

# **Longhope Neighbourhood Plan 2016-2026**

**A report to Forest of Dean District Council on the  
Longhope Neighbourhood Plan**

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## **Executive Summary**

- 1 I was appointed by Forest of Dean District Council in June 2017 to carry out the independent examination of the Longhope Neighbourhood Plan.
- 2 The examination was undertaken by written representations. I visited the neighbourhood plan area on 30 June 2017.
- 3 The Plan includes a series of policies and seeks to bring forward positive and sustainable development in the plan area. It has a focus on safeguarding its character and appearance, promoting appropriate housing and stimulating sustainable economic development. The Plan is very distinctive to the neighbourhood area and has been presented and prepared in an exemplary fashion.
- 4 The Plan has been underpinned by community support and engagement. All sections of the community have been actively engaged in its preparation.
- 5 Subject to the series of recommended modifications set out in this report I have concluded that the Longhope Neighbourhood Plan meets all the necessary legal requirements and should proceed to referendum.
- 6 I recommend that the referendum should be held within the neighbourhood plan area.

**Andrew Ashcroft**  
**Independent Examiner**  
**31 August 2017**

## **1 Introduction**

- 1.1 This report sets out the findings of the independent examination of the Longhope Neighbourhood Plan 2016-2026 ('the Plan').
- 1.2 The Plan has been submitted to Forest of Dean District Council (FoDDC) by Longhope Parish Council in its capacity as the qualifying body responsible for preparing the neighbourhood plan.
- 1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework in 2012 and which continues to be the principal element of national planning policy.
- 1.4 This report assesses whether the Plan is legally compliant and meets the Basic Conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.
- 1.5 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome the Plan would then be used to determine planning applications within the plan area and will sit as part of the wider development plan.

## 2 The Role of the Independent Examiner

- 2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.
- 2.2 I was appointed by FoDDC, with the consent of the Parish Council, to conduct the examination of the Plan and to prepare this report. I am independent of both FoDDC and the Parish Council. I do not have any interest in any land that may be affected by the Plan.
- 2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. In previous roles I have over 30 years' experience in various local authorities at either Head of Planning or Service Director level. I am a chartered town planner and have significant experience of undertaking other neighbourhood plan examinations and health checks. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral Service.

### *Examination Outcomes*

- 2.4 In my role as the independent examiner of the Plan I am required to recommend one of the following outcomes of the examination:
- (a) that the Plan is submitted to a referendum; or
  - (b) that the Plan should proceed to referendum as modified (based on my recommendations); or
  - (c) that the Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.

### *The Basic Conditions*

- 2.5 As part of this process I must consider whether the submitted Plan meets the Basic Conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:
- have regard to national policies and advice contained in guidance issued by the Secretary of State; and
  - contribute to the achievement of sustainable development; and
  - be in general conformity with the strategic policies of the development plan in the area; and
  - be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations.

I have examined the submitted Plan against each of these basic conditions, and my conclusions are set out in Sections 6 and 7 of this report. I have made specific comments on the fourth bullet point above in paragraphs 2.6 to 2.10 of this report.

- 2.6 In order to comply with the Basic Condition relating to European obligations the District Council carried out a screening assessment on behalf of the Parish Council. The conclusion of the Screening Report was that the Plan would not have any

significant environmental effects. A proportionate Statement of Reasons is included within the screening opinion. In summary, the screening report adopts its conclusion for the following reasons:

- the limited geographic spread of the Plan;
- its effects are limited and no new allocation are identified;
- the Plan does not create a new framework or programme beyond those that already exist (including the Core Strategy);
- the Plan provides policies to assess the impact of development; and
- the Plan includes environmental and associated mitigation issues.

2.7 The required consultation was carried out with the three prescribed bodies and the responses received are included within the report. The wider screening report is exemplary in its approach. Its conclusion is immediately apparent and is underpinned by a comprehensive and relevant range of information.

2.8 FoDDC has also prepared a Habitats Regulations Assessment (HRA) of the Plan. It concludes that the Plan is not likely to have significant environmental effects on a European nature conservation site or undermine their conservation objectives alone or in combination taking account of the precautionary principle. As such Appropriate Assessment is not required. The assessment has been produced in a similar standard to the SEA screening report. In reaching this conclusion the report took account of:

- any potential impacts on the River Wye and Severn SACs;
- any potential impacts on the Wye Woodlands and the Walmore Common SACs; and
- any potential impacts on the Wye Valley and Forest of Dean Bat SAC.

2.9 Having reviewed the information provided to me as part of the examination I am satisfied that a thorough, comprehensive and proportionate process has been undertaken in accordance with the various regulations. The various reports set out a robust and compelling assessment of the relevant information. None of the statutory consultees have raised any concerns with regard to either neighbourhood plan or to European obligations. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this aspect of European obligations.

2.10 In a similar fashion I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no evidence that has been submitted to me to suggest otherwise. There has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. On this basis, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

*Other examination matters*

2.11 In examining the Plan I am also required to check whether:

- the policies relate to the development and use of land for a designated neighbourhood plan area; and
- the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area); and
- the Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.

2.12 Having addressed the matters identified in paragraph 2.11 of this report I am satisfied that all of the points have been met subject to the contents of this report.

### 3 Procedural Matters

3.1 In undertaking this examination I have considered the following documents:

- the submitted Plan.
- the Basic Conditions Statement.
- the Consultation Statement.
- the Evidence Base Report
- Maps 1/2/3
- the FoDDC SEA and HRA reports.
- the representations made to the Plan.
- the adopted Forest of Dean Core Strategy 2012.
- the saved policies in the Forest of Dean Local Plan 2005.
- the Forest of Dean Allocations Plan Submission Draft 2015 and the Main Modifications (April 2016).
- the National Planning Policy Framework (March 2012).
- Planning Practice Guidance (March 2014 and subsequent updates).
- relevant Ministerial Statements.

3.2 I carried out an unaccompanied visit to the Plan area on 30 June 2017. I looked at its overall character and appearance and at those areas affected by policies in the Plan in particular. My site inspection is covered in more detail in paragraphs 5.9 to 5.16 of this report.

