

ID	Name/ Company / Organisation	Document to which comment relates.	Do you wish to Support or Object	Please give reasons for your support / objection:
LHNDP1	Sport England	Longhope Neighbourhood Development Plan	Make observations	<p>Thank you for consulting Sport England on the above neighbourhood plan. Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important. It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 73 and 74. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Planning Policy Statement: 'A Sporting Future for the Playing Fields of England'. http://www.sportengland.org/playingfieldspolicy Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/ Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 74 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery. Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work. http://www.sportengland.org/planningtoolsandguidance If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes. http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/ Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place. In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals. Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved. NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing Sport England's Active Design Guidance: https://www.sportengland.org/activedesign (Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)</p>
LHNDP2	Mr V Sheno	Longhope Neighbourhood Development Plan	Support	Sounds sensible and appropriate to needs of the community.

LHNDP3	Natural England	Longhope Neighbourhood Development Plan: Paragraph 4.1.1	Support with conditions	Natural England notes the wording at point 4.1.1 which states "Any new development should take into account the fact that the parish lies approximately 2-3km from Blaisdon Hall, a Wye Valley and Forest of Dean Special Area of Conservation and SSSI for lesser horseshoe bats. These bats have been recorded in the parish." NE support the consideration of the Bat SAC, but this wording should be changed to commit to avoiding impacts on SAC bats through good design. Longhope falls within a number of Bat SAC sites, and light-sensitive SAC bats should be presumed to be present when considering development within the plan area; policy wording should reflect this. Opportunities Developments in the plan should be designed to avoid excessive lighting and to prevent light spill avoiding impacts on the Bat SAC; the Neighbourhood Plan is an opportunity to commit to reducing light pollution locally, to enhance ecological interest, as well as improve general amenity for residents A specific policy should be included for green infrastructure (GI) in the plan. A green infrastructure policy should commit to the retention of existing hedgerows and trees. Weight should be given to the maintenance and creation of dark corridors for bats within the plan area. Commitment to green infrastructure has a number benefits, not least the creation of spaces of importance to the community; for example community orchards and gardens. GI should be required for new developments as part of a commitment to sustainable development, not only in cases where mitigation is necessary. Additional information The attached annex may be of use to you; it sets out sources of environmental information and some natural environment issues you may wish to consider as you develop your neighbourhood plan or order.
LHNDP4	Highways England	Longhope Neighbourhood Development Plan	Support with conditions	Development identified in the Longhope NDP is believed to be consistent with the Local Plan, which Highways England has previously issued consultation comments. However, where significant development proposals arise, we would expect to be consulted on any transport report accompanying the planning application, or for any development which is identified to have an impact on the operation of the A40. This includes both the A40/Church Road junction and A40/A4136 junction in relation to Longhope developments
LHNDP5	Gloucestershire Gardens and Landscape Trust	Longhope Neighbourhood Development Plan	Make observations	Having looked through the relevant sections of the Draft Plan, and particularly Policies PE1a and PE1b; GGLT is of the opinion that as the Draft Plan does not include proposals to release land for further development, it is satisfied the District's own Local Plan and Development Control processes should be sufficient to safeguard the wider built, historic and landscape assets of the plan area. However, for those areas within the plan area already earmarked for development, one would hope that the District would be able to secure from all development agencies improved levels of design and landscape quality .
LHNDP6	The Coal Authority	Longhope Neighbourhood Development Plan	Make observations	Having reviewed your document, I confirm that we have no specific comments to make on it.
