFC193	Michael and Rosemary Evans, Shorten and Evans	Policy FC AP9 Herefordshire and Gloucestershire Canal	Originally the policies map included previously deleted canal diversions and ancillary layers This has now been toggled off but must be deleted from the map. The combined single route with discontinuity links as now presented by the FoDDC planning authority on the policies map is considered to be generally acceptable as this avoids major deviations from the original canal route as originally proposed by the H&GCT. Differences and labelling which exist between the Further Changes Policies Map and the Further changes document must be addressing. This can be resolved by simply changing the map key legend references indicated in figure 1 to read H & G Canal Safeguarding – original route and H&G Canal Safeguarding Proposed discontinuity link. Both the further Changes Policies Map December 2016 and the relevant inset map included in 58 page Allocations Plan Further Changes document show a discontinuity of the protected canal route within the bounds of Dymock, on the South side. This gap also needs to be filled with a link. The planning consent in Dymock should be shown on policies Map.	The additional layer was removed from the on line mapping and it is agreed it was not well labelled, it was from the draft plan of 2014 which has been replaced. The other labelling issues referred to will be addressed in the final Policies map and where needed in the text of the AP. Support is noted for the proposed plan published in December 2016. The "gap" at Dymock exists because the line of the canal is now covered by an implemented planning permission which now enables the two sides to be linked. Much of the physical work (creation of a basin) has been completed and details can be seen on the planning application, P1219/12 and on the latest OS map.
APFC194	Ben Evans	Policy FC AP9 Herefordshire and Gloucestershire Canal	Originally the policies map included previously deleted canal diversions and ancillary layers This has now been toggled off but must be deleted from the map. The combined single route with discontinuity links as now presented by the FoDDC planning authority on the policies map is considered to be generally acceptable as this avoids major deviations from the original canal route as originally proposed by the H&GCT. Differences and labelling which exist between the Further Changes Policies Map and the Further changes document must be addressing. This can be resolved by simply changing the map key legend references indicated in figure 1 to read H & G Canal Safeguarding – original route and H&G Canal Safeguarding Proposed discontinuity link. Both the further Changes Policies Map December 2016 and the relevant inset map included in 58 page Allocations Plan Further Changes document show a discontinuity of the protected canal route within the bounds of Dymock, on the South side. This gap also needs to be filled with a link. The planning consent in Dymock should be shown on policies Map.	The additional layer was removed from the on line mapping and it is agreed it was not well labelled, it was from the draft plan of 2014 which has been replaced. The other labelling issues referred to will be addressed in the final Policies map and where needed in the text of the AP. Support is noted for the proposed plan published in December 2016. The "gap" at Dymock exists because the line of the canal is now covered by an implemented planning permission which now enables the two sides to be linked. Much of the physical work (creation of a basin) has been completed and details can be seen on the planning application, P1219/12 and on the latest OS map.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC195	Mr & Mrs B Oakley	Policy FC AP9 Herefordshire and Gloucestershire Canal	Originally the policies map included previously deleted canal diversions and ancillary layers This has now been toggled off but must be deleted from the map. The combined single route with discontinuity links as now presented by the FoDDC planning authority on the policies map is considered to be generally acceptable as this avoids major deviations from the original canal route as originally proposed by the H&GCT. Differences and labelling which exist between the Further Changes Policies Map and the Further changes document must be addressing. This can be resolved by simply changing the map key legend references indicated in figure 1 to read H & G Canal Safeguarding – original route and H&G Canal Safeguarding Proposed discontinuity link. Both the further Changes Policies Map December 2016 and the relevant inset map included in 58 page Allocations Plan Further Changes document show a discontinuity of the protected canal route within the bounds of Dymock, on the South side. This gap also needs to be filled with a link. The planning consent in Dymock should be shown on policies Map.	The additional layer was removed from the on line mapping and it is agreed it was not well labelled, it was from the draft plan of 2014 which has been replaced. The other labelling issues referred to will be addressed in the final Policies map and where needed in the text of the AP. Support is noted for the proposed plan published in December 2016. The "gap" at Dymock exists because the line of the canal is now covered by an implemented planning permission which now enables the two sides to be linked. Much of the physical work (creation of a basin) has been completed and details can be seen on the planning application, P1219/12 and on the latest OS map.
APFC196	Mr Kenneth Brooks	Policy FC AP9 Herefordshire and Gloucestershire Canal	Originally the policies map included previously deleted canal diversions and ancillary layers This has now been toggled off but must be deleted from the map. The combined single route with discontinuity links as now presented by the FoDDC planning authority on the policies map is considered to be generally acceptable as this avoids major deviations from the original canal route as originally proposed by the H&GCT. Differences and labelling which exist between the Further Changes Policies Map and the Further changes document must be addressing. This can be resolved by simply changing the map key legend references indicated in figure 1 to read H & G Canal Safeguarding – original route and H&G Canal Safeguarding Proposed discontinuity link. Both the further Changes Policies Map December 2016 and the relevant inset map included in 58 page Allocations Plan Further Changes document show a discontinuity of the protected canal route within the bounds of Dymock, on the South side. This gap also needs to be filled with a link. The planning consent in Dymock should be shown on policies Map.	The additional layer was removed from the on line mapping and it is agreed it was not well labelled, it was from the draft plan of 2014 which has been replaced. The other labelling issues referred to will be addressed in the final Policies map and where needed in the text of the AP. Support is noted for the proposed plan published in December 2016. The "gap" at Dymock exists because the line of the canal is now covered by an implemented planning permission which now enables the two sides to be linked. Much of the physical work (creation of a basin) has been completed and details can be seen on the planning application, P1219/12 and on the latest OS map.
APFC197	Mr R G Savage	Policy FC AP9 Herefordshire and Gloucestershire Canal	Originally the policies map included previously deleted canal diversions and ancillary layers This has now been toggled off but must be deleted from the map. The combined single route with discontinuity links as now presented by the FoDDC planning authority on the policies map is considered to be generally acceptable as this avoids major deviations from the original canal route as originally proposed by the H&GCT. Differences and labelling which exist between the Further Changes Policies Map and the Further changes document must be addressing. This can be resolved by simply changing the map key legend references indicated in figure 1 to read H & G Canal Safeguarding – original route and H&G Canal Safeguarding Proposed discontinuity link. Both the further Changes Policies Map December 2016 and the relevant inset map included in 58 page Allocations Plan Further Changes document show a discontinuity of the protected canal route within the bounds of Dymock, on the South side. This gap also needs to be filled with a link. The planning consent in Dymock should be shown on policies Map.	The additional layer was removed from the on line mapping and it is agreed it was not well labelled, it was from the draft plan of 2014 which has been replaced. The other labelling issues referred to will be addressed in the final Policies map and where needed in the text of the AP. Support is noted for the proposed plan published in December 2016. The "gap" at Dymock exists because the line of the canal is now covered by an implemented planning permission which now enables the two sides to be linked. Much of the physical work (creation of a basin) has been completed and details can be seen on the planning application, P1219/12 and on the latest OS map.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC199	Colonel Robbie Hall	Policy FC AP9 Herefordshire and Gloucestershire Canal	Concerned that the wording of AP9 is open to abuse of the planning regulations and should be caveated to prevent possible conflict of interest. Accepting the original route of the canal is, in several areas, inviable for restoration due to various developments, the Plan seeks to provide for alternative alignments to be agreed between the Canal Trust and landowners for new developments that will incorporate the canal (either restored or a new alignment), wording is as follows: “ the precise areas concerned will be refined, through consultation and agreement between the Canal Trust and affected landowners and occupiers”. This effectively empowers the Canal Trust to negotiate and agree development plans with landowners in two possible contexts: - The landowner wishes to obtain planning consent for a development on or adjacent to the protected route of the canal and the only prospect for doing so successfully is to accede to the demands of the Canal Trust who effectively have power of veto. - The Canal Trust take an opportunity to persuade a landowner to undertake a development that will be profitable for the landowner and be beneficial to the Canal Trust plans. In either context, there is the potential for a conflict of interest on the part of the Canal Trust; they could become more of a property development organisation with potentially considerable benefits, rather than being focussed on canal restoration. A simple caveat to the effect that the Canal Trust is not to enter into any partnership arrangements with landowners and/ or property developers that would allow them to gain in any respect, other than protecting an agreed alignment of the canal. I am also concerned that the AP9 wording exaggerates the competence and capacity of the Canal Trust to deliver either the restoration of significant stretches of canal, or the heritage and tourism benefits that could result. Wording at Para 6 states: “ During the period since the first district wide local plan in 1996, work on the canal has progressed and now there are further stretches in water and other areas where restoration plans are likely to be implemented in the short term.”	The additional layer was removed from the on line mapping and it is agreed it was not well labelled, it was from the draft plan of 2014 which has been replaced. The other labelling issues referred to will be addressed in the final Policies map and where needed in the text of the AP. Support is noted for the proposed plan published in December 2016. The "gap" at Dymock exists because the line of the canal is now covered by an implemented planning permission which now enables the two sides to be linked. Much of the physical work (creation of a basin) has been completed and details can be seen on the planning application, P1219/12 and on the latest OS map.
APFC200	Mr A Knight	Policy FC AP9 Herefordshire and Gloucestershire Canal	Summary 1 Originally the policies map included previously deleted canal diversions and ancillary layers This has now been toggled off but must be deleted from the map. The combined single route with discontinuity links as now presented by the FoDDC planning authority on the policies map is considered to be generally acceptable as this avoids major deviations from the original canal route as originally proposed by the H&GCT. Differences and labelling which exist between the Further Changes Policies Map and the Further changes document must be addressing. This can be resolved by simply changing the map key legend references indicated in figure 1 read H & G Canal Safeguarding – original route and H&G Canal Safeguarding Proposed discontinuity link. Both the further Changes Policies Map December 2016 and the relevant inset map included in 58 page Allocations Plan Further Changes document show a discontinuity of the protected canal route within the bounds of Dymock, on the South side. This gap also needs to be filled with a link.	The additional layer was removed from the on line mapping and it is agreed it was not well labelled, it was from the draft plan of 2014 which has been replaced. The other labelling issues referred to will be addressed in the final Policies map and where needed in the text of the AP. Support is noted for the proposed plan published in December 2016. The "gap" at Dymock exists because the line of the canal is now covered by an implemented planning permission which now enables the two sides to be linked. Much of the physical work (creation of a basin) has been completed and details can be seen on the planning application, P1219/12 and on the latest OS map.
APFC267	Mr Paul Dando	Policy FC AP9 Herefordshire and Gloucestershire Canal	Originally the policies map included previously deleted canal diversions and ancillary layers This has now been toggled off but must be deleted from the map. The combined single route with discontinuity links as now presented by the FoDDC planning authority on the policies map is considered to be generally acceptable as this avoids major deviations from the original canal route as originally proposed by the H&GCT. Differences and labelling which exist between the Further Changes Policies Map and the Further changes document must be addressing. This can be resolved by simply changing the map key legend references indicated in figure 1 read H & G Canal Safeguarding – original route and H&G Canal Safeguarding Proposed discontinuity link. Both the further Changes Policies Map December 2016 and the relevant inset map included in 58 page Allocations Plan Further Changes document show a discontinuity of the protected canal route within the bounds of Dymock, on the South side. This gap also needs to be filled with a link. The planning consent in Dymock should be shown on policies Map.	The Council are seeking to protect the historic route of the canal and where this in not possible, land which could enable the canal to be established in order to provide a continuous line. Much of this would require planning permission for the work and as a separate matter the consent of the landowner. The route is protected from development that would prevent the canal from being constructed, it does not safeguard land for the canal. The policy allows for diversions to be negotiated and these are expected along the route. The work to the canal would require various ecological assessments and be subject to the scrutiny that planning applications attract. It may require HRA and the policy which now emphasises the role as green infrastructure and the importance of biodiversity benefits will need to be satisfied.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC273	Mr Andrew Savage	Policy FC AP9 Herefordshire and Gloucestershire Canal	Originally the policies map included previously deleted canal diversions and ancillary layers This has now been toggled off but must be deleted from the map. The combined single route with discontinuity links as now presented by the FoDDC planning authority on the policies map is considered to be generally acceptable as this avoids major deviations from the original canal route as originally proposed by the H&GCT. Differences and labelling which exist between the Further Changes Policies Map and the Further changes document must be addressing. This can be resolved by simply changing the map key legend references indicated in figure 1 to read H & G Canal Safeguarding – original route and H&G Canal Safeguarding Proposed discontinuity link. Both the further Changes Policies Map December 2016 and the relevant inset map included in 58 page Allocations Plan Further Changes document show a discontinuity of the protected canal route within the bounds of Dymock, on the South side. This gap also needs to be filled with a link. The planning consent in Dymock should be shown on policies Map.	The additional layer was removed from the on line mapping and it is agreed it was not well labelled, it was from the draft plan of 2014 which has been replaced. The other labelling issues referred to will be addressed in the final Policies map and where needed in the text of the AP. Support is noted for the proposed plan published in December 2016. The "gap" at Dymock exists because the line of the canal is now covered by an implemented planning permission which now enables the two sides to be linked. Much of the physical work (creation of a basin) has been completed and details can be seen on the planning application, P1219/12 and on the latest OS map.
APFC285	Mrs S Smith	Policy FC AP9 Herefordshire and Gloucestershire Canal	Support Policy AP9. but we query how the policy will become reality without proposed development to enable any restoration. My client's support is for the canal is caveated only if there is a genuine and realistic opportunity to finance and restore the canal. If finance or enabling development agreements are not forthcoming, my client objects to the route of the canal.. We also to query why no allocations are proposed for Dymock. My clients support this diversion route across their land if this is also supported by the wider community, but there is an opportunity being missed to fund the restoration of the canal. This opportunity is to potentially allocate land for residential development which is specifically designed to enable the redevelopment of the canal together with a reasonable return to my clients, given the land is immediately adjacent to the settlement and therefore has a significant potential land value. There is an opportunity to promote a sustainable residential allocation on my client's land to provide much needed homes. Also the opportunity to safeguard the canal route, and further to provide a mechanism which could enable some of the canal restoration, by providing finance for the Canal Trust. My client's land offers a sensible, sustainable solution to provide much needed housing and the restoration of the canal is an additional benefit.	Comment noted, This representation relates to both the policy AP9 and is also made in favour of an "omission" site. It is noted that this was considered previously (073,074, Bennion). The Council's opinion remains that the site is not suitable for additional housing which would be not accord with the scale of new development considered appropriate in the village.
APFC290	Mr M Bennion	Policy FC AP9 Herefordshire and Gloucestershire Canal	I write to promote residential development on land opposite Beauchamp Arms. We note no allocations have been made in Dymock and we consider there is an opportunity to provide a suitably located site within a rural settlement. The representation relates Policy AP9. We are pleased to see there is no longer any requirement to provide a canal basin on my client's land. However the Council is missing an opportunity to link the existing Winding Pool to the existing footpath network which provides access to the Church, the Public House and Parish Hall. There is therefore an opportunity to promote an allocation on my client's land in advance of less suitable options being brought forward. We consider there is an opportunity being missed by not allocating any housing in Dymock, and my client's land offers a sensible location immediately adjacent to the public house, the village church and village hall. In addition my client is willing to offer land for the use of locals for a car park adjacent to the facilities which require parking the most. Therefore we do not consider the emerging allocations plan is Sound because: The changes are not Positively Prepared when considering the village's size and facilities available. The lack of any allocation within Dymock is not Justified as it seems at odds with paragraph 47 of the NPPF and with the Inspector's inference that rural areas beyond the main towns should be looked at within the District's growth strategy.	Dymock has seen some recent development off Western Way and is considered to be of a scale where relatively small scale development should be encouraged. The site proposed is large and would potentially harm the Conservation Area. It has been considered previously within the AP process and is not supported by the Council.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC291	Steve Hawkes	Policy FC AP9 Herefordshire and Gloucestershire Canal	Originally the policies map included previously deleted canal diversions and ancillary layers This has now been toggled off but must be deleted from the map. The combined single route with discontinuity links as now presented by the FoDDC planning authority on the policies map is considered to be generally acceptable as this avoids major deviations from the original canal route as originally proposed by the H&GCT. Differences and labelling which exist between the Further Changes Policies Map and the Further changes document must be addressing. This can be resolved by simply changing the map key legend references indicated in figure 1 read H & G Canal Safeguarding – original route and H&G Canal Safeguarding Proposed discontinuity link. Both the further Changes Policies Map December 2016 and the relevant inset map included in 58 page Allocations Plan Further Changes document show a discontinuity of the protected canal route within the bounds of Dymock, on the South side. This gap also needs to be filled with a link. The planning consent in Dymock should be shown on policies Map	The additional layer was removed from the on line mapping and it is agreed it was not well labelled, it was from the draft plan of 2014 which has been replaced. The other labelling issues referred to will be addressed in the final Policies Map and where needed in the text of the AP. Support is noted for the proposed plan published in December 2016. The "gap" at Dymock exists because the line of the canal is now covered by an implemented planning permission which now enables the two sides to be linked. Much of the physical work (creation of a basin) has been completed and details can be seen on the planning application, P1219/12 and on the latest OS map.
APFC304	Mr Paul Dando	Policy FC AP9 Herefordshire and Gloucestershire Canal	One further point we would like to make concerning point 2 in our earlier e-mail where we cast doubt on the viability of the project. The Canal Trust and before them, the Canal Society, have been running for 34 years. In that time, we understand they have 3 miles in ownership and 3 miles in water. These have been the easy miles, from here on it will become much more difficult to make progress. However, assuming they continue at the same rate, which we doubt, we estimate it will take another 385 years to complete their objective of opening all 34 miles of the canal. We know the District Council has to take the long term view but is the Council seriously prepared to blight all the properties along the route for this amount of time in order to satisfy the leisure activities of a relatively small and some would say, elitist section of our community, some of whom may appear to have commercial gain rather than altruistic objectives in mind.	The Council support the general principle of canal re instatement and the proposed further changes are proposed in response to the Inspector's concerns that the policy as submitted in 2015 required changes to achieve this. Whilst the representation is noted, the AP nonetheless seeks to protect land from other development that would prevent the canal from being restored/ re instated or a diversion from being created. It is agreed that the project may take many years but without such protection it could become impossible. The protection does not take away the need for planning permission nor does it prevent appropriate alternative routes from being agreed. The consent of landowners is required to enter land and for works to it and is entirely separate from any planning allocation.
APFC305	Mr John Teire	Policy FC AP9 Herefordshire and Gloucestershire Canal	The responses in the survey questionnaire and the comments from the previous meetings indicate that granting the granting of a protected route for the rebuilding of a canal between Hereford and Gloucester should be dependant upon the H&GCT having initial agreement of the land and property owners along the proposed route for such a rebuilt canal to cross their property and land. It should also be dependent upon the H&GCT having a detailed plan and a realistic timescale for the completion of such a rebuilt canal which have been presented to and received agreement from the land and property owners along the proposed route. Without these initial agreements the canal is unlikely to be built in a foreseeable future, if at all. and in the meantime there would be unnecessary restrictions on the owners use of their land and property and it's value could be adversely affected. Only when such agreements with the land and property owners along the proposed 34 mile stretch, on access, plans, timescales, and feasibility are in place should a protected route then be considered.	The Council support the long term re instatement of the canal and protect land from other development along its route. It is proposed in the further changes to provide a continuously protected route so that the canal could be re established. It is not a route protected for the canal but land protected from other development. The physical work to that canal would in most cases require planning permission and entry onto land would need the owner's permission. If the canal is to be reinstated however it needs a route to be safeguarded and this is the purpose of the plan. Without a safeguarded route protected from other development, albeit one that is able to be changed through negotiation, there is a risk that the canal would not be able to be established as a continuous feature. The survey associated with this representation is noted and will be taken into account more generally as well as in connection with the AP but it is noted that the current consultation related to the proposed further changes designed to address the Inspector's concern that the canal route and policy needed to be changed in order to be effective at enabling the (eventual) re establishment of the canal.
APFC128	Mrs Patricia Brooks	Paragraph 7	HGCT stated at a meeting held in Newent Library that an environmental study had been undertaken. However this was about fifteen years ago and since then we have had climate changes including periods of drought like conditions and also flooding. I feel it is unsafe to embark or even plan to reinstate the HGC without a full current environmental study as to the likely effects on the surrounding areas. Prepare a full study instead of making plans without the necessary knowledge.	The policy enables the canal's re instatement by protecting land from other development. New work would all require various permissions and planning permission would be needed for much of it. The nature of the work would be such that additional environmental studies, possibly including HRA would be required. The effects on the surrounding area would be one consideration. The policy AP9 makes this clear.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC130	Mr Paul Gurney	Paragraph 7	The inclusion into the AP of the HGCT and the historic route of the canal is unsound and unjustified, as the scheme as a whole is at this time and for the foreseeable future totally undeliverable. Some of the reasons ( but not all ) Lack of support from the landowners , who's property and businesses would be affected by the restoration, whom without their total support as a whole the canal will never be restored. As a consequence of the above, the scheme will not be deliverable in the time frame of this plan. For the above reasons alone the Canal Trusts stated aim of full restoration of the whole 34 miles of canal will not be deliverable. If this pie in the sky venture is judged on its realistic chances of completion it should no longer receive the Council support.	The Council along with other LAs on the route of the canal are committed to the principle of supporting the restoration. The policy AP9 is considered to provide appropriate safeguards and seeks to protect land from other development rather than allocating land for the canal. If the land is not protected then the canal would be much less likely to be able to be provided. Although it is recognised that the complete project is likely to take many years, significant stretches of canal have been restored.
APFC032	Ms Nicole Penfold, Gladman Developments	Policy FC 1 Land off Sneyd Wood Road, Cinderford	The site is located on grade 2 agricultural land where the council are resisting proposals on such land elsewhere in the district. This site has not demonstrated that it can be developed without impact on the Wye Valley and Forest of Dean Bat Special Area of Conservation. The site is also within the zone of influence of a site of Special Scientific Interest .Existing mature and hedgerow represents a constraint to the development of the site and should be retained and would comprise significantly the number of dwellings achievable, as too does the shape of the site and proximity of adjoining existing dwellings . The SEA superficially dismisses any potential effect on the findings of the SEA by the additional allocation.	The site adjoins land that was the subject of archaeological investigation when the new access road was constructed and it is considered that the development of this site, should it be allocated, would need to be subject to similar investigations. The policy should be amended to reflect this. The site is however considered deliverable and is a discrete parcel of land well related to the existing development. The site proposed by the LPA is considered developable having access and the land owner who supports its development. It is considered a more straight forward development than the build out of the larger scheme to "complete" the estate. This is also supported by the AP but is not assumed to contribute to the five year supply, although in the Council's opinion it may come forward in the short term. The land quality is acknowledged and is a consideration, however many of the allocated sites, including some being promoted by Gladman are best and most versatile land and that fact has to be balanced against the need for land and other constraints in other locations, for example the forest fringe. It is considered that subject to appropriate detailed design, layout, construction and mitigation; the requirements for which are embedded within the plan the site could be developed without adverse effects on integrity of the European nature conservation designations. Natural England raises no objection to the further changes or the HRA (16th February 2017).
APFC242	Mr Robin Johnson	Policy FC 1 Land off Sneyd Wood Road, Cinderford	1. Concern over the delivery of sites identified in plan 2. Lack of affordable housing 3. Lack of self build plots Support the allocation of 18 houses on Policy FC.1 but the site should be extended to 40 houses with adjoining land. The land is in ownership of developer and can be developed in the next 5 years.	Comment noted. The site as allocated is within a clear boundary, west of the access road and southwest of a field boundary. The additional land whether to the northeast or across the access road is considered more prominent and less well related to the existing developed area. The present farm has permission (prior approval) for conversions and these are accepted as the built footprint of the complex will not change.
APFC307	Mrs S Fellows, Land Research & Planning Associates Ltd.	Policy FC 1 Land off Sneyd Wood Road, Cinderford	Ecology issues.	The Council consider that the site is acceptable and can be developed. It is acknowledged that it is close to several protected sites including Bat SACs but this applies to other sites which have been developed. The proposed allocation has been tested by SA/ HRA. This representation draws attention to some of the issues that need to be considered in identifying sites for development. They are all agreed as subject areas that are relevant but equally the proposed allocations are all considered to be able to satisfactorily address them.
APFC133	Mr Peter Tufnell, Tufnell Town & Country Planning	Paragraph 9	The site presented by the LPA is understood to be either under the control of, or otherwise associated with, the CS site at St Whites that has failed to be completed and has been accepted as a site that will not deliver. Whilst the allocation of the additional site is supported, its 5 year deliverability is questionable. It is logical to develop both sides of this road and would wish to remind the Inspector of the submission made by AGS on behalf of the Whatmore Family, and further developed at the AP Hearing Sessions.	The larger site referred to has been excluded from the five year delivery estimate, it remains land with a valid planning consent for housing. In respect of this land as in the Further Changes the representation supports its development but seeks an additional allocation. The addition sought includes the farm and associated buildings which have consent under a prior notification for conversion. The impact of this is likely to be materially different from new building and is considered acceptable. The development should retain the character of this more prominent area of land and an extension of the proposed further change allocation is not considered appropriate.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC33	Ms Nicole Penfold, Gladman Developments	Policy FC 2 Former St Whites School, Cinderford	This site is within the urban area and should be considered a windfall. The proposal in part represents a conversion and adaptation of an existing building and some degree of feasibility/viability would be essential to demonstrate deliverability. The site has a highly constrained context with a restricted site area and shape. Access and traffic implications at this busy non standard junction need to be addressed. The building is at least a non designated heritage asset and could be listable. The Site is within the setting of St Johns Church. No assessments has been made of the implications of the development on the asset in line with the Framework. There is no feasibility which justification the number of dwellings expected which is critical given the complex nature of the scheme. The SEA superficially dismisses any potential effect on the findings of the SEA by the additional allocation.	Irrespective of whether this site is a MM required by the AP it is considered preferable to allocate the land to enable the AP to provide policy guidance as to how it should be developed. It is however proposed to be allocated and is considered able to be developed within five years. The site is split into two, one part being suitable for redevelopment the other for conversion. Both areas are the subject of current pre application discussions and although the objections from Gladman identifies issues that need to be addressed they are not considered to be barriers to development. The extent to which the development would affect the setting of the church is questioned- the area is built up and the main building is to be retained as a conversion. It is considered that it could be regarded as a non designated heritage asset.
APFC034	Ms Nicole Penfold, Gladman Developments	Policy FC 3 Former Baths Site (Ruspidge)	The site has been cleared for a number of years and no planning allocation has come forward. The site is not well related to existing village amenities. It is a former pit bath which brings potential for associated risk. The potential for flood risk needs to be assessed, consultation with the EA is required. Local ecological interest needs to be assessed before allocation. The requirement for further consultation with the Coal Authority and the need for a Coal Mining Risk Assessment means there is significant uncertainty regarding the appropriateness of the site and whether it is deliverable. The site is adjacent to woodland, the policy states that development would need to incorporate/protect as much as possible and to respect the forest edge location. The proposed 24 dwellings would be out of scale /context within the locality. There is no market in this location for apartments or high density development The SEA superficially dismisses any potential effect on the findings of the SEA by the additional allocation.	The site is an previously developed and lies within a settlement boundary. Although part lies within the Coal Authority's High Risk area, the affected areas are on the edge of the site and are believed to be constraints not matters that will prevent the development of the site. Similarly the need to consider ecology is not unusual, whilst flood risk appears to apply to the nearby watercourse and does not affect the site directly. The site is understood to be available. In terms of density, the site is considered able to accommodate a range of smaller units.
APFC292	Mr Carl Cording, Environment Agency	Policy FC 3 Former Baths Site (Ruspidge)	We have not undertaken an exhaustive review of the Flood Risk Keynote Paper but have cause to question the robustness of the assessment undertaken to date. The assessment table on page 10 fails to take account of fluvial flood risk. This means the fluvial flood risk to 10 new sites has not been carried at, or at least not documented in the supporting evidence base to the ADPD.A targeted review of the Flood Risk Keynote Paper has identified the following omissions that compound our concerns with regards the assessment of flood risk carried out:We recommend that the Flood Risk Keynote paper is revisited to address the concerns re the sites above, , as it would seem that a thorough assessment of Flood Risks to and from allocated sites has not been undertaken to date.We recommend that you check whether any of the additional allocations proposed are at risk of river or tidal flooding (i.e. Flood Zones 2 or 3') Policy FC3- Former Baths Site. - The proximity to Cinderford Brook is a constraint that should be fully acknowledged. As should the nearby Flood Zones 2 and 3, particularly in consideration of climate change allowances. - In the absence of further investigation the developable area available in Flood Zone 1 is unknown.	The sites have been considered against known information regarding flood risk and are considered able to be developed. The assessment along with comments from the Council's advisors (Drainage Engineer) suggest that the site is able to be developed and is clear of flood risk from the watercourse. Less than 10% of the site is within an area that may be at risk from surface water flooding but the site is higher than the land around the watercourse and the drainage engineer did not identify evidence of flows through the site. see <a href="http://www.fdean.gov.uk/media/4387/land-drainage-comments-for-potential-allocations.pdf">http://www.fdean.gov.uk/media/4387/land-drainage-comments-for-potential-allocations.pdf</a> for additional material.
APFC308	Mrs S Fellows, Land Research & Planning Associates Ltd.	Policy FC 3 Former Baths Site (Ruspidge)	Site where there was Coal Mining and so High Risk issues for development.	This representation draws attention to some of the issues that need to be considered in identifying sites for development. They are all agreed as subject areas that are relevant but equally the proposed allocations are all considered to be able to satisfactorily address them. Some of the allocated sites are on land where a mining risk assessment will be needed. This is normal and although there may be development constraints as a result, the sites concerned are very likely to remain suitable for the development proposed.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC098	Mr Antony Waddington	Section 6. Lydney	Object to the inclusion of what is being referred to as land off Court Road/Augustus Way. The recent comments by Gavin Barwell , in his written statement to Parliament , refHCWS 346 , seems to bring the present system and numbers into question . Land allocated between the then new Lydney Bypass and the old A48 through Lydney , the northern end is still available , the rest giving 1500 plus already , but not built out yet . There is also brownfield land available on the eastern side of Lydney Bypass . This land was included at a special council meeting called with only two days notice to specifically include this site , for which I cannot find any minutes on the Council website.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.
APFC006	Mrs E and Mr M Jenkins	Policy FC 4 Augustus Way, Lydney	The site is not supported by the NDP, and should remain as recreation space. This is an elevated site, access from Court Road would cause congestion. Further housing would place a strain on services and infrastructure. With building work started at Highfield Hill Lydney is playing its part in providing housing.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC016	Mr Barry Klein	Policy FC 4 Augustus Way, Lydney	The Lydney NDP excludes this land for future development .There is sufficient land adjacent to the Lydney by pass for several thousand new houses. . The only access to the site is from Court Road which is already heavily used, additional traffic would be a hazard to school children. It would spoil the landscape of this part of Lydney Development on land at Allaston would be a step to far for current infrastructure. Highway report inaccurate as access from Augustus Way is not currently available. The Lydney NDP has been ignored.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publically accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.
APFC017	Ms Susan Klein	Policy FC 4 Augustus Way, Lydney	The Lydney NDP excludes this land for future development .There is sufficient land adjacent to the Lydney by pass for several thousand new houses. The only access to the site is from Court Road which is already heavily used, additional traffic would be a hazard to school children. It would spoil the landscape of this part of Lydney Development on land at Allaston would be a step to far for current infrastructure. Highway report inaccurate as access from Augustus way is not currently available. The Lydney NDP has been ignored.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC021	Ms Maxine Ellis	Policy FC 4 Augustus Way, Lydney	This development will spoil an area which is classed as existing within an area of natural beauty and bring more traffic and noise into a residential area. There is already excess traffic at school run times and this would increase the problem ten fold. This threatens to destroy the peace of the area.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced. The site is considered to have reasonable access to the facilities in Lydney.
APFC022	Mr K French	Policy FC 4 Augustus Way, Lydney	It is most important to keep these fields as open areas, as a recreational place where children and adults from the surrounding estates can use. There are magnificent views off the Severn Estuary and beyond which will be lost forever. A walk along the road from the old farmhouse to Highfield Lane provides panoramic views and the peaceful and tranquil setting of the primary school and the animals grazing the meadows. The children at the school can enjoy a countryside feeling this should not be replaced by more houses cars roads and associated fumes. The children are already exposed to large amounts of pollutants that are blown up river on the breeze. There are large areas of land available for development East of Lydney. What happened to the NDP are local people being ignored.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC026	Miss Mary Sinclair	Policy FC 4 Augustus Way, Lydney	The site is outside the settlement boundary of Lydney Town and is not recognised in the Lydney Neighbourhood Development Plan (Oct 15) democratically voted for and accepted. It is disingenuous to refer to it as Court Road / Augustus Way as due to a strip of land owned by McAlpine, it is only possible to access the site via Court Road. This would route all traffic via Primrose Hill/Albert Street, a recognised location for traffic issues in Lydney (NDP pg 31)	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.
APFC027	Ms Meg Humphries	Policy FC 4 Augustus Way, Lydney	Development would be outside settlement boundary. 2. Goes against focus and nature of development as put forward by NDP based on extensive public consultation of Lydney residents, and voted into being by those residents. It is an official planning document and should not be ignored. 3. Also, allocation description isn't accurate as there can be no immediate access from Augustus Way due to land ownership issues, with no certainty of resolution. Therefore, the impact on Court Road would be significant. It's not a road set up for such heavy traffic, owing to numerous parked cars causing congestion, as can be seen every time school starts and finishes.	Comment noted. The AP process includes a comprehensive review of the settlement boundary which is in this instance proposed to include the additional allocation of about 120 homes at Allaston. The NDP was prepared at a time when the future needs of the district in terms of additional housing had not been fully established and as a consequence does not now reflect the FoDDC's proposed plan and the current position of the AP. The policy seeks access from Augustus Way and this is currently understood to be possible although it is not the solution shown in the current planning application for the remitted appeal.
APFC028	Freda and Bruce Dickinson	Policy FC 4 Augustus Way, Lydney	This development is outside the DSB as shown on your plan. Lydney residents voted to adopt the NDP in which Allaston is outside any development area. Primrose Hill, Allaston Road and Driffield Road are congested and dangerous and can not take any more traffic. Lydney has too much housing planned on the east side. Hunter page are seeking to increase the 110 to 166. There are no plans for schools, doctors shops or community areas in Lydney. Allaston is the only remaining green area in Lydney offering unrivalled views accessed by public footpaths.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC035	Ms Nicole Penfold, Gladman Developments	Policy FC 4 Augustus Way, Lydney	The text refers to the fact that the development will only be permitted where it can be demonstrated that it does not have an adverse effect on the Wye Valley /Forest of Dean Bat SAC, River Severn SAC,SAP and Ramsar sites. These issues should be looked at thoroughly to determine whether the site is capable of delivering development. There are potential landscape impacts, specifically in relation to views to and from the River Severn. It is predominantly best and most fertile agricultural land . The SEA superficially dismisses any potential effect on the findings of the SEA by the additional allocation.	It is considered that subject to appropriate detailed design, layout, construction and mitigation; the requirements for which are embedded within the plan, the site could be developed without adverse effects on integrity of the European nature conservation designations. Natural England raises no objection to the further changes or the HRA (16th February 2017).The draft policy makes clear the way in which the site is intended to be developed. The issue of land quality is common to many greenfield allocations in the area and is also common to alternative sites proposed by objectors including Gladman. The proposal to allocate this land is part of a balanced decision making process which took land quality into account.
APFC058	Mr Derek Morrison	Policy FC 4 Augustus Way, Lydney	Object to the site being included in the new Allocation Plan. At this time this site is with the Secretary of State to make the final decision on if to permit development RefAPPP1615/A/14/2218921. S o how can this site be considered for inclusion into the new development plan at this time? Lydney has a new NDP that doesn't include this site. The site is outside of the development boundary and not wanted by the people of Lydney. Lydney has all the land required for development next to the bypass with up to 2000 houses planned and building now underway. This site is the last open space to the north of Lydney with many footpaths used daily by local people. This site should not be included into the new allocation and is not wanted by the residents of Lydney. Also if this is added now to the Allocations plan will this now make all NDPs useless documents.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.
APFC059	Mrs Stella Imm	Policy FC 4 Augustus Way, Lydney	NDP - Electorate voted to accept this as the land in question was classified as outside the boundary for development Infrastructure - all access roads from proposed site totally unsuitable court road which leads onto Primrose Hill and Allaston Road are already heavily used and difficult to negotiate at certain times of the day and especially weekends There are potential safety hazards generated by the very significant increase in vehicular traffic on a network of roads which have become rat runs and by the level of on street parking on Allaston road. There is consistent conflict between vehicular and pedestrian traffic. Development East side of Lydney - Building has commenced off Highfield Hill which ultimately will be a site for allegedly 2000 houses. this is where all the new development should be as the access sites will be Highfield Hill and the bypass. The roads into Gloucester and Chepstow are grid locked at certain times of day. The land in question is one of the last pieces of land left untouched by houses. Everything else is being built on or plans are in the pipeline.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC060	GHA Lewis	Policy FC 4 Augustus Way, Lydney	Object to the proposed Allaston development. Your council and Lydney Town council ruled against it but refused to support your decision on appeal. Well meaning members of the community defended the appeal, at considerable cost to themselves and won. A local referendum confirmed that this development was not justified but this appears to carry no weight whatsoever. The Highfield Hill development currently underway will stretch Lydney's infrastructure close to breaking point. This will be greatly increased when a further 240 cars try to enter central Lydney should the Allaston development proceed. Such a development will increase the danger of serious accidents. Consideration should be given to medical care, schools, flooding and not least landscaping. Highfield Lane gets flooded now. It will impact Augusta Way and Juno Drive.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.
APFC061	Mrs Jennifer Imm	Policy FC 4 Augustus Way, Lydney	Object to policy 4 Augustus way Lydney. The only traffic access to this site is the proposed via Court Rd which is also the main access to the local Primrose Hill school. the allocations is not accurate as it says Court Road, Augustus Way at present a developer cannot come out of Augustus Way due to a strip of land belonging to McAlpine. Court Road takes all the volume of traffic for the surrounding area and is at times totally impassable with quite a few near misses being reported. A toddler playground is right on the corner of the main access and it is a number of cul-de-sac roads leading off so the volume of traffic would be totally unbearable for the residents of these houses that have already got cars parked on either side of the roads sometimes making walking on the way to school very dangerous. The most direct route from this area into Lydney town medical facilities, bus and railway stations etc is through Albert Street which is a single traffic road. At times this road can be blocked with traffic trying to access the main road . A democratic vote by the people of Lydney on the neighbourhood plan to improve develop and protect our boundaries, open spaces has been completely ignored if this development is allowed. I am sure there are a number of environmental issues that need to be addressed as this site Development of the east side of Lydney is be beyond what is needed for the town and one step too far for the infrastructure. This area is outside of the Forest of Dean Core Strategy planning Development and Lydney NDP.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC062	Mr Anthony Imm	Policy FC 4 Augustus Way, Lydney	Object to policy 4 Augustus way Lydney. The only traffic access to this site is the proposed via Court Rd which is also the main access to the local Primrose Hill school. the allocations is not accurate as it says Court Road, Augustus Way at present a developer cannot come out of Augustus Way due to a strip of land belonging to McAlpine. Court Road takes all the volume of traffic for the surrounding area and is at times totally impassable with quite a few near misses being reported. A toddler playground is right on the corner of the main access and it is a number of cul-de-sac roads leading off so the volume of traffic would be totally unbearable for the residents of these houses that have already got cars parked on either side of the roads sometimes making walking on the way to school very dangerous. The most direct route from this area into Lydney town medical facilities, bus and railway stations etc is through Albert Street which is a single traffic road. At times this road can be blocked with traffic trying to access the main road . A democratic vote by the people of Lydney on the neighbourhood plan to improve develop and protect our boundaries, open spaces has been completely ignored if this development is allowed. I am sure there are a number of environmental issues that need to be addressed as this site Development of the east side of Lydney is be beyond what is needed for the town and one step too far for the infrastructure. This area is outside of the Forest of Dean Core Strategy planning Development and Lydney NDP.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.
APFC065	R and Y Hook	Policy FC 4 Augustus Way, Lydney	We strongly object to this development The infrastructure is not adequate and the traffic would not cope. An access cannot be created off Augusta way due to a strip of land belonging to McAlpine. A negotiation would have to take place first which may take years. If all vehicles came off Court Road then the Highway report is invalid. We are fully aware the Doctors surgery, hospital schools etc will be affected more heavily as it is a big problem now.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced. Provision can be made for contributions to services if they are needed for the development proposed.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC066	Mr Bryn Richards	Policy FC 4 Augustus Way, Lydney	Total unsuitability of the site for such a large development, inadequate vehicle access, no public transport, lack of infrastructure. There is only one vehicle access for this development, and that is Court Road, If all vehicles can only exit via court Road then the existing Highway Report is invalid. The site outside the scope of the NDP.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.
APFC067	Nigel and Shirley Rosser	Policy FC 4 Augustus Way, Lydney	While I prefer to see green space around the town being preserved, my issue with this development is access to the proposed housing. Apparently this development has been renamed Court Road/Augustus Way and as there is no access through Augustus Way all traffic will use Court Road. Someone needs to sort the parking issues out now, as they stand, all the way down from Allaston into Lydney. There are vehicles parked all the way down this road at present and in several places it's a wonder there has not been head-on collisions before now. (Look at Springfield Road, just up from the junction with Springmeadow). Highways need to assess the situation now before perhaps 240 plus new vehicles are using it. Visit in the evening when all residents on the main road have parked their cars up for the night on the road or when the church on Primrose Hill is being used. It's a nightmare to get through. Get the access roads sorted out before permission is given for this development to go ahead please!!!!	The AP proposal does require access via Augustus way although that is not the same as the current planning application. It is accepted that there will be additional traffic but there will also need to be any improvements that are necessary to accommodate it. The site as proposed in the AP is considered acceptable.
APFC068	Mr G V Hastings	Policy FC 4 Augustus Way, Lydney	The development is unsuitable and unneeded and will ruin the landscape. The people have voted and been ignored now is the time to support us.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC069	S Haywood	Policy FC 4 Augustus Way, Lydney	Remove the site the people of Lydney did not vote for it. There is no access to Augustus Way, the developer does not own the land, Is the Highway report still valid with only the Court Road access.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.
APFC074	Mrs A D Morrison	Policy FC 4 Augustus Way, Lydney	I object to the proposed new allocation plan. Lydney Council have spent a lot of taxpayers money on the new adopted neighbourhood plan. How can this just be ignored by the Forest of Dean Council?. My main objection is the inclusion of the Allaston site which is still subject to an appeal ,and the Secretary of State will make the final decision on this appeal. I think that all N.D.Ps. should be put on hold now until the outcome of this, as to save other councils wasting anymore taxpayers money.	The site subject to appeal is larger than the proposed allocation and has a different proposed access. The Council object to this on landscape grounds. The proposed site is however an addition to that shown in the NDP and arises primarily because of the need to identify additional land over that first included in the AP.
APFC088	Mr K A Bell	Policy FC 4 Augustus Way, Lydney	This planned development directly clashes with Lydney (NDP Lydney's NDP was put to a referendum of local people and approved by the majority of voters. Work is already underway on the housing development off Highfield Road I feel that allowing development of the open space at Allaston fields, which outside the Settlement Boundary of the NDP , would be a step too far for the infrastructure, environment and landscape of this beautiful area. I object to the proposed development because of the huge impact it will have on the roads. The allocation is inaccurate as it suggests that traffic will use both Augustus Way and Court Road to access the proposed development. I understand that there is a strip of land adjacent to the Augustus Way which belongs to another party (McAlpine ?). If this is the case then the Traffic Report cannot be valid . Were the green light given to build houses on this particular parcel of land, it would be the thin end of the wedge. It would not be long before adjoining open spaces towards Windsor Drive / Allaston Road / Driffield Road, , would be the subject of further applications for more houses . This particular open space is the last boundary to the north of Lydney, separating it from Yorkley. Developing this area would cause irreparable damage and harm to the landscape, character and appeal of the area. It would inevitably lead to the total loss of this highly respected local landscape.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC089	Mr Kevin Morgan	Policy FC 4 Augustus Way, Lydney	I wish to object to the plan to construct 200 dwellings in the Court Road/Augustus Way development (formerly Allaston Development). This site would take away the importance and agreed development of the east side of Lydney. It is also beyond what is needed for the town and there is insufficient infrastructure. There would be a huge increase in the already large amount of traffic on Lancaster Drive.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.
APFC090	Angela Morgan	Policy FC 4 Augustus Way, Lydney	I wish to object to the plan to construct 200 dwellings in the Court Road/Augustus Way development (formerly Allaston Development). This site would take away the importance and agreed development of the east side of Lydney. It is also beyond what is needed for the town and there is insufficient infrastructure. There would be a huge increase in the already large amount of traffic on Lancaster Drive.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC091	Mr Keith Walker	Policy FC 4 Augustus Way, Lydney	Any decision to include land for proposed housing development that is not listed in the Neighbourhood Development plan (such as the proposed court road/ Augustus Way development) is totally unacceptable. Lydney has more than sufficient land already allocated for development as detailed in the Lydney Neighbourhood Development plan. Development of the Court Road/Augustus Way site will lead to increased traffic on Allaston and Primrose Hill roads. These roads are subject to many cars parked on the road, leading to difficulty / potential danger for road traffic travelling to / from Yorkley/ Lydney. The proposed development will add significant traffic to these already difficult to traverse roads. The proposed development will extend housing to the hillsides of the north of Lydney. and considerably impact the landscape there will also be a loss of amenity as the land is used by many local people for recreation.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.
APFC094	Victor Norris	Policy FC 4 Augustus Way, Lydney	I object to the site Land off land off Driftfield road , Allaston road Court road, being renamed Land off Court road and Augustus way, and being added to the new allocation plan. As you must know this site is going to have a final decision by The Secretary of State. On the existing planning application. Lydney has a new N.D.P. which was voted for by a large majority this site was outside the allocation boundary and should not be added as it is totally unsuitable and was refused planning permission by the Forest Of Dean Council. Lydney has planning permission for up to 1,500 new houses , with the first of 750 now commenced. these are all planned for an area with good road access. The Allaston site has very poor access and is completely unsuitable for development.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC095	Janice Clayden	Policy FC 4 Augustus Way, Lydney	I am writing to object to the proposed Allaston Development. Firstly it goes against the wishes of the people of Lydney who expressed their views in a vote on the Lydney NDP, so why ask people to vote only for their wishes to be ignored? Secondly it would appear that the highway report would be invalid as the vehicles would be coming out only in Court Road as there is no access through Augusta Way. In my opinion, it would appear that there are no grounds for altering the decision made by the previous Secretary of State and the refusal should stand.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.
APFC096	David Tinsley	Policy FC 4 Augustus Way, Lydney	I object to the application by Hunter Page to develop the open space at Allston fields. This development is in direct conflict with Lydney's(NDP) Surely the whole point of an approved NDP is to clearly define the areas which are suitable for development for new housing at the same time affording protection to our boundaries and open spaces, the land in question was not a site allocated for housing. Work is already underway on the housing development off Highfield Road . Allowing development of the open space at Allaston fields, which is outside of the Settlement Boundary would be a step too far for the infrastructure, environment and landscape of this beautiful area. The development will have a huge impact on the roads, traffic and parking situations. The only access to the proposed site would be Court Road ,land adjacent to Augusta Way is owned by another party. All site traffic would be using Court Road severely impacting on the residents of Primrose Hill, Court Road, Lancaster Drive, Oak Meadow and School Crescent.. Residents along Primrose Hill have no choice but to park their cars on the road. The proposed development would give rise to a constant flow of HGV traffic along this road to reach Court Road. It is inconceivable that such a flow of HGV traffic is sustainable without totally banning on-road parking along the length of Primrose Hill for the many years until all building work has finished. I can see the misery for the residents of this part of Lydney being drawn out over several years as the house-building programme rolls on and on. were the green light given to build houses on this particular parcel of land, it would be the thin end of the wedge. It would not be long before adjoining open spaces towards Windsor Drive / Allaston Road / Driffield Road, which I believe belong to the same landowner, would be the subject of further applications to build yet more houses on. This particular open space is the last boundary to the north of Lydney, separating it from Yorkley. The Governments White Paper published yesterday it makes it quite clear that brown field sites must be developed where possible and approval I only development on green belt in very exceptional circumstances.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.
APFC097	Lee Mason	Policy FC 4 Augustus Way, Lydney	Good Location, Walking distance to town, Close to good school, Good Access.	Support for the allocation is noted.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC099	Lisa Payne	Policy FC 4 Augustus Way, Lydney	As a small business owner I feel development will bring business to the town. A boost to our local economy will be very welcome.	Support noted.
APFC100	Thomas Adamson	Policy FC 4 Augustus Way, Lydney	Object to the site being included the allocation is not accurate as a Developer cannot come off Augustus Way due to a strip of land belonging to McAlpine. This site is not within the Lydney NDP and lies outside of the development boundary. This site should not be included in the new allocation.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.
APFC101	Denni Humphries	Policy FC 4 Augustus Way, Lydney	Lydney needs started homes to buy new. This is the perfect location. I have friends struggling to get on the housing ladder.	Support for the allocation noted.
APFC102	Mr Olly Rickards, Olly Rickards Property Maintenance	Policy FC 4 Augustus Way, Lydney	No self build plots available.	Comment noted.
APFC103	Jean E Powell	Policy FC 4 Augustus Way, Lydney	My daughter struggled to find a house to rent in Lydney . Development needs to happed young families need homes.	Noted as supporting this site.
APFC104	Mrs S J Lucas	Policy FC 4 Augustus Way, Lydney	Lydney needs to change or expand. My children have left the town to find employment and housing.	Comment noted.
APFC105	Sean McLean	Policy FC 4 Augustus Way, Lydney	Support.	Support noted.
APFC106	Mr Michael John Powell	Policy FC 4 Augustus Way, Lydney	I support the Plan, Lydney has suffered from lack of development for years, this needs to be reversed.	Support noted.
APFC107	Mr P E J Lucas	Policy FC 4 Augustus Way, Lydney	Good position. Would love to buy a retirement property here been waiting 3 years.	Support noted.
APFC109	Mr David Newman	Policy FC 4 Augustus Way, Lydney	My partner and I have been trying to buy a home in the forest for years. the average price in Glos is 10 times average income unless more homes are built this will never change. We would like the chance to purchase a home as have generations before us.	Comment supporting plan.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC110	Elsie Waddington	Policy FC 4 Augustus Way, Lydney	More than enough land between bypass and old A48 plus brownfield land east of bypass (see HCWS 346) Site is visually obtrusive and difficult to access will not be deliverable within 5 years. Does not co operate with Lydney Neighbourhood Plan which cannot be amended without a public referendum as we were told when we asked for open space to be green space.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.
APFC111	Ms Caroline Slack	Policy FC 4 Augustus Way, Lydney	As a local resident I wish to express my concerns and opposition to the proposal of the above housing development on the following basis: 1. Landscape This area is the last wild green space in Lydney (that is not a parkland and is not next to a busy road) and is used by Primrose Hill residents on a daily basis for quiet and safe walks - it was invaluable to me recently in my recovery from a back operation. The landscape is a haven for wildlife with many birds incl. thrush and long tailed tit taking full advantage of the hedgerows and open space. It is the only space left that beautiful uninterrupted views across Lydney and the Severn estuary can be enjoyed in peace and should be saved for the benefit of all. 2. Neighbourhood Development Plan This development appears to go completely against the plan and wishes of the Lydney residents. 3. Access & Infrastructure The access to this area would present a significant problem for existing and new residents with increased and unsustainable numbers of vehicles on the roads within the immediate vicinity. On road parking and speeding is already a safety concern in the Primrose Hill area. Off road parking is limited and the main Allaston Road being a 'rat run' to Lydney for vehicles coming to and from Yorkley. Primrose Hill was once a lovely separate village and has been gradually eroded away and absorbed into the Lydney sprawl with all it's character incl. Post Office destroyed. The need for more affordable housing is clear but there is no way that such a beautiful space is going to be used for this with commanding views this will command high house prices no doubt. Why is this 'green belt' of Lydney being allowed to disappear when plenty of brown sites with redundant industrial plots are available in the forest? Please do not let this happen if the democratic will means anything to you.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.
APFC112	Mr Harry Johnson	Policy FC 4 Augustus Way, Lydney	The site at Lydney (FC4) is suitable and sustainable for up to 200 new homes including 40% affordable. The site is deliverable and robust and should be included within the FoDDC housing land supply.	Support for allocation and larger scheme noted. The Council do not support the larger scheme but are proposing to allocate land for 120 homes on a smaller site.
APFC113	Donna Pritchard	Policy FC 4 Augustus Way, Lydney	I was born in Lydney and lived on Primrose Hill most of my young life. My partner and I have a young daughter would love the chance to buy a home. With the average price of houses 10 times most incomes, its impossible more homes need to be built.	Support noted.
APFC114	Tracey Beddis, Vape Vixen	Policy FC 4 Augustus Way, Lydney	As a small business owner I believe Lydney needs to grow the town centre would benefit from a growing town.	Support noted.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC115	Mr Charlie Hale	Policy FC 4 Augustus Way, Lydney	Looking for affordable home in Lydney to purchase, Redrow site is 300K and need homes in local peoples price range.	Noted.
APFC116	Alison Pritchard	Policy FC 4 Augustus Way, Lydney	We need to increase supply of affordable housing to stabilise the local rental costs. I'm renting at present and the rent is 50% of my income.	Support noted.
APFC119	Mr George Johnson	Policy FC 4 Augustus Way, Lydney	Allocating the extended site FC4 for 200 houses would be a robust allocations and would be deliverable within 5 years, this site would help to supply affordable homes in the area and its potential to give self build plots and custom built plots.	Support for the proposed allocation and for the larger site (200) is noted.
APFC120	Cathy Johnson	Policy FC 4 Augustus Way, Lydney	Support Allocation of 120 houses at FC4. The site should be extended to 200 homes which was rigorously tested by an inspector at appeal and found to be suitable and sustainable and would be deliverable in 5 years.	Support noted, including that for the larger site.
APFC121	Mr N Doherty	Policy FC 4 Augustus Way, Lydney	Good site with plenty of amenity land. Near school. Good access to town. Nice place to live.	Support noted.
APFC122	Mrs J Doherty	Policy FC 4 Augustus Way, Lydney	I agree with plan I had to move out of my home town of Lydney due to lack of job opportunities and lack of homes to buy. Forest of Dean needs pro growth.	Support noted.
APFC123	Mrs R Hartrey	Policy FC 4 Augustus Way, Lydney	I would move back to Lydney if there were some decent homes to buy and better paid jobs. Too many friends have left the forest to find work.	Support noted.
APFC124	Mr Stephen Hartrey	Policy FC 4 Augustus Way, Lydney	Lots of space. Good links to Lydney town. Would buy here.	Support noted.
APFC152	Christina Adamson	Policy FC 4 Augustus Way, Lydney	I object to the site being included in the new allocation plan. Lydney has a new NDP voted for by a large majority. Is the NDP going to be ignored? There are already so many houses already being built in Lydney. I believe any more building would be one step too far for the infrastructure. The landscape would also be spoilt as this site is the last open space to the north of Lydney with many footpaths used daily by local people.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC153	Mrs Linda Bell	Policy FC 4 Augustus Way, Lydney	<p>I want to record my strong objection to the allocation at Allaston fields, Lydney into a housing development. Access is an issue as it suggests that traffic will use both Augustus Way and Court Road to access the area. I am given to understand that there is a strip of land between Augustus Way and the green field site which belongs to yet another party (McAlpine ?). If this is the case then the traffic report cannot be valid, because all traffic (the large majority of which will be Heavy Goods Vehicles) would be using only Court Road to access the proposed development. The infrastructure is not able to cope with this enormous increase in traffic and the environment and landscape of this beautiful area will be destroyed irreparably. The proposal is contrary to the aims of the Lydney NDP as it is outside the settlement boundary in the NDP This proposed development will have an enormous detrimental impact on the roads, traffic and parking situations in this part of Lydney. This particular open space is the last boundary to the north of Lydney, separating it from Yorkley. If permission were granted to develop this area I believe that irreparable damage and harm would be caused to the landscape, character and appeal of the area. It would inevitably lead to the total loss of this highly respected local landscape The Government White Paper "Fixing our broken housing market" presented to Parliament by the Secretary of State for Communities and Local Government in February 2017 states quite clearly that full protection will be given to the green belt. The White Paper also states that development for additional housing should be done on brown field sites within the local boundary; What efforts have been made in this direction ? The White Paper further states that development of green belt for housing would only be allowed in exceptional circumstances; I do not believe that this proposed development falls into the category of an exceptional circumstance.</p>	<p>The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.</p>
APFC154	Keith Gorf	Policy FC 4 Augustus Way, Lydney	<p>This whole scheme is wrong and not required or wanted by the local people living near the proposed development or by the people of Lydney on many counts, these include the following:1. It goes against the NDP voted on by the people of Lydney. This is a legal document and must not be ignored. It will totally spoil the local landscape. It is the last boundary of open land on the north side of Lydney. The site would take away the importance of all the agreed allocated land in Lydney. Lydney has agreed that this would be one step to far for what is needed and the infrastructure will be unable to cope. 6. There is no access through Court Road. 7. The highway report is invalid as no vehicles can come through Court Road. 8. Lydney does not need any more development, there is enough already allocated.</p>	<p>The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.</p>

