

Mitcheldean
Neighbourhood Plan
Regulation 14 Consultation Draft



October 2018

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1 INTRODUCTION

1.1 Context

- 1.1.1 These representations provide Gladman’s response to the 3rd draft version of the Mitcheldean Neighbourhood Plan (MNP) under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012.
- 1.1.2 Through these representations, Gladman provides an analysis of the MNP and the policy decisions promoted within the Plan. Comments made by Gladman through these representations are provided in consideration of the MNP’s vision, objectives, suite of policies and its ability to fulfil the Neighbourhood Plan Basic Conditions as established by paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) and supported by the Neighbourhood Plan chapter of the PPG.
- 1.1.3 In accordance with the Neighbourhood Plan Basic Conditions, Neighbourhood Plan policies should align with the requirements of the National Planning Policy Framework (the Framework), and the wider strategic policies for the area set out in the Council’s adopted Development Plan. Neighbourhood Plans should provide a policy framework that complements and supports the requirements set out in these higher-order documents, setting out further, locally-specific requirements that will be applied to development proposals coming forward.
- 1.1.4 The MNP should only be progressed if it meets the Neighbourhood Plan Basic Conditions, supported by a robust and proportionate evidence base.
- 1.1.5 The Framework is clear that Neighbourhood Plans cannot introduce policies and proposals that would prevent sustainable development opportunities from going ahead. They are required to plan positively for new development, enabling sufficient growth to take place to meet the development needs for the area and assist local authorities in delivering full objectively assessed needs (OAN) for housing. Policies that are not clearly worded or intended to place an unjustified constraint on further sustainable development from taking place are not consistent with the requirements of the Framework or the Neighbourhood Plan Basic Conditions.
- 1.1.6 The MNP should not seek to include policies in the Neighbourhood Plan that have no planning basis or are inconsistent with national and local policy obligations. Proposals should be appropriately justified by the findings of a supporting evidence base and must be sufficiently clear to be capable of being interpreted by applicants and decision makers. Policies and proposals contained in the MNP should be designed to add value to existing policies and national guidance, as opposed to replicating their requirements.
- 1.1.7 Gladman has an interest in Land off Carisbrooke Road, Mitcheldean, and would welcome the opportunity to discuss our proposal with the Parish Council.

2 LEGAL AND POLICY CONTEXT

2.1 Legal Requirements

2.1.1 Neighbourhood Plans must be prepared against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The Basic Conditions that a neighbourhood plan must meet are as follows:

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).
- d) the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.
- e) the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
- f) the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.

2.1.2 The Neighbourhood Plan must have regard to these basic conditions throughout the preparation process. It will be especially important for the version of the Plan that is prepared for submission to Forest of Dean Council under Regulation 16 to take full account of these basic conditions and it must be accompanied by a 'Basic Conditions Statement' to demonstrate that it meets these requirements.

2.2 National Planning Policy Framework, & Planning Practice Guidance

National Planning Policy Framework

2.2.1 The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how they are expected to be applied. In doing so it sets out the requirements for neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role in which they play in delivering sustainable development to meet identified development needs.

2.2.2 At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through both plan-making and decision-taking. For plan-making this means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet Objectively Assessed Needs (OAN) for housing, with sufficient flexibility to adapt to rapid change. This requirement is also applicable to neighbourhood plans.

- 2.2.3 The application of the presumption in favour of sustainable development has implications for how communities engage with neighbourhood planning. Paragraph 29 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.
- 2.2.4 On the 24th July 2018, the government published a revised National Planning Policy Framework (2018 NPPF). The revised Framework states at paragraph 213 that ‘the policies of the previous Framework will apply for the purposes of examining plans, where those plans are submitted on or before 24 January 2019.’ As such the Parish Council will need to ensure that the policies contained within the MNP are consistent with the appropriate version of the NPPF. As we will set out below, Gladman have significant concerns regarding the policies contained within the draft version of the Neighbourhood Plan and as such we recommend that the Parish Council seek to take on board the points raised and undertake a further Regulation 14 consultation, once appropriate evidence to support the plan is published. With this in mind, Gladman have responded to this consultation based on the assumption that the plan will be examined against the 2018 NPPF.
- 2.2.5 Paragraph 29 further makes clear that neighbourhood plans should support the delivery of strategic policies contained in local plans. Neighbourhood Plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.

