

	Policy /Page	Examiners recommendations	Changes	Reasons for decision
1	Policy CTC1 Site Allocations in the Town CentreT	<p>Replace the opening part of the policy (brown) with the following:</p> <p>‘Proposals for development on the five sites listed below will be supported where they are consistent with the following development principles:’</p> <p>In relation to the five sites listed remove the respective number (4/5/6/7/3) from the beginning of each subsection and replace it in turn at the end of the first sentence of each of the five subsections with the following: ‘The site is identified as site [insert number] on Map 5.’</p> <p>In the first bullet point of Marshes, Lords Hill replace ‘would be encouraged’ with ‘will be particularly supported’.</p> <p>Replace the third bullet point of Lawnstone with the following: ‘include open space provision in the southern part of the site’.</p> <p>In the third bullet point of the Police Hub replace ‘permitted’ with ‘supported’.</p> <p>Insert the following at the end of the policy: ‘In addition to the parking and access requirements identified for the five specific sites above proposals for residential development of over five dwellings in the town centre will be supported where they meet the requirements of other policies in this Plan and where they provide car parking provision to</p>	<p><b>Policy CTC1</b> <b>Site Allocations in the Town Centre</b> <del>The following sites have been allocated (shown on Map 5). Any developments, over five dwellings, in the town centre will be supported providing they meet with specific comments below, and if there is adequate parking provision in order to mitigate problems of on road parking and congestion. See more detail for specific sites in Appendix D, and opportunities for developer contributions which may be sought (see list with 5.7.12).</del></p> <p><u>‘Proposals for development on the five sites listed below will be supported where they are consistent with the following development principles:’</u></p> <p><u>In relation to the five sites listed remove the respective number (4/5/6/7/3) from the beginning of each subsection and replace it in turn at the end of the first sentence of each of the five subsections with the following: ‘The site is identified as site [insert number] on Map 5.’</u></p> <p><b>Marshes, Lords Hill.</b> This site has permission for a retail convenience store to improve the range of existing town centre provision. <u>The site is identified as site 4 on Map 5.</u> Should this permission be replaced then the site should remain as town-centre use, and include:</p> <ul style="list-style-type: none"> <li>substantial retail use with some possible mixed use. Any mixed use which includes artisan centre, soft landscaping and/or green space <del>would be encouraged</del> <u>will be particularly supported.</u></li> <li>two storey design in keeping with the character assessment</li> </ul>	<p>The policy allocates a series of sites for development in the town centre. In most cases they would deliver residential development or mixed development including residential use.</p> <p>The policy is both detailed and comprehensive. It identifies five sites and then provides a series of criteria that would direct the development of each site in turn. The policy is helpfully supported by section 5.1 of the Plan. Map 6 shows the location of the sites which are addressed in the policy.</p> <p>Insofar as the policy addresses the individual sites concerned (shown in beige) its overall approach meets the basic conditions. The use of criteria brings clarity and consistency for all concerned in the development process. I recommend modifications to the opening section of the policy (shown in brown) so that it clearly sets the scene for the details on the allocated sites in turn. As submitted the policy introduction is both a context for the development of the five sites and sets out a requirement for parking standards. It also includes elements of supporting text which I recommend should sit within that part of the Plan rather than within the policy itself.</p> <p>I also recommend an additional element of supporting text to explain the numbering of the five sites. They are included in the Plan with their original numbers as the sites had been assessed with others during the Plan’s production. This results in a rather confusing reference system in the policy where the sites do not follow a logical</p>

		<p>development plan standards'</p> <p>Delete the italic comments at the end of the policy (addressing other neighbourhood policies)</p>	<ul style="list-style-type: none"> <li>• careful planning of access and possible alteration of the Lords Hill/Old Station Way junction to mitigate traffic congestion</li> <li>• parking suitable to its use and good pedestrian access links to the Market Place, Pyart Court.</li> </ul> <p><b>5. Lawnstone.</b> This site comprises the land area remaining after demolition of Lawnstone, the Annex to the north and the Bungalow and garden to the south. <u>The site is identified as site 5 on Map 5.</u> The emerging Allocations Plan (Policy AP56) identifies land including Lawnstone as allocated for retail, business and/or community use and for starter homes (flats). Any proposal for this site should:-</p> <ul style="list-style-type: none"> <li>• provide commercial development in the northern part of the site which complements and extends the existing street frontage</li> <li>• have starter/affordable homes in the northern part of the site incorporated into the design (up to 8, one or two bedroomed flats) as identified for local need</li> <li>• <del>include a local green space in the southern part of the site (about 40%) as specified in CC3 (Local Green Space Designation no. 15)</del> <u>include open space provision in the southern part of the site</u></li> <li>• be sensitively designed with a quality which reflects this important gateway location and its views (see Map 13). This will have appropriate landscaping to the southern portion, low massing and appropriate build design to the developed northern portion.</li> </ul>	<p>numbered order and where there is no clarity about other numbered sites. In recommending this modification I have taken account of the comments of the Town Council in response to my clarification note.</p> <p>In a more detailed fashion I recommend modifications to the wording insofar as it refers to the identified sites themselves. In relation to Marshes and the Police Hub they are of a technical nature. In relation to Lawnstone the recommended modification refers to the interplay between this policy and Policy CC3 which proposes the designation of Local Green Spaces (LGS). I address the Lawnstone issue in greater detail in that policy. However, in summary it is not appropriate to promote such a designation where development proposals are identified and/or where the proposed LGS does not exist at the point at which the Plan was prepared. I also recommend that the text element at the end of the policy commenting that any new development will need to be compatible with other policies in the Plan is deleted. There is no need for this comment as it is a fundamental principle of the planning system that the development plan is considered in the round when determining planning applications. I adopt this approach elsewhere in the Plan in respect of other policies which do likewise. Nonetheless in some cases there is a need to address overlaps with other policies.</p>
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**6. Old Guardian Office.** This site is within the town centre Conservation Area with Grade II listing to the frontage onto Newland Street.

**The site is identified as site 6 on Map 5** It is allocated for re-use/redevelopment for mixed town centre uses such as retail/museum/business premises with residential accommodation above with some additional space for development (possibly residential) to the rear.

Any proposal should:-

- respect the heritage asset of the listed building and the frontage onto Newland St
- provide any residential portion to suit the local identified need
- provide an appropriate amount of off-street parking to the rear for any residents of the development, with suitable safe access
- provide appropriate sewerage network toward Newland (NB see CITPA4 and flood zone 3 Newland St and sewer pipe problems toward Whitecliff)

**7. Kings Head.** The Allocations Plan identifies the King's Head Public House as allocated for redevelopment and conversion to residential use. **The site is identified as site 7 on Map 5** The building is within the town centre Conservation Area and is a Valued Heritage Asset [Appendix G]. Any proposal should:-

- respect the heritage asset of the building to both street-scene aspects and its important gateway location
- maintain a retail/commercial use to the ground floor
- provide for up to about 12 residential flats above

- provide for an appropriate amount of residential parking using the existing access of Spout Lane
- consider the opportunity for improvement to the traffic management at this junction in any replacement proposal, if this building is lost.

**3. Police Hub.** Policy AP 57 Former Courts and Police Station in the Allocations Plan identifies the former courts and current police station site as allocated for community uses, which may include the use of all or part of the site as a place of assembly. **The site is identified as site 3 on Map 5** Any future redevelopment of the site should:-

- continue to use the majority (at least two-thirds) of this important site for community uses
- in the event that the adjoining dwellings are also proposed to be redeveloped, new housing (on up to one third of the site area) will also be ~~permitted~~ supported.
- include a maximum two storey design which respects, and is in context with, the Conservation Area opposite
- schemes will be required to ensure suitable access and traffic management, particularly in the area around the Lords Hill entrance and traffic lights junction
- consider the opportunity for improvement to the traffic management at this junction.

~~This new development will have to be compatible with other NDP policies (NB design policies, open areas, local green spaces, green areas protected by the NDP and on sites allocated for other purposes).~~

			<p><u>In addition to the parking and access requirements identified for the five specific sites above proposals for residential development of over five dwellings in the town centre will be supported where they meet the requirements of other policies in this Plan and where they provide car parking provision to development plan standards.</u></p>	
2		<p><i>At the end of paragraph 5.1.17 add: 'Policy CTC1 identifies a series of development sites in the town centre. They are shown on Map 5. Section 5.7.12 of this Plan identifies potential developer contributions for the sites concerned'.</i></p>	<p>5.1.17 The Retail Keynote Update comments on the need to protect retailing at the ground floor level in the town centre. The Core Strategy supports the need to increase retailing in the town centre. Early, and later, public consultation and engagement on the NDP also provided a range of ideas to increase available shopping and services. There were comments that there is a need for a mix of retail and heritage uses, building on the craft/artisan provision linked to the number of independent shops and businesses.</p> <p>In addition, there was support for bringing in some multiples/chain stores to widen the existing retail offer and take up vacant premises. <u>Policy CTC1 identifies a series of development sites in the town centre. They are shown on Map 5. Section 5.7.12 of this Plan identifies potential developer contributions for the sites concerned. Policy CTC2 identifies a series of development sites on the edge of the town centre. They are shown on Map 5. Section 5.7.12 of this Plan identifies potential developer contributions for the sites concerned. Policy CTC3 identifies a series of development opportunities in the public realm. Section 5.7.12 of this Plan may also apply to sites of this nature on a case-by-case basis. Policy CTC4 offers support for new retail and commercial development. Section 5.7.12 of this Plan may also apply to sites of this nature on a case-by-case basis'</u></p>	
3	<p>Policy CTC2 Site Allocations on the edge of</p>	<p>Replace the opening part of the policy (brown) with the following: 'Proposals for development on the</p>	<p>Policy CTC2 Site Allocations on the edge of the Town Centre</p>	<p>The policy allocates two sites for development on the edge the town centre. The first is St John's Church and</p>