3.3 It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the information before me, including the representations made to the submitted plan, I was satisfied that the Plan could be examined without the need for a public hearing. I advised FoDDC of this decision early in the examination process.

## 4 Consultation

### *Consultation Process*

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such the Regulations require neighbourhood plans to be supported and underpinned by public consultation.
- 4.2 In accordance with the Neighbourhood Planning (General) Regulations 2012 the Parish Council has prepared a Consultation Statement. This statement is thorough and it provides an appropriate balance of detail and presentation. It designed and presented in a complementary fashion to the Plan itself and other related documents. It provides specific details on the consultation process that took place on the draft version of the Plan from November 2015 to January 2016. The Statement sets out how the emerging plan took account of the various comments and representations. The timeline in Section 1 is particularly helpful in setting out the sequence of events.
- 4.3 Section 1 of the Statement also sets out a summary of the wider consultation techniques that have been used throughout the evolution of the Plan. Details are provided about:
- The engagement of the Gloucestershire Rural Community Council;
  - Meetings with community groups to raise awareness;
  - Consultation events;
  - Meetings with businesses and landowners;
  - The organisation of a general community questionnaire; and
  - The organisation of a business survey.
- 4.4 The Consultation Statement provides very useful information on the various events, the publicity materials and the survey results. Various photographs give a useful flavour of the approaches taken and the responses received. This approach provides a very strong sense of assurance that the local community has been engaged in the plan-making process.
- 4.5 On this basis it is clear to me that consultation has fundamentally underpinned the Plan's production. Advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation. Consultation and feedback has been at the heart of the Plan throughout the various stages of its production.
- 4.6 The positive approach that was taken in responding to the earlier comments is reflected in the limited number of representations received to the submitted plan (see 4.8 below) and their generally positive nature.

- 4.7 From all the evidence provided to me as part of the examination, I can see that the Plan has promoted an inclusive and comprehensive approach to seeking the opinions of all concerned throughout the process. The FoDDC has carried out its own assessment that the consultation process has complied with the requirements of the Regulations.

*Representations Received*

- 4.8 Consultation on the submitted plan was undertaken by the District Council for a six-week period and which ended on 31 May 2017. This exercise generated comments from the following persons and organisations:

- Sport England
- Venkatesh Sheno
- Natural England
- Highways England
- The Gardens Trust
- The Coal Authority
- Colbourn Homes
- Gloucestershire County Council
- Environment Agency
- MF Freeman Limited
- Gladman Developments
- Regeneration Manager, FoDDC
- Historic England

- 4.9 As part of my examination of the Plan I have taken account of all the comments received.

## 5 The Plan Area and the Development Plan Context

### *The Plan Area*

- 5.1 The Plan area sits in the heart of the Forest of Dean District. In 2011, it had a population of 1490 persons living in 595 dwellings. It was designated as a neighbourhood area on 19 September 2013.
- 5.2 The Plan area is located to the immediate east of Mitcheldean. The majority of its built development is within the village of Longhope itself. The village sits between the A40 Gloucester to Ross Road to the north and the A4136 to the south. It has a strong north-south alignment along Church Road. The concentration of built development in the village is at its southern end at the junction of Church Road and Latchen. Both the Longhope Brook and the dismantled railway follow this natural north-south alignment.
- 5.3 The wider Plan area is predominantly rural in character. It lies in very pleasant countryside that is typical of the wider Forest of Dean area. May Hill sits at the north of the Plan area and Hope Wood sits at the south of the Plan area. Both these areas contribute significantly to its open and green character.

### *Development Plan Context*

- 5.4 The development plan covering the neighbourhood plan area is the Core Strategy 2012 together with the saved policies of the Forest of Dean Local Plan 2005. The Core Strategy sets out a vision, objectives, spatial strategy and overarching planning policies that guide new development in the District up until 2026. The Plan has been designed to respect this period.
- 5.5 Policy CS16 of the Core Strategy identifies Longhope as one of a series of service villages. In these villages, new housing and employment opportunities are likely to be small in scale (single plots or pairs of dwellings, small workshops or changes of use of existing buildings including the reuse of agricultural buildings).
- 5.6 The Basic Conditions Statement has very helpfully listed the policies in both the adopted development plan documents with which the Plan is considered to be consistent. It highlights the key policies in the development plan and how they relate to policies in the submitted Plan. This is good practice.
- 5.7 At the time of the examination a separate inquiry was taking place on the FoDDC Allocations Plan. This Plan sets out key allocations to supplement the adopted Core Strategy. Three allocations are proposed in the Plan area and are described in the Introduction to the Plan. In summary, they are as follows:

AP 79 Land off Church Road

Approximately 28 dwellings. This reflects the Main Modification MM069

AP80 Transport Depot A4136

4.3 hectares of land for employment generating uses.

AP81 Longhope Industrial Estate

A mixture of employment generating uses and housing.

- 5.8 The existing development plan has provided a clear and strong context for the preparation of the neighbourhood plan. The submitted plan provides a distinctive local dimension both to national policy and to the policies in the Core Strategy. It also takes account of the emerging Allocations Plan.

*Visit to the neighbourhood area*

- 5.9 I carried out an unaccompanied visit to the Plan area on 30 June 2017. I was fortunate in having chosen a bright day with good visibility. I approached the Plan area from Herefordshire to the north.
- 5.10 I initially went to Dursley Cross and May Hill. I drove up Yartleton Lane to May Hill Farm and then walked up the well-trodden footpath to the top of May Hill. I was rewarded with panoramic views of the Severn estuary to the south, of Sugar Loaf mountain to the west, of the Black Mountains to the north and of the Cotswold escarpment to the east. I also secured a rather lofty view of the neighbourhood area itself.
- 5.11 I continued driving along Yartleton Lane and into Barrel Lane. In doing so I passed through very pleasant countryside and saw evidence of the dismantled railway.
- 5.12 I then drove into Longhope village along Church Road. I looked at the proposed housing allocation in Church Road as identified in the FoDDC Allocations Plan (AP79) and the Industrial Estate (AP81).
- 5.13 I continued my visit by walking around the village centre. I saw the school, the shop/post office, the recreation ground, the bakery and the variety of other commercial uses. It was clearly the heart of the community.
- 5.14 I also took the opportunity to walk along Latchen. I saw that the character of the village changed at this point given that the road was wider and the housing stock was generally more modern. I walked down as far as the A4136 to look at the Transport Depot (AP80).
- 5.15 At various points during my visit I saw the range of community facilities highlighted in the Plan.
- 5.16 In order to get a full impression of the Plan area I drove around the Plan area in general, and along both the A40 and the A4136.