LHNDP7	Colburn Homes Ltd	Map 1 Allocations Plan: extract at page 6 and Map 3 DSB changes	Support with conditions	This representation relates to the boundary for allocation AP79 - Land off Church Road. on all three illustrations of the allocation (map 1, map3 and the extract at page 6 of the neighbourhood plan itself) the site as drawn does not reflect the red line plan associated with the previous appeal. In response to the previous appeal decision, the Fores of DEan District council specified (at ED032) that an area of 1.34ha would be allocated for approximately 28 dwellings. Page 6 of the neighbourhood plan repeats the reference to 1.34a. However, the maps do not indicate 1.34ha, they illustrate the former size of the allocation at just under 1ha. Attached to this representation is the site location plan illustrating 1.34 ha. It is respectfully requested that the neighbourhood plan be amended at map 1, map 3, and the inset map on page 6 to reflect the amended allocation in the Forest of Dean Site Allocations Development plan Document
LHNDP8	Colburn Homes Ltd	Longhope Neighbourhood Development Plan: Policy H1f	Object	Although it is acknowledged that paragraph 4.2.6 of the Neighbourhood Plan (NP) states that the document does not seek to identify specific sites for new housing development, the NP still needs to be in conformity with the Site Allocations Development Plan Document. In this respect, the NP acknowledges the allocation AP79. Allocation AP79 has been subject to Examination with no adverse comment on the amended wording (at examination document ED032) in the Inspector's Interim report. The allocation is for 1.34ha. of land, and approximately 28 dwellings. Policy H1f. seeks to limit development in Longhope to 'minor' housing developments, i.e. applications for 9 or fewer homes. This policy requires qualification as it presumably only relates to applications for housing beyond the allocations specified at Page 6 of the NP. It is respectfully requested that Policy H1f. be amended so that it is clear that it relates to applications for housing beyond those identified in the Site Allocations Development Plan Document.
LHNDP9	Gloucestershire County Council	Longhope Neighbourhood Development Plan	Make observations	Thank you for consulting Gloucestershire County Council on this matter. I can confirm that we have no further comments to make on it.

LHNDP10	Environment Agency	Strategic Environmental Assessment Screening Appendix 9	Make observations	<p>For completeness, we provided comment to the Strategic Environmental Assessment Screening Consultation on 25 July 2017 (letter reference SV/2010/104029/OT-06/IS1-L01). We sent your Council a copy of our Neighbourhood Plan pro-forma guidance, for distribution to Parish Councils. The purpose of the guidance is to assist the preparation of Neighbourhood Development Plans, including an appropriate evidence base. This includes consideration of some of the relevant environmental issues that should be considered, including flood risk (from rivers and sea), water quality, water resources and includes latest Climate Change recommendations for flood risk. Since we produced this guidance we have updated our climate change allowances for planners. See Flood risk assessment: climate change allowances for more information. For each proposed site allocation, we recommend completing the pro-forma to check the environmental constraints. This will help collect evidence, identify challenges, inform policy and assist delivery of sustainable solutions. We note Section 4.2.6 of the Plan confirms there are no additional housing allocations proposed. We would only make substantive further comments on the plan if it were seeking to allocate sites in Flood Zones 2 or 3 (the latter being used as the 100 year climate change extent). Furthermore, we do not offer detailed bespoke advice on policy but advise there is conformity with the Local Plan and refer to our guidance. This might assist with your consideration of a local environmental enhancements or improvement policies that may be necessary.</p>
LHNDP11	M F Freeman	Longhope Neighbourhood Development Plan: Section B housing, Section E Community	Object	<p>The representations relate to land interests located west of The Wend, Longhope and our comments are framed within that context. Part of the land interest benefits from planning permission (reference P1888/14/FUL) for 16 affordable dwellings. We support the Parish Council in bringing forward a Neighbourhood Plan (NP) and are encouraged by the proactive nature of the process being undertaken. MF Freeman wish to make comments on the emerging NP, and also to suggest that land west of The Wend, Longhope be allocated in the NP in order to help meet housing need and to assist in meeting some of the aspirations set out in the NP. We broadly support the need to widen housing choice, to provide homes for younger people and homes for elderly people to downsize. We acknowledge that the need for homes for younger people was identified during the local community consultation process. We therefore consider it