<p>the Town Centre</p>	<p>two sites listed below will be supported where they are consistent with the following development principles:  In relation to the two sites listed remove the number (1/2) from the beginning of each subsection and replace it in turn at the end of the first sentence of each of the five subsections with the following:  The site is identified as site [insert number] on Map 5.  Replace the initial section of the policy on St John's Church (up to 'the development should') with:  'St John's Church. This former traditional church building is allocated for community and visitor uses. Where appropriate, residential uses and service uses will be supported where they essential to the wider viability of a community use project. Development proposals for these uses will be supported provided that they.'  Replace the first bullet point with:  'take account of the integrity of the building and respect its status as a listed building'.  At the end of the sixth criterion add 'the site'  Replace the initial section of the policy on Coleford House (up to 'would be supported') with: 'Coleford House. This former school building is allocated for a mixed-use conversion or for redevelopment for residential, services and tourism uses.'  In the eighth bullet point of the policy replace 'could be' with 'are'.  Delete the italic comments at the end of the policy (addressing other neighbourhood policies)</p>	<p><del>The following sites (also shown on Map 5) have been consulted upon and allocated. Any developments will only be supported if they are in line with specific comments below and taking into account Table 9 All potential housing sites. See more detail for specific sites in Appendix D, and opportunities for developer contributions which may be sought (see list with 5.7.12).</del></p> <p><u>'Proposals for development on the two sites listed below will be supported where they are consistent with the following development principles</u></p> <p><del>4. <b>St John's Church</b> is allocated for, in order of priority, sustainable community/visitor uses, subject to the business case to be made, accepted and purchase being effected. Some enabling development such as residential/service provision could support that sustainable scheme. If that does not happen, then another use which retains and restores the Grade II Listed building would be supported.</del>  <u>Whichever of these two potential uses, the development should:</u></p> <p><b>St John's Church.</b> <u>This former traditional church building is allocated for community and visitor uses. The site is identified as site 1 on Map 5. Where appropriate, residential uses and service uses will be supported where they essential to the wider viability of a community use project. Development proposals for these uses will be supported provided that they</u></p> <ul style="list-style-type: none"> <li><del>• provide sensitive restoration which reflects the requirements appropriate to the Listing. (1880 F.S. Waller, and 1885 chancel and transepts S. Gambier-Parry)</del></li> <li><u>• take account of the integrity of the building and respect its status as a listed</u></li> </ul>	<p>the second is Coleford House. The policy is both detailed and comprehensive. It provides a series of criteria that would direct the development of each site in turn. The policy is helpfully supported by section 5.1 of the Plan which deals with the Town Centre. Map 5 shows the location of the sites which are addressed in the policy.</p> <p>The policy adopts a largely identical format to that used for Policy CTC1. My recommended modifications take on a largely identical format to those highlighted for that policy.</p> <p>Insofar as the policy addresses the individual sites concerned (shown in beige) its overall approach meets the basic conditions. The use of criteria brings clarity and consistency for all concerned in the development process. I recommend modifications to the opening section of the policy (shown in brown) so that it clearly sets the scene for the details on the allocated sites in turn.</p> <p>I also recommend an additional element of supporting text to explain the numbering of the two sites. They are included in the Plan with their original numbers as the sites had been assessed with others during the Plan's production. In recommending this modification I have taken account of the comments of the Town Council in response to my clarification note.  In a more detailed fashion I recommend modifications to the wording insofar as it refers to the identified sites themselves. The St John's Church site is the subject of a degree of uncertainty. This is not surprising given the nature of the building itself and the range of</p>
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			<p><u>building</u></p> <ul style="list-style-type: none"> <li>• use appropriate design and materials, and conserve specific memorials/1507 foundation stone/ interior features as on listing. (See site assessment in Appendix D)</li> <li>• be in context of the character assessment of this Victorian area at the edge of the Town Centre</li> <li>• reflect its position adjoining the Conservation Area</li> <li>• reflect the valued prominent position at the top of Bowens Hill, with key views in and out (see Map 13)</li> <li>• mitigate any impact on sites 2 Coleford House and site 6 Old Guardian Office which adjoin <u>the site</u></li> <li>• include appropriate vehicular access off Boxbush Rd whilst minimising loss of the perimeter wall</li> <li>• provide parking on the property, or off street within appropriate walking distance</li> <li>• mitigate traffic movements/any parking on Boxbush Rd or congestion at the junction at the bottom of the hill in the Conservation Area</li> <li>• provide appropriate sewerage network toward Newland (NB flood zone 3 Newland St and sewer pipe problems toward Whitecliff)</li> </ul> <p><del>2. Coleford House. Former school, allocated for mixed use conversion and/or redevelopment for residential, services and tourism, with residential linked to mixed use being the least favoured option. The site is identified as site 2 on Map 5. If residential use only, then up to 20 units would be supported. This former school building is allocated for a mixed-use conversion or for redevelopment for residential, services and tourism uses. The site is identified as site 2 on Map 5.</del></p>	<p>organisations involved in its conversion to community and visitor uses. The policy attempts to address this uncertainty by identifying a range of potential uses and their respective priorities. The effect of the wording however is to bring a lack of clarity and structure to the policy. In particular it does not identify how the business case and viability assessments would be considered and at what point alternatives other than the preferred scheme would become acceptable. As such I recommend a modification to simplify the policy so that it provides a range of uses that would be acceptable. I also recommend modifications to some of the criteria in this part of the policy. They either bring the clarity required by the NPPF or relocate supporting text to other parts of the Plan.</p> <p>Whilst the future of Coleford House has less uncertainty the policy approach adopted follows the same approach as that for St. John's Church. I recommend similar modification to this part of the policy. I also recommend modifications to some of the criteria in this part of the policy. They either bring the clarity required by the NPPF or relocate supporting text to other parts of the Plan.</p>
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The development will be supported provided that:

- the existing historic buildings are converted to provide eg houses/flats, small artisan attraction, administrative offices
- appropriate design and materials are used, including conservation of original Forest stone and the bell tower of the old school building (see site assessment in Appendix D)
- any part which is redeveloped would need to be well designed in context of the historic buildings and no more than two storeys high
- it respects the character assessment of this Victorian area, and the Conservation Area it adjoins
- it minimises impact upon St John's, the Grade II listed church building adjoining
- the only vehicular access is from Boxbush Rd, and parking is on site
- there is mitigation for resultant traffic movements on Boxbush Rd and/or congestion at the junction at the bottom of the hill in the Conservation Area
- access is a focus on a steep/two level site, and the pedestrian access/ steps from Bowens Hill ~~could be~~ are retained
- appropriate sewerage network is provided toward Newland (NB flood zone 3 Newland St and sewer pipe problems toward Whitecliff)
- the trees and high retaining wall on the boundary onto the Tram Rd (Conservation Area) are sensitively made good

*This new development will have to be compatible with other NDP policies (NB design policies, open areas, local green spaces, green areas protected by the NDP and on sites allocated for other purposes).*



4		<p><i>At the end of paragraph 5.1.17 (and after the additional text recommended in relation to Policy CTC1) add: 'Policy CTC2 identifies a series of development sites on the edge of the town centre. They are shown on Map 5. Section 5.7.12 of this Plan identifies potential developer contributions for the sites concerned'.</i></p>	<p>5.1.17 The Retail Keynote Update comments on the need to protect retailing at the ground floor level in the town centre. The Core Strategy supports the need to increase retailing in the town centre. Early, and later, public consultation and engagement on the NDP also provided a range of ideas to increase available shopping and services. There were comments that there is a need for a mix of retail and heritage uses, building on the craft/artisan provision linked to the number of independent shops and businesses.</p> <p>In addition, there was support for bringing in some multiples/chain stores to widen the existing retail offer and take up vacant premises. <u>Policy CTC1 identifies a series of development sites in the town centre. They are shown on Map 5. Section 5.7.12 of this Plan identifies potential developer contributions for the sites concerned. Policy CTC2 identifies a series of development sites on the edge of the town centre. They are shown on Map 5. Section 5.7.12 of this Plan identifies potential developer contributions for the sites concerned. Policy CTC3 identifies a series of development opportunities in the public realm. Section 5.7.12 of this Plan may also apply to sites of this nature on a case-by-case basis. Policy CTC4 offers support for new retail and commercial development. Section 5.7.12 of this Plan may also apply to sites of this nature on a case-by-case basis'</u></p>	
5	Policy CTC3 Enhancing Coleford Town Centre	<p>In the opening part of the policy (brown) replace 'encouraged' with 'supported'. Replace the sentence before the bullet points with: 'The following proposals will be particularly supported' Delete the final bullet point.</p>	<p><b>Policy CTC3 Enhancing Coleford Town Centre</b></p> <p>Proposals for development which allow for the enhancement of the public realm within the Town Centre as shown on Map 3 will be <del>encouraged</del>.supported.</p> <p>Such proposals will be required to be designed sensitively and should be</p>	<p>This policy offers support for proposals which would enhance the public realm in the town centre. The generality of its approach meets the basic conditions. Nevertheless, I recommend that 'encouraged' is replaced with 'supported'.</p> <p>Its details provide a series of examples which could be included within the</p>

		<p>appropriate to the historic environment in terms of materials, scale and detailing, and take into consideration views of the Clock Tower (Map 13). <del>This could include, for example, the following: Replace the sentence before the bullet points with:</del> <u>The following proposals will be particularly supported:</u></p> <ul style="list-style-type: none"> <li>• Shop front enhancements including restoration of traditional shop fronts and signage</li> <li>• Provision of public art</li> <li>• Introduction of areas of soft landscaping, planting, covered areas and seating to the area around the Clock Tower</li> <li>• Improved signage and accessibility including interpretation linked to the town's heritage</li> </ul> <p><del>Opportunities for developer contributions may be sought (see list with 5.7.12)</del></p>	<p>context of the policy. I recommend that this aspect is modified so that the schedule reads as a schedule of proposals which would be particularly supported.</p> <p>The final criterion of the policy refers to the potential for the various projects to generate the need for developer contributions. This aspect of the policy would not sit within the context that I have recommended above. In any event it is a matter of supporting policy rather than policy itself. As such I recommend that it is relocated to the supporting text.</p> <p>The Town Council has helpfully clarified that the footnote link (18) in the policy is incorrect. I recommend its deletion.</p>
		<p><i>Delete the footnote (18) from within the policy</i></p>	<p><del>Heritage Lottery Fund, Townscape Heritage - <a href="http://www.hlf.org.uk/looking-funding/our-grant-programmes/townscape-heritage">www.hlf.org.uk/looking-funding/our-grant-programmes/townscape-heritage</a></del></p>
6		<p><i>At the end of paragraph 5.1.17 (and after the additional text recommended in relation to Policy CTC1 and CTC2) add: 'Policy CTC3 identifies a series of development opportunities in the public realm. Section 5.7.12 of this Plan may also apply to sites of this nature on a case-by-case basis'.</i></p>	<p>5.1.17 The Retail Keynote Update comments on the need to protect retailing at the ground floor level in the town centre. The Core Strategy supports the need to increase retailing in the town centre. Early, and later, public consultation and engagement on the NDP also provided a range of ideas to increase available shopping and services. There were comments that there is a need for a mix of retail and heritage uses, building on the craft/artisan provision linked to the number of independent shops and businesses.</p> <p>In addition, there was support for bringing in some multiples/chain stores to widen the existing retail offer and take up vacant premises. <u>Policy CTC1 identifies a series of development sites in the town centre. They are shown on Map 5. Section 5.7.12 of this Plan identifies potential developer</u></p>