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC155	B & A Screen	Policy FC 4 Augustus Way, Lydney	<p>We wish to raise our strong objection to the proposed Allaston Housing Development in Lydney, Glos. The land in question is Agriculture &amp; Green Belt Land which is outside the Neighbourhood Plan which was voted upon by the people of Lydney to protect our open spaces &amp; also protect our boundaries. There is already a large number of new houses being built on Highfield in Lydney, &amp; also proposals for new houses on a Brownfield Site which has direct access onto a main road (Lydney Bypass), which is ideal so that the traffic can flow directly onto a main road. The access to the Allaston Site from Windsor Drive is completely unacceptable, as it is small cul-de-sac road, which barely allows two cars to pass, so would definitely not accommodate the many heavy vehicles which would use the road to access the site during construction. Also the other entries proposed to the site were Court Road/Augustus Way. At present a developer cannot use the Augustus entry due to a strip of land that they have to cross to gain access belongs to a previous developer McAlpine. The other access Court Road is also unacceptable. It is already extremely busy, not only with all the residents traffic, but also it is the main road leading to Primrose Hill Infants &amp; Junior School There are also traffic problem from Allaston all the way down to Albert Street in Lydney, and by allowing more houses to be built on Allaston creates an even worse scenario.</p>	<p>The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced. The Council do encourage the use of previously developed land where possible and the AP makes allocations on a variety of land. It is however necessary to identify substantial greenfield site in order to meet the required level of provision.</p>
APFC158	Mr & Mrs A Powell	Policy FC 4 Augustus Way, Lydney	<p>Our main concern is the access proposed and the amount of traffic which would be involved. We did assume that access would be onto Augustus Way then to HIGHFIELD Road but apparently this is not possible. This would make Primrose Hill very busy and unsafe. If access is not possible down Augustus Way then it would cause major problems down Albert Street. Also regarding Lydney Town Councils NDP we presume that development would be restricted to the by pass area of Lydney. Facilities such as schools and surgeries to cope with any increase in population.</p>	<p>The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.</p>