## 6 The Neighbourhood Plan as a whole

6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The submitted Basic Conditions Statement has helped considerably in the preparation of this section of the report. It is a well-presented, informative and very professional document. It follows other submission documents in terms of its design, format and presentation.

6.2 The Plan needs to meet all the basic conditions to proceed to referendum. This section provides an overview of the extent to which the Plan meets three of the four basic conditions. Paragraphs 2.6 to 2.10 of this report have already addressed the issue of conformity with European Union legislation.

### *National Planning Policies and Guidance*

6.3 The key elements of national policy relating to planning matters are set out in the National Planning Policy Framework (NPPF) issued in March 2012.

6.4 The NPPF sets out a range of core land-use planning principles to underpin both plan-making and decision-taking. The following are of particular relevance to the Longhope Neighbourhood Plan:

- a plan led system– in this case the relationship between the neighbourhood plan and the adopted Core Strategy/Local Plan.
- recognising the intrinsic character and beauty of the countryside and supporting thriving local communities.
- proactively driving and supporting economic development to deliver homes, businesses and industrial units and infrastructure.
- actively managing patterns of growth to make the fullest possible use of public transport, walking and cycling.
- taking account of and supporting local strategies to improve health, social and cultural well-being.

6.5 Neighbourhood plans sit within this wider context both generally, and within the more specific presumption in favour of sustainable development, which is identified as a golden thread running through the planning system. Paragraph 16 of the NPPF indicates that neighbourhoods should both develop plans that support the strategic needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.

6.6 In addition to the NPPF I have also taken account of other elements of national planning policy including Planning Practice Guidance and recent ministerial statements.

6.7 Having considered all the evidence and representations available as part of the examination I am satisfied that the submitted Plan has had regard to national Longhope Neighbourhood Plan – Examiner's Report

planning policies and guidance in general terms. It sets out a positive vision for the future of the plan area and promotes sustainable growth. At its heart are a suite of policies that aim to bring forward sensitive housing development to meet local needs, to safeguard its inherent character and to identify and to allow for the improvement of valued community facilities.

- 6.8 At a more practical level the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraphs 17 and 154). This was reinforced with the original publication of Planning Practice Guidance in March 2014. Its paragraph 41 (41-041-20140306) indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. Policies should also be concise, precise and supported by appropriate evidence. As submitted the Plan does not fully accord with this range of practical issues. The majority of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

*Contributing to sustainable development*

- 6.9 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social and environmental. It is clear to me that the submitted Plan has set out to achieve sustainable development in the Plan area. In the economic dimension, the Plan includes policies to promote sensitive new residential development and to promote business development and working from home. In the social role, it includes policies to promote affordable housing and to protect important community facilities. In the environmental dimension, the Plan positively seeks to protect the distinctive character of the neighbourhood area. It seeks to preserve and enhance the conservation area and proposes a policy on biodiversity and landscape

*General conformity with the strategic policies in the development plan*

- 6.10 I have already commented in detail on the development plan context in the wider Forest of Dean District Council area in paragraphs 5.4 to 5.8 of this report.
- 6.11 I consider that the submitted Plan delivers a local dimension to this strategic context and supplements the detail already included in the adopted Core Strategy. The Basic Conditions Statement helpfully relates the Plan's policies to policies in the Core Strategy/saved Local Plan. I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development plan.

## 7 The Neighbourhood Plan policies

- 7.1 This section of the report comments on the range of policies in the Plan. In particular, it makes a series of recommended modifications to ensure that the various policies have the necessary precision to meet the basic conditions.
- 7.2 My recommendations focus on the policies themselves given that the basic conditions relate primarily to this aspect of neighbourhood plans. In some cases, I have also recommended changes to the associated supporting text.
- 7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is thorough and distinctive to the Plan area. The wider community and the Parish Council have spent considerable time and energy in identifying the issues and objectives that they wish to be included in the Plan. This gets to the heart of the localism agenda.
- 7.4 The Plan has been designed to reflect Planning Practice Guidance (41-004-20140306) which indicates that neighbourhood plans must address the development and use of land.
- 7.5 I have addressed the policies in the order that they appear in the submitted plan. In some cases, there are overlaps between the different policies.
- 7.6 For clarity this section of the report comments on all policies whether or not I have recommended modifications in order to ensure that the Plan meets the basic conditions.
- 7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

### *The initial sections of the Plan*

- 7.8 These introductory elements of the Plan set the scene for the range of policies. They do so in a concise and proportionate way. The Plan is presented in an exemplary and professional way. It is colourful and makes a very effective use of high quality photographs and maps. It makes a very clear distinction between its policies and the supporting text. It also draws a very clear connection between the Plan's objectives and its resultant policies. The Plan also includes three high quality maps.
- 7.9 The Introduction provides a very clear context to the neighbourhood plan process. In particular it sets out a brief chronology of the Plan's production and how this has overlapped with early elements of the production of the emerging Allocations Plan.
- 7.10 Section 2 sets out key information about the neighbourhood area that has influenced the preparation of the Plan. It includes an interesting description of the village itself, and an equally-interesting account of its wider landscape setting. It provides a fascinating commentary about the iconic May Hill, a geological outlier of the Malvern Hills (paragraph 2.14).

- 7.11 Section 3 provides commentary on the vision and objectives underpinning the Plan. It usefully relates the Plan's vision to the wider concept of sustainable development and to the main issues affecting the Parish itself.

