

ID	Company / Organisation	Document relates - To which document does the comment relate	Do you wish to support /object	Please give reasons for your support / objection:
BCE1	Theatres Trust	Berry Hill Christchurch and Edge End Neighbourhood Development Plan - Five Acres Policy 1	Support	The Theatres Trust supports 'Five Acres Policy 1' and the requirement to retain or enhance the Forest Theatre for the benefit and well-being of the local community. This is consistent with Council's Core Strategy Policy CSP8: Retention of Community Facilities; and reflects item 70 in the National Planning Policy Framework which states that to deliver the social, recreational and cultural facilities and services that the community needs, planning policies and decisions should plan for the use of shared space and guard against unnecessary loss of valued community facilities. Also to ensure that established facilities and services are retained and able to develop for the benefit of the community. It is also consistent with requirements for Site AP 58 in the Site Allocations Plan currently in examination.
BCE2	Sport England	Berry Hill Christchurch and Edge End 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>

BCE3	Environment Agency	Berry Hill Christchurch and Edge End Neighbourhood Development Plan	Make observations	Thank you for referring the above consultation on the Berry Hill, Christchurch & Edge End Neighbourhood Development Plan. For completeness, we provided comment to the Strategic Environmental Assessment and Habitats Regulations Consultation on 9 January 2017 (letter reference SV/2010/104029/OT-07/PO1-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 there are no additional housing allocations proposed within the Plan. 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.
BCE4	Gloucestershire County Council	Berry Hill Christchurch and Edge End Neighbourhood Development Plan - Ecology	Make observations	Ecology Comments The views of the District Council in the reports on Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) are noted. The Gloucestershire Centre for Environmental records (GCER) does not appear to have been contacted to inform the NDP. However looking at the NDP area no statutory or non-statutory sites (such as SACs, SSSIs, Key Wildlife Sites or Conservation Road Verges) appear to lie within or close to the NDP area boundary that might need mentioning. The NDP proposals have some consistency with the Gloucestershire Local Nature Partnership's Strategic Framework for Green Infrastructure which overlaps Edge Hill in the east. Additionally Wye Woods 1 SNA and Nagshead Woods SNA from the Gloucestershire Nature Map overlap the western and eastern sides of the NDP area respectively. Further details of SNAs (Strategic Nature Areas) and the Strategic Framework for Green Infrastructure are to be found at http://gloucestershirenature.org.uk/index.php . It is noted that during the second open event of the NDP 100% of the local community respondents supported the proposal to conserve and enhance biodiversity which is a theme of the National Planning Policy Framework (NPPF). The NDP vision, objectives and resulting policies (CE1, CE2, CE3, CE4, & CE6) promote the conservation and achievement of a net gain for biodiversity which is welcomed. Green space, landscape character, ecological networks (wildlife corridors) and SuDS are being given high value. We do not have any compelling reasons to recommend any change to the wording of the NDP policies which seem to fit in well with District and County objectives.
BCE5	Gloucestershire County Council	Berry Hill Christchurch and Edge End Neighbourhood Development Plan - Flood Risk Management	Make observations	Flood Risk Management Comments The Lead Local Flood Authority will fulfil its statutory duty to provide advice to the Local Planning Authority when requested to do so regarding the management of surface water relating to major planning applications with the aim of ensuring related flood risk is managed as effectively as possible.
BCE6	Gloucestershire County Council	Berry Hill Christchurch and Edge End Neighbourhood Development Plan - Highways Policies TR.1.2, TR.1.3, TR.2.1	Object	Highway Comments There appears to be a desire to seek betterment to the existing situation which is likely to be contrary to the NPPF and the CIL Regulations. Policies TR.1.2 and TR.1.3 should be caveated to only apply to those developments that would have a severe impact on the transport network (para 32 of the NPPF). Policy TR.2.1 – the last sentence should be removed in its entirety:- TR.2.1: The NDP will support any development which will maximise opportunities to walk and/or cycle within easy distance to bus stops, the schools, a community health, well-being and fitness centre, shops and other community facilities. Developments will be required to take into account the need to improve accessibility for the whole community both within and adjacent to the development sites, by creating safe and attractive pedestrian and cycle routes to the edge of the villages and to all employment and development areas.
BCE7	Showmans Guild	Berry Hill Christchurch and Edge End Neighbourhood Development Plan	Make observations	Have you put any showmans sites in to the plan?

