Lydney NDP2 document, Design Guide and Masterplan Consultation responses (18th February 2026 and 1st April 2026)

ID NUMBER	Consultee Name	Comment
LNDP2 1	Royal Naval	Support
LNDP2 2	A Midgley	I have now read the new plan released today and in general agree with the content and philosophy behind it. However I was disappointed that the provision of improved medical facilities following the closure of the Community Hospital was hardly mentioned. There is reference to the redevelopment of the old Coop Building but no mention of its future use as a well being and medical facility for the town as the 2 existing GP practices are not adequate for the future development of the population both in numbers and age profile. We have been promised this redevelopment for several years but so far there seems to be no urgency around its progress with the building starting to deteriorate and dates for starting work on it being continuously deferred. By making no mention of it in the plan it suggests that it is of little importance to the towns future!
LNDP2 3	National Highways	Thank you for providing National Highways with the opportunity to comment on the revised Lydney Neighbourhood Development Plan (Lydney NDP2) submission draft. National Highways is responsible for operating, maintaining and improving the strategic road network (SRN) which in this instance consists of the M5 motorway running to the east of the Plan area and the A40 trunk road to the north. We are interested in the traffic impact of any future development proposal and specifically the impact of growth on the continued safe and efficient operation of the SRN. In respect of traffic and transport, Plan polices should ensure development mitigates its traffic impact on the surrounding network which includes reducing the reliance on the private car by requiring development to both safeguard and improve local facilities, services, and sustainable transport options. Following our review of the submission draft we are satisfied that the proposed policies within the draft Neighbourhood Plan are unlikely to result in development which will adversely impact the SRN and we therefore have no specific comments to make on the document. This does not however prejudice any future responses National Highways may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the prevailing policy at the time.
LNDP2 4	Community Campaigner	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse.
LNDP2 5	J Bourton	Policy RLP. 70. Land at Winding Wheel, Bream This land is currently unused other than for dumping rubbish. It is a wasted potential resource in its current state. It is very suitable for development for the village. The plan for new dwellings including local affordable housing for those with local connections will provide opportunities for many. I fully support this development.
LNDP2 6	K Chapman	Object The infrastructure is not capable of coping with the current traffic . Unless the roads , especially through Chepstow are improved we will soon be gridlocked. Plus schools , GP.s , Dentists etc require increased capacity
LNDP2 7	N Wood (Futurecell Ltd)	Object I object due to traffic. Our area is becoming polluted and we wine is constantly stuck in traffic. There are also not enough doctors or dentist to support extra residents.
LNDP2 8	L Caddick	Object There is not a sustainable traffic solution to manage the traffic that will be caused by this development. De-valuing property in the area and worsening the environment
LNDP2 9	Dr M Evans	Transport - page 73 onwards

		Object There is a total lack of impact assessment on the transport implications for the plans for additional residential housing in Lydney. I can see no mention of engaging with Monmouth CC regarding the significant road congestion issues current and additional houses along the A48 will bring to Chepstow and the South Forest of Dean area. We live in Tutshill and the traffic conditions are terrible in getting in and out of the village and beyond through Chepstow. This is predominantly been caused by all the additional housing developments in Lydney over recent years. The plan fails to acknowledge that a large proportion of the new houses in Lydney are occupied by people working in Bristol. They purchase property in Lydney as it's significantly cheaper than Bristol. This situation can be clearly seen every day with the queues of traffic for miles along the A48 going into Chepstow. There are no indications in the plan for improvement to in the major roads linking Lydney to the south and through to Bristol. The development of the station will not assist with relieving this traffic situation. A key reason why people use their cars to get to work in Bristol is that there is no direct train service going from Lydney / South Forest to Bristol, it goes to Cardiff. The Forest of Dean council and Gloucestershire CC need to address these significant strategic transport issues before any further housing developments are approved in Lydney and the South Forest area.
LNDP2 10	J Boon	All documents. You use cryptic document names and acronyms. There are hundreds of pages of dense material mostly describing history or current facts. To search for changes and updates to the policy takes hours. Members of the public cannot expect to digest all this material. There needs to be a better way of conveying the core information in the plan otherwise the public won't be in a position to fully understand and make appropriate comments. Maybe a video would help? the material is not easy to consume on mobile devices presentations are hard to attend when people are working during the day also the plan does not contain the latest housing areas set out in the FoDDC revised local plan. Hi I tried to submit this through your terrible website but just got a spinning progress wheel and no confirmation. Please can you extend the deadline for comments until your website is fixed and everyone has had the opportunity to submit conments using a facility that works? Otherwise you will be basing the plan on a public consultation in which the public were not consulted. I also do not believe the documents presented are suitable for commenting on. The names are unclear and there are multiple sometimes contradictory documents. Here are my comments - please collate them with other feedback. All documents: You use cryptic document names and acronyms. There are hundreds of pages of dense material mostly describing history or current facts. To search for changes and updates to the policy takes hours. Members of the public cannot be expected to digest all this material and sift the key plans. There needs to be a better way of conveying the core information in the plan otherwise the public won't be in a position to fully understand and make appropriate comments. Maybe a video would help? For example - finding the location of the proposed town square takes a lot of reading and then a 'where's wally' search of the town map I believe you are proposing a new town square outside coop. How will cars access the car park along the side of that building? The material is not easy to consume on mobile devices. In person presentations are hard to attend when people are working during the day