Planning Practice Guidance

- 2.2.6 The Planning Practice Guidance (PPG) provides further details on how specific elements of the Framework should be interpreted when preparing Local and Neighbourhood Plans. The neighbourhood planning chapter in particular provides a clear indication of how the Government expects qualifying bodies to take into account the requirements of the Framework when preparing a neighbourhood plan.
- 2.2.7 On 11th February 2016, the Secretary of State published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these updates highlighted a number of component parts of the evidence base that are required to support an emerging neighbourhood plan, in particular, the importance of considering housing reserve sites and providing indicative delivery time tables to ensure that emerging evidence of housing needs is addressed in order to help minimise any potential conflicts that can arise so that these are not overridden by a new Local Plan.
- 2.2.8 The PPG makes clear that up-to-date housing needs evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development¹. Furthermore, the PPG indicates that all settlements can play a role in

¹ PPG Paragraph: 009 Reference ID: 41-009-20160211

delivering sustainable development in rural areas, and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless this can be supported by robust evidence². Where a need for market and/or affordable housing is identified, the neighbourhood plan should seek to deliver this need in full with sufficient flexibility to respond to rapid change, otherwise there is risk that the Plan will be found contrary to basic conditions (a), (d), (e) and (f).

2.3 Sustainability Appraisal/Strategic Environmental Assessment

- 2.3.1 The preparation of a Neighbourhood Plan may fall under the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) that require a Strategic Environmental Assessment (SEA) to be undertaken where a Plan's proposals would be likely to have significant environmental effects. The requirement to undertake an SEA will be dependent on a Neighbourhood Plan's proposals, but is likely to be necessary where a Plan is proposing specific allocations or site designations.
- 2.3.2 In accordance with Schedule 1 of the SEA Regulations, a Screening Assessment of a Neighbourhood Plan's proposals should be completed to assess whether an SEA must be prepared. Where an SEA is required this should be commenced at the earliest opportunity, alongside the preparation of the emerging Neighbourhood Plan, to ensure the Neighbourhood Plan's proposals have been properly considered through the SEA process, and appropriately justified against other reasonable alternatives. Where an adequate SEA has not been undertaken a Neighbourhood Plan is unlikely to meet the Neighbourhood Plan Basic Conditions.
- 2.3.3 Although Neighbourhood Plans do not require a Sustainability Appraisal (SA) of their proposals, preparing an SA can help to show how a Neighbourhood Plan will contribute to the achievement of sustainable development, a Neighbourhood Plan Basic Condition. Where an SEA is required, extending this assessment to the preparation of an SA is unlikely to require significant additional input.
- 2.3.4 To be compatible with EU obligations, further appraisals, such as a Habitats Regulations Assessment, may also be required depending on local circumstances
- 2.3.5 Gladman have been unable to establish from examining the draft plan and evidence base if it is actually the case that an opinion on these matters has been sought from Forest of Dean Council. If it is the case that Forest of Dean Council have confirmed that a SEA and HRA are not required, then we urge the Parish Council to confirm this and provide evidence to support this position to the public and consider a second Regulation 14 consultation. If indeed the Council are yet to advise in respect of the requirement for a SEA and HRA, then we suggest that this issue is addressed as a matter of urgency and subject to any necessary work being undertaken as a result of the Council's

² PPG Paragraph: 001 Reference ID: 50-001-20160519

advice, a further Regulation 14 consultation will be necessary to ensure that the public are given the opportunity to respond to a plan with a full suite of evidence in front of them.

3 DEVELOPMENT PLAN

3.1 Adopted Development Plan

- 3.1.1 To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan.
- 3.1.2 The current Local Plan consists of a number of documents, which set out an overall strategy across the District until 2026. The Forest of Dean Core Strategy (CS) was adopted by the Council on 23rd February 2012. The adopted CS sets out an overall housing target across the plan period of some 5,162 dwellings.
- 3.1.3 Within the adopted CS, Mitcheldean is recognised as being a large village, with employment and services that are considered important to the wider area. It is acknowledged that the settlement can accommodate additional development. The CS sets a housing provision target of **around 101** dwellings over the plan period.
- 3.1.4 Forest of Dean Council adopted an Allocations Plan on 28th June 2018. The Allocations Plan shows how the adopted housing target will be met and includes sites for housing and employment across the plan area.
- 3.1.5 The allocations plan recognises that Mitcheldean has a good level of services, including a doctor's surgery and a library. The plan allocates four sites for residential development, totalling approximately 42 dwellings to be delivered over the plan period. Gladman through Representations to the Council and indeed as part of the Examination in Public, raised a number of concerns in respect of the then proposed allocations. We continue to have some concerns regarding the sustainable delivery of these allocations.