			<p><u>contributions for the sites concerned. Policy CTC2 identifies a series of development sites on the edge of the town centre. They are shown on Map 5. Section 5.7.12 of this Plan identifies potential developer contributions for the sites concerned. Policy CTC3 identifies a series of development opportunities in the public realm. Section 5.7.12 of this Plan may also apply to sites of this nature on a case-by-case basis. Policy CTC4 offers support for new retail and commercial development. Section 5.7.12 of this Plan may also apply to sites of this nature on a case-by-case basis'</u></p>	
7	<p>Policy CTC4 Supporting Town Centre Retail and Service Provision</p>	<p>Delete the final bullet point. In the penultimate paragraph of the policy replace 'are considered acceptable' with 'will be supported' and will be resisted with 'will not be supported'. Delete the comments at the end of the policy (addressing other neighbourhood policies)</p>	<p><b>Supporting Town Centre Retail and Service Provision</b> Proposals for new retail and service facilities which enhance the vitality and viability of the existing town centre of Coleford in Map 3 will be supported, provided that:</p> <ul style="list-style-type: none"> <li>• New commercial/retailing development will be required to demonstrate that its range of goods and services are complementary to the existing offer.</li> <li>• Proposals should be of a scale and design which are sympathetic to the distinctive character of the Conservation Area.</li> <li>• At any one time, the majority of ground floor units in Coleford's Town Centre should be within Class A1 retail, or community facility/service use.</li> </ul> <p><del>Opportunities for developer contributions may be sought (see list with 5.7.12). Changes of use of local retail premises to mixed offices and residential accommodation are considered acceptable will be supported, but loss of retail premises to wholly residential use will be resisted. will not be supported. This new development will have to be compatible with other NDP policies (NB design policies, open areas, local green spaces, green areas protected by the NDP and on sites allocated for other purposes).</del></p>	<p>This policy is the fourth and final policy which addresses the town centre. Its focus is on retail and service provision. In accordance with national and local policy its ambition is on supporting proposals that would enhance its vitality and viability.</p> <p>The final criterion of the policy refers to the potential for the various projects to generate the need for developer contributions. This aspect of the policy does not sit within the context set by the policy's structure. In any event it is a matter of supporting policy rather than policy itself. As such I recommend that it is relocated to the supporting text.</p> <p>The penultimate paragraph of the policy refers to the potential change of use of retail facilities. Its ambition is clear. Nevertheless, its policy language is unclear. I recommend accordingly.</p>

8		<p><i>At the end of paragraph 5.1.17 (and after the additional text recommended in relation to Policy CTC1/CTC2/CTC3) add: 'Policy CTC4 offers support for new retail and commercial development. Section 5.7.12 of this Plan may also apply to sites of this nature on a case-by-case basis'.</i></p>	<p>5.1.17 The Retail Keynote Update comments on the need to protect retailing at the ground floor level in the town centre. The Core Strategy supports the need to increase retailing in the town centre. Early, and later, public consultation and engagement on the NDP also provided a range of ideas to increase available shopping and services. There were comments that there is a need for a mix of retail and heritage uses, building on the craft/artisan provision linked to the number of independent shops and businesses.</p> <p>In addition, there was support for bringing in some multiples/chain stores to widen the existing retail offer and take up vacant premises. <u>Policy CTC1 identifies a series of development sites in the town centre. They are shown on Map 5. Section 5.7.12 of this Plan identifies potential developer contributions for the sites concerned. Policy CTC2 identifies a series of development sites on the edge of the town centre. They are shown on Map 5. Section 5.7.12 of this Plan identifies potential developer contributions for the sites concerned. Policy CTC3 identifies a series of development opportunities in the public realm. Section 5.7.12 of this Plan may also apply to sites of this nature on a case-by-case basis. Policy CTC4 offers support for new retail and commercial development. Section 5.7.12 of this Plan may also apply to sites of this nature on a case-by-case basis'</u></p>	
9	<p>Policy CE1 Supporting Tourism Development</p>	<p>Delete the final paragraph of the policy (addressing other neighbourhood policies)</p>	<p><b>Policy CE1 Supporting Tourism Development</b></p> <p>Proposals which expand and/or maintain the existing tourism and related facilities as part of the area's economic development and growth will be supported provided that they:</p> <ul style="list-style-type: none"> <li>• are sensitive to the distinctive character of the location</li> <li>• are designed to be proportionate to the location in terms of scale and type</li> <li>• in particular, reflect Coleford's unique</li> </ul>	<p>This policy provides a supportive context for the maintenance or expansion of tourism and related facilities. The importance of this issue to the local economy is highlighted in paragraphs 5.2.9 to 5.2.11.</p> <p>In general terms the policy meets the basic conditions. However, I recommend the deletion of its final paragraph which makes references to other Plan policies.</p>

			<p>industrial and other built heritage assets</p> <ul style="list-style-type: none"> <li>• would not have an adverse impact on the natural environment and biodiversity</li> <li>• are designed to mitigate any traffic impact or congestion</li> <li>• respect key views as in Map 13</li> <li>• provide appropriate signage for tourist information</li> </ul> <p><del>This new development will have to be compatible with other NDP policies (NB design policies, open areas, local green spaces, green areas protected by the NDP and on sites allocated for other purposes).</del>  <i>See 5.2.11 for examples of such tourism development</i>  <i>See also 5.2 Economy and 5.7 Infrastructure, Transport and Pedestrian Access</i>  <i>See also opportunities for developer contributions which may be sought (list with 5.7.12)</i></p>	
10	Policy CE2 Protecting and Supporting the development of local employment	<p>Replace the first part of the policy (in brown) with: 'The Plan supports the retention and the improvement of the economic well-being of the neighbourhood area'</p> <p>Reverse the order of the first and second parts of the policy.</p> <p>In the first part of the policy (first criterion) delete 'a considerable period of time'.</p> <p>In the first part of the policy (third criterion) delete 'specifically.... King's Head'.</p> <p>In the first part of the policy (fourth criterion) replace 'significant' with 'demonstrable'.</p> <p>In the second part of the policy replace 'such uses' with 'existing employment-generating uses'. Insert semi-colons after the first two criteria and '; and' after the third criterion.</p>	<p><b>Policy CE2</b>  Protecting and Supporting the Development of Local Employment Outside the Town Centre</p> <p><del><b>Existing employment-generating uses outside Coleford town centre should be retained or kept primarily for future employment.</b></del></p> <p><u>The Plan supports the retention and the improvement of the economic well-being of the neighbourhood area</u></p> <p>Proposals to improve or expand <del>such uses</del> <u>existing employment-generating uses</u> will be supported when they:</p> <ul style="list-style-type: none"> <li>• are sensitive to the distinctive character of the location;</li> <li>• are designed to be proportionate in terms of scale and type;</li> <li>• would not have an adverse impact of the</li> </ul>	<p>This policy sets out to safeguard existing employment uses in the neighbourhood area. It has two parts. The first identifies a series of circumstances where proposals for a change of use of employment operations to other uses will be supported. The second part of the policy offers support for the improvement or expansion of existing employment uses. These two component parts sit within the context provided an overview of the policy (in brown).</p> <p>The introduction to the policy (in the brown box) is more a statement of intent rather than a policy. It comments that existing employment generating uses outside the town centre should be retained or kept primarily for future employment. I recommend that this</p>

		<p>Delete the final paragraph of the policy (addressing other neighbourhood policies)</p>	<p>natural environment and biodiversity;</p> <ul style="list-style-type: none"> <li>• are designed to mitigate any traffic impact or congestion.</li> </ul> <p>Proposals to change such uses to non employment-generating uses will be supported when:</p> <ul style="list-style-type: none"> <li>• The property has been empty for a <del>considerable period of time</del>, more than 12 months, and after recent, active and appropriate marketing for at least 12 months there is no prospect of re-use in the short term; or</li> <li>• The property is in poor condition and not economically viable for employment use (such as B1, B2, and B8); or</li> <li>• The proposal for non-employment uses would help retain a heritage asset, <del>specifically, for example, The King's Head</del>; or</li> <li>• The proposal is for a tourism-related use with <del>significant</del> demonstrable economic benefits; or</li> <li>• The proposal promotes the support and enhancement of local employment in the whole of the Parish, which may include promoting homeworking, professional and forest industries, the creative industries and local produce</li> </ul> <p><del>This new development will be compatible with other NDP policies (Design policies, open areas, local green spaces, green areas protected by the NDP and on sites allocated for other purposes). See also Opportunities for developer contributions which may be sought (leased at 4.7.12).</del></p>	<p>initial part of the policy is modified so that it provides a policy context for its component parts.</p> <p>The first part of the policy identifies a series of circumstances where a change of use of employment operations to other uses will be supported. They mainly relate to viability issues or where such development would help to retain a heritage asset. I recommend two modifications to bring the clarity required by the NPPF. The first simplifies the criterion on the period for which a property needs to have been vacant. The second sets out to bring clarity on the economic benefits that may arise from an alternative tourism proposal.</p> <p>The second part of the policy sets out to identify the characteristics of proposals that would secure support for the expansion of existing employment uses. I recommend that this matter is made absolutely clear rather than simply referring the employment uses as 'such uses'. I also recommend that the policy is redefined so that all its criteria need to be achieved as appropriate to the site concerned.</p> <p>I also recommend that the order of the components of the policy is reversed. The existing second part of the policy is the more positive of its two components.</p>
11	Policy CE3 Connectivity and digital communications	<p>Replace the policy with: 'Subject to such proposals complying with other development plan policies new residential, employment and commercial development will be supported where it incorporates new digital connectivity or improves</p>	<p><b>Policy CE3 Improved Connectivity</b>  <del>The ongoing improvement of connectivity and all new residential, employment and commercial development must be designed to connect to high quality communications infrastructure.</del></p>	<p>As submitted the purpose of the policy is unclear. The Town Council clarified that the policy seeks to ensure that all new residential and commercial development is designed to be connected to high quality communications infrastructure. Plainly this will assist in improving the</p>

		the existing provision’.	<u>Subject to such proposals complying with other development plan policies new residential, employment and commercial development will be supported where it incorporates new digital connectivity or improves the existing provision</u>	economic and social well-being of the neighbourhood area. I recommend a modification accordingly.
12	Policy CE4 Development other than housing	Delete policy	<p>Development other than housing</p> <ul style="list-style-type: none"> <li>• <del>Tufthorn Avenue GL16 8PT (by traffic lights): This site is allocated for employment land in the Allocations Plan in Policy AP 60 Tufthorn Avenue and Pingry Farm – Employment sites. The NDP would also allocate it as employment land. [See text in 5.2.13, 14.]</del></li> <li>• <del>See also Policy CTIPA3 Health sites. Coleford NDP strongly supports the provision of a Primary Health Care Centre.</del></li> <li>• <del>Proposed actions for the Town Council, partnerships and other interested parties (See projects section 7.2). Note for improvement:</del></li> <li>• <del>traffic and pedestrian movements with access audit</del></li> <li>• <del>tourism branding as Coleford ‘Pride of the Forest’; tourism walks/cycle/heritage trails and signage</del></li> <li>• <del>linking in to business networks/clubs</del></li> </ul>	<p>This policy reads in a very different way to the earlier policies in the Plan. It effectively sets out its agreement to the allocation of Tufthorn Avenue as an employment site in the Allocations Plan (AP60). It also cross-refers to its support for health facilities as set out later in the Plan.</p> <p>Neither elements of the policy are necessary or add any value to other policies. The Tufthorn Avenue site is already allocated and Policy CTIPA3 addresses health issues in the town. On this basis I recommend the deletion of the policy. I also recommend the deletion of associated elements of supporting text.</p>
13	paragraphs 5.2.14 and 5.2.15	Delete paragraphs 5.2.14 and 5.2.15	<b>5.2.14</b> It is noted that the Tufthorn Avenue GL16 8PT site is controversial. An Aldi application was granted (October 2016) by the FeDDC. On 4 Aug after a court hearing this permission was rescinded on the grounds that the impact on town centre retailing had not been fully considered. This relates to Core Strategy policy CSP14. This planning application included a substantial petition from local residents wanting an Aldi store here, while comments from the most recent NDP consultation indicate a 50/50 split between those in favour of a store and those	