important that the NP should address these community housing needs. We support the recognition at paragraph 4.2.4 of the extant planning permission for 16 affordable homes at The Wend. We would however advise caution regarding the NP's assumption (paragraph 4.2.4) that this development alone will meet the affordable housing need. As you will appreciate, the needs of families and households are fluid, and the NP should therefore maintain appropriate flexibility in order to be able to respond to changing circumstances. We would therefore advocate an evidence led approach to the provision of affordable housing, which allows flexibility for additional affordable housing, if a need for such housing is later identified. We also wish to point out that affordable housing is just one type and tenure of housing need. Opportunities should be provided to allow young families to move up the housing ladder, as was identified as an important issue at the public consultation. Also, you will be aware that older persons are disproportionately home owners compared to younger age cohorts, and many older people own their homes outright. Older people often value the security of ownership and the NP should therefore encourage the provision of smaller open market dwellings to allow for downsizing. Paragraph 4.2.5 confirms the housing need that was highlighted at the community consultation but paragraph 4.2.6 goes on to state that the NP does not seek to identify any specific sites for new development. Therefore, it is not clear how the NP will help deliver the required housing? The Planning Practice Guidance (paragraph 42) confirms that an appraisal of options and an assessment of individual sites should be carried out against defined criteria. We are not aware that any comparative analysis (e.g testing of options) has been undertaken as required. The NP therefore fails to meet the basic conditions in this regard. We recognise that the support for 'small scale housing' reflects Core Strategy Policy CSP.5. In light of our concerns additional housing sites should be assessed and identified. We object to paragraph 4.2.7. Whilst Core Strategy policy CSP.16 confirms that settlement boundaries will be 'a key determinant in judging the acceptability of proposals' at service villages, the policy does not rule out greenfield development. However, paragraph 4.2.7 states 'no further development outside the existing settlement boundary is envisaged our supported'. This is a restrictive policy and is also contrary to the Core Strategy. Due to the conflict with the Core Strategy, the NP does not meet the basic conditions (as set out above) and the sentence should therefore be deleted accordingly. Overall, we consider that the NP should seek to provide more houses in order to meet housing need, and affordable need in particular, and to help achieve the wider NP objectives. It should also be more flexible to take account of changing circumstances. Section E- Community We broadly support the desire to protect local services and facilities. We consider that housing growth can help to support these services. Evidence from Gloucestershire County Council based on the census identifies that average household size in the Forest of Dean fell from 2.61 to 2.46 people between 1991 and 2001 and is expected to continue to fall below 2.3 persons by the year 2026. The evidence base underpinning the NP also shows that the population in Longhope is falling. Therefore, some housing growth is required just to maintain the population. Failure to do so potentially threatens the very services that the NP seeks to maintain. The Role of the Local Planning Authority As you are aware, paragraph 5 of Section 48B of the Act confirms that the Local Planning Authority must consider whether the NP complies with relevant legislation and guidance. For the reasons set out above, we do not consider that the NP currently meets the basic requirements. Land West of The Wend, Longhope We consider the land with planning consent for affordable housing to be an appropriate site to deliver the housing growth that the village community requires in order to meet its needs. In addition, land directly to the west and south of that site could play a role in meetings the future housing needs of the village and those of the wider District. The site is adjacent to the village and would therefore form a logical extension to the village. Access could be achieved from The Wend.</p>

