

From: [REDACTED]
To: ["PlanningPolicyConsultation@communities.gov.uk"](mailto:PlanningPolicyConsultation@communities.gov.uk)
Subject: Forest of Dean District Council formal response - Proposed reforms to the National Planning Policy Framework and other changes to the planning system
Date: 24 September 2024 17:58:09
Attachments: [NPPF 2024 Consultation - FODDC Response.pdf](#)

Dear Sir/Madam,

Please consider this correspondence, along with the attached document, the formal response on behalf of Forest of Dean District Council (FODDC). The response has been endorsed by the Cabinet Member for Planning Policy and Local Plans, Cllr. Sid Phelps.

We would like to take this opportunity to highlight the Council's main concerns as follows:

- a. FODDC does not consider the proposed standard methodology to be a true calculation or representation of the number of homes that are needed in an area. It is an overly simplistic 'one size fits all' calculation. There may be important local circumstances, such as the Statutory Forest within the FODD, flood zones and other designations such as National Landscape areas (formerly AONB) and Special Areas of Conservation (SAC), that justify an alternative housing need calculation.
- b. FODDC consider that the current proposed amendments go too far in increasing the additional housing burden to rural areas whilst relaxing that burden in urban areas. Urban areas are far more sustainable and better served by facilities and services so there should still be an urban bias. With a proposed increase of 81% in housing need in the FODD, at the very least improved transport infrastructure will be required to support such growth in a sustainable manner.
- c. FODDC want to avoid being placed in a position whereby 'Planning by Appeal' becomes prevalent as a result of changes being introduced in the NPPF. FODDC recommend that a transition period is introduced giving Councils time to adapt to the new requirements (including dealing with mitigating matters such as the Statutory Forest, flood zones and other designations such as National Landscape areas (formerly AONB) and Special Areas of Conservation (SAC)) whilst not exposing the Council and its residents to poor planning applications. Whilst FODDC are supportive of additional housing, especially affordable housing and social rented housing, including a presumption in favour of appropriate and sustainable development in the right circumstances, the Council is concerned that without amendment, the proposal will leave it exposed to inappropriate development in inappropriate locations through Planning Appeals.
- d. **With specific regard to the Forest of Dean District, it is a unique area of the country constrained by a large national statutory forest, where no development can take place as it is crown land. Furthermore, it has one of the largest populations of bats nationally, which severely constrains the potential for development.**

Further comments we would like to add, but are not necessarily appropriate for inclusion within the main consultation response:

- The need for all new and converted housing to comply with the National Space Standards and the principal roofs to new buildings to be orientated between SE and SW to permit the fitting of a PV array either at construction stage or later, and the avoidance of the use of dormers on such slopes;
- Is the Government prepared to upgrade the thermal insulation and ventilation requirements of the Building Regulations to meet the higher standards achieved in Ireland and elsewhere in Europe?;
- Will the Government prioritise a fabric first approach to new buildings to permit the use of Passivhaus standards as an alternative to Building Regulations and the use of PVs and

heat pumps as a secondary measure? The 20 year design life of these components is far less than the life of the building they serve and are costly to replace. There is no benefit in Developers producing sub-standard buildings that are not future-proofed and need upgrading within 5-15 years. There should be some form of commitment to build social rent housing at least to these higher standards so tenants have much lower bills.

Please refer to the attached document for the full formal response.

Kind regards,