		Also the plan does not contain the latest housing areas set out in the FoDDC revised local plan.
LNDP2 11	Natural England	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. It is Natural England' intention via this letter to outline our position on any interim Neighbourhood Plans that may come forward in advance of the new FoD Plan that is emerging ahead of it becoming adopted. It is our expectation that the Lydney Neighbourhood Plan (NP) will be in conformity with the emerging overarching Local Plan for the Forest of Dean when it is adopted, whereby all gathered impact pathway environmental evidence can be examined and considered as 'in combination', linked to all plans and projects coming forward within that Plan period. This would thus be legally compliant with the regulations linked to Habitats and SSSi's. Any new NP's coming forward that are delivering a housing allocation will need to demonstrate that they are legally compliant with the Habitat Regulations and SSSI Regulations and have current evidence driven policies that ensure that there are no adverse impacts on local and extra local protected sites. Where there is an overarching adopted Local Plan, then these regulations are generally addressed through that process. We note that until the emerging Local Plan for the Forest of Dean has been adopted there will be no additional allocations coming forward within Lydney Neighbourhood Plan area. Consequently, the already agreed housing allocations within the current plan would still hold and be acceptable in line with existing evidence base and would not be required to adopt the process outlined above, for this was agreed at the last local plan phase. With regard to the Master Planning and new Design Codes we have no comments to make. We hope this advice and guidance is helpful in enabling you to move forward your Neighbourhood Plans ahead of the Forest of Dean Local Development Plan being adopted. We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.
LNDP2 12	Canal & River Trust	We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Canal & River opportunity to input into planning policy related matters to ensure that our waterways are protected, safeguarded and enhanced within an appropriate policy framework. The Lydney canal is not owned or cared for by the Canal & River Trust. The Trust has no waterways, assets or land interests within the area covered by the document and as such we have no comment to make.
LNDP2 13	Sport England	Government planning policy, within the **National Planning Policy Framework** (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important. Therefore, it is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 103 and 104. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

		Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 104 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery. Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work. http://www.sportengland.org/planningtoolsandguidance If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes. http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/ Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place. In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals. Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved. NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing Sport England's Active Design Guidance: https://www.sportengland.org/activedesign *(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)* If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