			<p>not. The NDP is required to follow CS policies, such as CSP14, and notes that a) large retail is a town centre provision (CTC2), and b) part-time retail is a poor use of a valuable employment site when the area is low on high-income employment, ref 3.7 and 3.9</p> <p><b>5.2.15</b> It is important to note here that allocation of a site for a primary care centre in Coleford is prioritised by Glos CCG and supported by Coleford NDP. However, the Glos CCG and Glos Care have only recently begun their Community Hospitals in the Forest of Dean consultation <a href="http://www.fodhealth.nhs.uk/consultation-booklet/">http://www.fodhealth.nhs.uk/consultation-booklet/</a> and included in this is the potential for a hospital to be sited in Coleford. As the outcome of this is unknown (due to close December 17 2017) and there could be a relationship between the primary care centre and a possible hospital, it is not possible at this time to allocate a specific site for either use. See also CITPA3 for policy relating to this.</p>	
14	Policy CH1 Small housing development sites	Delete 'of less than ten dwellings'  Delete the final paragraph of the policy (addressing other neighbourhood policies)	<p><b>Policy CH1</b> <b>Small housing development sites</b> New housing development will be supported on sites of less than ten dwellings within the defined settlement boundary where they fit with the distinctive character of the local area and address the local needs (<i>as indicated in Coleford Overview 3.7,3.9 and 5.3.9 Housing Need</i>), Appendix A character assessment. See also opportunities for developer contributions which may be sought (<i>list with 5.7.12</i>). <del>These small sites will have to be compatible with other NDP policies (NB design policies, open areas, local green spaces, key views as in Map 13 and other allocations).</del></p>	<p>This policy sets the scene for the development of infill windfall sites throughout the neighbourhood area within the Plan period. It offers support on sites of less than ten dwellings within the defined settlement boundaries where they respect the character of the area and meet local needs.</p> <p>The generality of the policy meets the basic conditions. Its focus on infill development within defined settlements will contribute towards the delivery of sustainable development. Nevertheless, the policy artificially restricts infill development sites to less than ten dwellings. Whilst in practical terms most sites are likely to be of this scale the</p>



				<p>proposed size restriction may not assist in bringing sites forward. It may also inhibit imaginative design.</p> <p>On this basis I recommend a modification to address this matter. In doing so the modified policy retains the character issues. In the context of the recommended modified policy the size of the site and its character will determine its ultimate yield. Plainly this will be a matter of judgement on a site-by-site basis as planning applications are determined.</p>
15	Policy CH2 New Housing Development	<p>Replace 'when it...in that it' with 'subject to the following criteria'</p> <p>At the beginning of each criteria add 'it'</p> <p>Replace the sixth criteria with 'it addresses the housing needs in Coleford in terms of quantity, type, tenure mix and accessibility'</p> <p>In the seventh criteria delete 'in a similar.....dormer-bungalows'</p> <p>In the eighth criterion delete 'on the ground.... statement'</p> <p>Delete the final criterion</p> <p>Delete the final paragraph of the policy (addressing other neighbourhood policies)</p>	<p><b>Policy CH2</b></p> <p>New housing development</p> <p>New housing development, within the defined Coleford settlement boundary*, will be supported <del>when it meets Coleford's needs in that it</del> <u>subject to the following criteria</u></p> <ul style="list-style-type: none"> <li>• <u>It is designed to FoDDC Design Guide24 (refer to 5.3.10 below)</u></li> <li>• <u>It safeguards and does not have an adverse impact on the residential amenities of existing and future community</u></li> <li>• <u>It is in keeping with the character of the surrounding area (see Appendix A)</u></li> <li>• <u>It would not lead to over-development of the site</u></li> <li>• <u>It involves a prior satisfactory infrastructure impact survey25 and addresses any shortfall</u></li> <li>• <del>meets needs for quantity, type and tenure mix and accessibility</del></li> <li>• <u>it addresses the housing needs in Coleford in terms of quantity, type, tenure mix and accessibility</u></li> <li>• <u>It provides for 10% to be accessible, in a similar way to Lifetime Homes concept. This would include flats, traditional housing, bungalows 26 or</u></li> </ul>	<p>This policy offers support to new housing development within the defined Coleford settlement boundary. It does so to good effect within the context of a criteria-based policy format.</p> <p>The policy's opening section refers to the need for new housing development to meet Coleford's housing needs. This overlaps with the sixth criterion of the policy. I recommend a modification to address this overlap. It has the ability to detract from its overall clarity.</p> <p>I also recommend that 'and' is included after the penultimate criterion. This will ensure that an applicant will need to comply with all the criteria insofar as they are relevant to the proposal concerned. I also recommend detailed modifications to some of the criteria</p>

			<p><del>dormer bungalows</del></p> <ul style="list-style-type: none"> <li>• <u>It</u> provides robust pedestrian facilities <del>on the ground</del> and within its access statement</li> <li>• <u>It</u> has appropriate infrastructure improvements including associated street lighting and, especially sewer and drainage networks (see CITPA 4 &amp; 5)</li> <li>• <del>It also gives opportunities for developer contributions (list with 5.7.12)</del></li> </ul> <p>For defined settlement boundary see Map 1  This new housing will have to be compatible with other NDP policies (NB design policies, open areas, local green spaces, key views as in Map 13, green areas protected by the NDP and on sites allocated for other purposes).</p>	
16	Policy CH3 Sites outside the town centre	<p>Replace the initial (brown) part of the policy with:</p> <p>‘Development will be supported on the following sites identified in the Forest of Dean Allocations Plan 2026 which include’.</p> <p>Modify the detailed (beige) part of the policy as follows:</p> <p>Ellwood Road, Milkwall (AP64)</p> <p>Proposals will be supported which include the following features:  [list the bullet points included in the submitted Plan with the following detailed modifications]</p> <p>In the third bullet point delete ‘easy’.</p> <p>In the fourth and fifth bullet points insert ‘have’ at the beginning.</p> <p>Replace the sixth bullet point with: ‘satisfactorily address bat routes and</p>	<p><b>Policy CH3</b>  Sites outside the Town Centre, within the Parish of Coleford (NDP area) which are part or wholly housing  <del>The following sites (shown on Map 6 and see also Table 9) are allocated for development by the FoDDC Local Plan and, here, to be in general conformity with that. Any 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 woodlands and the Wye Valley and Forest of Dean Bat SAC. In the Allocations Plan guidance is given, but see Appendix D for site assessments and highlighted below are additional requirements specific to each site. See also opportunities for developer contributions which may be sought (list with 5.7.12).</del></p> <p><u>Development will be supported on the following sites identified in the Forest of Dean Allocations Plan 2026 which include.</u></p> <p><b>8. ELLWOOD ROAD Milkwall (AP64) is allocated for around 48 houses of mixed</b></p>	<p>This policy seeks to add further detail and clarification to the some of the sites in the emerging Allocations Plan that sit in the neighbourhood area. The Town Council has helpfully clarified its purpose and have advised about the issues that have arisen as the Main Modifications have been pursued in the Allocations Plan.</p> <p>Whilst I understand the approach that has been taken it does not have the clarity required by the NPPF. It also fails to take account of the very advanced nature of the Allocations Plan at that time. In particular there is no need for the submitted Plan to allocate separately these or any other sites. Equally the approach adopted for Poolway Farm seeks to unpick progress on the Allocations Plan without any evidence for doing so.</p> <p>Nevertheless the Town Council has advised that the primary purpose of this policy is to add value to the details of the</p>