3.2 Emerging Development Plan

- 3.2.1 Forest of Dean Council, as part of their latest Local Development Scheme (LDS), have indicated that work has already begun on a new Local Plan, which will guide and control development in the district up to 2041.
- 3.2.2 It is currently anticipated that Issues and Options will be consulted on in Summer/Autumn 2019, with a Publication Draft anticipated in Summer 2021.
- 3.2.3 Gladman consider it essential that the MNP allows for flexibility and adaptability, so it can positively respond to changes in circumstance which may arise through the preparation on the new Local Plan. This degree of flexibility is required to ensure that the MNP is capable of being effective over the duration of its plan period and not ultimately superseded by s38(5) of the Planning and Compulsory Purchase Act 2004, which states that:

'if to any extent, a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approached, or published (as the case may be).'

4 MITHELDEAN NEIGHBOURHOOD PLAN

4.1 Context

4.1.1 These representations are made in response to the current consultation on the draft version of the MNP, under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012. This chapter of the representation highlights the key points that Gladman raise with regard to the content of the MNP as currently proposed.

4.2 Vision

4.2.1 The Framework seeks to promote sustainable development to meet identified housing needs and states that local planning authorities should set out the strategic priorities for an area in a Local Plan. The MNP should therefore seek to promote these interests and ensure that strategic priorities, set out within the adopted Development Plan are given due regard and consideration, ensuring that sustainable development opportunities are fully supported.

4.3 Neighbourhood Plan Policies & Supporting Text

4.3.1 This section of Gladman's representations is made in response to those policies which still need to be addressed and amended through modification and/or deleted before the next round of consultation.

4.3.2 Gladman submit that in its current form the Neighbourhood Plan does not meet basic conditions (a), (d), (e) and (f).

Paragraph 1.8 – 1. Housing/Development

4.3.3 Paragraph 1.8 of the draft MNP states that 'The Forest of Dean Allocations Plan provides for no more than 100 dwellings to be provided in the Parish'. Gladman do not consider this statement to accurately replicate the wording contained within both the adopted Core Strategy and Site Allocations Plan, which do not seek to cap development to a maximum level. Thus, we suggest that working of this paragraph is amended to reflect that 'around' 100 dwellings are to be delivered in the Mitcheldean Parish.

Draft Policy H2 Gateway and outside settlement boundary

4.3.4 Draft Policy H2 states that outside the settlement boundary and along the gateways to Mitcheldean village, new housing development will not be supported in Protection Zones.

4.3.5 The introduction of a 'Protection Zone' is considered a strategic policy beyond the remit of neighbourhood plans that would have the effect of imposing a blanket restriction on development around the vast majority of the built-up area around Mitcheldean. It would effectively offer the same level of protection as Green Belt land without undertaking the necessary exceptional circumstances

test for the designation of new areas of Green Belt. As stated by PPG paragraph 074³, a neighbourhood plan should not attempt to introduce strategic policies, such as this, which would undermine the strategic policies set out in the development plan.