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC159	Nick & Anna Stewart	Policy FC 4 Augustus Way, Lydney	The Lydney NDP, specifically places this land outside of the settlement boundary. To change this now undemocratic and flies in the face of public opinion. This is an important recreational open space, and should stay that way for the benefit of the residents of the town. The transport infrastructure is already inadequate. Routes to and from the Allaston area are too narrow for current volumes of traffic as it is, namely Primrose Hill, Court Road and Driffield Road. The elevated nature of the land would mean that any development would be more prominent and therefore more of an eyesore.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.
APFC161	Helen Edmonds	Policy FC 4 Augustus Way, Lydney	I wish to object strongly to the development on the following grounds: According to the Forest of Dean Core Strategy adopted version 2012 the land is outside the defined settlement boundary and should therefore be rejected. No suitable access - Primrose Hill Road and Albert Street are not capable of coping with an increase in the volume of traffic It is a greenfield site used by many people and tourists for recreation and walking dogs and of course, agriculture Detrimental effect on wildlife - mature trees, hedgerows and wildlife including bats, buzzards, kestrels, owls, woodpeckers, swallows, goldfinches. Not enough schools, doctors, police. Drainage issues - would cause problems to properties further down the hill. Inadequate employment in the surrounding area - Increased congestion on A48 horrendous on these occasions. No need for extra housing - many new houses are being built on the Lydney by-pass. Long distance from the centre of town - no bus service and the climb up the hill is too much for the average person. Loss of a wonderful natural environment Detrimental effect on prices and of nearby houses Lydney has enough housing planned in line with the core strategy. How could the majority of council members vote this through when the NDP clearly states that the land is outside the boundary?	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC162	David Humphreys	Policy FC 4 Augustus Way, Lydney	<p>Vehicular traffic on Court Road must not be increased The addition of vehicles for a further 120 houses is not acceptable The location of the site high on a steep and considerable hill outside Lydney the vast majority of residents will rely on cars . The impact of extra traffic on connecting roads will also be detrimental. The site has considerable amenity value affording excellent views over the Severn Estuary. It is well used by walkers and provides elderly residents a pleasant area for strolling exercise. This amenity value for health and well being should not be overlooked.</p>	<p>The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.</p>
APFC164	Mrs Audrey Yeates	Policy FC 4 Augustus Way, Lydney	<p>Most homes have 2+ cars which has increased the road parking. I live near a school and during morning and afternoons our road is extremely busy with traffic parked wherever they can and cars driving up pavements The current road infrastructure will not sustain an increase in traffic. Traffic surveys should be conducted and at a time during school term, when children are being dropped off and picked up. The fields and green space will be lost forever and will devastate wildlife that currently exist in the hedgerows and trees Drainage is a huge concern. The fields are very often waterlogged . School Crescent and the surrounding roads are very often treacherous with drain covers being pushed up due to the volume of water being too much. There are already problems with 2 roads within half a mile of our home – they are collapsing. Other than school runs, traffic noise is very limited. and want to continue to enjoy. Lydney is already being developed with lack of doctors, dentists, schools and jobs. Shops and regular public transport are very poor and none of this will improve. Once again, my husband and I both strongly object to the above planning application for the above reasons. We believe it will have a negative impact and change the character of the neighbourhood in which we live and for which we paid for. Lydney is already overdeveloped and doesn't need developing any further. As with the previous application, there are just a handful of people who want this to go ahead, the rest, like us, are very much against it. In a democratic society, surely the voices of the many outweigh the voices of the few? In this case, the many voices say NO to this development. Having our say on applications such as this should be heard and taken notice of. We want to protect our boundaries and open spaces and our views should not be ignored. Every year you hear about another species becoming at risk of becoming an endangered species – continuous building on our fields and open spaces, destroying hedgerows, trees etc, only adds to the plight of these species. This application has been rejected time and again. Nothing has changed in our opinion and once and for all, this application should receive an overwhelming rejection and the site should be removed as per the residents wishes.</p>	<p>The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.</p>

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC165	Mrs Jennifer Hall	Policy FC 4 Augustus Way, Lydney	Landscape. The site is of considerable visual importance and recreational value to the local community as recognised in Lydney's NDP. This farm land helps to define the urban fringe and maintains continuity with the surrounding countryside. This land is designated an important open area and lies outside the DSB . Development would result in undesirable expansion into the countryside. At a public appeal on this site it was accepted that there would be major permanent adverse impact on the views from footpaths, and significant harm to the landscape character. The S.O.S has made comments on this site, stating that the proposed loss of countryside, diminution of view and well used public footpaths through this site and the erosion of pleasing unspoilt qualities of the site would detract from the character and appearance of the area. Lydney Neighbourhood Development Plan. Once a Neighbourhood Development Plan is 'made' it becomes part of the statutory development plan. This site is part of Lydney's NDP and this area falls outside of the development area, is recognised as open green space;. It is extremely frustrating that this council has totally dismissed the Lydney NDP which was democratically voted on. Lydney development. A new site has already started to be built by Redrow on Highfield Hill this has better access routes to the town and bypass and another site at cross hands adjacent to the Redrow site, has planning for 110 homes (P1829/13/OUT) the developer is looking to build 166 homes .These developments are in very close to the proposed allocation .Should the site be allocated it would distract from the main development area and would be a disaster for the town causing over development, the infrastructure would be unable to cope. There is no access rights through Augusta way as there is a ransom strip which sits with the developers of the Roman park development . Non Sustainable Whilst the five year HLS is not disputed this proposed site would result in significant harm and is not a sustainable development. This area has limited public transport, it would encourage more than average car use. The site is on a steep hill, so would disincentive people from walking up the steep hill, encouraged car use. I also believe the route to this area via court road could potentially be more hazardous to children who attend the local primary school.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.
APFC171	Mr Dave Bearcroft	Policy FC 4 Augustus Way, Lydney	I am writing to object to this development application as there is no need of anymore houses in this area. The local schools are overflowing, the doctors surgery's and our little hospital also struggle to keep up with the people who live here already. Where are all the extra people going to work ?, there is not enough work for the locals let alone more people moving in. This site would be beyond what is needed for the town and would only contribute to more traffic problems and be a terrific strain on the infrastructure of the town. The new development on the east side of Lydney is going to cause enough problems for our town please think about the strain on what is already overloaded, schools, doctors , hospital and roads I am 68 years old and born in Lydney, I've seen many changes here in my life. Please do not pass this application and let us keep what is left of our green fields and lovely countryside for the people of Lydney, their children and grandchildren to enjoy as I know they do.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.
APFC174	Mr Charlie Hale	Policy FC 4 Augustus Way, Lydney	Concern over the delivery of sites identified in plan. Lack of affordable homes. lack of self build plots. support the allocation of 120 homes in FC4 but the site should be extended to 200 homes this area of land was rigorously tested by an inspector at appeal and was found to be suitable and sustainable and will deliver homes in a 5 yr plan.	Support for proposed allocation and larger scheme noted.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC175	Mr Chris George	Policy FC 4 Augustus Way, Lydney	Concern over the delivery of sites identified in plan, Lack of affordable homes. lack of self build plots. I support the allocation of 120 houses in F.C.4 but the site should be extended to 200 homes this site is deliverable in 5 years and in the ownership of local developers.	Comment noted, the council do not however support the larger site which is considered to have an adverse impact on the landscape. Support for the smaller scheme is noted.
APFC177	Mr M L Parkes	Policy FC 4 Augustus Way, Lydney	A significant number of residents of Lydney signed a petition against development of this site not too long ago. a large number of residents raised funds and fought an appeal against development of this site. A majority of people who voted for the NDP supported the plan this site is outside the planning boundary in the current Lydney NDP. Lydney has accepted development and this site would be beyond what is needed for the town and its development and would just be one step too far for the infrastructure. At the last review the council removed a much smaller development proposal on part of this site from the plan based on local opposition.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.
APFC178	Mrs Anne Taylor	Policy FC 4 Augustus Way, Lydney	More affordable homes needed in Local Plan. More houses required in Lydney due to concerns of the delivery of sites identified in the plan. I support the allocation of 120 houses in F.C.4 but believe the site should be extended to 200 homes including self build plots and more affordable homes.	Support noted, including that for larger scheme.
APFC179	Sion Cocking	Policy FC 4 Augustus Way, Lydney	The allocation is not accurate as it says Court Road, Augusta Way, at present a developer cannot come off Augusta Way due to a strip of land belonging to McApline. If all vehicles should come of Court Road then the highway report is invalid. The surrounding roads in the area are not suitable for the extra traffic during and after construction. Lydney has excepted development on other sites, this site would be beyond what is needed for the historic town and its development would be one step to far for the infrastructure.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.
APFC180	Mrs C N Parkes	Policy FC 4 Augustus Way, Lydney	A significant number of residents of Lydney signed a petition against development of this site not too long ago. a large number of residents raised funds and fought an appeal against development of this site. A majority of people who voted for the NDP supported the plan this site is outside the planning boundary in the current Lydney NDP. Lydney has accepted development and this site would be beyond what is needed for the town and its development and would just be one step too far for the infrastructure. At the last review the council removed a much smaller development proposal on part of this site from the plan based on local opposition.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

<b>Ref Number</b>	<b>Full Name</b>	<b>Policy or Paragraph Number</b>	<b>Comment Summary</b>	<b>Draft Officer Response</b>
<b>APFC181</b>	David and Judy Offord	Policy FC 4 Augustus Way, Lydney	We strongly object yet again to the above, and trust our previous letters of objection are still valid and in your hands. We object because This is and has always been outside the Lydney Local Plan No infrastructure in place Roads will definitely not take the proposed increased amount of traffic Flooding to existing properties because of change of watercourses Change of landscape, would completely ruin open aspect which this area of Lydney has The allocated building on Lydney East is important and has already been agreed.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.
<b>APFC183</b>	Miss Amelia Taylor	Policy FC 4 Augustus Way, Lydney	More affordable homes needed in Local Plan. More houses required in Lydney due to concern of the delivery of sites identified in the plan. I support the allocation of 120 homes in F.C.4 but believe the site should be extended to 200 houses, including self build plots and more affordable homes.	Support noted including that for larger site.
<b>APFC198</b>	Ms Rosemary Worgan	Policy FC 4 Augustus Way, Lydney	More houses needed in Lydney, for young people and for older people to down size to.	Noted.
<b>APFC203</b>	Mr Bradley Willets	Policy FC 4 Augustus Way, Lydney	More affordable houses needed in local plan, concern over deliverability of sites identified in local plan. more homes needed in Lydney to include self build and custom build. I support the allocation of houses in FC4 but the site should be extended to 200 homes including self build and affordable homes. This site has been rigorously tested by an inspector at appeal and found to be suitable and sustainable.	Comment noted, the proposed smaller site is considered appropriate but the Council do not support the larger proposal which is the subject of a current appeal (to be heard for a second time following a challenge). It is agreed that there is a need for a wide range of homes in Lydney and the proposed allocations are considered appropriate to be able to deliver them.
<b>APFC205</b>	Luke Jobson	Policy FC 4 Augustus Way, Lydney	More affordable homes needed in Local plan concern over delivery of sites identified in Local Plan. More homes in Lydney to include custom build and self build. I support the implementation of 120 homes in FC4 but the site should be extended to 200 houses including self build and affordable homes. This site has been rigorously tested by an inspector at appeal and found to be suitable.	Comment noted, the proposed smaller site is considered appropriate but the Council do not support the larger proposal which is the subject of a current appeal (to be heard for a second time following a challenge). It is agreed that there is a need for a wide range of homes in Lydney and the proposed allocations are considered appropriate to be able to deliver them.
<b>APFC207</b>	Scott James	Policy FC 4 Augustus Way, Lydney	More affordable homes needed in Local plan concern over delivery of sites identified in Local Plan. More homes in Lydney to include custom build and self build. I support the implementation of 120 homes in FC4 but the site should be extended to 200 houses including self build and affordable homes. This site has been rigorously tested by an inspector at appeal and found to be suitable.	Comment noted, the proposed smaller site is considered appropriate but the Council do not support the larger proposal which is the subject of a current appeal (to be heard for a second time following a challenge). It is agreed that there is a need for a wide range of homes in Lydney and the proposed allocations are considered appropriate to be able to deliver them.
<b>APFC209</b>	Ed Bendall	Policy FC 4 Augustus Way, Lydney	More affordable homes needed in Local plan concern over delivery of sites identified in Local Plan. More homes in Lydney to include custom build and self build. I support the implementation of 120 homes in FC4 but the site should be extended to 200 houses including self build and affordable homes. This site has been rigorously tested by an inspector at appeal and found to be suitable.	Support noted including that for the larger site which the Council do not consider appropriate.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC210	Ryan Imm	Policy FC 4 Augustus Way, Lydney	More affordable homes needed in Local plan, concern over delivery of sites identified in Local Plan. More homes in Lydney to include custom build and self build. I support the implementation of 120 homes in FC4 but the site should be extended to 200 houses including self build and affordable homes. This site has been rigorously tested by an inspector at appeal and found to be suitable.	Comment noted, the proposed smaller site is considered appropriate but the Council do not support the larger proposal which is the subject of a current appeal (to be heard for a second time following a challenge). It is agreed that there is a need for a wide range of homes in Lydney and the proposed allocations are considered appropriate to be able to deliver them.
APFC213	S Mudway	Policy FC 4 Augustus Way, Lydney	More affordable homes needed in Local plan, concern over delivery of sites identified in Local Plan. More homes in Lydney to include custom build and self build. I support the implementation of 120 homes in FC4 but the site should be extended to 200 houses including self build and affordable homes. This site has been rigorously tested by an inspector at appeal and found to be suitable.	Comment noted, the proposed smaller site is considered appropriate but the Council do not support the larger proposal which is the subject of a current appeal (to be heard for a second time following a challenge). It is agreed that there is a need fro a wide range of homes in Lydney and the proposed allocations are considered appropriate to be able to deliver them.
APFC214	Mr William Taylor	Policy FC 4 Augustus Way, Lydney	More affordable homes needed in Local plan, concern over delivery of sites identified in Local Plan. More homes needed in Lydney I support the implementation of 120 homes in FC4 but the site should be extended to 200 houses including self build and affordable homes.	Support noted including that for the larger site which the Council do not consider appropriate.
APFC216	Mr Steve Grindle	Policy FC 4 Augustus Way, Lydney	I believe more affordable homes are needed in the Local Plan. Concerned other sites identified in plan are not deliverable and more houses are needed in Lydney. I support the allocation of 120 houses in FC.4 but believe the site should be extended to 200 houses including self-build plots and affordable homes.	Comment noted, the proposed smaller site is considered appropriate but the Council do not support the larger proposal which is the subject of a current appeal (to be heard for a second time following a challenge). It is agreed that there is a need for a wide range of homes in Lydney and the proposed allocations are considered appropriate to be able to deliver them.
APFC217	Mr Jarred Liddington	Policy FC 4 Augustus Way, Lydney	I believe more affordable homes are needed in the Local Plan. Concerned other sites identified in plan are not deliverable and more houses are needed in Lydney. I support the allocation of 120 houses in FC.4 but believe the site should be extended to 200 houses including self-build plots and more affordable homes.	Comment noted, the proposed smaller site is considered appropriate but the Council do not support the larger proposal which is the subject of a current appeal (to be heard for a second time following a challenge). It is agreed that there is a need for a wide range of homes in Lydney and the proposed allocations are considered appropriate to be able to deliver them.
APFC218	Mr Jeff Emery	Policy FC 4 Augustus Way, Lydney	Lydney is dying at present. Shops and pubs closing, sports teams struggling. Lydney needs to expand to get some life into the town again.	The AP allocates a large number of additional dwellings in Lydney and the additional population will support the town's services and clubs.
APFC219	Mr Jack Gore	Policy FC 4 Augustus Way, Lydney	More affordable homes needed in local plan concern over delivery of sites identified in local plan. More homes needed in Lydney to include self build and custom build. I support the allocation of 120 houses in FC.4 but the site should be extended to 200 houses including self-build plots and affordable homes. This site has been rigorously tested by an inspector at appeal and found to be suitable and sustainable.	Comment noted, the proposed smaller site is considered appropriate but the Council do not support the larger proposal which is the subject of a current appeal (to be heard for a second time following a challenge). It is agreed that there is a need for a wide range of homes in Lydney and the proposed allocations are considered appropriate to be able to deliver them.
APFC221	C J Johnson	Policy FC 4 Augustus Way, Lydney	The site allocated in Yorkley does not give the community benefits as the other Yorkley site opposite school currently going to appeal Ref AP0047/16/ref Welcome supply of land to local builder/self builders. Good position adjoining existing settlement boundary. Site can be completed in 5 year plan where others on plan will not Highways ecology approved.	Comment noted. It is not however known what if any benefits may flow from the proposed allocation or be agreed if the alternative site were to be permitted.
APFC222	Mr David Smalley	Policy FC 4 Augustus Way, Lydney	The desire to downsize in my retirement requires more homes which offer community facilities is essential for those who would need human interaction.	Comment noted, a range of homes is sought on the sites proposed to be allocated.
APFC223	Mr J Powell	Policy FC 4 Augustus Way, Lydney	More affordable homes needed in Local plan , concern over delivery of sites identified in Local Plan. More homes in Lydney to include custom build and self build I would like to put forward my land at Allaston road (land to the rear of 51 Allaston road for consideration. The land is for 4 units and I have a Local builder to develop plan attached.	General support noted. The site referred to is close to but not part of the larger scheme currently associated with the land at Allaston. If the latter were to be permitted following the pending appeal, then it may be appropriate to consider it alongside that site. The timing of the whole in relation to the AP process may enable this to be considered. If not it would be for any planning application to take into account the change of circumstances that may result from the current appeal being allowed. The council do not support the change sought at the present time.
APFC225	Lydney Rugby Club	Policy FC 4 Augustus Way, Lydney	More affordable homes needed in Local plan. concern over delivery of sites identified in Local Plan. I support the implementation of 120 homes in FC4 but the site should be extended to 200 houses including self build and affordable homes.	The sites proposed to be allocated are considered deliverable and recent changes in terms of the start of development on the major part of the east of Lydney support this. A range of sites are proposed but the expansion of the land at Allaston is not supported due primarily to landscape impacts.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC226	A Smalley	Policy FC 4 Augustus Way, Lydney	Would like to downsize therefore retirement properties are very necessary.	Comment noted- the sites allocated are expected to provide a wide range of homes.
APFC228	Mr Harvey Johnson	Policy FC 4 Augustus Way, Lydney	Site is in a good location. No landscape issue and the open space will be welcome to existing residence.	The expansion of the land at Allaston is not supported due primarily to landscape impacts. It is agreed that the smaller site as proposed in the AP changes can be developed and is in a suitable location.
APFC229	Lee Truman	Policy FC 4 Augustus Way, Lydney	More affordable homes needed in Local plan Local Plan does not make provision for this FC 4 this should be increased to 200 homes consequent to thorough review by an inspector that site has found to be suitable. To conclude I offer my support to the provision of 120 homes; but would like this to be increased.	The Plan does make provision for affordable housing although the relevant policies are in the Core Strategy rather than the AP. The allocations in the AP cover a broad range and affordable housing is sought as part of their total delivery.
APFC231	Mr R.J. Powell	Policy FC 4 Augustus Way, Lydney	Great opportunity to provide self build project. A welcome site for me as a tradesman.	Comment noted.
APFC232	Mr M Butler	Policy FC 4 Augustus Way, Lydney	This is in a good position on the edge of an existing development. Plus it stands to provide affordable homes. Also a good private mix.	Comment noted.
APFC234	Mr Oscar Lindsell Hales	Policy FC 4 Augustus Way, Lydney	More affordable homes required to fix over inflated housing market. Sites included in plan are restrictive; easier development, less bureaucracy required. As stated FC4 I support construction of 120 houses; I would like to see this extended to 200 -250. Consequent to the inspectors review it seems that the proposed development concurs with the governments aims of sustainability and suitability.	A range of sites are proposed which will deliver a range of accommodation but the expansion of the land at Allaston is not supported due primarily to landscape impacts. Affordable housing is expected on allocated sites including the Council's proposed site for about 120 homes at Allaston.
APFC235	Ms Shaunnah Curry	Policy FC 4 Augustus Way, Lydney	Homes aren't affordable in the Forest of Dean and Gloucester (Over 10x average income). Young people today don't have a very good chance in becoming home owners.	Comment noted.
APFC236	Mr Ben Gaget	Policy FC 4 Augustus Way, Lydney	More homes required, self build, custom build, affordable. I back the allocation of homes in FC4 however I would like to see the number increased. It seems that this site has been tested by an inspector at appeal demonstrating that the site is sustainable.	Comment noted, it is expected that the range of sites identified will deliver a range of accommodation and this is able to include self build and custom build as encouraged by government.
APFC238	Mr K. J. Farr	Policy FC 4 Augustus Way, Lydney	Being a Lydney resident we have had hardly any new houses built in the Lydney area over the last 10 years, the town is dying and we need more houses, self build and spec building plots are desperately needed.	There are now a large number of planned developments in Lydney and these are able to provide a range of homes. Delivery from the sites will result in a more rapid rate of development than in recent years although about 250 homes on the two largest sites have been completed in recent years.
APFC239	Mr R Johnson, FW Johnson LTD	Policy FC 4 Augustus Way, Lydney	1. Concerns over delivery of Housing site in the Forest of Dean Local Plan. 2. Lack of self build and custom built plots 3. Lack of small sites for local builders I support the allocation of Policy FC.4 for 120 units. I would also support the land to the rear of 51 Allaston Road to be included in plan. This site would be available to local builders and can deliver up to four new homes.	Comment noted. Delivery is considered to have improved in recent years and especially with the commencement of the larger element of the east of Lydney allocation. The site referred to (51 Allaston Rd) is land which could be considered for allocation in a future plan or could be considered earlier if the larger site at Allaston (subject to appeal) receives consent.
APFC240	Mr Richard Stock	Policy FC 4 Augustus Way, Lydney	This development builds on to the existing housing developments and given the lack of housing in the area will add to the stock of available property without having a major impact on the locality.	Comment noted.
APFC241	Mr Clinton Hale	Policy FC 4 Augustus Way, Lydney	1. Concern over the delivery of sites identified in plan. 2. Lack of affordable homes 3. Lack of self build Support the allocation of 120 houses in FC.4 but the site should be extended to 200 houses this area of land was rigorously rested by a inspector at appeal and was found to be suitable and sustainable and would deliver homes in a 5 yr plan. Support the allocation of 120 homes in FC.4	The sites proposed to be allocated are considered deliverable and recent changes in terms of the start of development on the major part of the east of Lydney support this. A range of sites are proposed which will deliver a range of accommodation but the expansion of the land at Allaston is not supported due primarily to landscape impacts. The sites allocated in the AP are suitable for self build and affordable homes. These will be sought on them alongside market housing.
APFC245	Ms Andrea Moore	Policy FC 4 Augustus Way, Lydney	Lydney needs to grow more homes are needed. Growth will boost the town and cool the housing market making houses more affordable for first time buyers.	Comment noted.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC244	Mr Gordon Preest	Policy FC 4 Augustus Way, Lydney	I am in favour of more affordable houses to buy in Lydney none of my children has been able to buy there own house due to high prices per wage/ratio and shortage of new homes. New Homes should be in price range of local people can afford.	Comment noted.
APFC246	Mr Henry Worgan	Policy FC 4 Augustus Way, Lydney	More houses needed in Lydney.	Comment noted.
APFC243	Mr Graham Walters	Policy FC 4 Augustus Way, Lydney	I support the Allaston development as I know there is a shortage retirement dwellings in Lydney ad I have been looking for a property without success for many months.	Support noted.
APFC247	Mr Nathan Jones	Policy FC 4 Augustus Way, Lydney	More affordable homes needed on local plan. Concern over delivery of sites identified in local plan. More homes needed in Lydney to include self build and custom build. I support the allocation of 120 houses in FC.4 but the site should be extended to 200 houses including self build and affordable homes. This site has been rigorously tested by an inspector at appeal and found to be suitable and sustainable.	Comment noted, the council do not support the allocation of the larger site.
APFC248	Mr Michael Jobson, MJM Ltd	Policy FC 4 Augustus Way, Lydney	More affordable homes required in the plan. More houses are needed in Lydney as other sites are not deliverable. I support the allocation of 120 houses in FC.4 but the site should be extended to 200 homes to include self-build and more affordable homes.	Comment noted although the Council do not support the larger site.
APFC249	Ms Alice Wogan	Policy FC 4 Augustus Way, Lydney	Been looking for a 2 bed house for a year and a half, there are no houses around the forest area. Lovely site in good location close to town and schools.	Comment noted though site not specified.
APFC250	Ms Rebecca Kent	Policy FC 4 Augustus Way, Lydney	More affordable homes needed in local plan. Concern over delivery or sites identified in the local plan. More homes needed in Lydney to include self build and custom build. I support the allocation of 120 houses in FC.4 but the site should be extended to 200 houses including self build and affordable homes. This site had been rigorously tested by an inspector at appeal and found to be suitable and sustainable.	Comment noted- the Council do not support the larger version of the site but are proposing to allocate land for about 120 homes on the southern part which is considered acceptable.
APFC253	Mr Charlie George	Policy FC 4 Augustus Way, Lydney	More affordable homes needed in local plan. Concerns over delivery of sites identified in local plan. More homes needed in Lydney to include self build and custom build. I support the allocation of 120 houses in F.C.4 but the site should be extended to 200 houses including self build and affordable homes. This site has been rigorously tested by an inspector at appeal and found to be suitable and sustainable.	Comment noted- the Council do not support the larger version of the site but are proposing to allocate land for about 120 homes on the southern part which is considered acceptable.
APFC254	Mr Luke Hutton	Policy FC 4 Augustus Way, Lydney	More affordable homes needed in local plan. Concern over delivery of sites identified in local plan. More homes needed in Lydney to include self build and custom build. I support the allocation of 120 houses in FC.4 but the site should be extended to 200 houses including self build and affordable homes. This site has been rigorously tested by an inspector at appeal and found to be suitable and sustainable.	Comment noted, the Council do not support the allocation of the larger site.
APFC255	Ms Lucy Collins	Policy FC 4 Augustus Way, Lydney	More affordable homes needed in local plan Concern over delivery of sites identified in local plan more homes needed in Lydney to include self-build and custom build. I support the allocation of 120 houses in FC4 but the site should be extended to 200 houses including self-build and affordable homes. This site has been rigorously tested by an inspector at appeal and found to be suitable and sustainable.	Comment noted- the Council do not support the larger version of the site but are proposing to allocate land for about 120 homes on the southern part which is considered acceptable.
APFC258	Suanne Darkes	Policy FC 4 Augustus Way, Lydney	There is no available access from Augusta Way , If all vehicles should come of Court Road then the highway report is invalid. The surrounding roads in the area are not suitable for the extra traffic, Lydney has excepted development on other sites, this site would be beyond what is needed for the historic town and its development would be one step to far for the infrastructure.	The ownership of land if as described may not prevent development in the manner preferred by the Council. Access from Augustus Way is advocated in the draft policy.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC259	Ms Tracey Bayliss	Policy FC 4 Augustus Way, Lydney	More affordable homes needed in local plan Concern over delivery of sites identified in local plan more homes needed in Lydney to include self-build and custom build. I support the allocation of 120 houses in FC4 but the site should be extended to 200 houses including self-build and affordable homes. This site has been rigorously tested by an inspector at appeal and found to be suitable and sustainable.	Comment noted- the Council do not support the larger version of the site but are proposing to allocate land for about 120 homes on the southern part which is considered acceptable.
APFC261	Mr Mike Bayliss	Policy FC 4 Augustus Way, Lydney	More affordable homes needed in local plan Concern over delivery of sites identified in local plan more homes needed in Lydney to include self-build and custom build. I support the allocation of 120 houses in FC4 but the site should be extended to 200 houses including self-build and affordable homes. This site has been rigorously tested by an inspector at appeal and found to be suitable and sustainable.	Comment noted- the Council do not support the larger version of the site but are proposing to allocate land for about 120 homes on the southern part which is considered acceptable.
APFC263	David Howley	Policy FC 4 Augustus Way, Lydney	The current nursery and primary school located on Primrose Hill can not sustain any more children. Local surgeries are already under far too much pressure and can only offer routine appointments if patients are prepared to wait for three weeks. The roads along Primrose Hill (especially Court Road/Allaston Road) would not be able to sustain a heavier traffic load. Further traffic would exasperate the problem and increase the risk of accident/injury to the many local children who use these roads to walk to school – this is unacceptable. Lydney already development taking at the Redrow Estate on Highfield hill and along the Lydney bypass – Lydney does not need this development as well. The natural floral and fauna of the fields deserves to be maintained.	The proposed development is considered to be needed in order to provide a sufficient supply of land for housing as required according to the latest assessment. The site itself is in the form proposed by the Council suitable for development. It adjoins the present built up area and can be developed with open space and landscape in mind in accord with the draft policy. Development is required to contribute to the need for infrastructure where this is not sufficient to accommodate it so contributions may be sought from this site.
APFC264	Ms Kate Collins	Policy FC 4 Augustus Way, Lydney	Support the allocation of 120 houses in FC4 but the site should be extended to 200 houses including self-build and affordable homes. This site has been rigorously tested by an inspector at appeal and found to be suitable and sustainable.	Comment noted- the Council do not support the larger version of the site but are proposing to allocate land for about 120 homes on the southern part which is considered acceptable.
APFC266	Mr Alan Gibbs	Policy FC 4 Augustus Way, Lydney	When the Lydney NDP was voted on there was a clear result and this site was not in it. Therefore it is not even worth having a new enquiry as the people have already passed their views.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.
APFC270	Mr Allister Dobbyn	Policy FC 4 Augustus Way, Lydney	More affordable homes needed in local plan Concern over delivery of sites identified in local plan more homes needed in Lydney to include self-build and custom build. I support the allocation of 120 houses in FC4 but the site should be extended to 200 houses including self-build and affordable homes. This site has been rigorously tested by an inspector at appeal and found to be suitable and sustainable.	Comment noted, the Council do not support the larger site but agree with the need for affordable homes.
APFC272	Mrs Rosemary Ann Jones	Policy FC 4 Augustus Way, Lydney	I strongly object to the development on Allaston Fields for the following reasons: Danger to the children at Primrose Hill School due to traffic Travelling anywhere in the Lydney area is already a nightmare, road in Allaston, Driffield and Primrose hill and housing estates are not built for the traffic that is on them and speed limits already broken by motorists.	The development as proposed by the Council is considered able to be completed with satisfactory highway arrangements. It is a site that is considered appropriate for housing given the needs of the area.
APFC274	Mr G Jones	Policy FC 4 Augustus Way, Lydney	I object to the development at Allaston fields because of the traffic already generated , danger to the school children at Primrose Hill School. Too much existing traffic on Driffield Road, Allaston already exists. People from Lydney will have to go to Bristol and Glos for work.	The site is considered able to be accommodated satisfactorily as far as access is concerned and is appropriate to be allocated given the requirement for new homes. The AP identifies land for employment and the council continues to encourage its development throughout the district.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC275	Mr G Jones	Policy FC 4 Augustus Way, Lydney	<p>The latest allocation of 120 houses on the above site, voted for by the full council was a travesty of justice. The people of Lydney can only hope that The Secretary of State will uphold his original decision to refuse permission for this development at the appeal on 25th April 2017. The present allocation of many 100's of houses along the bypass road is more than adequate for the needs of the people of Lydney and area. To develop a site where the entrance will either be at Court Road or Augusta Way will bring utter chaos to an area that could not possible cope with the extra traffic whilst also having a primary school at its centre. We feel that the NDP plan that the people of Lydney voted for has just been ignored, this Greenfield site, which is the last open space in this area, has magnificent views and footpaths enjoyed by locals. This must be kept as pasture land for future generations to enjoy. The people of Lydney have already made their view known on this application and contributed to the tune of £50000 to fight against it.</p>	<p>The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced. The proposed development off Highfield Hill is now 166 dwellings but that application has yet to be determined and although the principle is supported and the site is considered able to contribute to the five year supply that site is considered necessary as well as the additional allocation proposed at Allaston.</p>
APFC277	Mrs G Hoare	Policy FC 4 Augustus Way, Lydney	<p>Lydney NDP was then Made on the 1 st March 2016 ,a full legal planning document. It includes land for some 1900 homes for Lydney. Also in the LNDP jointly prepared by Gloucestershire Highways and by Forest of Dean says that the roads, especially to the north of Lydney were of great concern now. . With the development at Lydney East just under way and more to start soon there are many years of development to be had. There is a proposal to increase the number of houses at the Cross Hands from 110 to 166.</p> <p>With regards to the five year land supply and Neighbourhood plans the government's view states: "That once MADE a NDP should be upheld as an effective means to shape and direct development in the Neighbourhood Planning area in question, for example to ensure that the best located sites are developed. Also a Neighbourhood Plan that has been MADE, attains the same legal statue as the Local Plan and becomes part of the statutory development plan. Applications for planning permission must be determined in accordance with the development plan, unless considerations indicate otherwise".</p>	<p>The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced. The proposed development off Highfield Hill is now 166 dwellings but that application has yet to be determined and although the principle is supported and the site is considered able to contribute to the five year supply that site is considered necessary as well as the additional allocation proposed at Allaston.</p>