	<p>groundwater issues’.</p> <p>In the seventh bullet point insert ‘consider’ at the beginning and replace ‘recreation.... nearby’ with ‘recreation and leisure facilities’.</p> <p>North Road, Broadwell (AP65)</p> <p>Proposals will be supported which include the following features:</p> <p>[list the bullet points included in the submitted Plan with the following detailed modifications]</p> <p>Replace the first criterion with ‘access from North Road with any visibility splay improvements’.</p> <p>In the second criterion delete ‘e.g. chimneys, layout’.</p> <p>In the third bullet point insert ‘have’ at the beginning.</p> <p>Replace the fourth bullet point with: ‘satisfactorily address any sewerage infrastructure network issues’.</p> <p>Kings Meade (AP66)</p> <p>Proposals will be supported which include the following features:</p> <p>[list the bullet points included in the submitted Plan with the following detailed modifications]</p> <p>Replace the first bullet point with ‘the delivery of smaller homes including bungalows and lifetime homes’.</p> <p>Replace the second bullet point with ‘the design and layout respect the character of the site and its surroundings’.</p>	<p><del>size/type including affordable housing. As this site was previously in the Green Ring with its heritage and ecology, the following would be encouraged to aid support:</del></p> <p><u>Proposals will be supported which include the following features:</u></p> <ul style="list-style-type: none"> <li>• curved estate road(s), retention of mature trees and hedges, and gardens to mitigate impact on view in from Gorsty Knoll</li> <li>• mix of design in context of character assessment, including rural/vernacular details e.g. chimneys</li> <li>• <del>easy</del> access off Ellwood Rd with pavement extended to Station Rd and bus stop</li> <li>• <u>have</u> respect for the heritage features around the site e.g. industrial archaeology tram roads</li> <li>• <u>have</u> respect for the green infrastructure, including wildlife corridors, woodland and nearby meend</li> <li>• <del>bat routes and groundwater issues to be addressed</del></li> <li>• <u>satisfactorily address bat routes and groundwater issues</u></li> <li>• <u>consider</u> opportunities for mitigation via cycle/foot/bridle ways, <del>recreation/leisure/Hall nearby</del> <u>recreation and leisure facilities</u></li> </ul> <p><del><b>NORTH RD/WORCESTER WALK</b> is allocated for up to 70 mixed size/type housing units including affordable homes. As this site was previously included in the Green Ring with its ecology, the development should provide:</del></p> <p><b>North Road, Broadwell (AP65) Proposals will be supported which include the following features:</b></p>	<p>various policies in the emerging Allocations Plan. I will approach recommending modifications in this context. The recommended modifications to this policy will sit within the wider context provided by the Allocations Plan. In particular the Poolway Farm section of the policy will equally well apply to the larger site proposed in the Allocations Plan. I also recommend some detailed modifications to the site-by-site criteria. They are intended to bring clarity to the policy for long-term development management purposes.</p>
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		<p>In the third bullet point replace 'careful respect' with 'the layout carefully respects'.</p> <p>Tufthorn Avenue (AP67)</p> <p>Proposals will be supported which include the following features: [list the bullet points included in the submitted Plan with the following detailed modifications]</p> <p>In the first bullet point insert 'the provision' at the beginning and replace 'for employment site opposite' with 'other employment sites in the immediate locality'.</p> <p>Replace the second criteria with the following; 'provide a design solution that respects the mixed-use development and the character of the site and its surroundings'.</p> <p>Replace the third criterion with 'take account of traffic capacity in the immediate locality of the site'.</p> <p>In the fourth bullet point replace 'careful respect for' with 'the layout carefully respects'.</p> <p>Poolway Farm (AP63)</p> <p>Proposals will be supported which include the following features: [list the bullet points included in the submitted Plan with the following detailed modifications]</p> <p>In the first bullet point insert 'a' at the beginning and 'of houses' after 'mix/size'. Replace 'noting the</p>	<ul style="list-style-type: none"> <li>• <del>access from North Road with visibility splay improved as needed, and mitigation for increased traffic movements at minor junction and at Mile End crossroads</del></li> <li>• <u>access from North Road with any visibility splay improvements</u></li> <li>• mix of size/type and design in context of character assessment, including rural/ vernacular details e.g. chimneys, layout</li> <li>• <u>have respect for the green infrastructure, with gardens, trees and curved patterns</u></li> <li>• <del>sewerage infrastructure network to be addressed, possibly through direction to Severn watershed.</del></li> <li>• <u>satisfactorily address any sewerage infrastructure network issues</u></li> </ul> <p><b>KINGS MEADE (AP66)</b> <del>is allocated for up to 48 units. As this site was previously included in the Green Ring with its ecology, the development should provide:</del> <u>Proposals will be supported which include the following features:</u></p> <ul style="list-style-type: none"> <li>• <del>more accessible homes e.g. bungalows, lifetime style homes of one storey only</del></li> <li>• <u>the delivery of smaller homes including bungalows and lifetime homes</u></li> <li>• <del>design in context of character assessment</del></li> <li>• <u>the design and layout respect the character of the site and its surroundings.</u></li> <li>• <u>careful respect the layout carefully respects for wildlife corridor into valley and local green space along old railway line</u></li> </ul>	
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		<p>importance of' with 'giving particular importance to'</p> <p>In the second bullet point insert 'the use of' at the beginning.</p> <p>Replace the third bullet point to read: 'the use of careful design to facilitate the access from Gloucester Road to take account of the traffic movements into the Bakers Hill junction.</p> <p>Replace the fourth bullet point with 'the retention of Poolway Farmhouse'</p> <p>Delete the fifth bullet point</p> <p>Delete the final paragraph of the policy (addressing other neighbourhood policies)</p>	<ul style="list-style-type: none"> <li>• <del>sewerage infrastructure network and drainage to be addressed. Local watercourse and pond is an important natural resource</del></li> <li>• <u>satisfactorily address any sewerage infrastructure network and drainage issues</u></li> </ul> <p><del><b>TUFTHORN AVE</b> (ex Sonoco) site is allocated for around 65 mixed type/size housing units (including affordable housing) and around 10 small industrial/commercial units. The development should provide:</del></p> <p><b>Tufthorn Avenue (AP67)</b> Proposals will be supported which include the following features:</p> <ul style="list-style-type: none"> <li>• <u>the provision of access road(s) which do not conflict with existing neighbouring lorry accesses and planned new delivery and customer access for <del>employment site opposite other employment sites in the immediate locality</del></u></li> <li>• <del>mix of design in context of character assessment provide a design solution that respects the mixed-use development and the character of the site and its surroundings</del></li> <li>• <del>mitigation for increased traffic movements both onto/off Tufthorn Ave, and at the traffic lights take account of traffic capacity in the immediate locality of the site</del></li> <li>• <u>careful respect for the layout carefully respects bat routes, wildlife corridor into valley and local green space along old railway line</u></li> </ul> <p><del><b>POOLWAY FARM (AP63)</b> (original allocation only, 3.2ha) is allocated for 80 houses, including affordable housing, inside the existing defined settlement boundary. As this site was</del></p>	
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			<p>previously included in the Green Ring with its ecology, the development should provide: <u>Proposals will be supported which include the following features:</u></p> <ul style="list-style-type: none"> <li>• <u>a mix of type/size of houses</u> and design in context of character assessment, <del>noting the importance of giving particular importance to</del> the views in from The Gorse, and from the top of Poolway Road looking north-west from Broadwell</li> <li>• <u>the use of careful landscaping</u>, with inclusion of mature trees, gardens, curved road pattern</li> <li>• <del>careful design of the access from Gloucester Road to cope with traffic movements into the Bakers Hill junction and steep, bending hill</del> <u>the use of careful design to facilitate the access from Gloucester Road to take account of the traffic movements into the Bakers Hill junction</u></li> <li>• <del>the retention of Poolway Farmhouse which is included in Appendix G: Valued Heritage Assets</del></li> <li>• <del>potential for more flood attenuation</del></li> </ul> <p><i>(See also 5.3.17 and Table 9)</i>  This new development will have to be compatible with other NDP policies (NB design policies, open areas, local green spaces, key views as in Map 13, green areas protected by the NDP and on sites allocated for other purposes).</p>	
17	Policy CC1 Retaining and enhancing community services	<p>Replace the initial part of the policy with: 'The Plan will support proposals that will safeguard and/or enhance the community facilities in the neighbourhood area as listed in Appendix F'.</p> <p>In the first part of the policy (on</p>	<p><b>Policy CC1 Retaining and Enhancing Community Facilities</b>  <del>The Community Facilities identified in Appendix F will be protected for future community uses through the implementation of FoDDC Core Strategy CSP 8. Key examples to illustrate this are:</del></p>	<p>This policy sets out the Plan's approach to community facilities. It has two strands. The first supports proposals that would enhance existing facilities subject to a series of criteria. The second identifies how community facilities would be safeguarded and in particular how proposals for their</p>

	<p>enhanced facilities) insert 'and' after the third criterion.</p> <p>In the second part of the policy replace 'Redevelopment...under' with 'Proposals for the redevelopment or change of use of the community facilities in the neighbourhood area listed in Appendix F will only be supported in'.</p> <p>In the second criterion replace 'where part-residential' with 'where a part residential, part community use'</p> <p>Delete the italic comments at the end of the policy (addressing developer contributions)</p>	<p><del>ST JOHN'S CHURCH, following the closure for regular worship 2016, the Diocese who now have responsibility, are instigating a 'use-seeking' period, encouraging submissions to secure a sustainable future for the building MILKWALL HALL, an example of a community-run hall where local activities occur, and the building is a WW1 Nissen Hut</del></p> <p><u>The Plan will support proposals that will safeguard and/or enhance the community facilities in the neighbourhood area as listed in Appendix F'</u></p> <p>Proposals which enhance existing community facilities will be supported. This applies in particular to those which increase both indoor and outdoor youth provision, provided that they:</p> <ul style="list-style-type: none"> <li>• are sensitive to the distinctive character of the location, key views as in Map 13</li> <li>• are designed to be proportionate to the location in terms of scale and type</li> <li>• would not have an adverse impact on the natural environment and biodiversity <u>and</u></li> <li>• are designed to mitigate any traffic impact or congestion</li> </ul> <p><del>Re-development of these facilities for non-community uses will only be considered under</del>  <u>Proposals for the redevelopment or change of use of the community facilities in the neighbourhood area listed in Appendix F will only be supported in. the following circumstances and in this order of priority:</u></p> <ol style="list-style-type: none"> <li>1. When the existing community use can be re-located to an alternative nearby location in the Neighbourhood Plan area; or</li> <li>2. Exceptionally, where <u>a part-residential, part community use</u> would allow a more viable service to be provided.</li> <li>3. When the community building has been</li> </ol>	<p>redevelopment would be considered. In combination these strands of policy will assist significantly in promoting the social element of sustainable development in the neighbourhood area.</p> <p>Whilst the thrust of the policy is clear some of its detailed elements are far less clear. In particular the brown part of the policy is not designed in a policy format and provides two examples of community facilities. In addition, Table 10 identifies a schedule of key community facilities within the wider context of all the community facilities listed in Appendix F. The matter is further complicated as the local community has access to community facilities outside the neighbourhood area. The submitted Plan cannot apply policies to facilities outside the neighbourhood area. The Town Council has usefully submitted an updated Appendix F which addresses this issue.</p> <p>I recommend modifications to address these various matters. In particular I recommend a replacement of the initial (brown) section of the policy to provide a general context to the details of the policy itself.</p> <p>In addition I recommend modification to the details of the policy. In particular the recommended modification to its second part provides the necessary clarity and extends its remit to applications for change of use (rather than simply redevelopment).</p>
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			<p>underused/vacant for more than a year, and where the applicant can demonstrate it has been actively marketed for community use (as per national guidance) and such marketing has not been successful, other uses that would not conflict with other policies in this plan may be acceptable.</p> <p><i>Opportunities for developer contribution will be sought (see list with 5.7.12).</i></p>	
18	Policy CC2 Shops and Services in the Arc of Settlements	<p>In the brown part of the policy replace 'these' with 'the facility concerned' and delete e.g. .... Milkwall'</p> <p>In the beige part of the policy delete 'in its present location.... Local Plan CSP8')</p> <p>Delete the italic comments at the end of the policy (addressing developer contributions)</p>	<p><b>Policy CC2 Shops and Services in the Arc of Settlements within Coleford Parish but outside the Town Centre</b></p> <p>Proposals to enhance existing convenience shops and service uses will be supported when they do not have a detrimental impact on residential amenity, the natural or historic environment or public access to <del>these the</del> <u>facility concerned</u>, e.g. the Corner Stores is a vital, accessible resource for the community of Milkwall.</p> <p>Development proposals that would lead to the loss of local shops and service uses will not be supported unless:</p> <ul style="list-style-type: none"> <li>• Replacement provision is provided in a suitable location within the area that the facility to be replaced served; or</li> <li>• The local shop or service use is no longer viable <del>in its present location due to underuse</del> <u>by the community it once served (see FoDDC Local Plan CSP8).</u></li> </ul> <p><i>Opportunities for developer contributions will be sought (see list with 5.7.12).</i></p>	<p>This policy recognises the role of retail facilities in the neighbourhood area outside the town centre. It highlights that local shops and services can contribute towards the inherent sustainability of a place or community. The policy addresses both proposals for the enhancement of existing retail units (the brown part) and for proposals which might lead to the loss of retail units and services (the beige part).</p> <p>I recommend two modifications. The first deletes the example highlighted in the brown part of the policy. The second deletes unnecessary elements of the beige part of the policy – a retail use or other service may become unviable for a whole range of reasons and which may include under-use by the community.</p>
19	Policy CC3 Local Green Spaces	<p>Replace the policy to read: 'The following areas as shown on Map 8 are designated as Local Green Spaces [List the various sites minus Lawnstone (5) and Bale Field (36)]</p> <p>New development will not be</p>	<p><b>Policy CC3 Local Green Spaces</b></p> <p><del>The Local Green Spaces as shown in Map 8 will become areas for special protection (see 5.4.10). Support will be given to the enhancement of Local Green Spaces. Appendix H tabulates why each space is special, 'of particular importance'.</del></p>	<p>This policy proposes the designation of 37 local green spaces (LGSs). The proposed LGSs are helpfully identified in detail in Appendix H of the Plan. This appendix analyses the proposed areas on a site-by-site basis against the criteria in NPPF paragraph 77. It does so in a commendable way both in its</p>