LNDP2 14	Coal Authority	The Coal Authority is a non-departmental public body sponsored by the Department for Energy and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas. Our records indicate that within the Lydney Neighbourhood Plan area there are recorded coal mining features present at surface and shallow depth including; mine entries, coal workings and reported surface hazards. These features may post a potential risk to surface stability and public safety. It does not appear however that the Neighbourhood Plan proposed to allocate any new sites for development and on this basis we have no specific comments to make on this consultation document.
LNDP2 15	FoDDC Senior Conservation Officer	I am writing to you in response to your consultation on your Draft Neighbourhood Development Plan (LNDP2) which is currently at Regulation 15 stage. This response will be limited to comments in relation to the prepared list of Non-Designated Heritage Assets (NDHA). As you will be aware, preparing a local list is a useful tool to celebrate the importance of local heritage and preserving local character and distinctiveness. As such, these designations enable the significance of local heritage to be taken into account in planning applications which affect NDHAs whether that be directly or indirectly. Where NDHA have been included in a local list these will be added to the Historic Environment Record (HER) to ensure that they can be identified by applicants prior to submitting a planning application. However, to ensure the value of a local list, it must be prepared using clear selection criteria to ensure a consistent approach to the identification and management of NDHA. Historic England have provided detailed guidance on producing local lists, including selection criteria in Advice Note 7, which is linked to below. Forest of Dean District Council (FoDDC) also has guidance on this on our website. A link to this can be found here. Before going further in providing my more detailed comments on the NDHA list as part of the LNDP2, it is important to understand the national policy context. *National Policy – National Planning Policy Framework (NPPF)* The NPPF defines a heritage asset as: '*A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.'* and Chapter 16 of the NPPF notes that heritage assets are an 'irreplaceable resource' which should be conserved in an appropriate manner for the enjoyment of present and future generations. When considering planning applications which affect a NDHA, the Local Planning Authority (LPA) must come to a balanced judgement regarding any detrimental impact a proposal may have on the significance of a NDHA. It is important to note that the NPPF also notes that the protection and enhancement of the historic environment (which includes buildings and structures) forms one of the three pillars of sustainable development: the environmental objective. *National Policy – PPG: Historic environment* This supporting document to the NPPF explains that the majority of buildings have little or no heritage significance. Only a minority of buildings have enough heritage significance to merit identification as a NDHA. The document goes on to advise that regardless of how the NDHA is identified, the evidence and the reasons for designation must be clear and based on sound evidence. As part of this, plan making bodies (including town and parish councils) should make it clear what the selection criteria is. Significance is defined as either archaeological, architectural / artistic, or historic interest. Clearly articulating the nature, extent and importance of significance (including its setting if relevant) is very important for assessing the impact of a planning application and its overall acceptability. *Observations and Feedback* FoDDC is pleased to support any town or parish council producing a list of NDHA as this is a valuable mechanism for effective and transparent decision making within the planning process. However, to ensure that decision making is effective, consistent and ensures that what makes a NDHA significant is preserved, it is essential that its reasons for identification are clear and based on sound evidence and criteria as per national policy. Having reviewed the list of identified NDHA both within the LNDP2 and the separate supporting document, I have a number of concerns. At this stage I am not commenting of the merits of the NDHAs which have been identified, rather flagging areas which significantly reduce the effectiveness of your list within the planning process. • No selection criteria or evidence base has been set out. Therefore, the list does not comply with national guidance or Historic England's supporting guidance document. The section criteria and evidence base relied on can be different from that identified by Historic England and

		FoDDC as long as the rationale behind it is clearly articulated. I note at the start of the supporting NDHA list you have identified that cultural, heritage and architectural value have been considered, but this is not a clear selection criteria or methodology. • The list fails to include buildings already identified within the Conservation Area appraisal and therefore is not consistent with FoDDC long established guidance. These buildings should be included for consistency unless you consider that they are not worthy for inclusion. This is for two reasons (1) the conservation area appraisal may be updated in the future and (2) to support the appraisal as it is now 21 years old and not considered to be up to date. An up to date conservation areas appraisal is generally regarded as one which is no older than five years. • Limited identification – a map and / or photograph showing each identified NDHA should be provided. The address in some instances is not sufficient to identify the building for those without local knowledge. Therefore, it does not meet national policy requirement for NDHA to be clearly identified. • Insufficient explanation of why the building is significant enough to warrant identification as a NDHA. It is essential to articulate where the significance of the heritage asset lies to ensure that this can be protected in the planning process. This would likely be easier to set out if you have clear selection criteria to rely on. This must be realistic with regards to what can be controlled through the planning process. Given the nature of the concerns raised above, I would suggest that Historic England and national policy guidance is revisited to ensure that the NDHA list properly accords with these documents. I also suggest that it may be beneficial to look up lists produced by other neighbourhood development plans and LPAs to see how they approach it. At this stage, the NDHA list lacks the robustness required in the planning process. As a more general comment, I note that the list of NDHA only includes buildings, which is perfectly acceptable. However, I wanted to make sure that you are also aware that a NDHA can be and area (for example a public space), site or monument. Therefore, should you wish, and have the criteria and evidence base to do so, you could also include other aspects of the historic environment which you consider are worthy of consideration as a NDHA.
LNDP2 16	Gloucestershire Police Crime Prevention Team	Object – Make observations. Throughout the Design Code numerous references are made about securing property and including security, yet there is no advice or direction that could assist anyone using this guidance in the future. It would be good to see reference to Gloucestershire Constabulary's Designing Out Crime Officer (DOCO) who would be happy to offer current information for new or existing developments.
LNDP2 17	Pegasus obo Hitchins	Pegasus Group are instructed to prepare and submit representations to the revised Lydney Neighbourhood Development Plan (LNDP2) 2025-2043 (Regulation 16 submission draft) on behalf of our client Robert Hitchins Ltd. At the outset the considerable time and effort put into the preparation of the Neighbourhood Plan by the local community is acknowledged. Regulation 16 Lydney Neighbourhood Plan 2.1 A neighbourhood plan should support the delivery of strategic policies set out in the local plan. 2.2 NPPF paragraph 13 states: “Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.” 2.3 Paragraph 30 of the NPPF states: “Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.171” 2.4 The current development framework for the Forest of Dean District Council (FODDC) consists of the Core Strategy (2012), the Allocations Plan (2018), and the Cinderford Northern Quarter Area Action Plan (2012). Collectively, these documents set out the District’s development strategy up to 2026. 2.5 As the current Local Plan only provides the development strategy up to 2026, FODDC is in the process of preparing a new Local Plan, which