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC278	Mr M Hoare	Policy FC 4 Augustus Way, Lydney	<p>Lydney NDP was then Made on the 1 st March 2016 ,a full legal planning document. It includes land for some 1900 homes for Lydney. Also in the LNDP jointly prepared by Gloucestershire Highways and by Forest of Dean says that the roads, especially to the north of Lydney were of great concern now. . With the development at Lydney East just under way and more to start soon there are many years of development to be had. There is a proposal to increase the number of houses at the Cross Hands from 110 to 166.</p> <p>With regards to the five year land supply and Neighbourhood plans the government’s view states:“ That once MADE a NDP should be upheld as an effective means to shape and direct development in the Neighbourhood Planning area in question, for example to ensure that the best located sites are developed. Also a Neighbourhood Plan that has been MADE, attains the same legal statue as the Local Plan and becomes part of the statutory development plan. Applications for planning permission must be determined in accordance with the development plan, unless considerations indicate otherwise”.</p>	<p>The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced. The proposed development off Highfield Hill is now 166 dwellings but that application has yet to be determined and although the principle is supported and the site is considered able to contribute to the five year supply that site is considered necessary as well as the additional allocation proposed at Allaston.</p>
APFC280	Mrs Cheryl Stickler	Policy FC 4 Augustus Way, Lydney	<p>With regards to the five year land supply and Neighbourhood plans the government’s view states:“That once MADE a NDP should be upheld as an effective means to shape and direct development in the Neighbourhood Planning area in question, for example to ensure that the best located sites are developed. Also a Neighbourhood Plan that has been MADE, attains the same legal statue as the Local Plan and becomes part of the statutory development plan. Applications for planning permission must be determined in accordance with the development plan, unless considerations indicate otherwise”.</p>	<p>The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced. Reference made to the site (Edenstone) for 166 dwellings refers to a current application on land formerly granted consent for 110. It has yet to be determined and therefore is subject to change. The applicant does however consider it deliverable.</p>

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC281	Mr Michael Channon	Policy FC 4 Augustus Way, Lydney	<p>I attended the hearing concerning the above development application at the F.O.D.C. offices in Coleford in 2016. Prior to the hearing I carried out a survey of local businesses, estate agents and Coleford job centre. The results revealed very clearly that there were no employment vacancies in the forest area and approximately 160 properties for sale. Despite the low property prices they are still not selling, mainly because of the total lack of local employment so WHY WOULD LYDNEY NEED HUNDREDS OF EXTRA HOUSES ????. There are several industrial sites in the forest area that are crying out for redevelopment to bring employment to the area and reduce the number of local inhabitants running the "rat race" every day to find employment in Bristol, Gloucester and Cheltenham. There are many fatal accidents on the A48 every year and more houses can only increase this carnage as people attempt to find employment, whilst at the same time destroying the environment. The above proposed development site is extremely picturesque with beautiful views and is extensively used by locals for exercise, dog walking etc. it would be a crime to allow it to be covered with concrete and tarmac simply to let a developer make a large profit and move on to another site leaving us with the "eyesore". I used to live in a quiet cul-de-sac in North Somerset on the outskirts of Bristol. I worked hard to earn enough to get myself mortgage-free before my retirement. A developer bought the piece of land near the entrance of the cul-de-sac and, despite furious opposition from local residents, Bristol corporation allowed the development to proceed. After the buildings were complete they did not sell so they were offered for rent. Bristol corporation subsequently moved several homeless people and immigrant families into these buildings and within a few months the road was totally congested with cars, access was almost impossible. crime in the area increased, insurance premiums soared and property prices plummeted, the area started to resemble a slum. I personally lost thousands of pounds when I moved out of the area into Lydney and now I can see the whole thing starting all over again. WHY WON'T THE GOVERNMENT LISTEN TO THE PEOPLE LIVING IN THIS COUNTRY ?? DON'T THESE GOVERNMENT OFFICIALS REALISE THAT THEY WERE VOTED INTO OFFICE TO VOICE THE OPINIONS OF THIER CONSTITUANTS AND NOT JUST MAKE THIER OWN DECISIONS ??.</p>	<p>The objection is noted. The Council consider the development as proposed in the Further Changes document to be necessary and appropriate. They do not support the larger scheme which is the subject of a forthcoming appeal.</p>
APFC282	Mr Paul Stickler	Policy FC 4 Augustus Way, Lydney	<p>1, Adequate housing has already been allocated for Lydney. 26.2% increase above the CS. If this site is allocated this would increase to 36%.The site would not benefit the community. 2, This site has a number of landscape issues as its the Allaston Ridge. If this site is developed it would change the landscape dramatically . A number of panoramic views would be lost for ever. 3, The agreed development area for Lydney are on the east side by the by- pass, 4, Lydney ,the largest town in the forest does not have a police station, a upper six form, and only has a small GP hospital. It is however the furthest town away from Gloucester where you would need to go for these facilities. 5, The people of Lydney voted on a NDP which was put in place2016. The NDP which did agreed to developing this site. 6, This site is our last boundary on the north side between Lydney and Yorkley.</p>	<p>The objection is noted. The Council consider the development as proposed in the Further Changes document to be necessary and appropriate. They do not support the larger scheme which is the subject of a forthcoming appeal. The scheme as proposed by the Council is considered acceptable within the landscape subject to the requirements of the draft policy being met. Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it.</p>

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC283	Mr Philip Stickler	Policy FC 4 Augustus Way, Lydney	1, Court Road is a very congested ., there is only one way in and one way out, to increase the volume of traffic would be a disaster. The developer does not own the land to come into the site from Augusta Way, all traffic would come of court road. A traffic report solely on all traffic from court road has not been done, the real damage to this area is unknown. 2, There are a number of footpaths with panorama views across the Severn estuary, which would be lost to this community and walkers. If this site is added it would change the landscape from far a field and lowering the sky line and if lost would harm the well being of this area. 3, The site is outside of the boundaries in our NDP, is unexcitable. We came out and voted for a NDP as we where told that was the right thing to do for our town, that way we have a say on where Development should be and keep our open spaces.	The objection is noted. The Council consider the development a proposed in the Further Changes document to be necessary and appropriate. They do not support the larger scheme which is the subject of a forthcoming appeal. The scheme as proposed by the Council is considered acceptable within the landscape subject to the requirements of the draft policy being met. Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it.
APFC284	Miss Helen Stickler	Policy FC 4 Augustus Way, Lydney	1, Lydney has more development than any other part of the forest. Any more development would be above and beyond with what this town would be able to cope with. Lydney voted on a NDP which was put in place 2016. After 6 month the council totally dismisses it and add even more development onto Lydney. Another large developer to this town which would do enormous harm to our environment and infrastructure 2, This site is very important to this community for recreation, social and many walkers. The views and landscape would be lost to every one as this is on the Allaston Ridge it would be seen from far a field , totally changing the landscape of this area. 3, The area for development which had been agreed and has already started is on the east side of Lydney near the town and sustainable,. As this site is on a hill it would encourage more car use as it would be very difficult to walk the hill for the older generations and young families. 4, If this site is added it will do more harm than good as comes with very little benefit if any. The increase in traffic alone would cause great harm as going down or up the hill is normally signal file.	The objection is noted. The Council consider the development a proposed in the Further Changes document to be necessary and appropriate. They do not support the larger scheme which is the subject of a forthcoming appeal. The scheme as proposed by the Council is considered acceptable within the landscape subject to the requirements of the draft policy being met. Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it.
APFC287	Councillor Alan Preest	Policy FC 4 Augustus Way, Lydney	On the 22 Oct 15. I tabled the following motion at the Full FoDDC meeting : To request that the Council sets up a Development Control Working Group to examine working practices relating to all aspects of planning. The motion was unanimously passed. A Development Control Working Group was convened. A Planning Peer Challenge took place (8-11 Mar 16) . As I write this (12 Feb 17), over nine months on from the Council resolution. I believe no attempt has been made to reconvene the Development Control Working Group. The Council are in breach of a democratically taken "Sovereign" decision. Contained in the Planning Peer Challenge Report there are many issues that have failed to be addressed. So much for Localism. I also suspect, in identifying new sites, a knee jerk "pin the tail on the donkey" approach has been adopted, rather than a proper thought out rationale. Indeed, there appears to have been a "major" problem regarding the definition and calculation of the Objectively Assessed Need and the actual 5 year figure. Lydney, in consultation with the Local Planning Authority during the NDP process were quite clearly misled on the situation pertaining to the 5 year supply.	Comments noted. The Lydney NDP was prepared alongside the emerging AP and does not take account of the current situation regarding the updated housing requirement that is likely to be identified for the district. In meeting this in a sustainable manner it is necessary to consider the available options which accord with the NPPF and the CS. Further allocations are therefore proposed in Lydney, in accord with the overall strategy of the CS and AP. The need to plan using an up to date and compliant OAN means that the AP can only be delivered using this and consideration of NDP must take into account the fact that it is based on earlier and now out of date evidence.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC289	Allaston Developments Ltd	Policy FC 4 Augustus Way, Lydney	The principle of the allocation of this land is supported; however, concerns are raised with the Allocations Plan generally and the housing land supply position of the District. This representation also therefore relates to the evidence base, in particular the 'Housing Land Availability Summary', December 2016. The site identified within the Allocations Plan is available, suitable and development is achievable. In the context of the NPPF, it is therefore deliverable. The site is subject to a current application (P1111/14/OUT), which is due to be amended to reflect the modifications within the Allocations Plan. However, concern is raised about the deliverability of chosen housing sites and the sites identified in the Council's evidence base ('Housing Land Availability Summary', December 2016). The concern particularly relates to the housing trajectory and whether some of the sites identified can deliver housing within 5 years. In order to overcome these concerns, it is considered that additional land should be allocated for housing at the site identified at Policy FC 4. An extended site for 200 dwellings (including up to 40 serviced selfbuild plots and up to 37 retirement apartments), community building (up to 2,000 sq ft) and new public open space has already been rigorously tested at appeal and found to be suitable and sustainable.	The support for the Council's proposed allocation is noted. In addition the representation supports the additional land subject of a current appeal to be re heard in April 2017. The site is considered suitable for the development as proposed by the Council but there are objections to the larger area. In landscape terms the larger site is not supported due to its prominence. The site does not have planning permission at present and although it is agreed that it could make a contribution, the Council do not consider that the full 200 dwellings could be provided within five years alongside the delivery ascribed to other sites in the town. The location is generally sustainable although the preferred access via Augustus Way and Court Rd to the smaller site is considered very much preferable. the larger site being more remote from the town facilities is less easily accessed and hence less sustainable.
APFC309	Mrs S Fellows, Land Research & Planning Associates Ltd.	Policy FC 4 Augustus Way, Lydney	Site not within Lydney NDP.	The site (Allaston, FC4) at Lydney is not supported by the NDP. This was prepared and "made" at a time when it was broadly in accord with the emerging AP and also the CS. Since that time however the AP has progressed in that the OAN has been refined in accord with the Inspector's wishes and as a result (mainly of a need for additional land held to be available within five years) additional housing land needed to be identified. In accord with the CS this process considered land at the towns then larger villages. The exercise concluded that an additional deliverable site at Lydney which could be allocated was the Council's proposed allocation at Allaston. This is supported by the proposed developer who considers it able to deliver. The AP seeks to deliver housing to meet the up to date assessment of need in accord with the CS and also the NPPF. The assessment of need requires additional land over the original submission and as a consequence the NDP is in effect out of date.
APFC330	Mrs Cheryl Stickler	Policy FC 4 Augustus Way, Lydney	Lydney had a vote to instate a neighbourhood Plan for Lydney in February 2016. Which was agreed by a majority and democratically adopted by the local council. In September 2016 the Forest of Dean District Council added more development Court Road/Augustus Way, this lies outside of the settlement boundary of Lydney and not one of the areas allocated for housing.	This representation takes the form of a petition, drawing attention to the issues below. The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC333	Stop Allaston Development(SAD)	Policy FC 4 Augustus Way, Lydney	<p>This site has been brought forward quite specifically for the purpose of trying to bolster the 5y supply of housing land. I question the adequacy of the assessment that led to the assumption that this site is suitable for housing development per se and particularly whether it is capable of delivering dwellings within 5 years .A key factor is the harm that would be caused to significant landscape and countryside issues. I am not satisfied that an adequate assessment has been made, I have certainly seen no satisfactory evidence of it . I must register an objection to the accompanying Sustainability Appraisal which I consider fails to include key criteria and with regard to this site to ignore key issues such as ease of access to services, facilities and secondary education and to pay too little regard to the landscape and countryside matters. The previous Local Plan (2005) Inspector did not agree to allocate almost exactly the same area of land, concluding that the Allaston area is not easily accessible to town centre, shops, services, employment, recreation, secondary education facilities and is beyond reasonable walking distance. the steep gradients would be a disincentive to both walkers and cyclists. The site in question is part of an open area of countryside that sits prominently above Lydney. Development would clearly remove the sense of openness and destroy sweeping panoramic views. The issue is not just about landscape quality it is about the loss of countryside. The area is crossed by a network of footpaths which are extensively used It is from these footpaths that the sweeping nature of the 'panoramic' views across the Severn Estuary can be so well seen. Whilst the intention to facilitate views through the landscape is laudable the proximity of dwellings within a very changed landscape will remove the key panoramic quality which gives then such value. It would provide greater clarity to either leave the upper field as it is or allocate it as open space. SAD would not oppose either option. The large allocation east of Lydney now coming forward but the reserved matters application for the Thomson's garage site is for 126 dwellings The land owners talk of breaking it up into parcels to dispose of to local builders but such a process takes time and would require roads and services to be arranged and constructed in advance.</p>	<p>The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.</p>
APFC334	Name provided	Policy FC 4 Augustus Way, Lydney	<p>The site is part of open countryside and is outside Lydney DSB. It is agricultural land with hedgerows and would be a considerable loss to the area . Public footpaths cross this site and is used all the time. This site is not included within the Lydney NDP. There is not enough infrastructure to sustain the people we have in Lydney at the moment. We have a very small police presents, any major incident police have to come from Gloucester, which take 25min even with blue lights. The Hospital is open 8-8 with no Doctor on site. The ambulance can take over 20mins to get to heart attack. Surgeries are not equipped to take the strain of more families. The local school is already oversubscribed. Parking for the school is a hazard to the children and local home owners. With instances of children have been put at risk due to the parking and moving of cars. There is no employment in this area. People are commuting to Gloucester and Bristol to work, that's a commute of 1 1/2 hrs. The roads to the proposed site are narrow, at school times it is dangerous to cars and pedestrians. This site rises very considerably from south to north the rain water at present cascades to the roads lower down and blocks drains there. The developer's they have got no funds to develop this site. Nothing can be gained until the infrastructure is in place to build. The planning department has allowed this proposal to go ahead to get top this stage. Why! who is gaining by this .</p>	<p>The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it. The site is part of a larger one which is to be the subject of a new appeal shortly following a legal challenge. The larger site is one which the council object to in view of its landscape impact. It is also considered that the allocation of the larger site may not enable the delivery of more housing within the five year period because of the range of sites that are already in existence and in some cases are more advanced.</p>

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC336	Name provided	Policy FC 4 Augustus Way, Lydney	More affordable homes needed in local plan. concern over delivery of sites identified in local plan. More homes needed in Lydney to include selfbuild and custom build. I support the allocation of 120 houses in FC4 but the site should be extended to 200 houses including self build and affordable homes. This site has been rigorously tested by an inspector at appeal and found to be suitable and sustainable.	Comment noted, the proposed smaller site is considered appropriate but the Council do not support the larger proposal which is the subject of a current appeal (to be heard for a second time following a challenge). It is agreed that there is a need for a wide range of homes in Lydney and the proposed allocations are considered appropriate to be able to deliver them.
APFC004	Mr James Bevan	Paragraph 11	The land was presented by the Portfolio holder for Planning when there is public concern of the Portfolio Holder's personal connection with the landowners The Land is not identified as development land in the Local Lydney Area NDP. The access from Augustus Way and Court Road are inadequate to accommodate extra vehicle movements.	The Council consider that given the need to identify additional land in the AP, the smaller site for about 120 dwellings as proposed in the draft Further Changes document should be allocated, noting that the agent considers it deliverable. This site is proposed to be allocated to provide a dual access for vehicles thereby addressing some of the objector's concerns. It is intended that the site be developed in a manner which provides open space which would be publicly accessible based around the existing well used footpaths (PROW). Some representations draw attention to the development of this land being contrary to the recently made NDP. This is accepted but it is also the case that the NDP was made at a time when the AP was at a relatively early stage and the OAN, total housing requirement and the proposed supply of sites had yet to be settled. The proposed allocation is in tune with the CS but is driven by the recent and up to date numbers that arise from the NPPF compliant assessment. This accords with the AP Inspector's view that provision should be 330pa and that the allocations needed to be increased to meet the five year requirement arising from it.
APFC276	Mr Walt Williams	Section 7. Coleford	Summary 1. The Further Changes proposed should be deemed unsustainable as the quantities do not accord with the evidence provided. 2. The quantities suggested for Coleford will greatly exceed what might be deemed sustainable for its hierarchical position/size in the Forest distribution. 3. The sites suggested for Coleford are contrary to local wishes as expressed in the consults for the highly advanced Neighbourhood Development Plan (Coleford NDP) 4. Most of the sites suggested for Coleford and contrary to its own Core Strategy Policies on building within development boundaries and protection of the open space.	The scale of development that is to be provided for is derived from the current assessment of housing requirements. The figure is based on an annual requirement of 330pa but that is an average over the whole plan period. The so called backlog (difference between the number of dwellings built and the number required according to the calculation must be met if the AP is to comply with government policy. The policy also requires that there is adequate provision in terms of available land. This is assessed by meeting the basic requirement plus the backlog and then adding a buffer of 20%. As a result the AP is required to provide land of a scale that is supported by the Further Changes. This is an increase over the scale of allocation supported by the submitted AP, and also that referred to in the CS. It is both expected and appropriate that the CS figures will be replaced by those in the AP although the overall strategy should remain. This concentrates development in the towns of which Coleford is one. The additional sites are considered appropriate and able to be realised. The scale of development is able to be accommodated as proposed, with a range of sites. The new locations are inevitably all (except one) outside the settlement boundary but the consequential changes to this are acceptable under the terms of the need to define the limits of the various settlements and preserve their settings.
APFC036	Ms Nicole Penfold, Gladman Developments	Policy FC 5 Land at Ellwood Road Milkwall	Further understanding is required regarding the issue of the site being close to a former Iron mine. The requirement for further consultation with the Coal Authority and the need for a Coal Mining Risk Assessment bring into question the deliverability of the site. Policy highlights the need to consider the Wye Valley /Forest of Dean Bat SAC. Would also raise concerns regarding potential landscape implications The SEA superficially dismisses any potential effect on the findings of the SEA by the additional allocation.	The site is close to and slightly overlaps areas identified by the Coal authority as within their high risk zones but the great majority is unaffected. It is considered that subject to appropriate detailed design, layout, construction and mitigation; the requirements for which are embedded within the plan the site could be developed without adverse effects on integrity of the European nature conservation designations. Natural England raises no objection to the further changes or the HRA (16th February 2017). In terms of landscape although the site is one of many fields around the edge of the forest it is considered that with careful appropriate development the overall character can be retained. It is not prominent in the wider landscape. The Coal Authority's response to the consultation supports the Plans proposed approach and does not object to the proposed allocation. It is also noted that Natural England raise no objection.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC070	Mr I G Ellis	Policy FC 5 Land at Ellwood Road Milkwall	This land is wholly unsuitable for development. Ellwood Rd is very narrow used for taking children to nearby school, traffic movement at times is overwhelming, no pavement either side for 1/2 mile making road unsuitable for access or departure to the site. Area has seen extensive mining activity over many years it lies between 4 mine shafts 2 of which are still open . Water being extracted from one by the local drinks company, disturbance will have serious consequences for water contamination.	The comments are noted. The site is considered able to be allocated subject to the policy proposed which acknowledges both the mining history of the area and the sensitivity of the landscape. Its relationship to the forest edge is especially important and whilst it is recognised that the loss of a field would be a significant change in the locality it is considered that a new development can be satisfactorily integrated into the landscape at this location. The principle of development was supported by a majority of respondents to a recent NDP consultation exercise (see APFC322).
APFC167	Mr David Priddis	Policy FC 5 Land at Ellwood Road Milkwall	Inclusion of this site cannot be made sound without valid surveys at correct times of year. The Habitats Regulations require that it must be proved the proposal will not impact on the SAC. This cannot be done without evidence therefore legally the precautionary principle must apply and the site be rejected.	The HRA has evaluated the potential for likely significant effects as a result of the further changes proposed. The HRA consists principally of the March 2015 publication version and September 2016 and December 2016 addendums; in light of proposed further changes to the AP. The inspector, in the interim findings and Natural England (January 2016) are satisfied with the HRA assessment process. The HRA addendums assess the impacts of the proposed AP further changes utilising that same methodology throughout. Through a precautionary approach the HRA embeds avoidance, mitigation and or cancellation requirements within AP policies where there is potential for likely significant effects. In terms of the further change FC5 (Ellwood), the policy embeds the requirements that detailed development proposals must demonstrate they will avoid adverse impacts on the integrity of the relevant SAC/SPA/Ramsar site. The policy incorporation ensures that HRA will be undertaken again, with increased specificity, at the planning application stage; at which point the appropriateness of the survey information will be examined. Natural England raises no objection to the further changes or the HRA (16th February 2017).
APFC296	Mr Derek Foster, Dean Natural Alliance	Policy FC 5 Land at Ellwood Road Milkwall	Site is within 1km of Old Bow/Old Ham SSSI, SAC, the largest known hibernaculum of lesser horseshoe bats(>1,100) in UK. HRA notes some summer surveys carried out. As bats use site in Winter, Surveys are especially needed from Autumn to Spring. Site is well within the core sustance zone. It should be excluded from the AP unless proper surveys and HRA show it is safe for development . Conditional inclusion not valid.	The HRA has evaluated the potential for likely significant effects as a result of the further changes proposed. The HRA consists principally of the March 2015 publication version and September 2016 and December 2016 addendums; in light of proposed further changes to the AP. The inspector, in the interim findings and Natural England (January 2016) are satisfied with the HRA assessment process. The HRA addendums assess the impacts of the proposed AP further changes utilising that same methodology throughout. Through a precautionary approach the HRA embeds avoidance, mitigation and or cancellation requirements within AP policies where there is potential for likely significant effects. In terms of the further change FC5 (Ellwood), the policy embeds the requirements that detailed development proposals must demonstrate they will avoid adverse impacts on the integrity of the relevant SAC/SPA/Ramsar site. The policy incorporation ensures that HRA will be undertaken again, with increased specificity, at the planning application stage; at which point the appropriateness of the survey information will be examined. Natural England raises no objection to the further changes or the HRA (16th February 2017).
APFC300	Mr Conor Lee, Hannick Homes	Policy FC 5 Land at Ellwood Road Milkwall	Support Policy FC 5 (Land at Ellwood Road, Milkwall) which identifies the site as a proposed allocation for residential development. Policy FC 5 (Land at Ellwood Road, Milkwall) identifies the site as a proposed allocation for about 48 dwellings within the Allocations Plan Further Changes December 2016 document. It is one of the sites which was approved by the Forest of Dean Council and tendered to the Inspector in September 2016, and is deemed by the Council to be required to be added to the Plan in order to provide an adequate five year land supply. Hannick Homes supports the proposed allocation of the site by Policy FC 5 and, as set out below, confirms that the site is available and can deliver about 48 dwellings within the next 5 years. We note the assessment of the site provided on page 15 of the Sustainability Appraisal Addendum. We believe there are a number of inaccuracies in this assessment and offer further information to the Council for consideration.	Support is noted as is the range of preliminary work undertaken. The site is supported by the Council and regarded as one able be developed within five years.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC310	Mrs S Fellows, Land Research & Planning Associates Ltd.	Policy FC 5 Land at Ellwood Road Milkwall	Access Issues and Site where there was Coal Mining and so High Risk issues for development.	This representation draws attention to some of the issues that need to be considered in identifying sites for development. They are all agreed as subject areas that are relevant but equally the proposed allocations are all considered to be able to satisfactorily address them. All of the sites allocated have comments in the policy which show how access is expected to be obtained although the representation refers to a number to which there are objections on the grounds that it is unclear how access can be obtained. Some of the allocated sites are on land where a mining risk assessment will be needed. This is normal and although there may be development constraints as a result, the sites concerned are very likely to remain suitable for the development proposed.
APFC322	Marilyn Cox, Coleford NDP Steering Group	Policy FC 5 Land at Ellwood Road Milkwall	<p>The Coleford Parish Neighbourhood Development Plan Steering Group wishes you take into account the emerging NDP which was developed in response to consultation with local people and with particular reference to policies CH2, CH3, CNE1, CNE2.</p> <p>During the development of the Coleford NDP policies were developed to reflect that there was not a need for more housing or support for only small developments (fewer than 10 houses) and support for development within the settlement boundary, preferable as infill, and not on green field sites. The policies of the emerging NDP should be considered in the Allocations Plan. With regard to Ellwood Road Site – Whilst 75% of the 105 respondents agreed with the policy of mixed housing, 16% wanted the area kept as green space. It is noted in the FODDC policies and flood risk document against this site “major groundwater vulnerability and source protection zone 2”. This relates to the important aquifer, from where historically and currently water is sourced for the key employer in Coleford, now owned by Suntory, who manufacture soft drinks. This is the largest employer in the Parish. Minor groundwater vulnerability is noted against Worcester Walk/ North Road (3 counts). This site was not included in the 2016 ND consultation, but is within the Green Ring, outside the settlement boundary. Lower Lane Site is also relevant to the Further Changes on the grounds noted in the dismissal by the Secretary of State, some of which applies to the other sites.</p> <p>The Coleford NDP should be given weight in the Allocations Plan. Any new development should take place within the existing settlement boundary as shown in the policies map. The Green Ring defined as part of the character of Coleford should remain green. Flood risk considerations apply to all the proposed sites in Coleford. Where development is planned then we would support small developments. Developments must show a mixed range of housing to include smaller housing.</p>	Comments in respect of the land at Ellwood Rd Milkwall are noted, The importance of protecting the groundwater source is acknowledged. The site is within an important Source Protection Zone from which there is understood to be abstraction. The AP policy will be changed to include a statement to this effect. The summary comment that the NDP consultation responses agreed with a policy for the NDP of mixed housing on the site is noted.
APFC131	Ms Nicola Packer	Paragraph 13	This area is the over-wintering site for the largest colony of Lesser Horseshoe Bats in the UK. The proposed housing development would be devastating to the welfare of the Bats. Unless surveys carried out from autumn through to spring are carried out and prove without any doubt that bats are present, then this site should be omitted. This site should be omitted from the housing allocation until such time that surveys carried out from autumn through to spring are carried out and prove without any doubt that bats are present .	The HRA has evaluated the potential for likely significant effects as a result of the further changes proposed. The HRA consists principally of the March 2015 publication version and September 2016 and December 2016 addendums; in light of proposed further changes to the AP. The inspector, in the interim findings and Natural England (January 2016) are satisfied with the HRA assessment process. The HRA addendums assess the impacts of the proposed AP further changes utilising that same methodology throughout. Through a precautionary approach the HRA embeds avoidance, mitigation and or cancellation requirements within AP policies where there is potential for likely significant effects. In terms of the further change FC5 (Ellwood), the policy embeds the requirements that detailed development proposals must demonstrate they will avoid adverse impacts on the integrity of the relevant SAC/SPA/Ramsar site. The policy incorporation ensures that HRA will be undertaken again, with increased specificity, at the planning application stage. Natural England raises no objection to the further changes or the HRA (16th February 2017).