		<p>supported on land designated as local green space except in very special circumstances.'</p>	<p><del><b>Local Green Spaces by category</b> The spaces below can only be developed in 'very special circumstances' (the same protection as Green Belt).</del></p> <p><del><b>Local Green Spaces by category</b> The spaces below can only be developed in 'very special circumstances' (the same protection as Green Belt).</del></p> <p><u>The following areas as shown on Map 8 are designated as Local Green Spaces</u></p> <ol style="list-style-type: none"> <li>1 Sunnybank east gateway</li> <li>2 Buchanan Ave green</li> <li>3 Sunnybank Staunton road green bank</li> <li>4 Eastbourne Estate, green entry on gateway</li> <li>5 <del>Lawnstone</del></li> <li>6 Main Place green area</li> <li>7 Cycle path Gateway avenue in main car park to Milkwall</li> <li>8 Bakers Hill triangle</li> <li>9 Edenwall triangle</li> <li>10 Prosper Lane green Coalway</li> <li>11 Jugs Hole Pond &amp; meend</li> <li>12 Parkend Walk community oak &amp; green</li> <li>13 Upper Palmers Flat fringe</li> <li>14 Gorsty Knoll Meend</li> <li>15 Ellwood Rd - Milkwall meend</li> <li>16 Bells Field</li> <li>17a Angus Buchanan Recreation Ground Play area</li> <li>17b Buchanan Bowls and Boules</li> <li>17c Buchanan Hay &amp; Wildlife Meadow</li> <li>17d Buchanan Community Wood</li> <li>18 King George V field</li> <li>19 Milkwall Football Ground</li> <li>20 Broadwell FC</li> <li>21 Coalway Recreation Ground</li> <li>22 Cyril Hart Way play area, Mile End</li> <li>23 Tufthorn Close Play Area/Garden</li> <li>24 Parkside</li> <li>25 Primrose Drive Play area</li> <li>26 The Paddocks Play area</li> <li>27 Poppy Field Play area</li> </ol>	<p>own right and given the number of proposed designations in particular.</p> <p>The majority of the proposed LGSs are modest and provide informal recreational facilities for children within their immediate locality. Others such as the concentration of open spaces at the western end of Victoria Road are larger and provide more formal recreational facilities. With two exceptions which are addressed below I am satisfied that the range of LGSs meet the criteria set out in the NPPF.</p> <p>The Bale Field Playground (LGS36) would otherwise comfortably meet the criteria for LGS designation. However, it is outside (albeit adjacent to) the neighbourhood area. On this basis it cannot be incorporated into this neighbourhood plan. As such I recommend its deletion</p> <p>The proposed Lawnstone LGS (5) is an unusual proposal. At the time of my visit the area was an untidy open space adjacent to the FDDC offices. It is proposed for development both in the Allocations Plan and this Plan. Whilst I accept that the emerging development will include a degree of open space its extent is uncertain. In any event a Plan cannot designate an area as LGS before it has been established and can be assessed directly against the criteria in the NPPF. As such I recommend its deletion.</p> <p>I also recommend a modification to the policy itself. As submitted it fails to bring the protection envisaged by paragraph 78 of the NPPF. The policy merely indicates that they will 'become areas for special protection' without clarifying the</p>
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			<p>28 Lawdley Rd Play area  29 Battle Close Play area  30 Inwood Drive Play area  31 Caudwell Close  32 Walnut Close  33 Sylvan Close Play Area  34 Copley Drive  35 Coleford Cemetery  <del>36 Bale Field Playground***</del>  37 The Tump, Coalway Lane End  ***36 is technically in West Dean Parish, but has always been considered as in Coleford, and only near to Coleford residents. West Dean Parish Council agree this should be in Coleford Parish. See Forest of Dean District Council and Boundaries Commission 2017 boundary changes for update.  <u>New development will not be supported on land designated as local green space except in very special circumstances.</u></p>	nature of that protection.
20	Policy CC4 Surrounding Settlements	<p>Modify the title of the policy to read: 'Maintaining the separation and distinctive identity of settlements'.</p> <p>In the first part of the policy delete the two 'seek to'</p> <p>Delete the italic comments at the end of the policy (addressing developer contributions)</p>	<p><b>Policy CC4</b>  <b><u>Surrounding Settlements Maintaining the separation and distinctive identity of settlements</u></b></p> <p>Development in all of Coleford town's surrounding settlements should <del>seek to</del> retain and, where possible, reinforce the distinct identity of the settlement(s) as shown in the character assessments. Development proposals in the area should <del>seek to</del>:</p> <ul style="list-style-type: none"> <li>• Retain and enhance existing green infrastructure that maintains the separation from Coleford town</li> <li>• Maintain the green space between the Eastern and Southern Arcs</li> <li>• Retain and enhance existing green areas within the settlements, such as recreation areas and the meends</li> <li>• Use appropriate building styles and materials</li> <li>• Minimise traffic impact on the area</li> </ul>	<p>The Town Council helpfully clarified the purpose of this policy in its response to my clarification note. The policy clearly refers to an ambition to maintain the separation and the distinctive identity of the settlements within the neighbourhood area that surround Coleford. Given their scale and geography they are referred to as the Eastern and Southern Arcs. I recommend that the title of the policy is modified so that has clarity and a direct relationship to the policy itself.</p> <p>I also recommend modifications to the brown section of the policy. As submitted the effectiveness of the policy is significantly hampered by its language</p>

			<ul style="list-style-type: none"> <li>• Improve opportunities for walking and cycling</li> </ul> <p>Development will have to be compatible with other NDP policies (NB design policies, open areas, local green spaces, key views as in Map 13, green areas protected by the NDP and on sites allocated for other purposes). <i>Opportunities for developer contributions will be sought (see list with 5.7.12).</i></p>	
21	Policy CHE1 Protecting and Enhancing Local Character	<p>In the initial part of the policy delete its first sentence</p> <p>In the second part of the policy replace 'encouraged with supported (second sentence) and 'are encouraged' with will be 'supported' (third sentence).</p> <p>Delete the italic comments at the end of the policy (addressing developer contributions)</p>	<p><b>Policy CHE1 Protecting and Enhancing Local Character</b> <del>Coleford has a dual role as service centre and tourist centre.</del> New development will be required to respond positively to the local context, be in conformity with the Forest of Dean District Council Residential Design Guide, Allocations Plan policies AP4 and AP5 and also demonstrate consideration of the Character Assessments for each Character Area identified.</p> <p>New development should be of a scale, height, massing and design which is appropriate to its context. Innovative contemporary designs will be <del>encouraged</del> <u>supported</u> where appropriate but designs should be sensitive to the existing built heritage. Use of traditional local materials such as forest stone and local brick <del>are encouraged</del> <u>will be supported</u>.</p> <p>New development which protects and enhances existing trees, hedges and historic market town appearance of the Town Centre and Gateway routes in will be supported in particular (see Maps 2 and 3).</p> <p>Development will have to be compatible with other NDP policies (NB design policies, open areas, local green spaces, key views as in Map 13, green areas protected by the NDP and on sites allocated for other purposes). <i>Opportunities for developer contributions will be sought (see list with 5.7.12)</i></p>	<p>This policy provides an important context for the protection and enhancement of local character. It provides a direct linkage to the FDDC Residential Design Guide and to the general policies in the Allocations Plan. It does so to good effect.</p> <p>The first part of the policy (brown) includes some supporting text which I recommend is deleted. In the second part of the policy I recommend that the references to certain features being 'encouraged' are replaced with 'supported'.</p>

22	Policy CHE2 Protecting Heritage Assets	<p>Insert at the beginning of the policy (brown): 'The neighbourhood plan identifies the following properties as non-designated assets.'</p> <p>Delete 'seek to'.</p> <p>Delete the second sentence of the opening part of the policy.</p> <p>Add a separate paragraph after the separate schedule of policies to read: 'Developments that would detrimentally affect the integrity and/or the setting of either designated or the identified non-designated heritage assets in the neighbourhood area will not be supported unless the harm to the significance of the heritage asset concerned is outweighed by the public benefits that would arise from the proposed development.'</p>	<p><b>Policy CHE2 Protecting Heritage Assets</b> <u>The neighbourhood plan identifies the following properties as non-designated assets.</u> Development should <del>seek to</del> protect and, where possible, enhance both designated and valued non-designated heritage assets*. <del>This may be done by putting in place measures to avoid or minimise impact or mitigate damage to those assets, or relevant key views as highlighted in the character assessments (Appendix A and Map 13).</del></p> <p><i>*See below for named Valued Non-designated Heritage Assets, and Appendix G for more detail and exact location.</i></p> <p><i>Coleford Town Centre</i> Railway museum on site of original station Milestone in Forest stone Market Place traffic lights Once independent cinema, now part of small group Mushet mural Gates and plaque to David and Robert Forester Mushet Market Hall mural</p> <p><i>Coleford Town, residential Victorian</i> Angus Buchanan Gates 3 storey semis adjacent to St Johns Forest stone terrace, Boxbush Rd Coleford House note bell on top of old St John's Primary school</p> <p><i>Coleford Town, residential</i> 'Skew Bridge' railway viaduct, Newland St Rock House, along the Tram Rd, above Newland St</p> <p><i>Eastern Arc</i> Broadwell Memorial Hall <i>The Gorse Gateway</i></p>	<p>This policy refers specifically to heritage assets. It addresses both designated and non-designated assets. The latter are listed both in the policy itself and in Appendix A. The policy as submitted lacks clarity. Its opening section seeks to protect and enhance the various assets 'by putting in place measures to avoid or minimise impact or mitigate damage to those assets'. It does not provide certainty to the development management process.</p> <p>On this basis I recommend modifications to the policy. In combination they will define the non-designated assets and provide a policy context to applications which may affect their integrity. In doing so I provide a context directly back to the NPPF which addresses this matter and the relationship between the harm and the status of the asset concerned.</p>
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The Gorse Almshouses  
*Coalway Road Gateway*  
 Crown Inn Coalway  
 Dressed Forest stone villa, built for  
 quarry owner, Parkend

*Perrygrove Gateway*  
 Robert Forester Mushet Memorial  
 plaque

*Whitecliff Gateway*  
 Whitecliff House and garden

*Green Ring - zone 1*  
 Poolway Farmhouse  
 Tram way Poolway (map evidence &  
 hedge boundary only)

*Green Ring - zone 2*  
 Oval red stone bridge, Whitecliff  
 Burial Path  
 Possibly medieval house, Whitecliff

*Green Ring - zone 3*  
 Colour Works building Gorsty Knoll  
 Tram road leading from the old  
 station site at Milkwall  
 Local greystone cottage, Gorsty Knoll

*Southern Arc*  
 Tufthorn Inn  
 Milkwall Hall

*Whitecliff Gateway*  
 Well/spout Whitecliff

Developments that would detrimentally affect  
 the integrity and/or the setting of either  
 designated or the identified non-designated  
 heritage assets in the neighbourhood area will  
 not be supported unless the harm to the  
 significance of the heritage asset concerned  
 is outweighed by the public benefits that  
 would arise from the proposed development.