		will provide an updated development strategy up to 2045. 2.6 The latest Forest of Dean District Revised Draft Local Plan (Regulation 18 Consultation Version, February 2026) states that the housing requirement over a 20-year period to 12,080 dwellings. Table 2 in the Local Plan states that the total potential which includes an allowance for small sites and the carry forward of existing allocations is 13,431 dwellings. The strategy is to concentrate housing growth at the main towns including Lydney where there is best access to services, facilities, jobs and infrastructure. Housing and employment growth will also be centred at two new settlements. The strategy promotes development around Lydney in order to enhance its role in supporting the district as a whole. It is noted that: ”An emphasis is given to new development at Lydney, albeit through the implementation of existing commitments and an addition to the west of the town. 2.7 In response, Draft Policy RLP.5 of the Revised Draft Local Plan allocates land at Lydney for approximately 1,800 dwellings, from both new and existing allocations. Most of this development is currently envisaged through existing allocations and commitments to the east of the town, with one new allocation of up to 450 dwellings to the west. This is due to the recognition of the continued growth of Lydney in order to enhance its role in the FODDC as the largest single settlement and to benefit other areas from its increased importance. Lydney will accommodate 14% of the new development envisaged within the Local Plan period (paragraph 4.20 of the revised draft local plan). 2.8 However, within the LNDP2 no housing allocations are proposed. It is noted that the LNDP2 does not reference the proposed allocation to the west of Lydney as proposed in the Local Plan Review. Map 2 of the LNDP2 should reflect the proposals in the emerging Local Plan Review. In respect of east of Lydney we have made representations on the emerging Local Plan regarding necessary changes to its Proposals Map and this is picked up in Section 3 below. 2.9 The LNDP2 should align with the emerging Local Plan to ensure that neighbourhood-level policies complement the broader Local Plan. A failure to align with the emerging draft local plan risks the Neighbourhood Plan quickly falling out of general conformity and being superseded and thereby rendered out of date once the new Local Plan is adopted. 2.10 The vision objective of the LNDP2 is to bring the existing Lydney Neighbourhood Plan (2014-2024) up to date and extend its life to 2043 by further building upon its vision, objectives and policies. Not being in conformity with the emerging local plan is inconsistent with this objective. It should therefore be reviewed considering the significant increase in housing need, particularly given Lydney’s status as one of the District’s most sustainable settlements where new housing allocations have now been identified as being required. 2.11 Pegasus have recently submitted representations in response to the Regulation 18 consultation on the emerging Local Plan, seeking the reconsideration of the proposed employment area south and southeast of Crump Farm (as shown on the Illustrative Masterplan at Appendix 1) for residential development. The site has been marketed for employment uses for some time and to date no serious interest has been shown. 2.12 It has been demonstrated that the site, which is located within the existing settlement boundary of Lydney, comprises a logical extension and is suitable for residential development which would not extend into the open countryside through its containment by surrounding approved development and the A48 to the east. 2.13 Furthermore, the site is conveniently located to services and facilities, being located within proximity to the neighbourhood centre which is set to come forward as part of the mixed use outline planning application P0745/18/OUT and via an enhanced bus service which will serve the site and provide direct and frequent access into Lydney town centre and Lydney railway station. The site is therefore located in a highly sustainable location for further residential growth. 2.14 The land to the south and southeast of Crump Farm is therefore considered the optimal site to be included as a housing allocation to meet Lydney’s housing needs. 2.15 The PPG at paragraph 09 provides guidance if a Neighbourhood Plan was to come forward before an up-to-date Local Plan and states: “Although a draft neighbourhood plan or Order is not tested against the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up-to-date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development.” (my emphasis). 2.16 Given the changes that have arisen since the initial drafting of the Neighbourhood Plan, it is considered that the Parish Council, in line with the Planning Practice Guidance at paragraph 009, should re-engage with FODDC, as the local planning authority, to clarify the relationship between: •the emerging Local Plan (or spatial strategy); •the adopted development plan; and •relevant national policy and guidance. 2.17 The LNDP2 should also consider indicative delivery timetables and the allocation of reserve sites to respond to updated evidence of housing need. This approach can reduce potential conflicts and help ensure neighbourhood plan policies are not subsequently overridden by the Local Plan.