BCE8	Mr Charles Taylor	Berry Hill Christchurch and Edge End NDP Pan Area : Map 1	Support with conditions	<p>The document as a whole is excellent both in terms of content and design. My comments relate to Housing Policy 1 in relation to Site 3 - Land between Marions walk and Grove Road which has been put forward for development by the local landowner. This area lies outside the settlement boundary and to the best of my knowledge there been no appetite on the part of FODDC to alter the boundary to include it due to its proximity to the Wye Valley woodland. In an earlier paragraph it says that 'The NDP supports the existing settlement boundary as proposed in the AP (Allocations Plan) and does not support new housing outside the settlement boundary', however this excludes 'affordable housing on Rural Exception sites'. The comment on site 3 that 'it could be considered for affordable housing' suggests that this site could be one of those exclusions. I note from West Dean Parish Council minutes from May 31st 2017 that FODDC and GRCC working with WDPC and Housing Agencies have established a programme to identify Rural Exception Sites in the Berry Hill area and that 'a site' has been identified to provide a possible 26 dwellings of mixed tenure although the minutes do not identify the site. I assume the Marions Walk land is the site in question. The strength of NDP lies in the high level and quality of its public consultation which has informed policy and therefore imparted legitimacy and value to those policies and the strategies designed to achieve those policy outcomes. I feel very strongly that where Rural Exception sites such as this are put forward, which are likely to prove controversial, e.g. for residents of Marions Walk, that the NDP explicitly states, in this document, that it encourages and supports equally high levels of dialogue and public consultation between the agencies and local residents and others affected by these proposals. While it has been produced under the auspices of WDPC it is very important that the NDP is not perceived just as a vehicle for parish or district council policy. I note that the WDPC minutes from 31.5.17 state quite rightly that public consultation would be necessary. I therefore recommend that some similar line of dialogue be included as an amendment to the paragraph in the NDP document after the comments about rural exception sites. If local residents have views on these sorts of proposals they should be heard and the NDP should be seen to support them in expressing those views. Exception sites are an exception to normal planning policy and surely therefore need to be given exceptional consideration in the public domain. Local consultation has been effective in Christchurch in relation to plans submitted for the development of land on Site 1 - land between Woodland Road and Ross Road. At the encouragement of local councillors there has been constructive direct dialogue between the members of the local community and the land owner/ developer. This has been put forward as an alternative to the sterile and confrontational methods of normal planning procedure and thus far has resulted in reasonable compromise. These principles should be encouraged in the NDP document so that the idea of consultation on any significant development going forward is embedded in its purpose.</p> <p>I would like to see a line of dialogue be included in Section Housing Policy 1 as an amendment to the paragraph referring to rural exception sites to the effect that 'If such sites are put forward that there will be full consultation with local residents and others affected by these proposal to ensure that their voices are heard.'</p>
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BCE9	Forest of Dean District Council	Berry Hill Christchurch and Edge End Neighbourhood Development Plan		<p>Overall the plan and its supporting material is comprehensive and very well produced. Apart from one issue considered below, which the FoDDC have raised previously there are none which we wish to draw attention to at the present time. We have in the past commented on previous versions of the NDP and have said that it does in our view meet the "basic conditions". This requires a plan to be generally in accord with the current (adopted) development plan. Where there is a possible issue is that the emerging development plan does seek to promote a different mix of development which may include a greater scale of housing on the Five Acres site than that supported by the NDP. It is recognised however that the AP draft policy is not an allocation but an aspirational policy seeking a number of changes on the site allowing for a range of outcomes. There is flexibility in the AP and the policy (AP58) is drafted to provide policy guidance for the whole of the Five Acres site and some adjoining areas too. The FoDDC's main concern is about the implementation of the proposals for the Five Acres site. The available land may not be able to accommodate all of the uses referred to in the NDP. It is not large especially when the undeveloped open space is set aside. The NDP policy as written lists in priority order various uses and also requires an element of housing. The policy expects to: Provide a mix of recreational opportunities (requires indoor and outdoor space but may be within leisure centre?) Develop theatre (requires retention of theatre) Develop health facility (not specified would require dedicated space). Add dining options and associated facilities (not specified) Provide training facilities inc catering (implies retention of some buildings or new build) Support pedestrian and cycle network (links to the site- would not in itself need additional space) Create visitor accommodation (not specified-) Allocate around 40 homes- This implies a minimum of 1ha but probably more appropriately 1.5ha of the already developed area is given over to housing. The policy as worded implies the housing acting as enabling development able to subsidise other uses. This may be very difficult to achieve given the indications elsewhere in the district of development viability. The built up part of the site is about 2.7 ha. And if the housing is to be provided 1.7ha at the most would remain for the other uses listed. If the sports centre is to remain, there is after the car parking has been allowed for, not a lot of space remaining for housing and any other community/ employment uses. Further guidance in the plan