#### Policies in General

- 7.12 The Plan policies are helpfully set out to respond to important identified objectives and key local issues. The presentation of the Plan will ensure that decision-makers have clarity on its policies. These are produced in a colour-coded fashion. The Plan is very easy to follow for both the decision-maker and the casual reader.

#### Policy PE1a Development within the conservation area

- 7.13 As its title suggests this policy sets out to identify the type of development that will be supported in the conservation area. Its approach generally reflects national guidance on conservation areas and seeks to ensure that its character should be preserved or enhanced.
- 7.14 I recommend modifications to the policy so that it has full regard to national policy and has the clarity required by the NPPF. These modifications reflect the national test for conservation areas, the repositioning of supporting text from the policy itself and making a direct relationship between the policy and the Policies Map (Map 1)

**Insert 'as shown on the Policies Map (Map 1) after 'Area'**

**Insert 'be supported where it preserves or enhances its character and appearance' after 'will'**

**Delete the remainder of the first paragraph and replace with:**

**'New development should be in harmony with and respect existing buildings'.**

**In the third paragraph of the policy delete 'Whilst the.... principles'**

**Replace 'should only be used if' with 'will be supported where'**

*Include the following additional text in the second section of 4.1.1:*

*'Policy PE1a sets out the Plan's approach to development in the conservation area*

*The policy also clarifies the Plan's approach to photovoltaic panels.*

#### Policy PE1b Development outside the conservation area

- 7.15 This policy sets out design standards for the remainder of the area within the settlement boundary. It does so in a very effective way. It appropriately addresses the quality of materials, the height of new buildings and their wider relationship to the surrounding landscape.
- 7.16 The policy meets the basic conditions.

## Policy PE2 Biodiversity and Landscape

- 7.17 The policy sets out to preserve and enhance biodiversity in the parish. It adopts a precautionary approach. This policy has the ability to contribute significantly to the delivery of the environmental dimension of sustainable development.
- 7.18 Key elements of the policy focus on development management processes (the preparation of an impact assessment) rather than to craft a traditional policy approach. I recommend a modification to address this matter. The recommended modification takes account of the representation made by Natural England on this matter. It also reflects the importance of the Wye Valley and Forest of Dean Bat SAC in the Plan area.

### **Replace the policy with the following:**

**New development proposals should be designed so that they do not have any unacceptable detrimental effect on biodiversity or wildlife in the Plan area. In particular new development proposals should respect the Wye Valley and the Forest of Dean Bat SAC.**

**Any development that has the potential to impact on bat roosts in non-designated areas should include appropriate mitigation measures.**

## Policy H1a Meeting Local Needs

- 7.19 This policy sets out to ensure that proposals for new residential development should include a mix of housing size and types to reflect the projected needs of the Plan area. It has a focus on delivering two and three bedroomed properties (to cater for younger families) and housing suitable for older persons. This policy has the ability to contribute significantly to the delivery of the social dimension of sustainable development.
- 7.20 I recommend two modifications to the policy. The first builds in a reference to emerging assessments of housing needs. Plainly this matter has the ability to be dynamic during the Plan period. The second deletes any reference to the Lifetime Homes standards. Whilst I appreciate that these standards have the ability to assist in the delivery of properties suitable for older persons national advice is clear on this matter. In March 2015, a written ministerial statement indicated that local plans and neighbourhood plans should not set any technical standards relating to the construction, internal layout or the performance of new dwellings. Plainly this is a matter that has overtaken the production of the submitted Plan.

**In the first sentence replace ‘Where possible’ with ‘Where appropriate’ and ‘the existing and projected needs’ with ‘the latest assessment of housing needs’.**  
**In the second sentence delete ‘(i.e. built to Lifetime Home standards)’ and replace ‘included’ with ‘incorporated in new residential proposals.’**

### Policy H1b Affordable Housing

- 7.21 This policy sets out to ensure that new residential developments should provide affordable housing to Core Strategy standards.
- 7.22 I sought clarification on this matter from both the Parish Council and FoDDC. The latter provided a helpful update on its ongoing implementation of Core Strategy Policy CSP5 and its relationship to national policy that has developed since its adoption. It is clear that the District Council has procedures in place to address this important matter. In all the circumstances, the policy in the submitted Plan does not add any local value to the current position. In particular the Plan area is identified as a 'rural area' under Section 157 (1) of the Housing Act 1985. On this basis, I recommend that the policy is deleted.

### Delete policy

### Policy H1c Windfall Sites

- 7.23 This policy sets out the Plan's supportive approach towards windfall developments. It makes its own linkages to brownfield land, low cost and affordable housing and the safeguarding of residential amenities.
- 7.24 The policy supports small scale development (as defined as minor development - up to 9 dwellings). Core Strategy policy CSP16 specifies that in Longhope and other 'service' villages small-scale development will be supported. In that Plan, 'small scale' is identified as single plots or pairs of houses. This issue also appears in Policy H1f as addressed later in this report. There is no direct evidence to support the maximum size of a residential development as set out in the policy. The Plan does not set out a substantive case to warrant an approach that departs from the adopted Core Strategy. As such I recommend the deletion of this element of the policy and its associated supporting text. Plainly the FoDDC has the ongoing ability to make day-to-day judgements on planning applications for windfall sites in general terms, and for given sizes in particular. This will inevitably take place on a site-by-site basis.
- 7.25 The policy also requires windfall sites to provide for low-cost or affordable homes. I have already addressed this matter in relation to Policy H1b. Given the recommended modification that I have proposed to the size element of the policy I also recommend that this element of the policy is deleted. This second modification will not in itself prevent affordable housing schemes coming forward in their own rights on brownfield sites or as a required component of an open market development (see paragraph 7.22 of this report).
- 7.26 The policy also refers to the need for windfall developments to 'comply fully with the policies and spirit of this NDP'. I recommend that this aspect of the policy is modified so that it refers more widely to development plan policies. This will then require that

such proposals comply with current and future FoDDC planning policies as part of the development management process. This recommended modification also removes any reference to the 'spirit' of neighbourhood plan and development plan policies. Plainly this has the ability to be interpreted in many different ways and as such would not have the clarity required by the NPPF.