23	Policy CNE1 Protecting and Enhancing Local Landscape Character	<p>Replace the opening part of the policy (brown) with: 'New development should protect and enhance local landscape character in Coleford and its surrounding settlements'.</p> <p>At the beginning of the first part of the policy (beige) insert: 'Subject to other development plan policies'</p> <p>In the third bullet point delete 'including using TPOs'</p> <p>In the fifth bullet point delete 'e.g. .... Bridge' and add '; and' at the end</p> <p>In the sixth bullet point delete 'e.g. green roofs'</p> <p>Replace the introductory part of the second part of the policy to read: 'New recreation and tourism development will be supported where it would'</p> <p>Delete the final paragraph of the policy (addressing other neighbourhood policies)</p>	<p><b>Policy CNE1 Protecting and Enhancing Local Landscape Character in Coleford and its Surrounding Settlements</b></p> <p><del>In addition to complying with other policies where appropriate, any new development should include landscaping schemes which aim to protect and enhance local landscape character in the parish of Coleford.</del> <u>New development should protect and enhance local landscape character in Coleford and its surrounding settlements</u></p> <p><u>Subject to other development plan policies</u> new development will be supported, which demonstrates how it:</p> <ul style="list-style-type: none"> <li>• Promotes high quality residential design that respects local townscape and landscape character and reflects local vernacular building styles, layouts and materials</li> <li>• Conserves the landscape setting of Coleford, including the Green Ring</li> <li>• Conserves existing landscape features such as trees, and hedges as intrinsic parts of new development, <del>including using TPOs</del></li> <li>• Conserves the valued views into and out of sites as on Map 13</li> <li>• Seeks opportunities to create exciting new character in areas of degraded or declining landscape, <del>e.g. the industrial area at the end of the cycleway at Milkwall Bridge and</del></li> <li>• Seeks opportunities for innovative architectural/landscape schemes to create new character and minimise impact on local landscape character such as with the use of ecofeatures, <del>e.g. 'green roofs'</del></li> </ul> <p><del>Special consideration will be given to New recreation and tourist development <u>will be supported where it would only when it:</u></del></p>	<p>This policy seeks to contribute towards local landscape character in the neighbourhood area. It proposes overlapping criteria both for general development and specifically for recreation and tourist developments.</p> <p>I recommend that the initial (brown) part of the policy is replaced with a general policy statement. As submitted it is contextual supporting text. I also recommend that the second part of the policy addressing recreation and tourist development is modified so that it identifies a policy context for the basis on which such schemes would be supported (rather than being given special consideration).</p>
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			<ul style="list-style-type: none"> <li>• Conserves the rural landscape setting of Coleford and surrounding settlements as well as neighbouring villages, e.g. Berry Hill (see West Dean Parish's NDP)</li> <li>• Seeks to minimise the encroachment of development into visually exposed landscapes/key views</li> <li>• Conserves and enhances areas of existing woodland/forest cover</li> </ul> <p>Any new development will also have to be compatible with other NDP policies (NB design policies, open areas, local green spaces, green areas protected by the NDP and on sites allocated for other purposes).</p>	
24	Policy CNE2 Green Ring	<p>Replace policy with</p> <p>Brown: The Neighbourhood Plan identifies a Green Ring to protect the historic and natural setting of Coleford</p> <p>Beige: Within the identified Green Ring Zones 1-3 land will be protected from development that would detract from the open setting of Coleford</p> <p>Within Green Ring Zones 1-3 proposals that would consolidate or enhance outdoor recreational facilities and to assist in the delivery of biodiversity objectives will be supported</p>	<p><b>Policy CNE2 Green Ring</b></p> <p><del>The Green Ring with zones shown as 1, 2, 3 on Map 10 requires protection* from inappropriate development. These zones provide a significant contribution to local landscape character in terms of protecting the historic and natural setting of the town within its 'bowl' (see photographs right). Key purposes are to separate Coleford parished area from Berry Hill, and the surrounding settlements from the town centre and from each other, and from the AONB, through the green landscape identified here as Green Ring. These zones have an important role in terms of providing recreational, heritage and wildlife value. Green Zones 1 and 2 are coincident with Locally Valued Landscape in the Allocation Plan. The NDP considers Zone 3 in the south, requires the same status. The Green Ring also has a role for flood attenuation (see also policy CITPA4). The following areas are of note:</del></p> <ul style="list-style-type: none"> <li>• <del>Lower Lane, where the landscape impact, visual effect and the separation of Berry Hill from Coleford was of such significance that a planning</del></li> </ul>	<p>This is an important policy within the wider context of the Plan. It identifies a Green Ring to protect the historic and natural setting of the town within its natural bowl. Its key element is the identification of three distinctive areas within the bowl. Zones 1 and 2 are identical to the 'Locally Valued Landscapes' identified in the emerging Allocations Plan. The submitted neighbourhood plan identifies a third area to the south of the town (Zone 3).</p> <p>I sought clarification from the Town Council on the evidence for this additional allocation. I was advised about its built and natural environments and its wider landscape. From the observations of the area I was satisfied that this part of the neighbourhood area was worthy of such protection.</p> <p>The policy itself has few elements of direct policy. Instead it offers general commentary on the character and appearance of the Green Ring. I recommend modifications accordingly so that it adopts a policy-based context.</p>

			<p>application was dismissed by the Secretary of State in December 2016.</p> <ul style="list-style-type: none"> <li>• <del>Whitecliff valley as a green Gateway into Coleford</del></li> <li>• <del>Pingry Lane as a green lane</del></li> <li>• <del>Meends around the Southern and Eastern Arc</del></li> <li>• <del>Scowles, for example at Scowles</del></li> <li>• <del>Two golf courses, at Bells and Forest Hills</del></li> <li>• <del>Bells Field, separating the town from the Eastern Arc</del></li> </ul> <p><del>Appropriate proposals which enhance recreational provision or support local biodiversity objectives will be supported. See also reference policy CC4 Surrounding Settlements.</del></p> <p><del>Any new development will also have to be compatible with other NDP policies (NB design policies, open areas, local green spaces, key views as in Map 13, green areas protected by the NDP and on sites allocated for other purposes). Opportunities for developer contributions will be sought (see list with 5.7.12).</del></p> <p><del>*The subareas where sites have been allocated in order for the NDP to be in general conformity are also marked, given that the Local Plan Allocations Document has not been adopted as at 19/10/2017.</del></p> <p><u>The Neighbourhood Plan identifies a Green Ring to protect the historic and natural setting of Coleford</u></p> <p><u>Within the identified Green Ring Zones 1-3 land will be protected from development that would detract from the open setting of Coleford</u></p> <p><u>Within Green Ring Zones 1-3 proposals that would consolidate or enhance outdoor recreational facilities and to assist in the</u></p>	<p>This will ensure that the areas concerned can be safeguarded through the development management process.</p> <p>I also recommend the deletion of references in the policy or the supporting text to the Lower Lane site. Whilst I recognise the views of the community on this matter planning permission for the residential development of the site has now been granted on appeal. Plainly it would be inappropriate to include land within a Green Ring which has the benefit of planning permission. In coming to this recommendation, I am aware that FDDC has very recently sought to challenge this decision. Plainly this matter will be decided in the courts and is beyond the scope of this examination. On this basis my recommended modification reflects in a matter of fact way the position that exists when this report was sent to the District Council and the Town Council.</p> <p>Given the way in which the policy has been drafted it is difficult to modify. As such I recommend that it is replaced</p>
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			<u>delivery of biodiversity objectives will be supported</u>	
25	5.6.6 5.6.7 Map 10	<i>Delete paragraph 5.6.7 and replace with: Within the Green Ring the following areas are particularly important [list the areas in the third paragraph of the submitted policy minus the one on Lower Lane].</i>  <i>At the end of 5.6.6 add the first paragraph of the submitted policy</i>  <i>Amend Map 10 accordingly</i>	<b>5.6.6</b> The town of Coleford is surrounded by a 'Green Ring'..... health walks. <u>The Green Ring with zones shown as 1, 2, 3 on Map 10 requires protection from inappropriate development. These zones provide a significant contribution to local landscape character in terms of protecting the historic and natural setting of the town within its 'bowl</u>  <i>5.6.7 Old paragraph deleted</i> <i>5.6.7 Within the Green Ring the following areas are particularly important [list the areas in the third paragraph of the submitted policy minus the one on Lower Lane].</i>	
26	Policy CNE3 Green Infrastructure	Replace the opening part of the policy (brown) to read: 'Development proposals should safeguard protected species and habitats'.  Replace the opening part of the detailed element of the policy (beige) to read: 'Subject to other development plan policies development proposals will be supported where they safeguard protected species and habitats. Development proposals should'  In the first criterion delete 'For example.... SAC'	<b>Policy CNE3</b> <b>Green Infrastructure</b> <del>Coleford supports a range of protected and vulnerable species [Map 14]. The Neighbourhood Plan is recognised as an important local tool in ensuring that development is in conformity with character as evidenced in the area character assessments and has a positive impact on local habitats and wildlife, e.g. maintaining green wildlife corridors.</del> <u>Development proposals should safeguard protected species and habitats</u>  <del>Developers will be required to assess, and where appropriate strengthen, green infrastructure, thus will be required to:</del> <u>Subject to other development plan policies development proposals will be supported where they safeguard protected species and habitats. Development proposals should'</u> <ul style="list-style-type: none"> <li>• Demonstrate how the design has taken into account its potential impact on local habitats and species. <del>For example, use reduced light levels and avoid excessive lighting and prevent light spill to avoid impact on the bat</del></li> </ul>	This policy addresses green infrastructure. Its detailed part (beige) sets out measures that developers will be expected to assess when developing planning applications.  The general approach towards protecting safeguarded species has regard to national policy. Nevertheless, the opening part of the policy (brown) is supporting text rather than policy. In addition, the detailed part of the policy (beige) is more process based (identifying what a developer will be required to assess) rather than directly policy. I recommend modifications to address these matters

			<p><del>SAC.</del></p> <ul style="list-style-type: none"><li>• Ensure that appropriate measures are put in place to protect wildlife and enhance biodiversity and important habitats. Appropriate measures may include for instance use of swift bricks, bat and owl boxes, and ensuring that new and converted buildings provide nesting and roosting spaces for bats and birds. A mixture of native species typical of this locality should be incorporated in landscaping schemes including: Coast Redwood; Douglas Fir; Beech; Yew; Hazel; Ash; Oak; European Larch; Silver Fir; Birch; Scots Pine; Sweet Chestnut.</li><li>• Incorporate features such as green/living roofs. Re-naturalising water courses, planting of native woodland and use of sustainable drainage (SUDS) will be encouraged, especially for public buildings.</li></ul> <p>Any new development will also have to be compatible with other NDP policies (NB design policies, open areas, local green spaces, key views as in Map 13, green areas protected by the NDP and on sites allocated for other purposes). Opportunities for developer contributions will be sought (see list with 5.7.12).</p>	
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27	Policy CITPA1 Transport and Movement	Replace the policy with: 'Subject to other development plan policies development proposals will be supported where they can be satisfactorily incorporated within the existing highway network or where appropriate mitigation works can be undertaken'	<p><b>Policy CITPA1 Transport and Movement</b></p> <p><del>New development will be required to include an appropriate level of information to be submitted with the planning application to assess the impact of a proposal and from that the necessary mitigation with regard to the following:</del></p> <ul style="list-style-type: none"> <li><del>• Improvement of the road, cycle, footpath networks to create more pleasant and safe areas for all highway users (e.g. vehicles, mobility scooters, pedestrians and cyclists) whilst at the same time improving the safe flow of traffic, and helping to reduce vehicle emissions</del></li> <li><del>• New infrastructure and links that improve access including by public transport to the site</del></li> <li><del>• Publication and encouragement of greater use of public transport eg through travel plans</del></li> <li><del>• At Market Place and Gloucester Rd traffic lights, use a traffic management scheme to identify and evaluate options for pedestrian and easier traffic movement, and enable implementation of the preferred option (see also 7.7)</del></li> <li><del>• Improved parking, including on approach roads to reduce congestion e.g. at traffic lights Gloucester Rd/Market Place</del></li> </ul> <p><del>Opportunities for developer contributions (see list with 5.7.12) could be used</del></p> <p><u>Subject to other development plan policies development proposals will be supported where they can be satisfactorily incorporated within the existing highway network or where appropriate mitigation works can be undertaken</u></p>	<p>This policy sets out requirements for the level of information to be submitted with planning applications which have an impact on traffic and movement. It addresses a series of important factors in the town such as the Market Place/Gloucester Road traffic lights and the greater use of public transport.</p> <p>Several elements of the policy are more about the processing of planning applications rather than directly relating to policy matters. I sought clarification from the Town Council and it set out the need for clarity on traffic mitigation measures. I have considered these matters carefully. I recommend that the policy is recast so that it identifies the generality of the approach adopted. I then recommend that the detailed proposals and mitigation measures are repositioned into the supporting text. Plainly different proposals will have different effects on the highway network. Some will need mitigation and others will not. On this basis the inclusion of mitigation measures directly in the policy is inappropriate.</p>
28		<i>Insert the following at the end of paragraph 5.7.3: Policy CITPA1 sets out the Plan's approach to traffic and movement issues. It offers the</i>	5.7.3 Volumes of exhaust gases from HGVs already exceed nationally accepted limits in Lydney and Chepstow and are very close to the limit in Coleford at the Gloucester Rd	