regarding the nature of the planned uses may help as some that are envisaged may be small in scale or may be envisaged as the intensification of existing uses (for example the leisure centre). In addition there is a lack of guidance regarding how the uses planned may be implemented- and although the plan may allocate in anticipation, there should be some reasonable expectation that they can be achieved. The policy could be re cast as one which simply expresses the range of uses that will be permitted, with indications of the scale of each. It would be better if it specifically identified geographic areas for some uses such as the open space, the recreational/ sports element and the housing on a basic masterplan. Such a masterplan could be in accord with the AP and take it a stage further by showing in more detail how the site is expected to be developed. The suggested general policy would ensure that the land would be developed for the uses the plans (NDP and AP) support without requiring them all. It would be more closely in accord with the new AP if it were able to show how up to 80 dwellings could be accommodated on the wider site: "...land at five Acres will be identified for open space (xha), indoor sport and recreation (xha) and for about ##dwellings on xha of land..." Previous comments: April 2016 FA 1.1 (Five Acres) Policy is not in conflict with the emerging AP and certainly not the CS. The main concern is that it is worded as if everything will be developed and the reality is the site is small and the actual availability/ use of the buildings uncertain. The housing cannot be confined to WD residents. November 2016 29) p91 The Five Acres policy needs to set out priorities and also consider what is possible in terms of the land available. One approach could be a masterplan, another is to use options by specifying what may be permitted. The Gloscol site is not big so assuming the green area remains as open space, there is not a lot of spare space. Keeping pool and theatre in situ reduce scope further. Housing may need half or more of the built area and all uses will need parking space. Housing on the site won't be able to offer WDPC residents any priority. The site has considerable potential but needs a plan- ideally not just for the college footprint.</p>
BCE10	Natural England	Berry Hill Christchurch and Edge End Neighbourhood Development Plan	Support with conditions	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made. Natural England does not have any specific comments on this draft neighbourhood plan. However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan. Best and Most Versatile Agricultural Land We have not checked the agricultural land classification of the proposed allocations, but we advise you ensure that any allocations on best and most versatile land are justified in line with para 112 of the National Planning Policy Framework . Opportunities ☐ Natural England note and support the inclusion of measures to reduce light spillage in Countryside & Environment Policy 6. ☐ Natural England recommend that potential impacts on light sensitive Bat SAC populations are specifically mentioned in this policy and suggests that the Bat Conservation Trust interim guideline note could be referenced. ☐ Natural England notes and supports the policies included in Countryside & Environment Policy 1, but suggests that the term 'green infrastructure' is included and that the potential for GI to be multi-functional should be clearly outlined. ☐ e.g. green and natural features are not mutually exclusive and that the provision of any public spaces should include consideration of biodiversity, for example, dark corridors for bats. ☐ Natural England supports the commitment to increase habitat connectivity in Countryside & Environmental Policy 3. Given the location of the Plan area, Natural England recommends that the Wye Valley AONB office are consulted regarding those policies relating to landscape impacts of development.</p>

BCE11	Gladman	Berry Hill Christchurch and Edge End Neighbourhood Development Plan	Object	<p>Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that the BHCEENP must be consistent with national planning policy and the need to take account of up-to-date housing needs evidence for the wider local authority area. If the Plan is found to not meet the basic conditions at Examination then the Plan will be unable to progress to Referendum. In order for the plan to proceed and meet all of the neighbourhood plan basic conditions set out in schedule 4b, the NDP must ensure that its policies positively plan and allow for sufficient flexibility and based on robust and justified evidence. Through these representations Gladman has sought to provide some constructive criticism and has suggested a need for a number of amendments to the plan as currently proposed to ensure the fully delivery of the plan's economic, social and environmental objectives. Gladman feels that a less restrictive approach needs to be taken in the neighbourhood plan-making process, as well as a greater level of flexibility to ensure that the Plan is not superseded by the provisions of the emerging AP or any future Core Strategy review. Furthermore, to achieve the Plan's wider aspirations such as increasing the amount of affordable housing and improvements in community facilities at the GLOSCOL site, it is considered that additional housing will be required to deliver a number of aspirations that the Plan seeks to achieve. This section of the representations highlights policies which need to be addressed and amended through modification and/or deletion, should the plan progress to independent examination. As a general note the plan period will need clarifying, as the plan period in the title of the document states 2016-2026, yet the delivery and implementation section of the plan states it will be delivered over the next 20 years. Further to this, a number of policies lack the clarity to be applied consistently and confidently by a decision maker and as PPG states 'policies should be clear and unambiguous... drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence.' It is likely a number of policies will need to be modified for the plan to meet the basic conditions necessary for the plan to proceed to referendum. When read as a whole, it is considered the policies within the plan are worded negatively and will need rewording to reflect the positive approach of the Framework. Policy HP1.1 This policy is