- 4.3.6 Gladman note that previous iterations of the MNP have not sought to define a 'Protection Zone'.
- 4.3.7 At section 6 of the plan, it is stated that the Protection Zone has been identified in order to;
- Preserve the distinctive local landscape and views;
 - Protect the environmentally sensitive areas and support the Forest of Dean Bat Strategy; and
 - Preserve the heritage 'squatter settlements' and field patterns.
- 4.3.8 Gladman estimate that the proposed 'Protection Zone' covers approximately 71% of the total plan area. Given the particular topography of the area, we are further concerned that some of the areas contained within the 'Protection Zone' represent the most suitable and indeed most viable options for residential development, and as such are very concerned that this proposed policy would effectively prevent the most suitable or indeed in our assessment the only suitable locations for growth from coming forward.
- 4.3.9 In respect of local landscapes and views, Gladman submit that new development can often be located in areas without eroding the landscape and views considered to be important to the local community and can be appropriately designed to take into consideration the wider landscape features of a surrounding area to provide new vistas and views.
- 4.3.10 In addition, as set out in case law, to be valued, a view would need to have some form of physical attribute. Any related policy must allow a decision maker to come to a view as to whether particular locations contains physical attributes that would 'take it out of the ordinary' rather than selecting views which may not have any landscape significance and are based solely on community support. Opinions on landscape are highly subjective, therefore, without robust evidence to demonstrate why these views and landscape areas are considered special, Gladman fail to see how Policy H2 meets the requirements set out in the Framework.
- 4.3.11 Further, the PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded. Accordingly, the MNP will need to be updated so that it takes into account the latest guidance issued so that it can be found in compliance with basic condition (a), (d) and (e).
- 4.3.12 Gladman have been unable to locate any evidence to support the inclusion of any such designation in the draft plan. If indeed evidence has been produced to support this policy, it is essential that this

³ Paragraph: 074 Reference ID: 41-074-20140306

is made obviously available for public review and comment. We suggest that the Parish Council revisit this policy and ensure that sufficient evidence is provided to demonstrate consistency with the requirements of the Framework.

4.3.13 A similar policy proposed within the Stretton Neighbourhood Plan⁴ was recommended for deletion by examiner Allyson Linnegar, as it was found that it failed to have regard to the Framework, which, firstly, establishes a presumption in favour of sustainable development and, secondly, supports a prosperous rural economy.

4.3.14 Gladman strongly object to this policy and do not consider that it is in compliance with basic conditions (a), (d) and (e).

Draft Policy Option AC2 Local Green Space

4.3.15 Draft Policy AC2 identifies 10 parcels of land that are proposed as potential Local Green Spaces.

4.3.16 The designation of land as Local Green Space (LGS) is a significant policy designation and effectively means that once designated, they provide protection that is comparable to that of Green Belt land. As such, the Parish Council should ensure that the proposed designations are capable of meeting the requirements of national policy if they consider it necessary to seek LGS designation.

4.3.17 The Framework is explicit in stating at paragraph 100 that ‘Local Green Space should be consistent with local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services’.. With this in mind, it is imperative that the plan makers can clearly demonstrate that the requirements for LGS designation are met. The designation of LGS should only be used:

- Where the green space is in reasonably close proximity to the community it serves;
- Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- Where the green area concerned is local in character and is not an extensive tract of land.

4.3.18 Gladman suggest that the evidence that has been produced to support the designations of LGS is not considered robust or detailed. We consider that at least 2 of the parcels of land are considered extensive tracts of land and therefore do not meet the requirements of the Framework.

4.3.19 The issues surrounding LGS designations have been considered in a number of other Examiner’s reports across the country and we highlight the following decisions:

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<http://www.eaststaffsbc.gov.uk/sites/default/files/docs/planning/planningpolicy/neighplanning/stretton/STRETTONEXAMINERSREPORTEFINALMARCH2015.pdf>

- The Seldlescombe Neighbourhood Plan Examiner’s Report⁵ recommended the deletion of a LGS measuring approximately 4.5ha as it was found to be an extensive tract of land.
- The Oakley and Deane Neighbourhood Plan Examiners Report⁶ recommended the deletion of a LGS measuring approximately 5ha and also found this area to be not local in character. Thereby failing to meet 2 of the 3 tests for LGS designation.
- The Alrewas Neighbourhood Plan Examiner’s Report⁷ identifies that both sites proposed as LGS in the neighbourhood plan ‘*in relation to the overall size of the Alrewas Village*’ to be extensive tracts of land. The Examiner in this instance recommended the deletion of the proposed LGSs which measured approximately 2.4ha and 3.7ha.
- The Freshford and Limpley Neighbourhood Plan Examiner’s Report⁸ identified that the six LGS proposed did not meet the criteria required by the Framework either collectively or individually. Indeed, the Examiner identified that the combination of sites comprised of an extensive tract of land. The Examiner also considered that the protection of fields to ‘prevent agglomeration between the settlement areas... is not the purpose of Local Green Space designation’.
- The Eastington Neighbourhood Plan Examiner’s Report⁹ recommended the deletion of three LGS (16ha and 2ha) considered to be extensive tracts of land. The third proposed LGS was deleted due to the lack of evidence demonstrating its importance and significance to the local community.
- The Tattenhill and Rangemore Neighbourhood Plan Examiner’s Report¹⁰ recommended the deletion of 2 LGS comprising of 4.3ha and 9.4ha.
- The Norley Examiner’s Report¹¹ identified a total of 13 parcels of land to be designated as LGS. The Examiner recommended at §4.98 that the identification of these extensive tracts of agricultural land was contrary to NPPF policy and recommended that the policy should be deleted. The proposed LGS measured in the range of 1ha – 4.3ha.