**Delete '(i.e. minor development)' and 'that include low-cost...homes'.**  
**Replace 'fully with.... NDP' with 'with other policies in this Plan and with wider development plan policies'**

*Delete the references to minor development in paragraphs 4.2.5 and 4.2.6.*

Policy H1d Infill development

- 7.27 This policy sets out the Plan's approach to backland development. It reflects the potential for such development to come forward in the main village itself given its linear nature. The policy correctly identifies an appropriate range of criteria against which any such proposals will be assessed.
- 7.28 I recommend a modification to the policy so that it adopts a positive rather than a negative tone. In doing so the environmental safeguards that I have described above would remain.

**Replace 'will not be supported.... neighbouring properties either through' with 'will be supported where they safeguard the amenities of neighbouring properties by ensuring that there is not either an unacceptable'.**

Policy H1e Developer Contributions

- 7.29 This policy sets out the Plan's approach towards developer contributions. It requires that any planning application for new development contributes towards the delivery of community development.
- 7.30 The aspiration of the policy may naturally be met by a wide range of planning applications and by the implementation of other policies in the wider development plan. Nevertheless, there is a requirement for neighbourhood plan policies to meet the basic conditions. In this respect paragraph 204 of the NPPF is clear that planning obligations should only be sought where they are necessary to make the development acceptable in planning terms, where they are directly-related to the development and where they are fairly and reasonably related in scale and kind to the proposed development.
- 7.31 FoDDC has not yet adopted a Community Infrastructure Levy. It has however adopted a detailed Infrastructure Delivery Plan in 2015. This sets out the scale and nature of the infrastructure that will be needed to implement the policies and proposals of the adopted Core Strategy. It provides a clear context within which FoDDC can reasonably request developer contributions and how the monies

concerned can be applied. I recommend that the policy is modified so that it has regard to national policy and is in general conformity with the strategic policies in the development plan (and in this case how they are applied through the Infrastructure Delivery Plan). FoDDC has advised that the Infrastructure Delivery Plan is being refreshed. I reflect this in the recommended modification.

**Replace the policy with:**

**‘Where appropriate and in accordance with paragraph 204 of the NPPF, development proposals should make proportionate contributions towards the delivery of strategic infrastructure as set out in the Forest of Dean Infrastructure Delivery Plan (2015) or any equivalent replacement document’.**

Policy H1f Size of Housing Developments

- 7.32 This policy seeks to establish guidance on the size of future housing developments. The policy sets its own limit to that defined as minor development (up to 9 dwellings). The policy draws its own comparison with Core Strategy policy CSP16 which specifies that in Longhope and other ‘service’ villages small-scale development will be supported. In that Plan, small scale is identified as single plots or pairs of houses. The approach adopted mirrors that set out in Policy H1c Windfall Sites.
- 7.33 The approach has attracted a representation from a developer which comments that the identification of ‘minor’ development is arbitrary and un evidenced. It also refers to the inherent contradiction of the emerging Allocations Plan (and the associated main modification MM069) identifying land for housing development off Church Road for 28 dwellings.
- 7.34 Taking all the information into account I am not satisfied that the policy has the clarity required by the NPPF. Its two principal components are contradictory and will not assist in the effective delivery of the development management process. In addition, there is no direct evidence to support the maximum size of a residential development as set out in the policy. The Plan does not set out a substantive case to warrant an approach that departs from the adopted Core Strategy. As such I recommend the deletion of the policy and its associated supporting text.

**Delete policy**

*Delete paragraph 4.2.8.*

Policy H1g Density of Housing

- 7.35 This policy seeks to address the density of housing developments. Its first part seeks to ensure that new housing proposals do not have an unacceptable impact on local landscape character. Its second part comments that the maintenance of local character will have a higher significance than that of achieving the density figures identified in the Core Strategy.

- 7.36 I sought clarification from the Parish Council on the second part of the policy. In its response, the Parish Council acknowledges that FoDDC does not apply density policies in the Core Strategy as is implied by the language in the policy. It advises that community would prefer to see small low-density new developments.
- 7.37 I recommend that the policy is modified so that it has the clarity required by the NPPF and appropriately adds value to adopted Core Strategy policies. In particular the recommended modifications relate density considerations to local landscape character.

**Replace the policy with the following:**

**‘New development within the Plan area should respect the landscape character of the locality in which it is located. The density, layout and scale of housing developments should be designed in a way that does not have an unacceptable impact on local landscape character’.**

Policy H2a Design Standards

- 7.38 This policy requires high design standards for new housing development. It also outlines the need for high sustainability standards by reference to two specific design checklists. The final section of the policy sets out the need for new development to be resilient to the effects of climate change and flooding.
- 7.39 Good design is an integral part of national and local policy. Nevertheless, a direct reference to two specific design standards (Lifetime Homes and Building for Life) in relation to sustainability standards is onerous. In any event the March 2015 written ministerial statement indicates that local plans and neighbourhood plans should not set any technical standards relating to the construction, internal layout or the performance of new dwellings. Plainly this is a matter that has overtaken the production of the submitted Plan.
- 7.40 Taking all these matters into account I recommend that this component of the policy is deleted. I also recommend that the structure of the remaining parts of the policy is modified to take account of the deleted element and to have the clarity required by the NPPF.

**Delete ‘and built to a...criteria’**

**In the first sentence of the policy replace ‘Any’ with ‘All’**

**In the second sentence of the policy delete ‘In addition’**

Policy H2b Secured by Design

- 7.41 The policy sets out the Plan’s ambitions for the security of new developments. It does so by reference to a series of national non-statutory guidance notes.
- 7.42 Plainly there is an overlap here with my comments on the previous policy. However, in this case the policy refers to the spatial layout of new developments rather than the internal layout or performance standards of new dwellings.

- 7.43 I am satisfied that it would be appropriate to include a policy of this type in the Plan and that (as modified) it would meet the basic conditions. I recommend that the policy is modified so that it adopts a general format rather than one that refers to specific guidance. Plainly a developer would be able to adopt the more specific design codes that are widely promoted, including those mentioned in the submitted policy.