unclear and ambiguous and will need rewording to meet the basic conditions. The policy states 'small scale' housing developments will be supported within the settlement boundary without defining what is classed as small-scale development. Further, whilst setting out what is considered acceptable within the settlement boundary there is no reference to what development would be considered outside the settlement boundary. As written it is a rather unhelpful policy that will likely lead to inconsistencies in the decision-making process. Without stating what development would be considered beyond the settlement boundary it is not clear how a decision maker should react to a development proposal. If it were to mean a blanket restriction towards all development beyond the settlement boundaries this would not accord with the Framework. Policy HP1.3 Gladman suggests policy HP 1.3 is deleted from the plan as it is not clear how the various criteria can be applied to development proposals consistently and confidently as the application of each of the criteria would be subjective and again lead to inconsistencies in the decision-making process. Supporting text The supporting text references two parcels of land adjacent to the neighbourhood plan area as natural land barriers (buffer zones). It is considered inappropriate to reference a site of which most of the land is outside the neighbourhood area. Whilst a marginal amount of land at Lower Lane falls within the neighbourhood plan area most of the site is outside the neighbourhood plan area falling within the adjacent Coleford neighbourhood plan area. An area of separation has been proposed in the draft version of this plan, which Gladman have previously raised objections to. There is insufficient evidence behind the policy and Gladman objects to the reference to this site . Policy HP 2.1 This is a poorly worded policy which will need significant modifications. If the objective of the policy is to boost the provision of affordable housing through supporting rural exception schemes Gladman suggest this approach is reconsidered. Whilst supporting the ambition to boost affordable housing provision it is very unlikely a rural exception site will be delivered as a willing landowner will not be benefitting from the full value of the land. Gladman suggest increasing affordable housing provision should be done through increasing overall housing delivery, with affordable housing being an element of larger schemes combined with market housing. Policy H.P 3.1 Through the reading of this policy any development which includes affordable provisions as set out will be supported anywhere within the neighbourhood plan area. Gladman support this approach if it is to add an additional level of detail to and sit alongside the settlement boundary policy in that this will equally apply to development outside the defined settlement boundary. This would be an effective, flexible policy which would help meet the aims of the Framework in boosting the supply of housing. Policy HP.5.1 Gladman is concerned that this policy is overly detailed, duplicates other legislation and should be left for strategic level policies to deal with. It is considered to be an overly technical policy requiring disproportionate evidence and work to be undertaken to support any development application in an area of minimal flood risk. Should the Parish council wish to maintain a flood risk policy it should be simpler and clearer and aligned to strategic policies within the Core Strategy and AP to allow a decision maker to apply the policy consistently and effectively. Policy C.E 3.2 It is noted that this policy is overly restrictive and unenforceable in seeking to maintain gardens and varied boundaries of houses. It is unclear how this policy would be applied positively without seeking to resist development. Flexibility should be incorporated into the policy to provide allowance for mitigation or offsetting of any impacts on biodiversity through changes to gardens or varied boundaries. Policy C.E.3.3 Gladman suggests the rewording of this policy to be more in the line with the Framework because as currently worded this could be open to interpretation by a decision maker. As landscape is a subjective issue one decision maker may hold a different opinion to another decision marker on whether a development 'assimilated' in to the local landscape . To accord with the Framework developments which do not have an adverse impact on the landscape or where this could be mitigated against would be supported and Gladman suggests the wording is modified to reflect this. Policy C.E 4.1 This policy is a slightly modified version of Para 115 of the Framework which sets out considerations to be made when considering development in National Parks, The Broads and Areas of Outstanding Natural Beauty. As worded this policy is seeking to apply a policy used for higher level environmental landscape designations to all landscape within the neighbourhood plan area which contains no such designations. Therefore, this conflicts with basic condition (a) and should be deleted. Policy C.E 4.2 This policy adds no additional detail than that already contained in the Framework regarding heritage assets. It is considered unnecessary for the plan to contain a policy already covered by higher level policy in significantly more detail incorporating a much more flexible approach. Gladman suggests that this policy is deleted from the plan. Policy C.E.5.1</p>
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BCE12	Historic England	Berry Hill Christchurch and Edge End Neighbourhood Development Plan	Support with conditions	Thank you for your Regulation 16 consultation on the Berry Hill, Christchurch and Edge End neighbourhood Development Plan. We offered comments on the draft Plan as part of our response to your authority's SEA Screening consultation in January this year. These are attached for information. The submitted version of the Plan has usefully clarified our previous comments. I can therefore confirm that at this advanced stage in the plan preparation process we are happy to defer to your authority in the determination of its conformity with national and local planning policy. We would ask in particular that that evidence in support of the allocation for development of the Five Acres (policy FAP1) and Berry Hill Primary School (policy HP1.2) sites appropriately demonstrates that designated heritage assets will not be harmed.