		<p><i>opportunity for mitigation measures where appropriate. The following measures in particular should be addressed where necessary as part of any mitigation measures [at this point include the five bullet points included in the submitted Plan].</i></p>	<p>traffic lights. Increased numbers of lorry movements which could arise from granting of outstanding planning applications for quarry extension, and changes in the Minerals Plan will significantly add to the pollution at Bank St and the Market Place/ Gloucester Road traffic lights which are focal to the town and in the Conservation Area. It will also increase air pollution at the Tufthorn Avenue/High Nash lights where the recently agreed Aldi store is also to be constructed.</p> <p><u>Policy CITPA1 sets out the Plan's approach to traffic and movement issues. It offers the opportunity for mitigation measures where appropriate. The following measures in particular should be addressed where necessary as part of any mitigation measures</u></p> <ul style="list-style-type: none"> <li>• <u>Improvement of the road, cycle, footpath networks to create more pleasant and safe areas for all highway users (e.g. vehicles, mobility scooters, pedestrians and cyclists) whilst at the same time improving the safe flow of traffic, and helping to reduce vehicle emissions</u></li> <li>• <u>New infrastructure and links that improve access including by public transport to the site</u></li> <li>• <u>Publication and encouragement of greater use of public transport eg through travel plans</u></li> <li>• <u>At Market Place and Gloucester Rd traffic lights, use a traffic management scheme to identify and evaluate options for pedestrian and easier traffic movement, and enable implementation of the preferred option (see also 7.7)</u></li> <li>• <u>Improved parking, including on approach roads to reduce congestion e.g. at traffic lights Gloucester Rd/Market Place</u></li> </ul>	
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29	Policy CITPA2 Through Routes and Gateways	<p>Replace the initial (brown) part of the policy with: 'Development proposals which would have adverse impacts on through routes or gateways as shown on Map 3 will only be supported where they:'</p> <p>In the first bullet point add 'incorporate' at the start.</p> <p>In the second bullet point replace 'enhancing' with 'enhance'.</p>	<p><b>Policy CITPA2 Through Routes and Gateways</b>  <del>Where new development has significant impact on through routes or Gateways (as in Map 3), the following will be required where appropriate to be used in order to mitigate that impact: Development proposals which would have adverse impacts on through routes or gateways as shown on Map 3 will only be supported where they:</del></p> <ul style="list-style-type: none"> <li>• <u>Incorporate</u> appropriate design of new building sympathetic to the streetscape and local character as defined in the character assessment for the area (Appendix A)</li> <li>• <u>Enhance</u> <del>Enhancing</del> landmark buildings/views of landmark buildings (see Map 13)</li> <li>• Use a mix of appropriate low maintenance, hard and natural landscaping</li> <li>• Improve safety, ease of access and environment for pedestrians and cyclists</li> <li>• Review use of signage and street furniture to reduce clutter and, where possible, help reinforce the identity and distinctiveness of the area</li> <li>• Incorporate public art</li> </ul> <p><i>Opportunities for developer contributions (see list with 5.7.12) could be used</i></p>	<p>This policy identifies the circumstances in which development proposals will be supported where they would impact on gateways or on through routes. As with Policy CITPA1 it contains a degree of both policy and process.</p> <p>I recommend modifications so that it adopts a supportive approach subject to criteria which describe a series of mitigation measures</p>
30	Policy CITPA3 Local infrastructure for health and well-being	<p>Replace the opening part of the policy (brown) with: 'The neighbourhood plan supports the development of a primary care health centre and the Forest of Dean hospital in the neighbourhood area'</p> <p>Add a new section before the first set of bullet points to read: The development of a primary health care facility will be supported where it meets the following locational and</p>	<p><b>Policy CITPA3 Local infrastructure for health and well-being</b>  <del>The development of Coleford primary health care centre to meet local needs is strongly supported and will be sited following these criteria</del> <u>The neighbourhood plan supports the development of a primary care health centre and the Forest of Dean hospital in the neighbourhood area</u></p> <p><u>The development of a primary health care</u></p>	<p>This policy offers support both for a primary care health centre and a Forest of Dean hospital. The policy supports the hospital where it is co-located with any primary care centre</p> <p>The policy is entirely appropriate. It provides an appropriate context for important community and health facilities. I recommend modifications so that its various components have the clarity required by the NPPF. I also</p>

		<p>practical criteria:</p> <p>Delete the first bullet point</p> <p>Replace 'Should the agreed... Hospital' with 'In the event that the Forest of Dean Hospital is chosen to be located in the neighbourhood area such a proposal will be supported subject to the following criteria.'</p> <p>Delete the first bullet point</p>	<p><u>facility will be supported where it meets the following locational and practical criteria:</u></p> <ul style="list-style-type: none"> <li><del>• One site, possibly one new building around 700-1000sqm for primary care</del></li> <li>• Accessible: for patient &amp; staff car parking, public transport and appropriate disability access</li> <li>• Town centre location</li> <li>• Flexible to address increased population growth in this Plan as well as any further projection from relevant NHS authorities</li> </ul> <p><del>Should the agreed new Forest of Dean Hospital be located in Coleford, then the NDP would support a suitable site which follows these criteria:</del></p> <p><u>In the event that the Forest of Dean Hospital is chosen to be located in the neighbourhood area such a proposal will be supported subject to the following criteria:</u> One site covering up to 2 hectares in size</p> <ul style="list-style-type: none"> <li><del>• Accessible: for patient &amp; staff car parking, public transport and appropriate disability access</del></li> <li>• Within the development boundary</li> <li>• With a possibility of linking the primary care centre with such potential hospital site in Coleford</li> </ul> <p>Any new development will also have to be compatible with other NDP policies (NB design policies, open areas, local green spaces, key views as in Map 13, green areas protected by the NDP and on sites allocated for other purposes). Opportunities for developer contributions (see list with 5.7.12) could be sought.</p>	<p>recommend that the first bullet point of each of the two sections are deleted and replaced in the supporting text. As submitted the criteria are prescriptive and the size thresholds may vary during the Plan period.</p>
31	paragraph 5.7.14	At the end of paragraph 5.7.14 add the following additional supporting text: 'Plainly the scale and nature of	<b>5.7.14</b> Consultations for a new Community Hospital in the Forest of Dean close December 17, and consultation over a	

		<p><i>the facilities may alter as they are worked up in further detail. However, at this stage it is envisaged that the primary care centre would occupy around 700-1000 square metres. A District Hospital would be likely to need a site in the order of two hectares'</i></p>	<p>primary care facility for Coleford is expected to take place in 2018 as a matter of priority and relating to criteria in policy CITPA3. <u>Plainly the scale and nature of the facilities may alter as they are worked up in further detail. However, at this stage it is envisaged that the primary care centre would occupy around 700-1000 square metres. A District Hospital would be likely to need a site in the order of two hectares</u></p>	
32	Policy CITPA4 Flooding and increased capacity in water systems	<p>Replace the policy with: 'New development proposals should be designed in a fashion that provides appropriate levels of capacity in water systems and to prevent flooding'.</p>	<p><b>Policy CITPA4 Flooding and increased capacity in water systems</b>  <del>Where appropriate opportunities will be used from new development to reduce the flood risk in Coleford by</del></p> <ul style="list-style-type: none"> <li><del>• completing outstanding works to improve foul and surface water systems</del></li> <li><del>• incorporating improvements in existing systems wherever new development might allow</del></li> <li><del>• not supporting, without an accepted Flood Risk Assessment (FRA) in accordance with National Guidance and FoDDC CSP 1, any new development conversions and extensions, other than minor domestic or commercial extensions.</del></li> </ul> <p><del>This is particularly relevant to the higher risk assessment areas in Coleford (as identified in 5.7.20).  <i>(It is noted that any new development will in any case incorporate SUDS systems in order to gain planning permission.)</i></del></p> <p><u>New development proposals should be designed in a fashion that provides appropriate levels of capacity in water systems and to prevent flooding</u></p>	<p>The policy sets out to take appropriate opportunities from new development to reduce the flood risk in Coleford. Paragraph 5.7.20 identifies areas where there are higher flood risks than elsewhere in the neighbourhood area.</p> <p>I have some sympathy for the approach adopted by the Town Council. Nevertheless, it is not the role of the planning system to require that new development addresses or resolves existing infrastructure capacity issues. Rather all new developments are expected to provide drainage and surface water facilities appropriate to their scale, type and location.</p> <p>As such I recommend that the policy is simplified so that it requires new development to resolve its own technical issues on this matter. Elements of the submitted policy are also recommended to be transferred into the supporting text.</p>
33	paragraph	At the end of paragraph 5.7.20 add:	<b>5.7.20</b> The design and location of new	

	5.7.20	<i>'In general terms all new developments other than minor domestic or commercial extensions will be expected to be accompanied by a Flood Risk Assessment to national and local specifications'.</i>	<p>developments, conversions and extensions should be resilient to the effects of flooding and take account of sustainable water and sewage management. This also relates to climate change.</p> <p>For Coleford, the higher risk areas are</p> <ul style="list-style-type: none"> <li>• The whole area which drains toward and through Coleford town centre (as Market Place/ St John St through Newland St to Whitecliff is categorised as flood zones 2/3 )</li> <li>• For reasons of groundwater: Ellwood Rd Worcester Walk/North Road, Poolway Farm</li> <li>• For adjoining watercourse reasons: Tufthorn Ave site, Kings Meade</li> </ul> <p>Risk assessment must be provided to show no adverse risk of pollution to groundwater or controlled waters including potable supplies, surface watercourses, ponds etc.</p>	
34	Other Matters	<i>Modification of general text (where necessary) to achieve consistency with the modified policies.</i>		<p>This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly as a result of my recommended modification to the policy concerned I have highlighted them in this report. However other changes to the general text may be required elsewhere in the Plan as a result of the recommended modifications to the policies. It will be appropriate for FDDC and the Town Council to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.</p>