**Replace the policy with the following:**

**‘All new development should be designed in a fashion that would provide appropriate security for occupants and visitors alike’.**

Policy H2c Residential Car Parking Spaces

- 7.44 The policy sets out to ensure that new residential developments are self-sufficient in providing for their car parking needs. The second part of the policy refers to both NPPF and County Council guidance.
- 7.45 I recommend modifications to the policy so that it has the clarity required by the NPPF. Whilst as drafted it refers both to the NPPF and to County Council guidance in neither case are detailed standards identified. The recommended modified policy incorporates the approach adopted by paragraphs 35 and 39 of the NPPF into the initial part of the policy. In addition, the second part of the policy simply ‘encourages’ developers to use the methodology in the NPPF. I also recommend modifications to the structure of the policy so that it clarifies the types of proposals that will be supported.

**Replace the policy with the following:**

**‘Proposals for new residential development should provide sufficient off-street car parking spaces for their own needs and to prevent environmental and safety problems arising elsewhere. The car parking needs for individual developments should be calculated in accordance with the principles in paragraphs 35 and 39 of the NPPF.**

**The required parking provision should be sensitively integrated into the overall design of the development concerned’.**

Policy E1a Small Scale Business

- 7.46 The policy provides a positive context within which commercial development can take place within the Plan area. It has regard to national policy as expressed in paragraph 28 of the NPPF. The policy offers particular support for A1/A4/B1/B2/B8 uses. It includes appropriate environmental controls and safeguards.
- 7.47 The policy offers ‘encouragement’ to these uses. The policy would however provide the clarity required by the NPPF if it ‘supported’ the development of such uses. I recommend accordingly

**In both sentences of the policy replace ‘encouraged’ with ‘supported.’**

### Policy E1b Relocation of Businesses

- 7.48 As its title suggests this policy provides a supportive context for the redevelopment of existing employment sites which may present a series of environmental issues. It requires that there is no net loss of local employment.
- 7.49 I sought clarification from the Parish Council on this matter in general, and the types of uses that it had in mind. It advised on potentially emerging proposals on one site in particular. It was flexible on the type of uses that would arise on the original site following its redevelopment.
- 7.50 Plainly there is a degree of balance to be struck on this policy. It needs to have sufficient flexibility to achieve its ultimate ambition of enhancing the prospects for the local economy on the one hand and ensuring that the end uses are appropriate to the location of the site and development plan policies on the other hand. There is also a need to ensure that appropriate levels of local employment are safeguarded as part of the different developments.
- 7.51 I recommend modifications to the policy to reflect these differing requirements. They also bring the degree of clarity required both by the decision-maker and the developer.

**Replace ‘there is.....nature conservation measures’ with  
‘the following criteria are met:**

- **the development package includes proposals for the relocation of the existing employment use;**
- **the proposals for the redevelopment of the site are in accordance with development plan policies including other policies in this Plan; and**
- **the proposed redevelopment of the site can be satisfactorily accommodated without creating unacceptable impacts on the amenities of surrounding land uses and the capacity of the local highway network**

### Policy E1c Working from home

- 7.52 This policy actively supports the concept of working from home. The Plan recognises that this will assist in contributing towards the diversification of the local economy. The policy usefully identifies a series of criteria against which proposals can be assessed.
- 7.53 I recommend two modifications to the policy. The first clarifies that planning permission will not necessarily be required for all such proposals. The second inserts a degree of support for the tourism sector in the policy. This approach has been

suggested by the FoDDC Regeneration Manager. Such an approach also has regard to national policy.

**Replace ‘Planning permission.... light industrial use and’ with ‘Insofar as planning permission is required proposals for the use of part of a dwelling for office, light industrial or tourism uses will be supported together with proposals’**

#### Policy E1d Reuse of Farm Buildings

- 7.54 This policy has two separate parts. The first sets out a policy approach towards new uses within redundant farm buildings. The second sets out a policy approach towards further farm buildings adjacent to existing agricultural buildings.
- 7.55 I sought clarification from the Parish Council on the first component of the policy. As submitted it does not specify the types of new uses that would be supported (other than that they comply with other policies in the Plan). This does not have the clarity required by the NPPF. The Parish Council commented that the type of uses it had in mind were tourist accommodation, tourism activities and art/gallery uses. I reflect these uses within a recommended modification to the policy. The Parish Council has also helpfully responded to an additional matter of clarification on this policy. It has confirmed that the second part of the policy applies specifically to the proposed development of additional farm building for agricultural use. I recommend that the policy is modified to reflect this point. I also recommend a modification to the second part of the policy by way of deleting unnecessary text.

**Replace ‘Applications for new uses of...farm buildings’ with ‘Proposals for the use of traditional farm buildings for tourist accommodation, tourism-related activities and art and craft-related activities’**

**In the second sentence of the policy insert ‘for agricultural use’ between ‘buildings’ and ‘adjacent’.**

**In the second sentence of the policy delete ‘normal planning consent and’ and replace ‘conformity to’ with ‘conformity with’.**

#### Policy AM1a Traffic Congestion

- 7.56 This policy is an important mechanism to ensure that new development does not add to existing issues in relation to congestion and car parking. It effectively requires that new developments provide an appropriate degree of car parking to meet their own needs. It also provides policy advice on proposals which may increase the number of access points onto the highway or which would in more general terms involve an increase in traffic generation.
- 7.57 I sought clarification from the Parish Council on the policy’s reliance on other policies in the submitted Plan and paragraph 35 of the NPPF. I was advised about the

specific policies in the Plan and the importance of the NPPF to the circumstances in the Plan area.

- 7.58 I am satisfied that there is a need for the policy, and that it has the ability to add local distinctiveness to national policy. However, I recommend modifications to the policy so that it has the clarity required by the NPPF. In particular I recommend that the policy adopts a positive approach towards identifying the basis on which local proposals will be supported rather than making a very general comment that they need to comply with the NPPF and other policies in the Plan.