Draft Policy Option E2 Protecting Heritage Assets

- 4.3.20 Draft Policy E2 states that designated and non-designated heritage assets should be preserved in a manner appropriate to their significance.
- 4.3.21 Paragraph 193 of the 2018 Framework makes it clear that great weight should be given to a heritage asset’s conservation and that the more important the asset, the greater the weight should be.
- 4.3.22 With reference to designated heritage assets, the Council should refer specifically to paragraphs 193 and 197 of the 2018 Framework which sets out that Councils should assess the significance of

⁵ <http://www.rother.gov.uk/CHttpHandler.ashx?id=22996&p=0>

⁶ <https://www.basingstoke.gov.uk/content/doclib/1382.pdf>

⁷ <https://www.lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Neighbourhood-plans/Downloads/Alrewas/Alrewas-Neighbourhood-Plan-Examiners-Report.pdf>

⁸ http://www.wiltshire.gov.uk/freshford_limpley_examination_final_report.pdf

⁹ <https://www.stroud.gov.uk/media/2596/2016-04-28-eastington-examiners-report-final.pdf>

¹⁰ <http://www.eaststaffsbc.gov.uk/sites/default/files/docs/planning/planningpolicy/neighborplanning/tatenhill/02%20Tatenhill%20Neighbourhood%20Plan%202015.pdf>

¹¹ <http://consult.cheshirewestandchester.gov.uk/file/3626372>

the designated heritage asset and where there is less than substantial harm, this should be weighed in the planning balance against the public benefits of the proposal. Where there is deemed to be substantial harm, then the proposal would need to achieve substantial public benefits to outweigh that harm.

- 4.3.23 For non-designated heritage assets, the policy must reflect the guidance set out within paragraph 197 of the Framework. This states that the policy test that should be applied in these cases is that a balanced judgement should be reached having regard to the scale of any harm and the significance of the heritage asset.
- 4.3.24 Gladman believe that this policy needs to be redrafted in order to ensure that it conforms with the guidance and requirements set through national policy. As currently draft this policy is unlikely to be found to be compliant with Basic Conditions.

Draft Policy Option E4 Biodiversity

- 4.3.25 Policy E4 states that development proposals should include measure to enhance biodiversity, and in order to preserve biodiversity across the parish, a list of 6 policy criterion have been established.
- 4.3.26 In respect of the 6th criterion, relating to the Protection Zone, Gladman reiterate the points made above, and object to the inclusion of such a designation, without sufficient and robust evidence being available to support any such area.
- 4.3.27 Paragraph 171 of the Framework refers to the need for criteria-based policies in relation to proposals affecting protected wildlife or geodiversity sites or landscape areas, and that protection should be commensurate with their status which gives appropriate weight to their importance and contributions to wider networks. As currently drafted, Gladman do not believe this policy fully aligns with the Framework. The policy fails to make a distinction and recognise that there are two separate balancing exercises which need to be undertaken for national and local designated sites and their settings. We therefore suggest that the policy is revisited to ensure that it is consistent with the approach set out within the Framework.