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC037	Ms Nicole Penfold, Gladman Developments	Policy FC 6 North Road, Broadwell	<p>Gladman note that depending on which approach to housing land supply is used the Council are making differing assumptions regarding delivery rates. Gladman object to this approach, as the delivery rate assumptions should be the same for both, this is an attempt by the Council to manipulate the figures to suit the approach being taken and ensure the Council can claim to have a 5yr supply of housing. This allocation has the potential to fall within the setting of the Coleford Bowl, specifically the area protected by AP64. The supporting text to this allocation states "It adjoins the area of open landscape between Coleford and the surrounding settlements and can take advantage of this without detracting from the open setting of Coleford, which is protected by Policy AP64. Development should have this setting in mind and layouts should reflect this and the "frontage" onto Edge End Road, from which some of the site is visible." The Council's objection to development having an impact on the Coleford bowl was demonstrated by their opposition to development of land south of Berry Hill. There is an inconsistent approach being applied to sites within the area covered by Policy AP64 and landscape impact generally around Coleford . If it can be robustly demonstrated that this site should warrants the policy protection afforded by Policy AP64 then is the Council proposing it as an allocation .The site is high grade agricultural land which the council are resisting for development elsewhere in the District. The SEA superficially dismisses any potential effect on the findings of the SEA by the additional allocation.</p>	<p>The site's development is supported by the agent for the owner. It is land well related to the built up area. As it currently stands it lies within the locally designated landscape around Coleford but it is considered that the areas proposed to be allocated would not be detrimental to the policy. The site is well enclosed and its development would not compromise AP64 which seeks to protect the setting of Coleford and the surrounding settlements. Given the requirement for housing sites and the need to locate them in sustainable locations it is inevitable that greenfield sites will be needed and a high proportion of these are best and most versatile land. It is noted that the site referred to at Berry Hill in this representation is also of similar quality as well as being affected by past coal mining. It is also larger and much more prominent in the landscape.</p>
APFC082	Mr Ryan Norman, Dwr Cymru Welsh Water	Policy FC 6 North Road, Broadwell	<p>Policy FC 6 – North Road, Broadwell – 70 dwellings Sewerage There are no issues with the public sewerage network accommodating the foul-only flows from this proposed allocation, though provision of off-site sewers may be required. Wastewater treatment (all Coleford proposed allocations) Coleford is served by our Newland Wastewater Treatment Works (WwTW) for which there are no issues in accommodating the foul-only flows from the proposed allocations.</p>	<p>Comments noted.</p>
APFC324	Marilyn Cox, Coleford NDP Steering Group	Policy FC 6 North Road, Broadwell	<p>The Coleford Parish Neighbourhood Development Plan Steering Group wishes you take into account the emerging NDP which was developed in reponse to consultation with local people and with particular reference to polices CH2, CH2, CH3, CNE1, CNE2.</p> <p>During the development of the Coleford NDP policies were developed to reflect that there was not a need for more housing or support for only small developments (fewer than 10 houses) and support for development within the settlement boundary, preferable as infill, and not on green field sites. the policies of the emerging NDP should be considered in the Allocations plan. Lower Lane Site is also relevant to the Further Changes on the grounds noted in the dismissal by the Secretary of State, some of which applies to the other sites.</p> <p>The Coleford NDP should be given weight in the Allocations Plan. Any new development should take place within the existing settlement boundary as shown in the policies map. The Green Ring defined as part of the character of Coleford should remain green. Flood risk considerations apply to all the proposed sites in Coleford. Where development is planned then we would support small developments. Developments must show a mixed range of housing to include smaller housing.</p>	<p>The comment notes minor groundwater vulnerability and the fact that the site is within the AP's Locally Valued Landscape (AP64). The site is on the edge of the built up area and occupies part of the gap between Broadwell and Coleford. It is because of this identified as part of the Locally Valued Landscape in the submitted AP. The site is however not prominent in that landscape and can be considered well related to the existing built up area. for this reason and the need to identify further housing sites it is proposed to be a housing allocation.</p>

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC003	Mr Daniel Scales	Paragraph 14	This allocation is outside the defined settlement boundary within the locally valued landscape area defined Core Strategy and AP64 . The description of this location lacks necessary clarity and is potentially misleading. This allocation is contrary to the aims of the locally valued landscape area. This allocation is also contrary to the Core Strategy's objectives for Coleford ( this allocation is now referred to as North Road, Broadwell in FC 6 (which better describes the location), yet still referred to as Worcester Walk in many of the consultation materials, This may lead to potential confusion over matters concerning this allocation.	The site (to be described as North Rd, Broadwell) is considered able to be developed. Although it lies on the inside edge of the settlement it is located in such a way as to not be prominent and would not adversely affect the setting of Coleford or of Broadwell which are protected by AP64. It is agreed that the site is greenfield in common with a large number of proposed allocations. Although the AP seeks to promote the use of previously developed land where possible the need for land especially for housing means that a number of greenfield allocations have to be made. The draft policy could be amended to ensure that the landscaping to be provided is described more clearly. The site's development is supported by the agent for the owner. It is land well related to the built up area. As it currently stands it lies within the locally designated landscape around Coleford but it is considered that the areas proposed to be allocated would not be detrimental to the policy. The site is well enclosed.
APFC134	Mr Peter Tufnell, Tufnell Town & Country Planning	Paragraph 14	The allocation of this site is supported. The land owner (Mr J. Hawkins) also has adjoining land to the immediate south, with a secondary access (adjoining Folly Farm) off Machen Road, that is also available for inclusion in the AP. The land is considered to be deliverable.	Support from land owner noted (site FC6), Broadwell.
APFC038	Ms Nicole Penfold, Gladman Developments	Policy FC 7 Kings Meade, Coleford	Concerns regarding the proposed access off Kings Meade an area of existing retirement bungalows. This access is not appropriate or achievable in terms of delivering a development of this scale. The site is close to the former vicarage which is listed, the development has not been appropriately assessed to consider the implications of what is at least a less than substantial impact on this heritage asset. Also query the appropriateness of this site for a residential allocation with only a cycle path separating the site from an operational industrial estate. The potential for noise and disturbance strongly suggest the site's inappropriateness for residential development Other land around Coleford is more suitable for allocation including land south of Berry Hill. The SEA superficially dismisses any potential effect on the findings of the SEA by the additional allocation.	The development of the site is considered unlikely to have any impact on the setting of the former vicarage. The industrial area to the southwest will need to be taken into account but is separated by the cycle track and the watercourse. The watercourse is quite deeply incised and any flood risk (shown as a potential surface water impact on the margins of the site) is considered able to be adequately addressed. The development of the site has been supported by the agent for the owner who is the developer/ builder of the adjoining Kings Meade. The site is considered by the agent to be able to be accessed from that development.
APFC083	Mr Ryan Norman, Dwr Cymru Welsh Water	Policy FC 7 Kings Meade, Coleford	Policy FC 7 – Kings Meade, Coleford – 48 dwellings Sewerage There are no issues with the public sewerage network accommodating the foul-only flows from this proposed allocation, though provision of off-site sewers may be required. Waste water treatment (all Coleford proposed allocations) Coleford is served by our Newlands Wastewater Treatment Works (WwTW) for which there are no issues in accommodating the foul-only flows from the proposed allocations.	Comments noted.
APFC311	Mrs S Fellows, Land Research & Planning Associates Ltd.	Policy FC 7 Kings Meade, Coleford	Access and Flood Risk issues and Site where there was Coal Mining and so High Risk issues for development.	This representation draws attention to some of the issues that need to be considered in identifying sites for development. They are all agreed as subject areas that are relevant but equally the proposed allocations are all considered to be able to satisfactorily address them. All of the sites allocated have comments in the policy which show how access is expected to be obtained although the representation refers to a number to which there are objections on the grounds that it is unclear how access can be obtained. Flood risk is referred to and whilst it is agreed that it can be a constraint there is no material in the representation to show how. In the case of the sites referred to, neither is directly affected although there are off site issues that need to be considered. Some of the allocated sites are on land where a mining risk assessment will be needed. This is normal and although there may be development constraints as a result, the sites concerned are very likely to remain suitable for the development proposed.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC325	Marilyn Cox, Coleford NDP Steering Group	Policy FC 7 Kings Meade, Coleford	<p>The final consultation on the Coleford NDP is likely to take place end of March/April. All through the process we have dealt with the mismatch of timing with the Local Plan. The nearness of the last key stage in the submission document means that it makes sense for this to be given the weight which is alluded to by the Secretary of State as above. Any new development should take place within the existing settlement boundary as shown on your website in the policies map as part of this current consultation. Kings Meade site was not included in the NDP2016 consultation, but is not within the settlement boundary, and the following note is made in the policies and flood risk assessment "Edge of site affected by SW issues." Lower Lane Site is also relevant to the Further Changes on the grounds noted in the dismissal by the Secretary of State, some of which applies to the other sites.</p> <p>The Coleford NDP should be given weight in the Allocations Plan. Any new development should take place within the existing settlement boundary as shown in the policies map. The Green Ring defined as part of the character of Coleford should remain green. Flood risk considerations apply to all the proposed sites in Coleford. Where development is planned then we would support small developments. Developments must show a mixed range of housing to include smaller housing.</p>	<p>This site is acknowledged to be on the edge but outside the settlement boundary as originally envisaged in the submitted AP. It is however considered that it could be satisfactorily developed without major impact or harm to the locally valued landscape area. The watercourse which is well below the level of the proposed allocation but is close by has the potential to flood but the site itself is only marginally affected if at all.</p>
APFC056	Mr Ivor Ellis	Paragraph 18	<p>Unsound, the local council has not provided any proof that the housing stock in the Coleford area needs to be increased, also in one instance they are saying this area is protected from development which could detract from the setting of Coleford then in the next instance, to justify further development they say it will have no effect on the setting of the town.</p>	<p>This comment is made against a paragraph of the Further Changes document which relates to the proposed allocation of land off Kings Meade. In general the Council accepts that additional land (beyond that originally identified in the submitted AP) needs to be identified. This needs to be identified in accord with national and other local planning policies which the AP is guided by. The identification of new sites well related to existing towns is in accord with this. The site proposed is an extension of an existing development close to the town centre, and has the support of the land owner. It is a site which is not prominent in the landscape and is not otherwise constrained. The land proposed for development would be one of a number of additional sites proposed in a range of locations including all four towns. It addresses district wide need.</p>
APFC039	Ms Nicole Penfold, Gladman Developments	Policy FC 8 Land at Poolway Farm, Coleford	<p>The site location conflicts with policy AP64 and contradicts the Council's approach elsewhere protecting locally important area of landscape. The allocation sits entirely within the Coleford Bowl, and falls within AP64. The extension moves further into the bowl area, a clearly prominent and evident development. Development of this site would narrow the gap between Coleford and Berry Hill. This site fulfils the purpose of Policy AP64 as proposed by the Council and therefore, protection from encroaching and prominent on this site would be appropriate. Concerns regarding the inconsistent approach to the application of Policy AP64. The site is also best and most versatile agricultural land its allocation is inconsistency with the Council's protection of such land elsewhere when development is proposed. Historically there has been issues of flooding on this site, questioning the suitability as a proposed housing allocation. The site is close to the Coombs which is listed, the development has not been appropriately assessed to consider the implications on this heritage asset. Part of this site was allocated by the 2005 Local Plan and has not been advanced for development since then. There has been no evidence to suggest the situation has changed, Is there any appetite to develop this site. The site certainly should not be included in the 5 supply and its suitability for allocation is challenged, especially this extended area into the designated locally valued landscape. The Gladman do not consider site to be deliverable and object to its proposed allocation. Other land around Coleford is more suitable for allocation including land south of Berry Hill. The SEA superficially dismisses any potential effect on the findings of the SEA by the additional allocation.</p>	<p>The allocation of this land is supported by the agent for the developer and is considered a logical extension to the land already allocated in the present (2005) LP as well as the draft AP. It is considered to be deliverable, possibly at a rate beyond the 50 dwellings assumed in five years (and supported by the AP Inspector). Its development can take full account of the watercourse which crosses the site and the whole can be designed in order to retain the existing farmhouse and buildings worthy of retention. It is not considered that the development would have any impact on the Listed Building, The Coombs.</p>

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC084	Mr Ryan Norman, Dwr Cymru Welsh Water	Policy FC 8 Land at Poolway Farm, Coleford	Policy FC 8 – Land at Poolway Farm, Coleford – 140 dwellings (including 80 dwellings in submitted Allocations Plan) Sewerage There are no issues with the public sewerage network accommodating the foul-only flows from this proposed allocation, though provision of off-site sewers may be required. A 225mm combined public sewer traverses the eastern part of the site, for which protection measures will be required in the form of a diversion or easement width. Wastewater treatment (all Coleford proposed allocations) Coleford is served by our Newlands Wastewater Treatment Works (WwTW) for which there are no issues in accommodating the foul-only flows from the proposed allocations.	Comments noted.
APFC166	Mr Neil Jones, M F Freeman	Policy FC 8 Land at Poolway Farm, Coleford	The extension to the allocation site boundary is supported. We suggest that it should extend slightly further, to the existing field boundary. This would enable a more comprehensive nature of development.	The representations are noted and the Council agree that the site is developable and can provide dwellings for the five year supply. At the time of the last assessment this total was assumed to be 50, following the Inspector's findings. Since that date these further representations suggest that an additional allowance may be appropriate based perhaps on two years development at 40 per year. This is below that achieved on the Owen Farm (David Wilson) site in Coleford. The present calculations for the land supply are based on a total of 50 from this site within five years. This is considered by the council to be at the low end of the likely range given the changes now proposed and the representation received. The general principles of development outlined in the representation are broadly agreed. in respect of the possible extension of the site, this could be accepted but only if part of the land were to be retained as open space/ landscaping. This could be identified on the policies map and be specified in the policy.
APFC312	Mrs S Fellows, Land Research & Planning Associates Ltd.	Policy FC 8 Land at Poolway Farm, Coleford	Access issues and Site where there was Coal Mining and so High Risk issues for development.	Some of the allocated sites are on land where a mining risk assessment will be needed. This is normal and although there may be development constraints as a result, the sites concerned are very likely to remain suitable for the development as proposed. Access is a matter considered in each of the draft policies which show how access is expected to be obtained. In all cases it is considered satisfactory.
APFC327	Marilyn Cox, Coleford NDP Steering Group	Policy FC 8 Land at Poolway Farm, Coleford	The Coleford Parish Neighbourhood Development Plan Steering Group wishes you take into account the emerging NDP which was developed in reponse to consultation with local people and with particular reference to polices CH2, CH2, CH3, CNE1, CNE2. During the development of the Coleford NDP policies were developed to reflect that there was not a need for more housing or support for only small developments (fewer than 10 houses) and support for development within the settlement boundary, preferable as infill, and not on green field sites. the policies of the emerging NDP should be considered in the Allocations plan. With ref to Poolway Farm is "minor groundwater vulnerability see policy re watercourse." Some of the site is in the Green Ring, outside the settlement boundary. Lower Lane Site is also relevant to the Further Changes on the grounds noted in the dismissal by the Secretary of State, some of which applies to the other sites. The Coleford NDP should be given weight in the Allocations Plan. Any new development should take place within the existing settlement boundary as shown in the policies map. The Green Ring defined as part of the character of Coleford should remain green. Flood risk considerations apply to all the proposed sites in Coleford. Where development is planned then we would support small developments. Developments must show a mixed range of housing to include smaller housing.	The proposed extension of this site is outside the settlement boundary as defined on the submitted plan. It is however considered well related to the existing town and the development of the land will enable the larger site to be planned in a more comprehensive manner so that for example the watercourse crossing the site can be protected and the existing buildings retained where merited (farmhouse and those suitable for conversion). It is recognised that the site is presently within the Locally Valued Landscape but it is not considered that its development will have a material effect on that policy and its purpose except at a very local level.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC040	Ms Nicole Penfold, Gladman Developments	Policy FC 9 Tufthorn Avenue, Coleford	Concerns regarding potential amenity implications the site is surrounded to the north and east by commercial/industrial operations. Concerns re the loss of employment land. The site is in very close proximity to the listed ex Grammar School and there has been no assessment of the clear potential for impact on the setting of this asset. Further justification and consideration is required in relation to this proposed site. Other land around Coleford is more suitable for allocation including land south of Berry Hill. The SEA superficially dismisses any potential effect on the findings of the SEA by the additional allocation.	Although it is recognised that this site adjoins an area of established industry it also adjoins a residential area. It is proposed to be allocated for mixed development in a manner that would enable new employment uses on the land as well as dwellings. Although careful design would be necessary, the site which is partly brownfield would be able to find a beneficial use. It is considered capable of delivery within five years in part and there is also a current planning application which is in general accord with the proposed AP policy. The reference to a nearby Listed Building is thought to be an error as the nearest is some 688m away (Whitehall Farm)
APFC085	Mr Ryan Norman, Dwr Cymru Welsh Water	Policy FC 9 Tufthorn Avenue, Coleford	Policy FC 9 – Land at Tufthorn Avenue, Coleford – 60 dwellings and B1 use Sewerage There are no issues with the public sewerage network accommodating the foul-only flows from this proposed allocation, though provision of off-site sewers may be required. A 225mm combined public sewer traverses the western part of the site, for which protection measures will be required in the form of a diversion or easement width. Wastewater treatment (all Coleford proposed allocations) Coleford is served by our Newlands Wastewater Treatment Works (WwTW) for which there are no issues in accommodating the foul-only flows from the proposed allocations.	Comments noted.
APFC326	Marilyn Cox, Coleford NDP Steering Group	Policy FC 9 Tufthorn Avenue, Coleford	<p>The Coleford Parish Neighbourhood Development Plan Steering Group wishes you take into account the emerging NDP which was developed in response to consultation with local people and with particular reference to policies CH2, CH3, CNE1, CNE2.</p> <p>During the development of the Coleford NDP policies were developed to reflect that there was not a need for more housing or support for only small developments (fewer than 10 houses) and support for development within the settlement boundary, preferable as infill, and not on green field sites. the policies of the emerging NDP should be considered in the Allocations plan. With regard to Tufthorn Ave site was not included in the 2016 NDP consultation, but is within the settlement boundary. However in the policies and flood risk document is noted "Edge of site adjoins watercourse which has potential SW flood issue". Note a recent planning permission was given for Aldi on a site opposite, but nearer the traffic lights. Lower Lane Site is also relevant to the Further Changes on the grounds noted in the dismissal by the Secretary of State, some of which applies to the other sites.</p> <p>The Coleford NDP should be given weight in the Allocations Plan. Any new development should take place within the existing settlement boundary as shown in the policies map. The Green Ring defined as part of the character of Coleford should remain green. Flood risk considerations apply to all the proposed sites in Coleford. Where development is planned then we would support small developments. Developments must show a mixed range of housing to include smaller housing.</p>	This site is the subject of a current application and comments are made and noted in respect of it being adjoining a watercourse which may have SW flooding issue. The site is considered by the council to be able to be developed in the manner proposed in the draft policy, FC9.
APFC139	Mrs Lindy Gregory	Section 8. Newent	Support allocation at Southend Lane, we are concerned that the allocation plan has not been prepared in accordance with the spatial strategy of the Core Strategy because a significant proportion of the housing allocations in the major villages and service villages of the district. We recognise that that housing allocations can enhance and maintain the vitality of rural communities, but we are concerned that the proportion of housing allocations in the major and service villages run contrary to the aims of policy CSP.4 of the Core Strategy which states that new development should be concentrated in the towns where there is already good access to employment and where additional employment can be provided. The Allocations plan should be revised to reflect the hierarchy of settlement and the spatial strategy of the Core Strategy. We believe that this could be achieved by removing the restrictive arbitrary boundary and extending the allocation at Southend Lane, Newent to include the remainder of the field parcel to the east.	Support noted. The site is also the subject of supporting representations from a developer and an housebuilder. It is considered able to provide new homes within the first five years. The whole field is not proposed to be allocated at the present time but its potential for development could be considered alongside other options and the prevailing need at the time of the plan review. The Council do not consider there to be a disproportionate allocation of housing to the service villages so there is no need for the "rebalancing" suggested.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
<b>APFC042</b>	Ms Nicole Penfold, Gladman Developments	Policy FC 10 Southend Lane, Newent	<p>A key issue for this site is the landscape impact from the east, compounded by the fact that there is no distinct defensible boundary for the middle parcel of the site. The development will have a significant adverse impact upon views from the east in particular from the existing Public Right of Way. Concerns regarding access, there is no access through the persimmon scheme to the remaining parcels of the allocation. The development of that site was not anticipated to access to additional land and existing estate roads. both within the new Persimmon development or generally approach roads through the adjacent residential area are not appropriate to support the additional traffic. Southend Lane is very narrow and not a suitable or appropriate access solution for any additional traffic Southend Lane will serve the redevelopment the former Glasshouses to the south 25 dwellings and serves existing uses further east. Concerns regarding the location of the site in relation to the listed building to the south and the views towards this, along with any impact on other non designated assets locally in this part of Newent and on their settings. These issues have not been given sufficient and proper consideration. The site is currently greenfield. The proposed development is in close proximity and in direct line of sight from the listed building. It is also on the direct approach to the listed building along Southend Lane. The implications and potential for at least less than substantial harm to the local heritage assets has not been considered appropriately. The site is also best and most versatile agricultural land including Grade 2. The allocation of this land for housing is inconsistent with the Councils approach to resist land for development elsewhere in Newent for this reason. Other land in Newent is better placed and more suited to allocation in Newent including land at Ross Road Newent promoted by Gladman. The SEA superficially dismisses any potential effect on the findings of the SEA by the additional allocation.</p>	<p>The allocation of this site has the support of the owner who advocates a larger site being identified. One potential developer who is building on land to the immediate north supports the allocation and considers that access can be obtained from this development. Representations opposing the site's allocation indicate it is good agricultural land which is correct. Objections to the potential landscape impact refer to the impact when seen from the east. Due to the intervening land use between the proposed allocation and the countryside to the east this is not considered an issue. Although it would be possible to identify the whole of the field for development, the present needs (a five year land supply) would not be affected by this. The "whole field" does have potential to be identified for development although this may be better considered in the context of any plan review.</p>
<b>APFC151</b>	Mr Phil Hardwick, Robert Hitchins Limited	Policy FC 10 Southend Lane, Newent	Support for Policy FC10- 120 houses at Southend Lane Newent .	The comments in support of the proposed allocation are noted.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC301	Mr J A W Wildsmith	Policy FC 10 Southend Lane, Newent	<p>We write further to your consultation regarding the aforementioned and would offer the following representations on behalf of Persimmon Homes and the landowners. Whilst we welcome the residential allocation of the land at Southend Lane, Newent (FC10), we would request that the restrictive, arbitrary boundary that defines the allocation is removed, and the boundary extended to include the remainder of the field parcel to the east as illustrated on the enclosed plan (edged red). Extending the allocation in this way will reinforce the aims and objectives of the spatial strategy of the Core Strategy by focussing growth in the sustainable settlement of Newent. The extended allocation will also secure: A logical and natural allocation that overcomes the arbitrary and restrictive boundary of the existing proposed allocation; A well contained allocation that has regard the physical features of the site (trees and hedgerows) and forms a defensible boundary; An allocation framed by existing and proposed development on all sides (existing and new development to the north and west, properties fronting Southend Lane and former nursery to the south, and travellers site to the east); An additional supply of homes for local people at affordable prices; Economic benefits that will improve the vitality and vibrancy of Newent which will help sustain local businesses and services in the town. Our assessment indicates that the revised allocation could deliver an additional 100 units bringing the total quantum of potential development to 220 dwellings, which will help address the housing backlog that exists in a sustainable location with a proven demand for housing. The development at Foley Gardens, Newent – which adjoins the proposed allocation - has proved popular and we see the extended allocation as an opportunity to build on this success, by delivering housing in a sustainable location with a proven demand for housing. Persimmon and the landowner have committed to work closely together to ensure deliverability of the proposed allocated site, and if allocated, for the remainder of the land edged in red.</p>	<p>The concentration of development in towns is maintained in the AP when the proposed further changes are taken into account. The policy was not one of excluding development in the villages especially the service and major/ group villages. It remains the case that the bulk of the new allocations are made in the towns.</p>
APFC313	Mrs S Fellows, Land Research & Planning Associates Ltd.	Policy FC 10 Southend Lane, Newent	<p>Access Issues.</p>	<p>All of the sites allocated have comments in the policy which show how access is expected to be obtained although the representation refers to a number to which there are objections on the grounds that it is unclear how access can be obtained. In the case of this site representations in support also state how access (through the development to the north) would be obtained.</p>
APFC043	Ms Nicole Penfold, Gladman Developments	Policy FC 11 Cleeve Mill Lane/ Gloucester Street Newent	<p>Gladman note that the smaller parcel to the north of the Cleeve Mill Lane is currently under construction. The proposed vehicular access is principally from the south into Gloucester Street, with limited access to Cleeve Mill Lane or onto Gloucester Street and Croft Road. Gladman object to the allocation of this site. Firstly due to the location immediately adjacent to the sewage treatment works, Gladman do not consider this location to be appropriate for housing in principle. Further to this Gladman raise concerns regarding potential landscape sensitivity, particularly from the east. The site is prominent in distant views from the east and would have a significant urbanising effect on this side of the town. The site is also at least in part Grade 1 agricultural land, the highest land grade and the allocation of this land for housing is inconsistent with the Councils approach to resist land for development elsewhere in Newent for this reason. The SEA superficially dismisses any potential effect on the findings of the SEA by the additional allocation.</p>	<p>The comments are noted, however the land as it is proposed to be allocated is considered to be suitable for allocation and deliverable. It is considered that the area to be developed would be sufficiently far from the STW. The site is in common for example with that promoted by Gladman off the Ross Rd best and most versatile land. In making a balanced judgement and considering this site's ability to be allocated for recreation and housing it is considered that the site should be allocated in the AP.</p>
APFC314	Mrs S Fellows, Land Research & Planning Associates Ltd.	Policy FC 11 Cleeve Mill Lane/ Gloucester Street Newent	<p>Ecology issues.</p>	<p>This representation draws attention to some of the issues that need to be considered in identifying sites for development. They are all agreed as subject areas that are relevant but equally the proposed allocations are all considered to be able to satisfactorily address them. Ecology can also be a constraint but again it is a matter of carrying out assessments as necessary and the sites proposed at present are all considered able to be developed.</p>