LHNDP12	Gladman Developments	Longhope Neighbourhood Development Plan	Object	<p>Relationship to Local Plans The adopted Development Plan relevant to the preparation of the LNP is the Forest of Deane Core Strategy. The Core Strategy was formally adopted by FoDDC on 24th February 2012 and therefore pre-dates the approach to plan making set out in the Framework. The Council is now progressing its Allocations Plan, together with the Core Strategy and the Cinderford Northern Quarter Area Action Plan, the Allocations Plan will form part of the Development Plan for Forest of Dean. Through the Allocations Plan, the Council has revisited its evidence of housing need which suggests an annual need of 330 dwellings per annum. Despite the very modest increase to the proposed housing requirement through the further proposed changes, the evidence prepared by Barton Willmore on behalf of Gladman to the further proposed changes consultation points to a higher level of need. Accordingly, the outcome of the examination is unknown and the LNP should seek to allow for a degree of flexibility so that it is able to react to changes that may arise through the course of examination into the Allocations Plan. Longhope Neighbourhood Plan Housing Objective Gladman do not support the objective which seeks to provide a limited amount of new housing to meet local needs. This use of wording is not considered appropriate nor consistent with the approach taken in the Framework to boost significantly the supply of housing. Policy H1a Whilst recognising the importance of this policy to meet local housing needs it is important that this policy allows for sufficient flexibility. Housing needs are inevitably subject to change, as such, it is recommended that up-to-date over the duration of the plan period. Policy H1b Whilst supporting the general thrust of this policy which seeks to ensure the provision of affordable housing, the purpose of the policy should seek to add value to the existing policy framework and include policies that are distinctive to the local area. There is no need to repeat policies contained in the adopted Development Plan where these do not add value to the existing policy framework, as such policies will be taken into consideration regardless of whether or not they are included in the neighbourhood plan. Policy H1c Gladman recommend that this policy is amended to reflect the requirements established by the Framework. Developer contributions can only be sought where they meet the tests set out under paragraph 204 of the Framework which states that: - Necessary to make the development acceptable in planning terms; - Directly related to the development; and - Fairly and reasonable related in scale and kind to the proposed development Policy H1f Gladman submit that policy H1F is contrary to the basic conditions as it seeks to limit development in the neighbourhood area to minor development as defined by the DCLG. This definition is simply to provide an indication of what category a planning application would fall into. sThe inclusion of such a policy is unevidenced and would be contrary to the Frameworks requirement which seeks to boost significantly the supply of housing and the presumption in favour of sustainable development. Furthermore, we question how the Parish Council would seek to implement a number of its aspirations when it is unlikely to receive any significant financial contributions that would enable the delivery of the Plan s wider objectives. It should be further noted that the emerging Allocations DPD identifies land for housing development at land off Church Road for 15 dwellings. The inclusion of this site demonstrates that the neighbourhood plan area is capable of accommodating a higher level of growth than that defined by the definition of minor development . Policies H2a and H2b The above policies refer to the need for development to meet the highest standards of design i.e. Building for Lifetime Homes. In this regard, Gladman is concerned that the above policies require development proposals to be required to incorporate the principles of design guidance which are non-statutory in nature. Indeed, this point was considered in the examiners Report to Kelsall and Willington Neighbourhood Plan. Paragraph 106 stated that: 'Policy D1 - This requires new housing development to meet Building for Life 12 Criteria. While good design is an integral part of both national planning policy and the existing development plan policy it is unduly onerous to require all housing development to be assessed by a non-mandatory framework...' I hope you have found this representation to be constructive</p>
LHNDP13	Forest of Dean District Council Regeneration	Longhope Neighbourhood Development Plan: Economy	Make observations	<p>Economy It may be helpful for the NDP to mention the growing importance of tourism within the Forest of Dean's economy. This may be valid in Longhope Parish where there existing visitor attractions and existing land based businesses seeking to diversify. I attach the most recent data from the South West Tourism Alliance for the Forest of Dean from 2015. This may be a useful addition to the NDP evidence base if this has not already been identified. I would like to suggest expanding the current wording within the following draft NDP policies to include opportunities to support tourism sector growth: E1c - Working from home E1d - Re-use of Farm Buildings Both policies could help facilitate local investment in new visitor attractions, visitor accommodation or tourism related business services.</p>
LHNDP14	Historic England	Longhope Neighbourhood Development Plan	Make observations	<p>I can confirm that we have no comments that we wish to make on the Plan.</p>