5 SITE SUBMISSION

5.1 Land off Carisbrook Road, Mitcheldean

- 5.1.1 Gladman would like to take this opportunity to make the Parish Council aware of our land interest off Carisbrook Road, Mithceldean. A Site Location Plan can be found at Appendix 1. Gladman seeks allocation of the site for residential development within the Neighbourhood Plan. This site presents an ideal opportunity to create a sustainable, high quality residential development located in a sought-after location. We would welcome the opportunity to discuss our proposals in greater detail with the Parish Council.
- 5.1.2 The site is located to the northern built edge of Mithceldean and extends to some 10.4 hectares. Within the emerging Neighbourhood Plan, the site is located within the proposed 'Protection Zone'. Gladman have above raised an objection to the proposed 'Protection Zone' and have been unable to identify any evidence to support the inclusion of the site, or indeed the wider area in any such designation.
- 5.1.3 The site is bounded by residential development to the south and west agricultural land to the north; and employment land to the east. The site itself is not subject of any formal historic or environmental designations and is not situated within a Conservation Area.
- 5.1.4 We note from the 'Notable Species and Protection Zone appendix, accompanying the draft Neighbourhood Plan, that the site is considered a 'sensitive area' and that notable, rare or protected species have been recorded on site. Given the location of the site, and indeed the wider settlement, this is as would be expected. Long-term monitoring of the bat populations at Wigpool Stone Mines SSSI means that there is well recorded evidence of bats locally. However, the protected species records provided within the neighbourhood plan are low resolution and non-species specific, hence it is not clear what if any species may have been specifically recorded on the proposed development area. It is notable that the proposed development site is under arable cultivation and unlikely to form a key foraging resource for horseshoe bats which typically utilise grazed pasture and woodland habitats. It is however expected that the boundary hedgerows at the site will support a degree of bat foraging and commuting activity. A sensitive scheme to appropriately maintain and enhance hedgerows and trees at the Site, potentially combined with the provision of new habitat to enhance or create dark corridors for bats, could provide a positive way forward.
- 5.1.5 In accordance with the National Planning Policy Framework, for a site to be considered deliverable, it must be available now, offer a suitable location for development now and there should be a realistic prospect that development would be delivered within five years. At present Gladman see no reason why the site is not considered viable.
- 5.1.6 Gladman consider that the site should be included in the Mitcheldean Neighbourhood Plan as it provides a sustainable location for future growth, consistent with the requirements of the

Framework which make clear that development that is sustainable should proceed without delay, in accordance with the presumption in favour of sustainable development.

5.1.7 We consider the site to be a sustainable and viable location for growth and believe that a sustainable level of growth could be delivered within a relatively short period and make a significant contribution to the Council's five-year housing land supply. Gladman therefore request that the Parish Council offer support to the submitted proposal. The proposed development will bring benefits to the local community, including:

- The delivery of market and affordable housing in a sustainable location to meet housing needs;
- The provision of new public open space that is not currently available and a high-quality landscape setting, along with more informal recreation space and landscaping to meet the needs of existing and future residents; and
- The creation of a high quality residential development which respects the character of the surrounding area.