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC269	Mr Alec Davis, Petition Coordinator	Section 9. Alvington	Residents of Alvington are clearly against any further increases in the size of what is identified as a service village. The village is surrounded by good quality agricultural land and wish to maintain this and the vista for future generations. Both nearby Lydney and Chepstow are experiencing extensive housing booms where they have services to support an increase in population. why build in Alvington where very limited services exist.	The comment and petition is noted. The current allocation proposed coincides in area with the permission granted on appeal late in 2016 (3153161) Clanna Lane. The site is therefore regarded as available. The Council do not support any increase in size of the site and therefore consider the number of dwellings (about 12) to be appropriate for the site although the precise number and layout would have to be established through a detail application.
APFC045	Ms Nicole Penfold, Gladman Developments	Policy FC 12 Clanna Road, Alvington	A residential scheme was permitted for this site at appeal in 2016 and therefore it really should be treated as a commitment and update to the supply when a future year base date calculation is prepared. Notwithstanding this, concerns with respect to the site adjoining the conservation area and also landscape sensitivity. The Parish Council also raised the issue of the potential for surface water flooding off Clanna Road. The SEA superficially dismisses any potential effect on the findings of the SEA by the additional allocation.	The site is considered deliverable in the form that was permitted. The issues of surface water drainage and landscape were considered by the Inspector and an outline consent exists for the land.
APFC073	Mrs Emma Money, Alvington Parish Council	Policy FC 12 Clanna Road, Alvington	Councillors and Parishioners have expressed concern about the inclusion of the proposed development in Clanna Road (Lane) in the draft Development Plan issued in December 2016 as this was undoubtedly used as supporting information resulting in the approval of this development under appeal. With that said neither the Council nor the Alvington Residents would like to see this potential development included within any revision to the Settlement Boundary in future. Objection to the DSB being extended. Flooding : There is extensive evidence that there will be Increased runoff to the existing surface water infrastructure which already experiences flooding in both recent and an historic context . Ecological : T his is A1 agricultural land and there are other brown field sites more suited to property development in surrounding areas near to Alvington. Hedges have been removed to create larger fields this contradicts ecological practices where hedging is considered to be wildlife corridors important for retaining nesting birds, reptiles and other small mammals indigenous to the country side of this area. Archaeological : T he site may contain evidence of post medieval iron working , any finds concomitant with the metal slagging (carbon detritus) needs Carbon 14 dating and/or typology to establish its chronology and type as this area may contain important relic archaeology that would further add to the narrative of previous settlements and their occupants. Highways Issues: A village traffic report the findings confirmed an increase in the A48 traffic to >11000 vehicles per day and Clanna lanes /Garlands Rd was over 1000 vehicles a day many being large ag machinery or lorries using sat nav to find the shortest route. The lane’s road surface and grass curbs are now being eroded with the sediment being deposited in the upper Clanna Lane drainage system. further compounded with high volumes of vehicular traffic accessing the A48 by the busy Globe Inn on the corner of Clanna Lane and the A48 creating a danger to pedestrians and road users. In regard to building on Green Belt land it is clear that unless, and I quote (Gavin Barwel MP Planning and Housing Minister) there are exceptional circumstances building on green belt is still sacrosanct and any new builds should use the many Brown field sites that are available. In conclusion, it is the view of many of the residents of both Clanna Lane and the wider community of Alvington that any development that erodes the surrounding Green fields , or impacts on any residents of Alvington should be rejected or at least reconsidered due to the current problems on Clanna Lane and agricultural fields that border it.	There is acknowledgement by PC that the allocation as proposed has permission. There are no major issues as proposed by FoDDC. It is considered that the proposed allocation should if it becomes a MM be limited to the area occupied by the permission now granted. The policy as drafted and the permission granted take account of the surface water flooding which affects Clanna Lane. Objections to the highway impact, ecology and landscape have been considered in the appeal decision and AP supports development of a similar nature. The Council would not support an increase in the site area.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC293	Mr Carl Cording, Environment Agency	Policy FC 12 Clanna Road, Alvington	<p>We have not undertaken an exhaustive review of the Flood Risk Keynote Paper but have cause to question the robustness of the assessment undertaken to date. The assessment table on page 10 fails to take account of fluvial flood risk. This means the fluvial flood risk to 10 new sites has not been carried at, or at least not documented in the supporting evidence base to the ADPD. A targeted review of the Flood Risk Keynote Paper has identified the following omissions that compound our concerns with regards the assessment of flood risk carried out: We recommend that the Flood Risk Keynote paper is revisited to address the concerns re the sites above, , as it would seem that a thorough assessment of Flood Risks to and from allocated sites has not been undertaken to date. We recommend that you check whether any of the additional allocations proposed are at risk of river or tidal flooding (i.e. Flood Zones 2 or 3')</p> <p>Policy FC12- Alvington, Clanna Rd.- The Keynote Paper has failed to highlight the culverted watercourse that transects the site and the flood risks associated with this feature. Opportunities to open up this culvert should be explored. Whilst the ordinary watercourse may not have been modelled and have mapped flood zones, that is not to say is free from flood risk.</p>	<p>This site has planning permission for development (on appeal) and is considered by the Council and by the Inspector to be able to be developed in the manner permitted. There is an existing surface water problem in Clanna Lane which the development will need to address. The policy and the permission both take account of this. see <a href="http://www.fdean.gov.uk/media/4387/land-drainage-comments-for-potential-allocations.pdf">http://www.fdean.gov.uk/media/4387/land-drainage-comments-for-potential-allocations.pdf</a> for additional material.</p>
APFC046	Ms Nicole Penfold, Gladman Developments	Policy FC 13	<p>Concerns regarding the deliverability of this site particularly in relation to the significant adverse landscape implications due to the sites prominent location on the hillside. Development proposals for this site must be able to demonstrate that there is no adverse effects on the integrity of the River Severn SAC, SPA and Ramsar site. The site is best and most versatile agricultural land. The allocation of this land for housing is inconsistent with the Councils approach to resist land for development elsewhere in the District for this reason. These concerns need to be addressed in order for the Council to be confident that the site is deliverable and therefore appropriate to be allocated for housing. The SEA superficially dismisses any potential effect on the findings of the SEA by the additional allocation.</p>	<p>The site is considered developable and in terms of landscape impact is acceptable in the context of its potential impact. The site subject of the further changes consultation is an allocation for what would be an addition to land already proposed to be allocated. There is a current planning application for the development of 57 homes. The Council do resist the development of sites that are considered inappropriate. The reasons for this include those referred to but equally the AP must provide sufficient land and balance the various considerations in order to allocate the most suitable sites. This site adjoins a major village which has a good range of services. It is in common with many other sites best and most versatile agricultural land.</p>
APFC315	Mrs S Fellows, Land Research & Planning Associates Ltd.	Policy FC 13 High Street, Drybrook	<p>Access issues.</p>	<p>The current planning application and the proposed policy both cover the provision of access to the site and show how it can be satisfactorily obtained.</p>
APFC077	Mr and Mrs Parslow	Section 23. Hartpury	<p>Please consider the site identified within plan B attached, this site also adjoins the new Village Hall and Primary School and again has its own existing access to Over Old Road and is deliverable and sustainable within the 5/ 10 year plan.</p>	<p>The land identified is noted, but is not considered necessary at present and has not be subject to detailed assessment regarding its suitability for allocation. It has been recorded as able to be developed in the Council's SHLAA although this simply reflects its technical suitability.</p>
APFC047	Ms Nicole Penfold, Gladman Developments	Policy FC 14 Hartpury, Adjoining Village Hall	<p>Policy FC14 proposed to allocate land adjoining the village hall for the delivery of 12 dwellings. Gladman object to the allocation and note that the proposed vehicular access for this site is from Over Old Road, this is a very narrow road and consequently Gladman doubt its suitability as an access for the proposed scale of development on this site. Gladman also note that with reference to the affordable housing scheme off School Close, the Parish Council raised the issue of flooding in the general area. The Council need to be clear that flooding will not be an issue for the proposed allocation as this could affect the delivery of the dwellings allocated for this site. This has not been assessed to date in the allocation of the site. The site is also in very close proximity to the listed Chapel and there has been no assessment of the clear potential for impact on the setting of this asset in line with the Framework. Concerns regarding access and flooding need to be considered and the Council need to be confident that this site is deliverable if it is to remain as an allocation within the AP. The SEA superficially dismisses any potential effect on the findings of the SEA by the additional allocation.</p>	<p>The allocation proposed has the support of the landowner. It is considered able to be developed without adversely affecting the nearby chapel. Access is able to be provided.</p>

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC076	Mr and Mrs Parslow	Policy FC 14 Hartpury, Adjoining Village Hall	We would like to advise we support the land allocation adjacent to Hartpury Village Hall as identified within plan A attached. It will provide much needed housing for local people to be able to remain or return to the village they grew up in. The site adjoins Hartpury Primary School and the new Village Hall and new green space with children's playground. Therefore cars will not be required and children can walk to school and avoid parking/dropping off issues and will ensure a future supply of children to the Primary School. Public transport is easily accessible and the bus stop is within a very short walking distance of this site, the 351 Tewkesbury to Gloucester bus route providing 6/7 services per day. The Village Post Office is also only a short walk away, again avoiding the need for a car journey. There is current existing road access to Over Old Road from this site and this allocation is deliverable within the 5 year plan.	Support noted.
APFC048	Ms Nicole Penfold, Gladman Developments	Policy FC 15 Land Adjacent the Poplars, Huntley	The policy refers to the need to minimise the loss of trees on this site, consequently Gladman query whether the proposed site is capable of delivery the scale of development proposed by the Council. Gladman also note that there is a Public Right of Way crossing the site, which the policy states would need to be retained, this will also reduce the developable area of the site. The SEA superficially dismisses any potential effect on the findings of the SEA by the additional allocation.	The comments are noted: the indicative capacity of the site has been amended at an early stage in its consideration to 12 to take account of the constraints referred to.
APFC316	Mrs S Fellows, Land Research & Planning Associates Ltd.	Policy FC 15 Land Adjacent the Poplars, Huntley	Ecology issues.	This representation draws attention to some of the issues that need to be considered in identifying sites for development. They are agreed as subject areas that are relevant but equally the proposed allocations are all considered to be able to satisfactorily address them. Ecology can be a constraint but it is a matter of carrying out assessments as necessary and the sites proposed at present are all considered able to be developed.
APFC014	Rohan Torkildsen, Historic England	Policy FC 16 Old Coach Depot, Mitcheldean	This is a sensitive site adjacent to Mitcheldean Conservation Area and St Michaels and All Angels church which is grade I. The modification doubles the size of the allocation and includes raising agricultural ground to the north which falls with the setting of the Church, Conservation Area and town. We would have expected the relative suitability of the modification to be informed by an appropriate heritage assessment, setting out how the proposed extended site may contribute to the significance of the individual heritage assets, the integrity of the associated (historic) settlement, the historic landscape and /or townscape, how any harm can be avoided and how a positive enhancement may be achieved. This appears to be absent even though an additional Heritage Topic Paper and Sustainability Appraisal have been prepared.	It is agreed that the proposed additional land at this location which is part of the further changes consultation would need careful development. An addition to the policy could be made in order to emphasise the need for development to demonstrate that it is compatible with the Church and the Conservation Area although the facts are already presented under "special features" in the policy. As with most greenfield allocations in the district, the site is good quality agricultural land (best and most versatile). The majority of the site is at a low level similar to the church and development though it will need to be carefully designed will not have an adverse impact especially for the elevated parts of the site. The present coach depot buildings are relatively large and their presence and potential use could have a detrimental impact on the Conservation Area and the setting of the church. The options for access appear to offer a choice rather than a constraint and one advantage of the extended site could be the ability to use a vehicular access which is not close to the church for all or some of the development.
APFC049	Ms Nicole Penfold, Gladman Developments	Policy FC 16 Old Coach Depot, Mitcheldean	There are adverse landscape implications as the site rises up the hill away from the existing built form in Mitcheldean. The additional land extends the site beyond just the previously developed site of the former coach depot and now includes more sensitive adjoining greenfield land. Description of the site as the old coach depot does not fairly describe the site, Council's assessment including in the SEA does not note this distinction. The site adjoins the conservation area and lies within the setting of St. Michaels church(Grade 1 listed), the significant potential for adverse impact has not been assessed particularly as the site now extends onto greenfield land .The proposed access for this allocations is off Churchill Way, St. Michaels Close or both ,these site accesses are unsuitable due to potential conflicts with existing dwellings in these locations. The SEA superficially dismisses any potential effect on the findings of the SEA by the additional allocation.	It is agreed that the proposed additional land at this location which is part of the further changes consultation would need careful development. An addition to the policy could be made in order to emphasise the need for development to demonstrate that it is compatible with the Church and the Conservation Area although the facts are already presented under "special features". As with most greenfield allocations in the district, the site is good quality agricultural land (best and most versatile). The options for access appear to offer a choice rather than a constraint and one advantage of the extended site could be the ability to use a vehicular access which is not close to the church for all or some of the development. The SA/SEA assesses and records the change in the potential for landscape impact as a result of the increased allocation.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC135	Mr Peter Tufnell, Tufnell Town & Country Planning	Policy FC 16 Old Coach Depot, Mitcheldean	This two stage approach to add undefined parcels of green field land to the original small scale brownfield site are questioned. as is whether the LPA has had proper regard to: a)The impact of the development on the setting of the Grade 1 Church; or b)The nearby Conservation Area; c) landscape impact d) access constraint. Whilst the site is in a physically sustainable location and Mitcheldean is a settlement where further development should be taking place, this site does not appear to have been "chosen" with due care.	It is agreed that the proposed additional land at this location which is part of the further changes consultation would need careful development. An addition to the policy could be made in order to emphasise the need for development to demonstrate that it is compatible with the Church and the Conservation Area although the facts are already presented under "special features". As with most greenfield allocations in the district, the site is good quality agricultural land (best and most versatile). The options for access appear to offer a choice rather than a constraint and one advantage of the extended site could be the ability to use a vehicular access which is not close to the church for all or some of the development.
APFC317	Mrs S Fellows, Land Research & Planning Associates Ltd.	Policy FC 16 Old Coach Depot, Mitcheldean	Access issues and site is notably close to the Church (presumably Grade I or II Listed)	This representation draws attention to some of the issues that need to be considered in identifying sites for development. They are all agreed as subject areas that are relevant but equally the proposed allocations are all considered to be able to satisfactorily address them. It is agreed that there are specific heritage issues in respect of the proposed allocations at Mitcheldean and Staunton, however subject to the comments in response to representations received the sites are considered able to be developed. All of the sites allocated have comments in the policy which show how access is expected to be obtained although the representation refers to a number to which there are objections on the grounds that it is unclear how access can be obtained.
APFC025	Mr David Tingle, Newnham Parish Council	Policy FC 17	The Parish council argue that the increase from 40 to 95 houses is wholly disproportionate and not in conformity with the explicit policies in the Core Strategy. The people of Newnham have been open and constructive about development throughout the consultation process, provided it maintains a sustainable community with good design and appropriate infrastructure.. An allocation of 95 is unsustainable and irrational and represents a desperate opportunistic land grab, rather than meeting identified local housing needs. An allocation of 95 units rather stretches the meaning of the quantifier "modest" as it represents a roughly 20% uplift of both housing and population. How the character of the village can be retained in the light of densification of development is a mystery, nor is it clear what the effect of a satellite development would be on the Conservation Area and indeed on the fabric and cohesion of the whole settlement. The field between the school and Unlawater Lane has an area of 1.6 ha and an allocation of 40 units. This yields plots of 400 sqm or 20x20 m. The likely character of the development would therefore be noisy, stressful rabbit hutches which would be totally out of character with the rest of the village. Section 3.40 (CS)states that in smaller settlements development of appropriate scale can be considered if it is able to: support economic activity extend the range of services meets identified local housing needs The 95 units in Newnham are unlikely to achieve any of this and will almost certainly end up as a dormitory satellite. there was no tangible evidence that local views had any impact on the outcome. The latest allocation of 95 units represents a clear and unacceptable breach of the District Council's own Core Strategy which is meant to "respond to the needs and aspirations of the community".	The principle of allocating development to major villages is established in the CS. The proposed increase in the scale of this allocation is one that does represent a substantial increase, but is considered able to be accommodated within the plan period. The proposed allocation is considered sustainable under the terms of the NPPF, having been assessed prior to the published further change. The site is considered able to be developed and substantially completed within five years. The proposal is in accord with the strategy of the CS although the scale of the allocation exceeds that referred to in that document. This arises primarily as a result of the revised calculation of overall housing need and the need to identify land that can meet the five year supply that arises from the revised need. The land is well related to the existing village and adjoins it but its development would not have a harmful impact on the Conservation Area and may provide some benefits in the form of improved access to the school, as required by the policy. The village has a range of services and these could benefit from new development. In recent years there have been very few dwellings completed in the village with the last large scheme (of 29) being finished in 2011.
APFC050	Ms Nicole Penfold, Gladman Developments	Policy FC 17 Land North of Newnham on Severn and adjoining Unlawater Lane	This site lies within the setting of the conservation area in close proximity to listed buildings and the significant potential for adverse impact to the setting of these heritage assets has not been properly assessed in line with the Framework and statutory requirements. There are also known significant ecological interest in the locality and there is no evidence to explain that the ecological impacts of the propose development can be appropriately mitigated. Proposals on this site would also need to demonstrate that they do not have an adverse effect on the Wye Valley and Forest of Dean Bat SAC and Severn Estuary SAC, SPA and Ramsar Sites The SEA superficially dismisses any potential effect on the findings of the SEA by the additional allocation.	The site adjoins and also includes a small part of the Conservation Area. There are also listed buildings close by. These have been taken into account when the site was first allocated and the parts of the whole allocation that are closest to the CA are within the area originally proposed to be allocated. It is considered that subject to appropriate detailed design, layout, construction and mitigation; the requirements for which are embedded within the plan, the site could be developed without adverse effects on integrity of the European nature conservation designations. Natural England raises no objection to the further changes or the HRA (16th February 2017). It is also noted that there are no objections from HE.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC141	Mr Peter Monk	Policy FC 17 Land North of Newnham on Severn and adjoining Unlawater Lane	The FC17 allocation is of doubtful viability and deliverability, due to coastal tidal flooding combined with Surface and foul water sewage pumps having inadequate capacity to always relieve storm flows. In addition, Allocation FC17 and its new road access rising from the A48 might well cause harm to the approach to, or river views of, what the Forest of Dean District Council describe in a response to the representations at the Allocations Examination in 2016 as "the historic settlement of Newnham on Severn [which] is of high architectural importance as a well-preserved former port". What is not at all clear is whether, following architect designed enhancement of modern cottages built next to Unlawater House at Unlawater Rise, that it is still true for the Council to say that "modern development has already compromised the historic character of this part of the settlement", as claimed in this the "Matter 10a Other Settlements" paper dated January 2016. The conclusion is that the field west of Unlawater Lane should be allocated to uses in the period up to 2026 (including a new emergency access track to the primary school), that would not require a new road access off the A48, would preserve the character of the Unlawater Lane green walking and cycling approach to the village cricket field and the footpath to the West view children's play area. The FC17 allocation would be abandoned. The 40 or so extra care units and perhaps 3 custom-build housing units fronting the lane, together amount to 43 units or so that could count against the OAN housing need for the plan period, as allowed for in national Planning Practice Guidance.	The site is marginally affected by flood zone 2, but it is acknowledged that the A48 adjoining the site and to the south is within zone 3. The area proposed for development would be wholly outside this and the provision of the access to the school for example as required by the policy could also serve as emergency access. Whatever is developed on the site it will need to be safe from flooding. The proposed allocation is well related to the existing village unlike for example land at Elton Corner. Representations from the potential developer of the site have been received and the site is considered to be viable especially in the form it now is having been extended as part of the further proposed changes. The council is not aware of any sewage or drainage issues that cannot be properly addressed by a developer. The site is allocated for housing and could within that definition provide a range of accommodation. Should there be a proven need for a form of supported or sheltered housing that could be considered under the present policy. The council's view remains that expressed in the reply to the Inspector's Interim findings, namely that there is a surplus at present of certain types of accommodation (EDO62A). With the proposed modified wording to acknowledge the situation and the consideration that sites allocated for housing could provide a wide variety of accommodation, no change in respect of the site at Newnham is considered necessary.
APFC168	Mr David Priddis	Policy FC 17 Land North of Newnham on Severn and adjoining Unlawater Lane	The additional site will remove hedgerows. The site is within the Dean Hall SSSI, SAC, Core sustenance zone for Greater Horseshoe Bats. As it cannot be shown it will not impact on SAC, it is not valid to include the site. Conditional approval is not in accordance with the Habitats Regulations. Evidence from surveys needed first to show site is safe.	The HRA has evaluated the potential for likely significant effects as a result of the further changes proposed. The HRA consists principally of the March 2015 publication version and September 2016 and December 2016 addendums; in light of proposed further changes to the AP. The inspector, in the interim findings and Natural England (January 2016) are satisfied with the HRA assessment process. The HRA addendums assess the impacts of the proposed AP further changes utilising that same methodology throughout. Through a precautionary approach the HRA embeds avoidance, mitigation and or cancellation requirements within AP policies where there is potential for likely significant effects. In terms of the further change FC17 (Newnham), the policy embeds the requirements that detailed development proposals must demonstrate they will avoid adverse impacts on the integrity of the relevant SAC/SPA/Ramsar site. The policy incorporation ensures that HRA will be undertaken again, with increased specificity, at planning application stages. Natural England raises no objection to the further changes or the HRA (16th February 2017).
APFC265	Mr Neil Jones, M F Freeman	Policy FC 17 Land North of Newnham on Severn and adjoining Unlawater Lane	Support the inclusion of the site (Policy Ref. FC 17). The additional land is suitable for residential development in terms of the need to identify sustainable locations for growth, the additional land is required to ensure sufficient land along the A48 frontage is included within the allocation to deliver the primary access and associated visibility splays...The Council is respectfully requested to revisit the extent of the allocation with regard to Landscape and Green Infrastructure as there are clear opportunities to encompass existing hedgerows and mature trees to help define the development edge and provide immediate mature landscape mitigation for the development. The site is within walking distance of existing services and facilities. It is noted that the Council's Sustainability Appraisal (SA) work considers 'Highway Access' as a constraint to development.. However additional development at land north of Newnham can provide significant net benefits in this regard including traffic calming measures along the A48, planting along the A48 frontage to improve the A48 'gateway' to the village and, connectivity to the cricket ground and primary school. There is no sequentially preferable site in Newnham to that of the proposed allocation. The site is currently available and achievable. Freeman Homes intend submitting a planning application for the residential development during 2017.	The submission in support of the proposed allocation is noted. The council consider the site capable of delivery within five years, bringing the total close to the entire allocation. Whilst the allocation does not use an existing boundary along all of its northern edge it is considered that the approximate scale and shape should remain as defined with appropriate landscaping and boundary reinforcement which may be outside or within the allocation. Additional landscaped and open space could be provided outside the boundary of the proposed allocation.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC294	Mr Carl Cording, Environment Agency	Policy FC 17 Land North of Newnham on Severn and adjoining Unlawater Lane	<p>We have not undertaken an exhaustive review of the Flood Risk Keynote Paper but have cause to question the robustness of the assessment undertaken to date. The assessment table on page 10 fails to take account of fluvial flood risk. This means the fluvial flood risk to 10 new sites has not been carried at, or at least not documented in the supporting evidence base to the ADPD. A targeted review of the Flood Risk Keynote Paper has identified the following omissions that compound our concerns with regards the assessment of flood risk carried out: We recommend that the Flood Risk Keynote paper is revisited to address the concerns re the sites above, , as it would seem that a thorough assessment of Flood Risks to and from allocated sites has not been undertaken to date. We recommend that you check whether any of the additional allocations proposed are at risk of river or tidal flooding (i.e. Flood Zones 2 or 3')</p> <p>Policy FC17- Land North of Newnham. This is an extension to the Newnham site but our previous comments concerning this site have not been taken account of. The Keynote Paper does not acknowledge the proximity to the Severn Estuary or the presence of the Whetstone Brook that enters culvert under Unlawater Road. Whilst this ordinary watercourse may not have been modelled and have mapped flood zones, that is not to say is free from flood risk.</p>	<p>The site is within flood zone 1 but borders zone 3. It can however make provision for access without crossing into areas of risk although the main access would be from the A48 which can be affected by short periods of flooding. The site is considered developable subject to the considerations in the policy as drafted. see <a href="http://www.fdean.gov.uk/media/4387/land-drainage-comments-for-potential-allocations.pdf">http://www.fdean.gov.uk/media/4387/land-drainage-comments-for-potential-allocations.pdf</a> for additional material.</p>
APFC297	Mr Derek Foster, Dean Natural Alliance	Policy FC 17 Land North of Newnham on Severn and adjoining Unlawater Lane	<p>The additional site will remove hedgerows. The site is within the Dean Hall SSSI SAC Core sustenance zone for Greater Horeshoe Bats. As it cannot be shown it will not impact on SAC, it is not valid to include the site. Conditional approval is not in accordance with the Habitats Regulations. Evidence from surveys needed first to show site is safe.</p>	<p>The HRA has evaluated the potential for likely significant effects as a result of the further changes proposed. The HRA consists principally of the March 2015 publication version and September 2016 and December 2016 addendums; in light of proposed further changes to the AP. The inspector, in the interim findings and Natural England (January 2016) are satisfied with the HRA assessment process. The HRA addendums assess the impacts of the proposed AP further changes utilising that same methodology throughout. Through a precautionary approach the HRA embeds avoidance, mitigation and or cancellation requirements within AP policies where there is potential for likely significant effects. In terms of the further change FC17 (Newnham), the policy embeds the requirements that detailed development proposals must demonstrate they will avoid adverse impacts on the integrity of the relevant SAC/SPA/Ramsar site. The policy incorporation ensures that HRA will be undertaken again, with increased specificity, at planning application stages. Natural England raises no objection to the further changes or the HRA (16th February 2017).</p>
APFC318	Mrs S Fellows, Land Research & Planning Associates Ltd.	Policy FC 17 Land North of Newnham on Severn and adjoining Unlawater Lane	<p>Access and Flood Risk Issues.</p>	<p>This representation draws attention to some of the issues that need to be considered in identifying sites for development. They are all agreed as subject areas that are relevant but equally the proposed allocations are all considered to be able to satisfactorily address them. All of the sites allocated have comments in the policy which show how access is expected to be obtained although the representation refers to a number to which there are objections on the grounds that it is unclear how access can be obtained. Flood risk is referred to and whilst it is agreed that it can be a constraint there is no material in the representation to show how. In the case of this site referred to, it is not directly affected although there are off site issues that need to be considered.</p>