**Replace the first sentence of the policy with the following:**

**‘Proposals that promote the use of sustainable transport modes for the movement of goods or people will be supported’.**

**In the second sentence of the policy replace:**

**‘Proposals.... seek to’ with ‘Insofar as planning permission is required proposals that would’;**

**‘will need to demonstrate that’ with ‘will be supported where’; and**

**‘conditions of parking stress’ with existing parking issues’**

**Delete ‘especially.... leading off’**

*At the end of paragraph 4.4.2 add:*

*Policy AM1a sets out the Plan’s approach both to the promotion of sustainable means of transport and the need for new developments to meet their own car parking requirements. This is particularly important in and around particular sections of Church Road where its inherent narrowness can generate pedestrian and vehicle conflicts.*

Policy AM1b Public Car Parking Places

- 7.59 The policy sets out to support proposals for public car parking facilities either in their own right or as part of wider new development proposals. It helpfully identifies criteria against which such proposals can be assessed. The second part of the policy identifies that where new development proposals are located near the centre of Longhope they should provide public car parking provision.
- 7.60 I am satisfied in principle that the first part of the policy meets the basic conditions. It reflects the restricted nature of Church Road and the limited availability of public car parking to access the various retail, commercial and other services it has to offer. The second part of the policy is however unreasonably onerous on private developers. It takes no account of viability or security/site management issues. In any event it fails to clarify the types of schemes to which it would apply and the extent of public car parking required. I recommend that it is deleted from the policy. Plainly there would be no reason why a developer could not provide public car parking as part of a wider package if it was viable and otherwise appropriate.

- 7.61 I recommend modifications to the retained part of the policy to bring the clarity required by the NPPF and to delete unnecessary text. In particular the recommended modifications will ensure that proposals need to meet all of the three identified criteria.

**Delete ‘in the parish’**

**Replace ‘in their entirety’ with ‘in their own right’**

**Insert ‘and’ after the second criterion**

**Delete the second part of the policy.**

Policy AM1c Access and Parking for the school

- 7.62 This policy reflects parking issues associated with the Hopebrook School. It seeks to ensure that proposals that might lead to a significant increase in pupil numbers at the school will only be supported where they include sustainable transport measures. The policy also requires that those proposals should give consideration to the provision of convenient off-street parking for those delivering and collecting children from the school.
- 7.63 I have sympathy with the approach proposed by this policy. Nevertheless, it will be impractical to implement through the development management process. There is no direct connection established between the development concerned and the need for the provision of sustainable transport measures at the school. Equally the policy does not identify the land that would otherwise be needed for such facilities. In any event national policy (in the NPPF paragraph 204) is clear that developer contributions for works of this nature should only be sought where they are necessary to make the development acceptable in planning terms, where they are directly related to the development and where they are fairly and reasonably related in scale and kind to the development itself. It may well be that the ambitions of this policy could be delivered indirectly through the implementation of Policy H1e of this Plan (as recommended to be modified).

**Delete policy**

Policy AM1d Business Traffic

- 7.64 This policy has two separate parts. The first indicates that business and other organisations should make provision for staff and visitors (in consultation with FoDDC and the Parish Council). The second requires that new employment development should make provision for the unloading and turning of delivery vehicles within the site concerned.
- 7.65 As submitted the first part of the policy is aspirational. There is no direct mechanism in the planning process to make this aspiration happen in a practical sense. It is likely that many of the businesses in the area will have been in operation for many years

and as such whatever parking issues they may experience will be beyond planning control. I recommend a modification to this part of the policy so that it adopts a more permissive format. This will provide a supporting context for developments of this nature as they may arise during the Plan period.

- 7.66 The second part of the policy is entirely appropriate to the Plan area. Nevertheless, I recommend modifications so that it has the clarity required by the NPPF.

**Replace the first sentence of the policy with the following:**

**‘Proposals to establish or to expand car parking provision for staff and/or visitors at business or other commercial enterprises will be supported’.**

**In the second sentence of the policy replace ‘For a new.... Map 1)’ with ‘Proposals for new employment development within the main settlement area as shown on the Policies Map should make’ and delete ‘should be made.’**

Policy AM2 Pedestrian Access

- 7.67 This policy sets out key principles guiding public accessibility to all new developments. It has regard to national policy by providing a direct linkage to paragraph 35 of the NPPF. The policy provides very specific detail for the levels of accessibility required. However, on balance I am satisfied that it will provide the level of clarity required by the NPPF to all concerned in the development management process. In any event the safe access to be provided will collectively satisfy the needs of the various groups identified in the policy.
- 7.68 I recommend a modification to the policy so that it provides a degree of flexibility to FoDDC in the exercise of its development management responsibilities. As submitted the policy is very absolute.

**Replace ‘must’ with ‘should.’**

Policy C1 Protection of Community Facilities

- 7.69 The policy celebrates the range of community facilities in the Plan area. These facilities are also more generally described in paragraph 4.5 of the Plan. The policy has two parts. The first sets out to safeguard four identified facilities. The second sets out a series of alternatives in the event that the existing village shop should close.
- 7.70 The first part of the policy in general terms has regard to national policy and is in general conformity with the strategic policies of the development plan. I recommend a modification to this part of the policy so that it has the clarity required by the NPPF and delivers the objectives identified in the supporting text. In particular I recommend that the policy has sufficient flexibility to reflect changing circumstances or the establishment of new facilities which may meet the identified community needs in a different way. The second part of the policy does not have the required format to operate as a policy. It is more aspirational in tone. In the event that the existing shop

should close it 'would wish to see' another shop unit take its place (this would not need planning permission), another shop to open in other premises central to the village (no premises are identified) or the use relocated into a new small-scale development (no premises are identified). For these reasons, I recommend that this part of the policy is deleted. In practical terms, any proposal for a new or replacement retail unit in the central part of the village would be likely to be supported without the need for a specific policy in the neighbourhood plan.