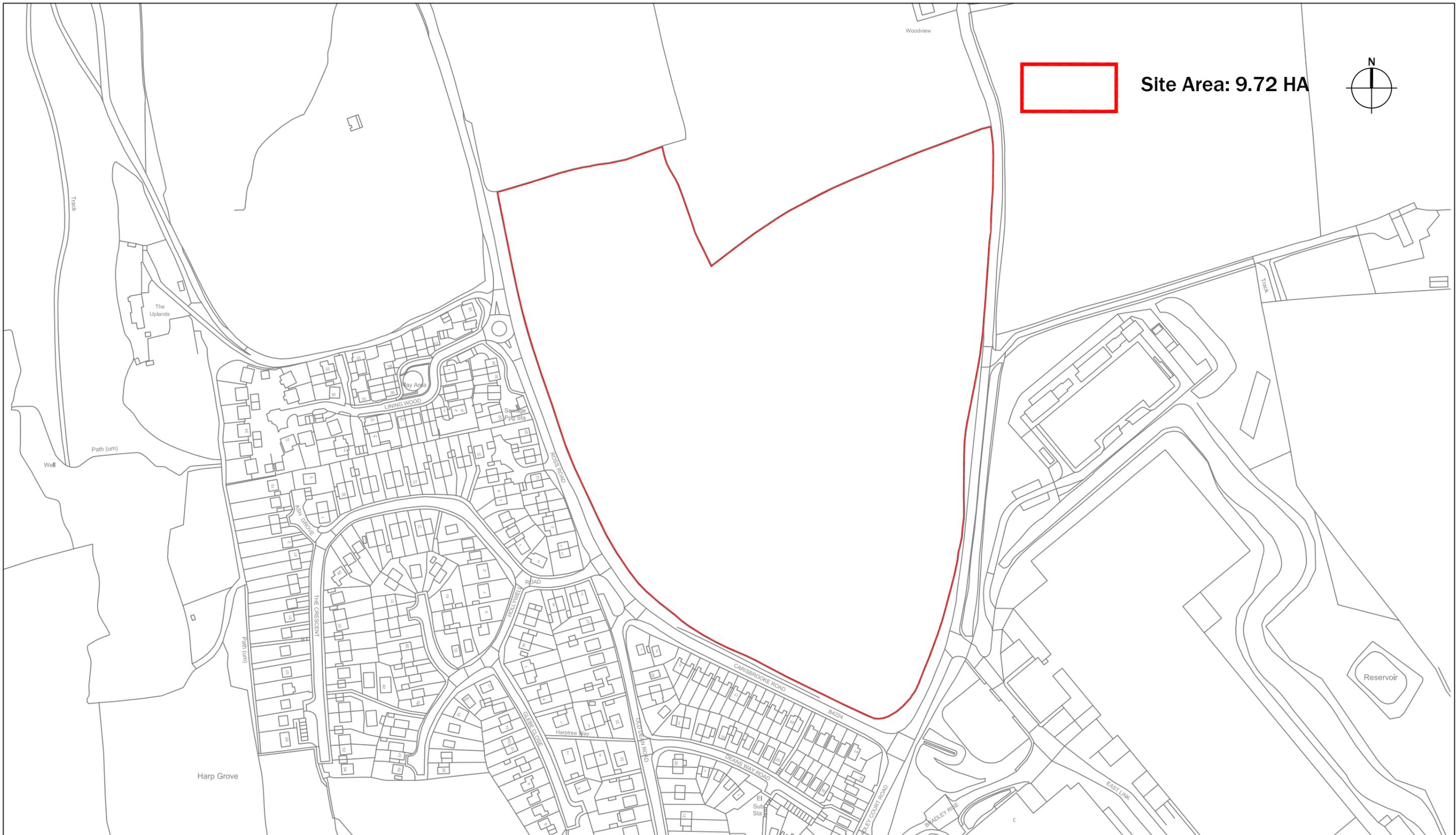
5.1.8 The delivery of this scheme will result in significant benefits for the local community and surrounding area including the provision of New Homes Bonus payments, increasing the economic activity of the area and provide a number of aspirations that are currently being targeted by the Mitcheldean Neighbourhood Plan.

6 CONCLUSIONS

- 6.1.1 Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. The Regulation 14 consultation marks an important milestone in the preparation of the Mitcheldean Neighbourhood Plan and Gladman welcomes the opportunity to comment on the emerging document.
- 6.1.2 It is clear from national guidance that the Mitcheldean Neighbourhood Plan must be consistent with national planning policy and the need to take account of up-to-date housing needs evidence for the wider Forest of Dean Council area.
- 6.1.3 In order for the Plan to proceed and meet all of the neighbourhood plan basic conditions, the Parish Council must ensure that its policies are based on robust and justified evidence and contain policies that provide sufficient flexibility. Furthermore, all relevant evidence used to inform the Plan should be made available so that interested parties can fully understand the rationale behind preferred approach that has been selected.
- 6.1.4 Through this consultation response, Gladman has sought to clarify the relationship of the MNP as currently proposed with the requirements of national planning policy and the wider strategic policies for the area.
- 6.1.5 Gladman are very concerned that the plan in its current form does not comply with basic conditions (a), (d), (e) and (f). The plan does not conform with national policy and guidance and in its current form does not contribute to the achievement of sustainable development, and further we are not satisfied that the plan is compatible with EU obligations.
- 6.1.6 We recommend that the Parish Council take some time to reassess the policies within the draft plan and produce an evidence base that is required to support these policies. We strongly recommend that the current version of the plan, does not proceed to Regulation 15.

Appendix 1

Land off Carisbrook Road, Mitcheldean – Site Location Plan




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Rev	Date	By	Revision notes
*	*	*	*
Status			
PERLIMINARY			

Project	Mitcheldean, Carisbrooke Road
Title	LOCATION PLAN

Drawn by Tim Poupard	Issue date 10-08-2018
Title checked by CHECKED BY	Title checked date CHECKED_DATE
Highways checked by CHECKED BY	Highways checked date CHECKED_DATE
Topo checked by CHECKED BY	Topo checked date CHECKED_DATE
Scale(s)	
1:2500@A3	
Drawing No	
2018-098-101	