BCE13	HCA	Berry Hill Christchurch and Edge End Neighbourhood Development Plan	Object	As a key stakeholder in the local area, the HCA welcomes the opportunity to provide comments on the draft NDP which are outlined below. The HCA is the current owner of the Five Acres 'Gloscol' site within the NDP area and it is the intention that ownership of this site is transferred to the Forest of Dean District Council ('FoDDC') in due course. The HCA welcomes the inclusion of the new residential uses in the redevelopment proposals for the Five Acres site. Such uses will help to bring vitality to the area and meet housing needs. Policy FA.1.2 indicates that around 40 good quality starter/affordable homes will be provided on the Gloscol/Lakers site subject to certain conditions being met. The HCA has the following comments in relation to this draft proposal: It is to be noted that the emerging Forest of Dean Site Allocations Plan ('the AP') allocates up to 80 residential units to the Berry Hill / Five Acres area. The allocation in the AP covers a wider area than just Five Acres and we note that the draft NDP allocates the remaining 40 units to the Berry Hill primary school site. However, provision of up to 40 units on the school site is clearly dependant on the school relocating and therefore the HCA recommends that the draft NDP is revised in order to ensure that up to 80 units can be provided for across the AP allocation for Berry Hill / Five Acres. In particular: The AP figure of up to 80 units must be repeated in the NDP (i.e. in Policy HP1); and There must be the ability for the Five Acres site to accommodate more than 'around 40 units', via Policy FP1 , if up to 40 units are not delivered on the primary school site. At FA.1.2 it is noted that the 'around 40' units should be 'starter/affordable homes'. Whilst there is a possibility that some of the new residential units in Berry Hill / Five Acres could fall in to these categories, such an allocation is not in line with the draft AP and should be revised. Based upon the contents of the current version of the draft AP, the NDP should remove the reference to starter homes and state that up to 80 residential units will be provided with a policy compliant level of affordable homes subject to the usual viability tests. FA.1.2 also provides a number of 'conditions' on the delivery of residential uses on the Gloscol/Lakers site. These relate to the relocation of Gloscol to Cinderford, the transfer of ownership of the Gloscol site to WDPC and FoDDC and the housing being allocated to local residents in the first instance. Some of these conditions should be removed for the following reasons: o In relation to the relocation of Gloscol to the Northern Quarter in Cinderford, whilst the construction of the new campus has now commenced and there is every current intention that all of Gloscol's functions will relocate, the HCA does not understand why it is necessary to state that residential development can only occur if a particular educational establishment leaves the Five Acres site. Instead, the land use merits of progressing redevelopment proposals should be based upon land use issues and not the identity of occupiers. Moreover, as currently drafted, the policy is also out of step with the contents of draft Policy AP58 in the draft AP. Similarly, the identity of the owner of the Five Acres site is not relevant to this land use allocation. The planning merits of residential proposals should not be influenced by the owner of the land. Therefore, this criterion should be removed. o The third bullet point gives the impression that all of the homes delivered on the Five Acres site will be prioritised for local people within West Dean and then the Forest of Dean. Whilst an applicant could, in principle, propose such an arrangement, the current wording is out of line with draft Policy AP58 which does not seek to restrict the occupancy of new homes in the Berry Hill / Five Acres area save for the provision of 40% affordable homes. In relation to other policies in the draft NDP: As noted above, draft Policy HP1 needs to be amended to refer to up to 80 residential units, in order to provision consistency with the draft AP. Draft Policy HP1 should also be amended to make reference to the potential for residential development at the Five Acres site. Whilst the principle of draft Policy CP1 is supported, other parts of the draft NDP indicate that part of the Five Acres site could be suitable for residential uses alongside the existing community uses. This needs to be acknowledged in a revised to draft CO.1.4. The HCA considers that the above amendments are required in order to provide for a robust NDP and looks forward to these changes being made.