**Replace the first part of the policy with the following:**

**The following facilities are identified as important community facilities:**

**The recreation field;**

**The tennis courts;**

**The children's play area; and**

**The allotments**

**Proposals that would result in either the loss of, or significant harm to an important community facility will not be supported unless it can be clearly demonstrated that the operation of the facility, or of another community use of the facility, is no longer economically viable, or that there is an alternative facility available to meet the identified community needs in the Plan area**

**Delete the second part of the policy**

*At the end of paragraph 4.5 add:*

*Policy C1 identifies four important community facilities and safeguards them for this purpose.*

Policy IF1 Flood Risk Management

- 7.71 This policy sets out the Plan's approach on flood risk management. It requires that any new proposals should conform to the NPPF and to the Longhope hydrological studies. This approach reflects a strong community support to address the important local issue associated with the flooding of Hope Brook. This is confirmed in the response from the Parish Council to my clarification questions.
- 7.72 Plainly it is important that these issues should be articulated within the Plan. However, the policy as submitted does not specify to a developer what will and will not be supported. Its focus is on requiring conformity with national policy and with FoDDC-commissioned work. I recommend a modification to the policy so that it has the clarification required by the NPPF. This will be particularly valuable both to the decision-maker and to the developer.

**Replace the policy with the following:**

**'Inappropriate development in areas at risk of flooding will not be supported unless:**

- **it can be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk as**

informed by a Strategic Flood Risk Assessment where one has been prepared; and

- a site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall’.

*Insert the following text at the end of paragraph 4.6:*

*Policy IF1 sets out the Plan’s policy towards developments in areas at risk of flooding. All new developments in the Plan area should have regard to paragraphs 100-103 of the NPPF and should take account of the Longhope hydrological surveys commissioned by the District Council.*

Policy IF2 Waste and Water

- 7.73 This policy sets out the Plan’s approach to waste water and water supply capacity. This is particularly important given that the majority of the built development in the Plan area is concentrated in Longhope village and which is itself restricted within the confines of the Longhope Brook valley.
- 7.74 The approach adopted is appropriate in general terms. I recommend a modification so that it is clear how a developer needs to comply with its requirements.

**Replace ‘will be required’ with ‘should’.**

Other matters

- 7.75 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 FoDDC and the Parish Council to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

*Modification of general text (where necessary) to achieve consistency with the modified policies*

- 7.76 I have commented earlier in this report about the quality and the presentation of the submitted documents. This quality also extends to the three submitted maps (Map 1- the Allocations Plan, Map 2 – the Parish Boundary and Map 3 Defined Settlement Boundary). These maps have been very helpful as part of the preparation of the neighbourhood plan and in engaging the general public in a clear and legible way. They have also been hugely helpful as part of the examination process
- 7.77 Nevertheless in the event that the Plan is ‘made’ it will become part of the development plan and will need a degree of clarity as a Policies Map. On this basis, I recommend that two maps are retained. The first would be what is currently Map 2

(the neighbourhood area). The second would be the 'Policies Map' based on what is currently Map 1. For the purposes of the 'Policies Map' I recommend the following changes to Map 1:

- the inclusion of the relevant policy number in brackets after each relevant part of the key
- the removal of the Housing Allocations from the Map and the key – they are proposals in the emerging Allocations Plan and not in the Neighbourhood Plan
- the inclusion of a title as follows: Longhope Neighbourhood Development Plan 2016-2026 Policies Map

*Replace Maps 1 and 3 with one Policies Map to the specification set out above.*

- 7.78 Comments from the Parish Council and the developer concerned have identified that the precise boundaries of site AP79 Church Road need to be amended to reflect the current Allocations Plan position. I recommend accordingly.

*Correct the boundaries to the site in the FoDDC Allocations Plan AP79 as shown on page 6 to reflect Main Modification MM069 of the Allocations Plan.*

- 7.79 The Plan's supporting text on housing matters (Section B) properly sets the scene for the variety of housing policies H1a to H1g and H2a to H2c. I have recommended a series of modifications to some of these policies earlier in this report. There are however certain elements of the supporting text which make policy type statements and which run the risk of conflicting with the policies that would appear in any 'made' neighbourhood plan. In particular:

Paragraph 4.2.4 makes a sweeping statement that 'further exception sites are therefore unlikely to be required in the parish over the life of this NDP'. This may prove to be the case however there is no evidence provided to substantiate the statement in the Plan.

Paragraph 4.2.7 comments that 'excluding schemes that have already been granted planning permission no further development outside the existing settlement boundary is envisaged or supported'. This is a similarly sweeping statement that is without detailed evidence and does not have regard to national policy.

- 7.80 I recommend modifications to address these matters. In 4.2.4 I recommend that the full sentence is deleted. In 4.2.7 I recommend that the tone of the sentence is modified so that further development outside the settlement boundary is not 'anticipated'. This would be in general conformity with the development plan. In addition it would not prevent potentially-acceptable development coming forward that otherwise had regard to national policy and addressed a particular set of local circumstances at some point within the Plan period.

*In 4.2.4 delete the sentence referenced above*

*In 4.2.7 replace 'envisaged or supported' in the sentence referenced above with 'anticipated'.*

## 8 Summary and Conclusions

### *Summary*

- 8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2026. It is concise and distinctive in addressing a specific set of issues that have been identified and refined by the wider community.
- 8.2 Following my independent examination of the Plan I have concluded that the Longhope Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood plan subject to a series of recommended modifications.
- 8.3 This report has recommended a series of modifications to the policies in the Plan. Nevertheless, it remains fundamentally unchanged in its role and purpose.

### *Conclusion*

- 8.4 On the basis of the findings in this report I recommend to the Forest of Dean District Council that subject to the incorporation of the modifications set out in this report that the Longhope Neighbourhood Plan should proceed to referendum.

### *Referendum Area*

- 8.5 I am required to consider whether the referendum area should be extended beyond the Plan area. In my view, the neighbourhood area is entirely appropriate for this purpose and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the Plan should proceed to referendum based on the neighbourhood area as approved by the District Council on 19 September 2013.
- 8.6 I am grateful to everyone who has helped in any way to ensure that this examination has run in a smooth and efficient manner.

**Andrew Ashcroft  
Independent Examiner  
31 August 2017**