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC132	Ms Nicola Packer	Paragraph 29	Omit this area from the housing allocation. This area is an important feeding ground for a maternity roost of Greater Horseshoe bats at Littledean Hall. AP 90 in the 'Wye Valley and Forest of Dean Bat SAC' identifies the area and states 'Development will only be permitted where it can be demonstrated that it will not have an adverse effect on the integrity of the Wye Valley and Forest of Dean Bat SAC.' I can find no evidence that this lack of adverse effect has been proved.	The HRA has evaluated the potential for likely significant effects as a result of the further changes proposed. The HRA consists principally of the March 2015 publication version and September 2016 and December 2016 addendums; in light of proposed further changes to the AP. The inspector, in the interim findings and Natural England (January 2016) are satisfied with the HRA assessment process. The HRA addendums assess the impacts of the proposed AP further changes utilising that same methodology throughout. Through a precautionary approach the HRA embeds avoidance, mitigation and or cancellation requirements within AP policies where there is potential for likely significant effects. Taking into consideration these embedded measures the HRA for the AP has concluded the plan will not have an adverse effect on the integrity of European designated nature conservation sites, alone or in combination. The policy incorporations ensure that HRA will be undertaken again, with increased specificity, at planning application stages. Natural England raises no objection to the further changes or the HRA (16th February 2017).
APFC143	Mr Peter Monk	Paragraph 29	See comments under Policy FC17, Amend FC17 to show development only on the part of the site west of Unlawater Lane.	For a full response see FC141. It is considered that the proposed further change is appropriate and necessary and that the proposed additional site area is able to be developed in a satisfactory manner.
APFC144	Mr Peter Monk	Paragraph 29	See comments on Policy FC17. Delete paragraph 29.	See FC143. The allocation as proposed is considered necessary and appropriate.
APFC051	Ms Nicole Penfold, Gladman Developments	Policy FC 18 Land off Drury Lane, Redmarley	The site has however been the subject of a recent appeal and is more akin to a windfall and the site should now be more appropriately reflected as a commitment and included in the supply in a future update of the housing land supply calculation.	This site has permission granted on appeal. It will unless it has commenced by the time the AP is finalised be shown as a new policy which will allocate the land for development as permitted. If started it will be a commitment. As it has outline permission it is considered developable unless there are indications otherwise. The agent considers the site available and able to be developed inside five years and its contribution should therefore be taken into account when assessing supply.
APFC137	Mr Peter Tufnell, Tufnell Town & Country Planning	Policy FC 18 Land off Drury Lane, Redmarley	The allocation of this site, granted on appeal is fully supported. This appeal decision clearly demonstrates that the LPA has got it wrong in terms of its assessment via DSB of The Frameworks model of sustainability. There is a real danger that if the DSBs are adopted within the AP review then sites like this one (and a further recent appeal decision at Hartpury) will not come forward and sustainable development appropriate to the villages will be denied. Contrary to the flexible approach that is needed in the FOD and contrary to the vitality of local communities. The District needs rural centred policies to ensure that its rural communities survive and thrive. The current policy regime, centered as it is on the old CS restraint approach is inadequate. Provision for small builders/developers is part of the direction of travel of national policy. With positive planning, there is an opportunity for FODDC to be up with (or ahead of) the game, rather than in a position of perpetual catch up. Part of the problem is that the AP is based on outdated CS restrictive policy which are not compliant with The Framework Such a position is also being advocated by other professionals and bodies (e.g. CLA- Rural Business 2030 Report), seeking to ensure that practical steps are taken to ensure that the Governments bold ambition "solving the crisis" is realized.	Support for the intended allocation of land at Redmarley is noted. In respect of other comments, the IF refers to the adequacy of flexibility in the settlement boundaries (IF108.109). This flexibility evidenced by the relatively large number of consents for small developments will be maintained. Within the strategy there are a number of allocations proposed in service villages (Alvington, Staunton, Netherend/ Woolaston, Longhope, Huntley) in addition to permissions for previously unidentified smaller sites.
APFC087	Pollard	Section 40. Sedbury and Tutshill	Sedbury Lane is a small quiet area prone to flooding, further housing in this area will add to the run off causing the flooding and the lane will become considerably busier with traffic in both directions, it is already a rat run in the busier times of the day. More housing will ruin the nature of the area, access created in to Sedbury lane and improvements in the lane towards Beachley will not ease the traffic that will exit the lane the other way causing an already a risky lane and exit onto the main road to be even more risky. Changes to the area will impact negatively on all current residents.	It is acknowledged that there is an existing surface water flooding problem in Sedbury Lane. The Lane and its suitability for access itself would also need to be addressed and may need improvement. There may need to be contributions to improve services such as schools and GPs if the new development could not be accommodated by existing facilities. Welsh Water (responsible for water supply and for drainage) consider both to be available for the development proposed and did not object to it. The site is considered able to be developed subject to the usual more detail considerations to ensure that the amenity of new and existing residents is safeguarded. It is agreed that there would be a significant change as the land is developed but it is considered able to provide new housing as proposed in the Further Changes.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC008	Mrs Patricia Pratt	Policy FC 19 Land off Sedbury Lane, Sedbury	Sedbury Lane is a narrow country lane with severe flooding problems. Recent road works in the lane caused chaotic traffic problems. The lane suffers from subsidence. The two narrow railway bridges would not cope with the extra volume or weight of traffic. Pollution will be increased. Services, Doctors/Schools will struggle to cope. There is no employment locally scheme will increase commuting.	It is acknowledged that there is an existing surface water flooding problem in Sedbury Lane. The Lane and its suitability for access itself would also need to be addressed and may need improvement. There may need to be contributions to improve services such as schools and GPs if the new development could not be accommodated by existing facilities.
APFC018	Mrs Lynda Perkins	Policy FC 19 Land off Sedbury Lane, Sedbury	There are various reasons why the plot would not be appropriate: · It will completely obstruct the view to those living nearby We will be overlooked by the new occupants The plot behind Wye Dean would be far more suitable and less intrusive for those living nearby. Houses will become available at the Barracks when it closes down The land is on a slope The land is prone to flooding on Sedbury Lane There is poor drainage Sedbury lane is very narrow There is a telephone pole and wires in the field There's a lack of employment available in Chepstow Our dwellings will lose their value The wildlife will be disturbed and destroyed Can I urge you, as strongly as I possibly can, to prevent the development behind Park View Sedbury from going ahead.	It is acknowledged that there is an existing surface water flooding problem in Sedbury Lane. The Lane and its suitability for access itself would also need to be addressed and may need improvement. There may need to be contributions to improve services such as schools and GPs if the new development could not be accommodated by existing facilities. Welsh Water (responsible for water supply and for drainage) consider both to be available for the development proposed and did not object to it. The site is considered able to be developed subject to the usual more detail considerations to ensure that the amenity of new and existing residents is safeguarded. It is agreed that there would be a significant change as the land is developed but it is considered able to provide new housing as proposed in the Further Changes. Although planned the closure of the barracks at Beachley is set for 2027, beyond the current plan period.
APFC023	Mrs G Furley	Policy FC 19 Land off Sedbury Lane, Sedbury	We were told the land could not be build on as the ground was contaminated when it was a railway yard. Building here would take away our peace and quiet and privacy. What will happen to the wildlife, rabbits, squirrels and the birds we feed and look after? Part of the field floods as does the lane. Its a narrow lane. Dog walkers, cyclists horse riders and the army keep fit runs use the lane . The price of our bungalow will drop will we be compensated?.	The site was crossed by a railway and adjoined the now largely redeveloped Sedbury Camp. It is possible that there may be a need for remediation but this is not considered to be a major issue for the development of the land. There is a surface water flooding issue in Sedbury Lane which may need to be addressed if the land is developed. The field is affected too though this is confined to the lower lying areas adjacent to the lane. Although any adjoining development would need to consider the amenity of adjoining property prices themselves are not a planning consideration.
APFC024	R Godfrey	Policy FC 19 Land off Sedbury Lane, Sedbury	There is already planning permission for housing by the school and Tutshill. How will the schools cope. I have suffered rubbish and damage to the fences on the path. There is NO maintenance of the path except by myself. Beachley camp is closing this will give plenty of land for housing but will not help the traffic. Sedbury lane is a lane used by walkers, horseriders, cyclists. this will disadvantage the community and wildlife. Farmers use the lane to move animals and machinery into fields. Empty premises could be converted into housing . It will not stop at 40 houses.	This site is considered to be necessary in order to ensure that there is sufficient land available. It is primarily a shortage of land that can be developed over the next five years that it is intended to address and the timetable for the closure of Beachley Camp would not address this. The Plan already takes into account "windfall" development such as vacant premises and allocations such as this site are required in addition. The site is considered able to be developed subject to the usual more detail considerations to ensure that the amenity of new and existing residents is safeguarded. It is agreed that there would be a significant change as the land is developed but it is considered able to provide new housing as proposed in the Further Changes.
APFC029	Mr David Eisenhofer	Policy FC 19 Land off Sedbury Lane, Sedbury	Sedbury Lane is a single-track lane with many pot holes.. The lane is used by various organisations, runners, soldiers, etc., and these in themselves are a hazardous. There is a weight limit on Snape Bridge which is ignored by many contractors /individuals.	It is acknowledged that there is an existing surface water flooding problem in Sedbury Lane. The Lane and its suitability for access itself would also need to be addressed and may need improvement. There may need to be contributions to improve services such as schools and GPs if the new development could not be accommodated by existing facilities. The site is considered able to be developed subject to the usual more detail considerations to ensure that the amenity of new and existing residents is safeguarded. It is agreed that there would be a significant change as the land is developed but it is considered able to provide new housing as proposed in the Further Changes.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC052	Ms Nicole Penfold, Gladman Developments	Policy FC 19 Land off Sedbury Lane, Sedbury	The proposed access is narrow and it is not suitability as a vehicular access for a scheme of approximately 40 dwellings. The Council are aware of this potential issue as the supporting text states that "the main access will be from Sedbury Lane and this may require suitable improvements." The Council need to be assured that an adequate site access can be achieved if this proposed allocation is to remain within the Allocations Plan including full details of ownership to demonstrate all required improvements are deliverable. Without this the site cannot be deemed to be deliverable. The site is adjoining a number of industrial and commercial uses and there will be the potential for amenity implications as a result of this. Gladman also raise concerns regarding the potential impact of developing this site on the landscape due to its position rising up a prominent hillside. The SEA superficially dismisses any potential effect on the findings of the SEA by the additional allocation.	It is acknowledged that there is an existing surface water flooding problem in Sedbury Lane. The Lane and its suitability for access itself would also need to be addressed and may need improvement. There may need to be contributions to improve services such as schools and GPs if the new development could not be accommodated by existing facilities. Welsh Water (responsible for water supply and for drainage) consider both to be available for the development proposed and did not object to it. It is not considered that the "nearby" employment uses will have prevent the development of the site, nor will its location in the landscape make it impossible to develop. The site is considered able to be developed subject to the usual more detail considerations to ensure that the amenity of new and existing residents is safeguarded. It is agreed that there would be a significant change as the land is developed but it is considered able to provide new housing as proposed in the Further Changes.
APFC063	Mrs Jane Brambell	Policy FC 19 Land off Sedbury Lane, Sedbury	This would cause a lot of traffic in this lane which is not designed for a housing estate, it's a single track country lane used to serve 3 farms and several properties. Its a lane used by a lot of people walking and horse-riding which would make it more dangerous than it already is. The area has insufficient mains sewerage and poor water supply. The lane is prone to flooding and to build here would create even worse flooding. The doctors, schools and local services are at full capacity and this is going to have a bug impact on them The infrastructure is at full capacity and this is just going to add to it.	It is acknowledged that there is an existing surface water flooding problem in Sedbury Lane. The Lane and its suitability for access itself would also need to be addressed and may need improvement. There may need to be contributions to improve services such as schools and GPs if the new development could not be accommodated by existing facilities. Welsh Water (responsible for water supply and sewerage) do not object to the development as proposed and consider it can be supplied with water and they can accommodate sewer flows. The site is considered able to be developed subject to the usual more detail considerations to ensure that the amenity of new and existing residents is safeguarded. It is agreed that there would be a significant change as the land is developed but it is considered able to provide new housing as proposed in the Further Changes.
APFC064	Mr Andrew Brambell	Policy FC 19 Land off Sedbury Lane, Sedbury	Object again to the proposed development of land off Sedbury Lane. It would have a detrimental effect on the present housing in Tylers Way and Park View, let alone the occupier of the Elms bungalow. To propose access onto Sedbury Lane appears to have been made by someone without knowledge of the area. The lane is a single track with passing places serving several residential properties, 3 farms and a racing stables all with their associated traffic movements. Add an extra 40 to 80 vehicle movements and gridlock would result. 'Improvements to Sedbury Lane may be required for access' is an understatement. Is the council proposing to widen the lane and install proper drainage to reduce the present flooding problems. Sewerage is another issue from such a development as it will only add to the present overloaded system. There are many other points of objection some of which were expressed in my response to AP90 para40.7/40.8 of the publication draft 21st July 2014.	It is acknowledged that there is an existing surface water flooding problem in Sedbury Lane. The Lane and its suitability for access itself would also need to be addressed and may need improvement. There may need to be contributions to improve services such as schools and GPs if the new development could not be accommodated by existing facilities. Welsh Water (responsible for water supply and for drainage) consider both to be available for the development proposed and did not object to it. The site is considered able to be developed subject to the usual more detail considerations to ensure that the amenity of new and existing residents is safeguarded. It is agreed that there would be a significant change as the land is developed but it is considered able to provide new housing as proposed in the Further Changes.
APFC075	Hollins	Policy FC 19 Land off Sedbury Lane, Sedbury	Sedbury Lane is prone to flooding and becomes impassable. Sedbury Lane is a single-track road unable to cope with the additional traffic. Access to and from Sedbury Lane is already poor, increased traffic would require major alterations to prevent accidents.	It is acknowledged that there is an existing surface water flooding problem in Sedbury Lane. The Lane and its suitability for access itself would also need to be addressed and may need improvement.
APFC078	Mr R J Brambell	Policy FC 19 Land off Sedbury Lane, Sedbury	Sedbury Lane is most unsuitable for access into a housing estate, it is a single track, country lane serving 3 farms and residential properties. It has poor drainage, constantly floods, insufficient mains sewerage, poor water supply.	It is acknowledged that there is an existing surface water flooding problem in Sedbury Lane. The Lane and its suitability for access itself would also need to be addressed and may need improvement. There may need to be contributions to improve services such as schools and GPs if the new development could not be accommodated by existing facilities. Welsh Water (responsible for water supply and for drainage) consider both to be available for the development proposed and did not object to it. The site is considered able to be developed subject to the usual more detail considerations to ensure that the amenity of new and existing residents is safeguarded. It is agreed that there would be a significant change as the land is developed but it is considered able to provide new housing as proposed in the Further Changes.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC079	Mr S Brambell	Policy FC 19 Land off Sedbury Lane, Sedbury	Sedbury Lane is most unsuitable as it is a single track narrow country lane used by 3 Farms and residents cars. More traffic on the Lane it would get gridlocked and unpassable & more dangerous for horseriders and cars. There is not sufficient drainage and constantly floods. The sewerage system is overloaded, to add to it will cause major problems. The surrounding roads and local services are already struggling to cope.	It is acknowledged that there is an existing surface water flooding problem in Sedbury Lane. The Lane and its suitability for access itself would also need to be addressed and may need improvement. There may need to be contributions to improve services such as schools and GPs if the new development could not be accommodated by existing facilities. Welsh Water (responsible for water supply and for drainage) consider both to be available for the development proposed and did not object to it. The site is considered able to be developed subject to the usual more detail considerations to ensure that the amenity of new and existing residents is safeguarded. It is agreed that there would be a significant change as the land is developed but it is considered able to provide new housing as proposed in the Further Changes.
APFC081	K .T. Milligan	Policy FC 19 Land off Sedbury Lane, Sedbury	Sedbury Lane is narrow, has poor access, and is subject to flooding. The sewerage system would need updating a major project.. Something should be done about the Old Laundry at Omerod Rd which is an eyesore. Wydean school will need to increase its capacity. Beachley barracks is closing which would be available for housing . Traffic will increase and local services will not be able to cope.	It is acknowledged that there is an existing surface water flooding problem in Sedbury Lane. The Lane and its suitability for access itself would also need to be addressed and may need improvement. There may need to be contributions to improve services such as schools and GPs if the new development could not be accommodated by existing facilities. Welsh Water (responsible for water supply and for drainage) consider both to be available for the development proposed and did not object to it. The site is considered able to be developed subject to the usual more detail considerations to ensure that the amenity of new and existing residents is safeguarded. It is agreed that there would be a significant change as the land is developed but it is considered able to provide new housing as proposed in the Further Changes The former laundry could be considered for alternative uses under the plan but is a separate matter from the proposed allocation.
APFC086	Mr Ryan Norman, Dwr Cymru Welsh Water	Policy FC 19 Land off Sedbury Lane, Sedbury	Sedbury Policy FC 19 – Land off Sedbury Lane, Sedbury – 40 dwellings Water supply There are no issues in providing this proposed allocation with a supply of potable (clean water). A 300mm distribution water main traverses the eastern part of the site, for which protection measures will be required in the form of a diversion or easement width. Sewerage There are no issues with the public sewerage network accommodating the foul-only flows from this proposed allocation, though provision of off-site sewers may be required. Wastewater treatment Sedbury is served by our Nash WwTW for which there are no issues in accommodating the foul-only flows from this proposed allocation.	Comments noted, A comment will be added to the policy regarding the water main crossing the site.
APFC092	Mr M H Pearce	Policy FC 19 Land off Sedbury Lane, Sedbury	Sedbury Lane is narrow, has poor access, and is subject to flooding. The sewerage system would need updating a major project. Something should be done about the Old Laundry at Omerod Rd which is an eyesore. Wydean school will need to increase its capacity. Beachley barracks is closing which would be available for housing . Traffic will increase and local services will not be able to cope.	It is acknowledged that there is an existing surface water flooding problem in Sedbury Lane. The Lane and its suitability for access itself would also need to be addressed and may need improvement. There may need to be contributions to improve services such as schools and GPs if the new development could not be accommodated by existing facilities. Welsh Water (responsible for water supply and for drainage) consider both to be available for the development proposed and did not object to it. The site is considered able to be developed subject to the usual more detail considerations to ensure that the amenity of new and existing residents is safeguarded. It is agreed that there would be a significant change as the land is developed but it is considered able to provide new housing as proposed in the Further Changes. The site referred to at Ormerod Rd is a separate matter and could be regarded as available for alternative uses and these would be considered under the policies of the plan.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

<b>Ref Number</b>	<b>Full Name</b>	<b>Policy or Paragraph Number</b>	<b>Comment Summary</b>	<b>Draft Officer Response</b>
<b>APFC093</b>	Mr P J Jones	Policy FC 19 Land off Sedbury Lane, Sedbury	No suitable access onto narrow twisting lane that is prone to flooding. You are already intending to build close to the 6th form college. You have done nothing about the old Laundry in Omerod Rd which is a disgrace. Beachley Barracks is closing the married quarters will become available for housing. The extra traffic will result in congestion. There will be a shortage of school places. Services inc drainage will have to be increased. All the properties adj to the site are bungalows houses will look down on them .	It is acknowledged that there is an existing surface water flooding problem in Sedbury Lane. The Lane and its suitability for access itself would also need to be addressed and may need improvement. There may need to be contributions to improve services such as schools and GPs if the new development could not be accommodated by existing facilities. Welsh Water (responsible for water supply and for drainage) consider both to be available for the development proposed and did not object to it. With the planned closure of Beachley Barracks in 2027, it would not be possible for housing (if it were to become available) there to contribute to this plan which looks only to 2026. The site is considered able to be developed subject to the usual more detail considerations to ensure that the amenity of new and existing residents is safeguarded. It is agreed that there would be a significant change as the land is developed but it is considered able to provide new housing as proposed in the Further Changes.
<b>APFC108</b>	P.P. Matthews	Policy FC 19 Land off Sedbury Lane, Sedbury	I object to the proposal to build 40 houses on land off Sedbury Lane. As this will cause a substantial amount of traffic having to use a single track country lane which is used by three farms and several properties. The lane is used by a lot of people walking and horseriding and this would make it more dangerous. The lane floods regularly whenever there is moderate rainfall so this would only add to the problem.	It is acknowledged that there is an existing surface water flooding problem in Sedbury Lane. The Lane and its suitability for access itself would also need to be addressed and may need improvement. There may need to be contributions to improve services such as schools and GPs if the new development could not be accommodated by existing facilities. Welsh Water (responsible for water supply and for drainage) consider both to be available for the development proposed and did not object to it. The site is considered able to be developed subject to the usual more detail considerations to ensure that the amenity of new and existing residents is safeguarded. It is agreed that there would be a significant change as the land is developed but it is considered able to provide new housing as proposed in the Further Changes.
<b>APFC117</b>	Linda Sandison	Policy FC 19 Land off Sedbury Lane, Sedbury	Access not suitable for 40 dwellings. The lane is impossible for vehicles to pass even in dry conditions. Following moderate rain the lane is flooded in several places and can remain so for days. There is no room for widening of the lane. The surface is not suitable for heavy traffic because it is constantly undermined by surface water. Racehorses use the lane moving to their gallops requiring traffic to wait for them to pass. The lane toward the A48 is very narrow and twisty making access from this end dangerous for increased volumes of traffic. Access from the Beachley Road end in Sedbury will result in all the additional traffic from the homes pouring through the village increasing existing problems.	It is acknowledged that there is an existing surface water flooding problem in Sedbury Lane. The Lane and its suitability for access itself would also need to be addressed and may need improvement. There may need to be contributions to improve services such as schools and GPs if the new development could not be accommodated by existing facilities. Welsh Water (responsible for water supply and for drainage) consider both to be available for the development proposed and did not object to it. The site is considered able to be developed subject to the usual more detail considerations to ensure that the amenity of new and existing residents is safeguarded. It is agreed that there would be a significant change as the land is developed but it is considered able to provide new housing as proposed in the Further Changes.
<b>APFC118</b>	Mr R Johnson, FW Johnson LTD	Policy FC 19 Land off Sedbury Lane, Sedbury	FW Johnson Ltd have been developing homes in the Forest of Dean area for over 50 years We have concerns on the delivery numbers and time scale of sites identified in the Plan.FC4 should be increased to 200 units .the site can be developed with 5 years.	Comments noted, this site is one located at a major village and is considered able to be delivered as estimated. Tutshill and Sedbury combined have a population of about 3800+ and form a sustainable location for further development especially when taken together with Chepstow. The case for allocation of additional land at Lydney is noted and responses to that proposal are included under "Lydney" comments.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC156	Mrs Hazel Evans	Policy FC 19 Land off Sedbury Lane, Sedbury	It is quite probable that if this development were to be seriously considered then access along the whole length of Sedbury Lane would definitely need improvement/ widening. Also there has been a problem regularly with flooding .With several developments being given permission to build (eventually.,) in the surrounding area to Sedbury Lane then we have 500+ dwellings on Mabey Bridge land, behind Tesco in Chepstow, and all traffic has only the one main road, the A48 through Chepstow to the motorways to Bristol, Newport and Cardiff or Lydney /Gloucester way .There are not enough jobs we need more affordable housing /houses for rent. New houses should be more efficient. Sedbury will need an improved bus service. Infrastructure will need improving .	It is acknowledged that there is an existing surface water flooding problem in Sedbury Lane. The Lane and its suitability for access itself would also need to be addressed and may need improvement. There may need to be contributions to improve services such as schools and GPs if the new development could not be accommodated by existing facilities. Welsh Water (responsible for water supply and for drainage) consider both to be available for the development proposed and did not object to it. The site is considered able to be developed subject to the usual more detail considerations to ensure that the amenity of new and existing residents is safeguarded. It is agreed that there would be a significant change as the land is developed but it is considered able to provide new housing as proposed in the Further Changes. Sedbury and Tutshill are together regarded as suitable locations for the scale of development envisaged although it is accepted that infrastructure will need to be improved in step with these changes.
APFC157	Mr & Mrs David & Amanda Malik & Pady	Policy FC 19 Land off Sedbury Lane, Sedbury	Objection to the proposed re-instatement on land adjacent to Sedbury Lane primarily based on the fact that access to this housing development would be via Sedbury Lane. Sedbury Lane is a single track lane with a few passing places with drainage only provided by culverts in the soft verge. The lane is liable to flooding both at the Sedbury and Lydney ends making access difficult. The lane is used by the surrounding farms and their associated vehicles / livestock, drivers are often required to reverse a significant distance or attempt to pass at inappropriate points, resulting in damage to the verges or indeed vehicles dropping in to the culverts necessitating recovery. The lane provides the local community with an important rural resource and is used by walkers, joggers, families, horse riders, army and local schools. the increased level of traffic using the lane would create significant additional risk of accident. With the already approved land allocations next to Sedbury School and Tutshill and the subsequent development planning approvals there is already a significant planned increase in the amount of housing, putting demands on an infrastructure (Water, Sewerage, Drainage) that is already struggling to cope with the existing levels of housing development in the village. We accept the need to provide land for housing but with the developments already approved, the area is making a significant contribution and that any further land allocations is both unnecessary and undesirable as it permanently impacts the rural feel of the village, an important resource for all its current residents.	It is acknowledged that there is an existing surface water flooding problem in Sedbury Lane. The Lane and its suitability for access itself would also need to be addressed and may need improvement. There may need to be contributions to improve services such as schools and GPs if the new development could not be accommodated by existing facilities. Welsh Water (responsible for water supply and for drainage) consider both to be available for the development proposed and did not object to it. The site is considered able to be developed subject to the usual more detail considerations to ensure that the amenity of new and existing residents is safeguarded. It is agreed that there would be a significant change as the land is developed but it is considered able to provide new housing as proposed in the Further Changes.
APFC160	Mr Julian Perkins	Policy FC 19 Land off Sedbury Lane, Sedbury	The majority of dwellings affected by this are bungalows which will be overlooked by the new development. The existing traffic flow on the A48 both on the access turn to Sedbury and also on the run down to Chepstow regularly becomes congested and often gridlocked. This will only compound the problems. There are other brown field sites in the Chepstow area. If a development has to be found, the plot adjacent to Wye Dean School would be far more suitable and less intrusive for those living nearby. I understand that houses and development opportunities will shortly become available when the Barracks closes down. That development would be far less impacting on local residents. Is there any joined up thinking that can occur? The land is in a hopeless slope and surrounded with access problems especially Sedbury Lane and dangerous A48 Access. The land is already prone to flooding on Sedbury Lane. This will only exacerbate the issue. There's a lack of employment available in Chepstow so social housing situated this far will mean a real challenge to occupants finding work and commuting costs for them. Surely brown field sites are far more useful? The wildlife will be disturbed and destroyed	It is acknowledged that there is an existing surface water flooding problem in Sedbury Lane. The Lane and its suitability for access itself would also need to be addressed and may need improvement. There may need to be contributions to improve services such as schools and GPs if the new development could not be accommodated by existing facilities. Welsh Water (responsible for water supply and for drainage) consider both to be available for the development proposed and did not object to it. The site is considered able to be developed subject to the usual more detail considerations to ensure that the amenity of new and existing residents is safeguarded. It is agreed that there would be a significant change as the land is developed but it is considered able to provide new housing as proposed in the Further Changes.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

<b>Ref Number</b>	<b>Full Name</b>	<b>Policy or Paragraph Number</b>	<b>Comment Summary</b>	<b>Draft Officer Response</b>
<b>APFC170</b>	Mr Martin Davies, Monmouthshire County Council	Policy FC 19 Land off Sedbury Lane, Sedbury	Please see attached this Council's comments on the originally submitted version of the Allocations Plan, in which concern was expressed about the impact of additional traffic on the A48 Trunk Road through Chepstow, both in respect of traffic congestion and the adverse effects on the existing Air Quality Management Area. It is noted that Site AP90 for has now been reinstated (under Policy FC 19) for a development of 40 dwellings. It is also understood that the appeal for an additional 126 dwellings at land north of Gloucester Road, Tutshill has been allowed. There has, therefore, been a significant increase in the likely amount of development in the Sedbury/Tutshill area since my previous letter, which reinforces the need to give careful consideration to impacts on future traffic conditions in Chepstow. I trust that liaison between our authorities will continue in relation to applications in Sedbury/Tutshill (and Lydney) in order that traffic impacts on Chepstow can be fully assessed and mitigation measures provided where necessary.	It is agreed that there does need to be careful liaison between the Forest of Dean and Monmouthshire Authorities. There are clear issues with regard to traffic management especially on the A48. There is a considerable increase in housing and other development planned on both sides of the Wales England border and co operation and discussion between the various bodies will continue and is welcome. Current discussions cover the present plans and the longer term future and issues such as the planned closure of the barracks at Beachley will also be the subject of joint working.
<b>APFC319</b>	Mrs S Fellows, Land Research & Planning Associates Ltd.	Policy FC 19 Land off Sedbury Lane, Sedbury	Access and Ecology issues.	Access is one issue that the proposed policy refers to and acknowledges that there will need to be improvements to accommodate the development proposed. This does not prevent development in the manner envisaged. Ecology is always a consideration and this site is one where various surveys and possibly mitigation will be needed. It however considered to be a site capable of development.
<b>APFC015</b>	Rohan Torkildsen, Historic England	Policy FC 20 Chartist Way Staunton / Corse	It is noted that APFC20 allocates 1.1ha of land for 15 single storey dwellings and that 0.6ha will be open area/paddock. The AP requires the design to satisfy AP4 and AP5 and be without detriment to the heritage interests of nearby properties, the conservation and village as a whole. Mindful of the low density of development detached dwellings in large gardens characterises the historic significance of the locality is the LA able to demonstrate the 0.5ha of development has the capacity to accommodate 15 single storey dwellings in such a manner? Will the allocation be deliverable? Can the LA demonstrate that the proposed modification accords with national policy for the deliverable of sustainable development.	The allocation is considered to be deliverable with regard to the considerations referred to and in accord with the Inspector's comments at the previous appeal in 2015 (2228466, Chartist Way Staunton). The appeal was dismissed but the Inspector's conclusions suggested that there may be scope for a smaller development than that which was the subject of the appeal. The proposed allocation is a smaller version of this with a requirement for an undeveloped area to the north in order to protect the area of Ledbury Road Crescent. It is likely that any development would have to be single storey or similar in order to avoid harm to the heritage assets. The site is in common with much of the land allocated in the district best and most versatile land. The village has a range of services and the development proposed is considered in accord with the overall plan strategy. Development in the manner proposed would be sustainable given the location and the facilities nearby. The impact on the built environment would be acceptable if developed in the manner proposed in the draft policy.
<b>APFC053</b>	Ms Nicole Penfold, Gladman Developments	Policy FC 20 Chartist Way Staunton / Corse	Concerns regarding the delivery of this proposed allocation in relation to the proposed access and also the potential impacts on the setting of the adjacent listed buildings. The site sits immediately to the north of two prominent listed buildings and the setting of these building will be significantly adversely affected by the proposed development. Site is also likely to be a historic Chartist plot. The site is Grade 1 agricultural land and its allocation conflicts with the Council's approach to resist the development of such land elsewhere in the District for this reason. These issues bring into question fundamentally the appropriateness of this site for a residential allocation within the allocations plan. The SEA superficially dismisses any potential effect on the findings of the SEA by the additional allocation.	The objections are noted as is the support of the land owner. The site is one that was the subject of a planning appeal in 2015 (2228466, Chartist Way Staunton). The appeal was dismissed but the Inspector's conclusions suggested that there may be scope for a smaller development than that which was the subject of the appeal. The proposed allocation is a smaller version of this with a requirement for an undeveloped area to the north in order to protect the area of Ledbury   Road Crescent. It is likely that any development would have to be single storey or similar in order to avoid harm to the heritage assets. The site is in common with much of the land allocated in the district best and most versatile land. The village has a range of services and the development proposed is considered in accord with the overall plan strategy.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC071	Mrs Julie Milroy	Policy FC 20 Chartist Way Staunton / Corse	The Planning Inspector's report which concluded (paragraph 39) that the proposed development of both eastern and western fields that makes up the land of Chartist Way, would cause conspicuous harm to the settings of the nearby heritage assets and particularly to those of the Snigs End CA, the listed buildings Belle Vue, No 5 Ledbury Road Crescent and Lyndale. Paragraph 40 states that the harm to both the designated and non-designated assets must be weighted in the overall planning balance against other relevant considerations. The Inspector believed that in the case of the Land off Chartist Way, allowing development of the land and the harm it would cause should be given great weight. Paragraph 72 then goes onto state that redressing a housing shortfall and providing economic benefits, in particular, are matters which deserve significant weight. But the harm to the settings of the heritage assets that I have identified would be serious. The heritage assets in question are rare and setting is fragile. The development would involve a substantial loss of their historical and architectural significance, and would thus undermine their value as heritage assets. The harm would be permanent in nature. The harm to the designated assets in particular, including the Snigs End CA, Lyndale, Belle Vue, and No 5 Ledbury Road, demands to be given great weight. Consequently, having regard to the balancing exercise required of NPPF guidelines, the harm to heritage interests would outweigh the public benefits both significantly and demonstrably.	The appeal decision is noted and the Inspector's conclusions in respect of the site which was larger and would have had a harmful impact on the area's assets. The proposed allocation is however a smaller area within the area forming the eastern part of the appeal site. The Inspector's conclusions in this respect (2228466, appeal Chartist Way Staunton) especially para 29 and 36 are supportive of the smaller site's ability to accommodate development. On balance the Council agree that a carefully planned development as proposed to be allocated and with an open area to its north would be acceptable. It is supported and considered deliverable by the owner/ developer. The policy as written refers to the need to comply with other policies in the draft AP, and in order to do this it is likely that the development would need to be designed appropriately. This may require dwellings with a similar impact to those of a single storey. The explanatory text of the policy will be amended to this effect.
APFC138	Mr Peter Tufnell, Tufnell Town & Country Planning	Policy FC 20 Chartist Way Staunton / Corse	The LPA should not promote sites that cannot/should not be delivered where there will be harm that cannot be mitigated, (e.g. in this case impact on heritage assets and landscape).	The objections are noted as is the support of the land owner. The site is one that was the subject of a planning appeal in 2015 (2228466, Chartist Way Staunton). The appeal was dismissed but the Inspector's conclusions suggested that there may be scope for a smaller development than that which was the subject of the appeal. The proposed allocation is a smaller version of this with a requirement for an undeveloped area to the north in order to protect the area of Ledbury Road Crescent. It is likely that any development would have to be single storey or similar in order to avoid harm to the heritage assets. The site is in common with much of the land allocated in the district best and most versatile land. The village has a range of services and the development proposed is considered in accord with the overall plan strategy. The landscape is one where development of the scale proposed can be accommodated under the terms of the policy or the principles applied by the recent appeal inspector in respect of the larger site (2228466).
APFC146	Mr Phil Hardwick, Robert Hitchens Limited	Policy FC 20 Chartist Way Staunton / Corse	It is considered that the site should be allocated in its entirety such that the most appropriate form of development including layout height of development, landscaping and areas of open space can be considered through a planning application in order to make the best use of the site. What is not clearly evidenced by the LPA is exactly why 0.6ha of the allocated site should be retained as open space, other than to safeguard the settings of the heritage assets described above. No reference is made by the LPA to an open space strategy or pitch playing strategy for the authority, that would evidence any newly arising need for the village for formal playing pitches or informal open space in accordance with NPPF para 73. The setting of the Listed Building and CA are already protected by the 1990 (Listed buildings and Conservation Areas) Act and the NPPF.	In making the proposed allocation the Council need to set out how a particular site can be satisfactorily developed. The first stage is to consider the previous history of the site which includes a recent appeal. The inspector drew a clear distinction between the eastern and western parts of a larger area and the council agree with his analysis that only the eastern part of the site is suitable for development. The Council agree but also place great importance on the need to protect the Ledbury Rd Crescent part of the Conservation Area, hence the open space or undeveloped areas along the north of Chartist Way. This was established in the 2005 LP allocation and continued in the recent development of Freedom Close. In making the allocation it is necessary to identify land that may be developed without harm to heritage assets and this limitation on the area to be developed is considered necessary. Although the policy does not specify single storey development the impact (visibility) of new dwellings from the Conservation Area or from listed curtilages will need to be considered in assessing any detailed proposals. To include the open area north of the proposed allocation within the allocation would be possible but given the need to preserve it as an open area this may cause it to need to be developed as open space, rather than retaining greater flexibility it has albeit as a small paddock.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC150	Mr Phil Hardwick, Robert Hitchins Limited	Policy FC 20 Chartist Way Staunton / Corse	The Sustainability Appraisal(ED057) is misleading with regard to Chartist Way in as far as it gives a negative score to the access to medical facilities criteria. This compares to the score for a site adjacent to Hartpury Village Hall. The settlement of Staunton and Corse benefits from a new /modern doctor's surgery being located within the settlement. Hartpury village does not have a doctor's surgery and the 1200 residents at Hartpury College are also served by the Doctor's at the Staunton surgery. The entry on the Sustainability Appraisal (as) for the access to Health Care Facilities for Land at Chartist Way Staunton be amended to reflect the fact that there is a new modern surgery in the village that provides not only access to GP but also specialist facilities and clinics providing primary health care needs as well as on site dispensing.	For the purposes of the assessment it is agreed that there is easy physical access to GP facilities at Staunton. The SA will be amended.
APFC320	Mrs S Fellows, Land Research & Planning Associates Ltd.	Policy FC 20 Chartist Way Staunton / Corse	The site is enveloped by one of the most important National Heritage sites in the UK namely the Chartist Settlement. An Appeal has been dismissed in regard this important matter nearby this proposed site.	The development will need to be compatible with the local policies and the well recognised conservation considerations that apply. The principle of development in the manner proposed to be allocated is acceptable, and this is supported by the Inspector's conclusions in the previous appeal (2228466, 2015).
APFC149	Mr Phil Hardwick, Robert Hitchins Limited	Paragraph 32	Policy FC20 Chartist Way does not make the best use of deliverable land as it fails to allocate the northern part of the site for residential development . The whole site is currently subject of a S78 appeal for refusal of an outline application for up to 27 dwellings . It would be resource efficient to allocate the whole 1.7 acres of land for upto 27 dwellings.	The allocation as proposed by the is appropriate given the need to consider and respect the conservation of the settlement. The proposed development of the larger area would impinge on the setting of the properties and their curtilages along Ledbury Road Crescent and would not be compatible with policy AP96. Following the guidance from the previous appeal in 2015 and that of the emerging AP, it is apparent that the area allocated could be developed given the need to consider carefully the impact of any new development and this may mean restricting the height of any new dwellings.
APFC054	Ms Nicole Penfold, Gladman Developments	Policy FC 21 Adjoining the Health Centre, Yorkley	Concerns regarding the access for this site it is unclear how this will be taken from Tower Road there is no site frontage to Tower Road. This road is a narrow road and is unsuitability for additional traffic. Concerns regarding the sites location adjacent to statutory forest and implications development may have on this. The density of adjoining housing as well as the size and shape of the site and need to provide road infrastructure access would significantly question the ability for the site to accommodate the scale of the development proposed. The SEA superficially dismisses any potential effect on the findings of the SEA by the additional allocation.	The likely access would be into the northern boundary of the land, and it would then form the edge to the forest along with the development itself. The Council consider that the site is capable of development in a manner that would be both achievable and acceptable from the amenity point of view.
APFC136	Vicky Aston, Sport England	Policy FC 21 Adjoining the Health Centre, Yorkley	Policy FC 21 - Adjoining the Health Centre, Yorkley. It is not clear from aerial images whether or not this is a playing field or used for that purpose. It is adjacent to the village recreation ground. If this is playing field land then Sport England objects to its allocation.	The site adjoins but is not part of the playing field.
APFC201	Laura Dayson	Policy FC 21 Adjoining the Health Centre, Yorkley	Deliverability of housing sites in local plan The site of Yorkley FC21 is not deliverable, has access problems and no planning history Land at Lydney Road Yorkley should be included in the Local Plan. there are no constraints to the development as identified by the officer recommendation to approve planning permission(refused by members). It will include additional benefits as affordable housing, parking for school and new open space all of which would not be available on FC21 Yorkley.	The likely access would be into the northern boundary of the land, and it would then form the edge to the forest along with the development itself. The Council consider that the site is capable of development in a manner that would be both achievable and acceptable from the amenity point of view. It is agreed there is no recent planning history.
APFC202	Mr Bradley Willets	Policy FC 21 Adjoining the Health Centre, Yorkley	Deliverability of housing sites in local plan The site of Yorkley FC21 is not deliverable, has access problems and no planning history Land at Lydney Road Yorkley should be included in the Local Plan. there are no constraints to the development as identified by the officer recommendation to approve planning permission(refused by members). It will include additional benefits as affordable housing, parking for school and new open space all of which would not be available on FC21 Yorkley.	The likely access would be into the northern boundary of the land, and it would then form the edge to the forest along with the development itself. The Council consider that the site is capable of development in a manner that would be both achievable and acceptable from the amenity point of view. It is agreed there is no recent planning history.
APFC204	Luke Jobson	Policy FC 21 Adjoining the Health Centre, Yorkley	Questionable delivery of sites in Local plan FC21 has access problems and no planning records Lydney Road Yorkley should be included in the Local plan Planning approval should be provided as detailed by the officer.	The likely access would be into the northern boundary of the land, and it would then form the edge to the forest along with the development itself. The Council consider that the site is capable of development in a manner that would be both achievable and acceptable from the amenity point of view. It is agreed there is no recent planning history.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC206	Scott James	Policy FC 21 Adjoining the Health Centre, Yorkley	Deliverability of sites in Local plan Site FC21 has deliverability and access problems and no planning history Lydney Road Yorkley should be included in the Local plan. There are no constraints to the development as identified by the officers recommendation to approve planning permission (refused by members) It will include additional benefits as affordable housing, parking for school and new public open space, all of which wold not be available on FC21 Yorkley.	The likely access would be into the northern boundary of the land, and it would then form the edge to the forest along with the development itself. The Council consider that the site is capable of development in a manner that would be both achievable and acceptable from the amenity point of view. It is agreed there is no recent planning history.
APFC208	Ed Bendall	Policy FC 21 Adjoining the Health Centre, Yorkley	Deliverability of housing sites in Local plan FC21 is not deliverable, has access problems and no planning history Lydney Road Yorkley should be included in the Local plan. There are no constraints to the development as identified by the officers recommendation to approve planning permission (refused by members) It will include additional benefits as affordable housing, parking for school and new public open space, all of which wold not be available on FC21 Yorkley.	The likely access would be into the northern boundary of the land, and it would then form the edge to the forest along with the development itself. The Council consider that the site is capable of development in a manner that would be both achievable and acceptable from the amenity point of view. It is agreed there is no recent planning history.
APFC211	Ryan Imm	Policy FC 21 Adjoining the Health Centre, Yorkley	Deliverability of housing sites in Local plan FC21 is not deliverable, has access problems and no planning history Lydney Road Yorkley should be included in the Local plan. There are no constraints to the development as identified by the officers recommendation to approve planning permission (refused by members) It will include additional benefits as affordable housing, parking for school and new public open space, all of which wold not be available on FC21 Yorkley.	The likely access would be into the northern boundary of the land, and it would then form the edge to the forest along with the development itself. The Council consider that the site is capable of development in a manner that would be both achievable and acceptable from the amenity point of view. It is agreed there is no recent planning history.
APFC212	S Mudway	Policy FC 21 Adjoining the Health Centre, Yorkley	Deliverability of housing sites in Local plan FC21 is not deliverable, has access problems and no planning history Lydney Road Yorkley should be included in the Local plan. There are no constraints to the development as identified by the officers recommendation to approve planning permission (refused by members) It will include additional benefits as affordable housing, parking for school and new public open space, all of which wold not be available on FC21 Yorkley.	The likely access would be into the northern boundary of the land, and it would then form the edge to the forest along with the development itself. The Council consider that the site is capable of development in a manner that would be both achievable and acceptable from the amenity point of view. It is agreed there is no recent planning history.
APFC215	Mr Nathan Jones	Policy FC 21 Adjoining the Health Centre, Yorkley	Question deliverability of housing sites in local plan. The site at Yorkley FC21 is not deliverable, has access problems and no planning history. Land at Lydney road Yorkley should be included in the local plan. There are no constraints to the development as identified by the officers recommendation to approve planning permission (refused by members). It will include additional benefits as affordable housing, parking for school and new public open space all of which would not be available on F.C.21 Yorkley.	The likely access would be into the northern boundary of the land, and it would then form the edge to the forest along with the development itself. The Council consider that the site is capable of development in a manner that would be both achievable and acceptable from the amenity point of view. It is agreed there is no recent planning history.
APFC220	Mr Luke Hutton	Policy FC 21 Adjoining the Health Centre, Yorkley	Deliverability of housing sites in local plan. The site at Yorkley FC.21 is not deliverable, has access problems and no planning history. Lydney Road Yorkley should be included in the Local plan. There are no constraints to the development as identified by the officers recommendation to approve planning permission (refused by members) It will include additional benefits as affordable housing, parking for school and new public open space, all of which would not be available on FC21 Yorkley.	The site is due to be the subject of an appeal shortly if it is allowed then it will be included in the AP if the result of the appeal is known before the AP is finalised.
APFC224	Lydney Rugby Club	Policy FC 21 Adjoining the Health Centre, Yorkley	FC21 is not deliverable, has access problems and no planning history.	The likely access would be into the northern boundary of the land, and it would then form the edge to the forest along with the development itself. The Council consider that the site is capable of development in a manner that would be both achievable and acceptable from the amenity point of view. It is agreed there is no recent planning history.
APFC230	Lee Truman	Policy FC 21 Adjoining the Health Centre, Yorkley	Undeliverability of housing sites in Local plan. FC21 has no planning history. FC21 makes no provision for additional parking at the school and lacks affordable housing . The land at Lydney Road made this provision and therefore should be included in the Local Plan.	The likely access would be into the northern boundary of the land, and it would then form the edge to the forest along with the development itself. The Council consider that the site is capable of development in a manner that would be both achievable and acceptable from the amenity point of view. It is agreed there is no recent planning history.
APFC233	Mr Oscar Lindsell Hales	Policy FC 21 Adjoining the Health Centre, Yorkley	Policy FC21 is absent of planning history, an acknowledge of access requirements and the feasibility of fulfilling prerequisites The housing plan is unlikely to be delivered. I would like to see the land at Yorkley Road be included in the Local Plan. despite refusal by members I see this development to be far more viable than FC21.	The likely access would be into the northern boundary of the land, and it would then form the edge to the forest along with the development itself. The Council consider that the site is capable of development in a manner that would be both achievable and acceptable from the amenity point of view. It is agreed there is no recent planning history.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC237	Mr Ben Gaget	Policy FC 21 Adjoining the Health Centre, Yorkley	Unrealistic deliverability of housing sites in local plan. The site (FC21) is not deliverable access problems and no planning history. The local plan should include land at Lydney Road. As identified by the officers recommendation to approve planning permission, there are no constraints to the development which was refused by members.	The likely access would be into the northern boundary of the land, and it would then form the edge to the forest along with the development itself. The Council consider that the site is capable of development in a manner that would be both achievable and acceptable from the amenity point of view. It is agreed there is no recent planning history.
APFC251	Ms Rebecca Kent	Policy FC 21 Adjoining the Health Centre, Yorkley	1. Deliverability of housing sites in the local plan 2. The site at Yorkley FC.21 is not deliverable, has access problems and no planning history. Land at Lydney Road, Yorkley should be included in the local plan. There are no constraints to the development as identified by the officers recommendation to approve planning permission (refused by members). It will include additional benefits as affordable parking for school, now public open space, all of which would not be available on FC.21 Yorkley.	The site proposed to be allocated is considered able to be delivered. It is accepted that the alternative site suggested is able to be developed following the recommendation but the Council have refused it permission and an appeal is due to be heard shortly. The Council will allocate the site in the event that the appeal is allowed but at present do not support it. Irrespective of the appeal, it is possible to identify and allocate the proposed site off Tower Rd for the development proposed.
APFC252	Mr Charlie George	Policy FC 21 Adjoining the Health Centre, Yorkley	1. Deliverability of housing sites in local plan 2. The site at Yorkley F.C.21 is not deliverable has access problems and no planning history. Land at Lydney Road Yorkley should be included in the local plan. There are no constraints to the development as identified by officers recommendation to approve planning permission (refused by members) it will include additional benefits as affordable housing parking for school and new public open space all of which would not be available in FC.21 Yorkley.	The site proposed to be allocated is considered able to be delivered. It is accepted that the alternative site suggested is able to be developed following the recommendation but the Council have refused it permission and an appeal is due to be heard shortly. The Council will allocate the site in the event that the appeal is allowed but at present do not support it. Irrespective of the appeal, it is possible to identify and allocate the proposed site off Tower Rd for the development proposed.
APFC256	Ms Lucy Collins	Policy FC 21 Adjoining the Health Centre, Yorkley	Deliverability of housing sites in local plan The site at Yorkley F.C.21 is not deliverable , has access problems and no planning history Land at Lydney Road Yorkley should be included in the local plan. There are no constraints in the development as identified by the officer's recommendation to approve planning permission (refused by members). It will include additional benefits as affordable housing, parking for the school and new public open space, all of which would not be available on F.C 21 Yorkley.	The site proposed to be allocated is considered able to be delivered. It is accepted that the alternative site suggested is able to be developed following the recommendation but the Council have refused it permission and an appeal is due to be heard shortly. The Council will allocate the site in the event that the appeal is allowed but at present do not support it. Irrespective of the appeal, it is possible to identify and allocate the proposed site off Tower Rd for the development proposed.
APFC257	Ms Tracey Bayliss	Policy FC 21 Adjoining the Health Centre, Yorkley	Deliverability of housing sites in local plan The site at Yorkley F.C.21 is not deliverable , has access problems and no planning history Land at Lydney Road Yorkley should be included in the local plan. There are no constraints in the development as identified by the officer's recommendation to approve planning permission (refused by members). It will include additional benefits as affordable housing, parking for the school and new public open space, all of which would not be available on F.C 21 Yorkley.	The site proposed to be allocated is considered deliverable and preferable to the alternative. The latter is the subject of a current appeal which if allowed will mean that the AP will be modified to allocate the land concerned.
APFC260	Mr Mike Bayliss	Policy FC 21 Adjoining the Health Centre, Yorkley	Deliverability of housing sites in local plan The site at Yorkley F.C.21 is not deliverable , has access problems and no planning history Land at Lydney Road Yorkley should be included in the local plan. There are no constraints in the development as identified by the officer's recommendation to approve planning permission (refused by members). It will include additional benefits as affordable housing, parking for the school and new public open space, all of which would not be available on F.C 21 Yorkley.	The site proposed to be allocated is considered able to be delivered. It is accepted that the alternative site suggested is able to be developed following the recommendation but the Council have refused it permission and an appeal is due to be heard shortly. The Council will allocate the site in the event that the appeal is allowed but at present do not support it. Irrespective of the appeal, it is possible to identify and allocate the proposed site off Tower Rd for the development proposed.
APFC262	Ms Kate Collins	Policy FC 21 Adjoining the Health Centre, Yorkley	Deliverability of housing sites in local plan The site at Yorkley F.C.21 is not deliverable , has access problems and no planning history Land at Lydney Road Yorkley should be included in the local plan. There are no constraints in the development as identified by the officer's recommendation to approve planning permission (refused by members). It will include additional benefits as affordable housing, parking for the school and new public open space, all of which would not be available on F.C 21 Yorkley.	The site proposed to be allocated is considered able to be delivered. It is accepted that the alternative site suggested is able to be developed following the recommendation but the Council have refused it permission and an appeal is due to be heard shortly. The Council will allocate the site in the event that the appeal is allowed but at present do not support it. Irrespective of the appeal, it is possible to identify and allocate the proposed site off Tower Rd for the development proposed.
APFC268	Mr Allister Dobbyn	Policy FC 21 Adjoining the Health Centre, Yorkley	Deliverability of housing sites in local plan The site at Yorkley F.C.21 is not deliverable, has access problems and no planning history Land at Lydney Road Yorkley should be included in the local plan. There are no constraints in the development as identified by the officer's recommendation to approve planning permission (refused by members). It will include additional benefits as affordable housing, parking for the school and new public open space, all of which would not be available on F.C 21 Yorkley.	The site proposed to be allocated is considered able to be delivered. It is accepted that the alternative site suggested is able to be developed following the recommendation but the Council have refused it permission and an appeal is due to be heard shortly. The Council will allocate the site in the event that the appeal is allowed but at present do not support it. Irrespective of the appeal, it is possible to identify and allocate the proposed site off Tower Rd for the development proposed.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC271	Mr Jack Gore	Policy FC 21 Adjoining the Health Centre, Yorkley	Deliverability of housing sites in local plan The site at Yorkley F.C.21 is not deliverable, has access problems and no planning history Land at Lydney Road Yorkley should be included in the local plan. There are no constraints in the development as identified by the officer's recommendation to approve planning permission (refused by members). It will include additional benefits as affordable housing, parking for the school and new public open space, all of which would not be available on F.C 21 Yorkley.	The site proposed to be allocated is considered able to be delivered. It is accepted that the alternative site suggested is able to be developed following the recommendation but the Council have refused it permission and an appeal is due to be heard shortly. The Council will allocate the site in the event that the appeal is allowed but at present do not support it. Irrespective of the appeal, it is possible to identify and allocate the proposed site off Tower Rd for the development proposed.
APFC286	Catherine Brabner Evans, Woodland Trust	Policy FC 21 Adjoining the Health Centre, Yorkley	The Woodland Trust has concerns about Policy FC 21 – the proposed development near Yorkley health centre at SO639071 which is adjacent to ancient woodland. Ancient woodland is defined as an irreplaceable natural resource that has remained constantly wooded since at least AD1600. The length at which ancient woodland takes to develop and evolve (centuries, even millennia), coupled with the vital links it creates between plants, animals and soils accentuate its irreplaceable status. The varied and unique habitats ancient woodland sites provide for many of the UK's most important and threatened fauna and flora species cannot be re-created and cannot afford to be lost. We, therefore, confirm our commitment to the policies set out in both the Open Habitats Policy and Keepers of Time, our statement of policy for England's ancient and native woodland'. Development impacts on ancient woodland in a number of ways. Any effect of development can impact cumulatively on ancient woodland - this is much more damaging than individual effects. Creation of new areas of woodland or buffer zones around semi-natural habitats, and more particularly ancient woodland, will help to reduce and ameliorate the impact of damaging 'edge effects', serving to improve their sustainability. The size of the buffer is dependent on the intensity of land use in the intervening matrix between ancient woods. The Natural England standing advice for Ancient Woodland and Veteran Trees (April 2014) paragraph 6.4 states: " Development must be kept as far as possible from ancient woodland, with a buffer area maintained between the ancient woodland and any development boundary. We would recommend a buffer zone of at least 50 metres of semi-natural vegetation would be required to protect the woodland from the change in land use on the site for each allocation. This 50m should be included as part of the policy for each site. We hope you will take these matters into consideration by including at least a 50m buffer zone between the woodland and the residential development curtilage.	It is agreed that the woodland adjoining should be protected. The proposed development site is close to existing woodland but its development using the existing access which would need to be improved is considered possible without harm to the adjoining woodland. The actual wooded area only bounds the northern edge of the site and the access could be provided within the allocated area and clear of the woodland especially once the access is able to run into the main allocated area.

**Comments Received to Further Changes Consultation December 2016 to February 2017**

Ref Number	Full Name	Policy or Paragraph Number	Comment Summary	Draft Officer Response
APFC288	ORB Developments Ltd	Policy FC 21 Adjoining the Health Centre, Yorkley	Concerns are raised with the Allocations Plan generally and the housing land supply position of the District set out within the Council's evidence base. It is recommended that Land East of Lydney Road, Yorkley is allocated for residential development in order to ensure a robust housing land supply. Concern is raised about the deliverability of the Council's chosen housing sites identified within the Council's evidence base (set out within 'Housing Land Availability Summary', December 2016). The concern particularly relates to the housing trajectory and whether some of the sites identified can deliver housing within 5 years. In order to address these concerns it is recommended that additional land is allocated for housing at Land East of Lydney Road, Yorkley which is considered to be a suitable site for small-scale residential development. The site is the subject of a planning appeal, the proposed development consists of the construction of up to 37 dwellings, additional car parking spaces for the primary school, public open space, associated landscaping, two vehicular accesses and a pedestrian route into the site. The proposal also includes provision of a range of traffic calming measures along Lydney Road to improve connectivity between the Primary School and the development. The site was recommended for approval by Officers. In the Officer's report to committee concluded that the proposal is acceptable and does not conflict with the aims and objectives of the NPPF. It is therefore considered that the site is a suitable and sustainable location for small-scale housing growth in line with the Core Strategy (Policy CS.16). The site is available, deliverable and suitable and residential development of the site is achievable. The site is in single ownership and development can be delivered within 5 years. It is recommended that the site East of Lydney Road is allocated in preference to the land adjoining the medical centre, in order to bring additional benefits to the village.	The site proposed to be allocated (off Tower Rd) is considered able to be delivered. It is accepted that the alternative site suggested is able to be developed following the recommendation but the Council have refused it permission and an appeal is due to be heard shortly. The Council will allocate the site in the event that the appeal is allowed but at present do not support it. Irrespective of the appeal, it is possible to identify and allocate the proposed site off Tower Rd for the development proposed.
APFC321	Mrs S Fellows, Land Research & Planning Associates Ltd.	Policy FC 21 Adjoining the Health Centre, Yorkley	Access issues to site.	It is considered that access to this site would be by way of improvements to the existing track along the northern edge of the existing property but that the access could at the point where the access reaches the main part of the site this could run into it.
APFC335	Name provided	Policy FC 21 Adjoining the Health Centre, Yorkley	Deliverability of housing sites in local plan. The site at Yorkley FC21 is not deliverable has access problems and no planning history. Land at Lydney Road, Yorkley should be included in the Local Plan. There are no constraints to the development as identified by the officers recommendation to approve planning permission (refused by members) It will include additional benefits as affordable housing parking for school and new public open space all of which would not be available on FC21 Yorkley.	The likely access would be into the northern boundary of the land, and it would then form the edge to the forest along with the development itself. The Council consider that the site is capable of development in a manner that would be both achievable and acceptable from the amenity point of view. It is agreed there is no recent planning history.