		3. Neighbourhood Plan Policies 3.1 We have set out below our comments on the LNDP2 policies. Draft Employment Policy LYD ET1 3.2 Draft Policy LYD ET1 is set out below: {policy inserted} 3.3 Draft Policy LYD ET1 should be updated to provide flexibility for residential development where employment use is demonstrated to be unsuitable or unviable. At present, the policy requires employment uses to remain the predominant activity within employment areas without any exemption. 3.4 As currently drafted, LYD ET1 is inconsistent with adopted Policy CSP.7 of the Core Strategy, which states: “Land presently used for employment will be expected to remain so, unless allocated for another purpose. To encourage this, a range of employment-generating uses appropriate to each site will be considered favourably. Where a site is underused and unsuitable (due to environment or location) for any employment-generating use (including service-based uses), a mixed-use approach may be appropriate (e.g., employment and housing), and failing that, an alternative non-employment use may be considered.” (our emphasis) 3.5 Moreover, Core Policy CSP.7 is also consistent with emerging draft Policy RLP.110 of the Revised Draft Local Plan. Therefore, Draft Policy LYD ET1 should be revised to ensure consistency with both the adopted and emerging Local Plans. 3.6 In addition, Maps 2 and 11 of the LNDP2 are out of date The former we have addressed in representations to the District Council’s emerging Local Plan. The latter is a LNDP2 Map and should also be updated to reflect the area approved for employment generating uses under planning permission reference P0745/18/OUT (a copy of Illustrative Masterplan is attached to these representations). For the reasons set out this consented employment land should be allocated for residential use. Draft Policy ENV3 – Protecting Lydney’s Heritage 3.7 The wording of the Policy is overly restrictive when considered alongside relevant legislation and Section 16 of the NPPF. 3.8 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that, when assessing the potential impact of a proposed development on the heritage significance of a Listed Building, the decision-maker shall have: “special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses” (emphasis added). 3.9 The critical terms here are “special regard” and “desirability.” Section 66(1) does not mandate that the heritage significance of a Listed Building must be sustained, including any contribution from its setting, as set out in Draft Policy LYD ENV3. 3.10 Section 16 of the NPPF sets out the national policy framework for the historic environment. While it states that “great weight should be given to the asset’s conservation,” it does not require that a development must sustain the significance of all designated and locally identified non-designated heritage assets. 3.11 Notably, Paragraphs 214 and 215 of the NPPF allow decision-makers to weigh harm to the heritage significance of a designated asset against the public benefits of the development. Draft Policy LYD ENV3 does not reference this balancing exercise. Additionally, the wording of Part 1 of Policy LYD ENV3 does not distinguish between the considerations for designated and non-designated heritage assets in decision-making, as outlined in Paragraphs 214-216 of the NPPF. 3.13 Accordingly, the wording of Policy LYD ENV3 should be revised to reflect national policy and Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. 3.14 Moreover, any new non-designated heritage assets identified through the Neighbourhood Plan, as listed in the table on page 39, must be reviewed by a suitably qualified heritage panel prior to formal designation, allowing for an appropriate judgment.
LNDP2 18	Boyer obo Barratt Wilson Redrow	**1. INTRODUCTION** 1.1 These representations have been prepared by Boyer on behalf of Barratt Redrow, in response to Lydney Neighbourhood Development Plan 2 (‘LNDP2’) Consultation under Regulation 16 of the Neighbourhood Planning Regulations. 1.2 Barratt Redrow is promoting land north of Highfield Road (the ‘Site’). An extraction of the Site Location Plan is shown below and included at **Appendix One.** 1.3 Barratt Redrow has been promoting the Site through the Forest of Dean District Council (‘FoDDC’) Draft Local Plan, most recently through the Revised Draft Local Plan Regulation 18 Consultation Document 2025-2045 in March 2026. 1.4 Land north of Highfield Road can create a sustainable new neighbourhood to the east of Lydney, which would represent an organic extension to the settlement. The proposed development could deliver a multitude of benefits including up to 640 homes (including policy

		compliant affordable homes), extensive areas of public open space, and potential land reserved for community facilities subject to local need – including potential employment, educational and commercial uses. 1.5 Housing delivery could commence in the short to medium term and would be delivered by Barratt Redrow, a national housebuilder with a track record in delivering comprehensive residential developments. An extract of the indicative Concept Masterplan is shown below and included in **Appendix Two** and a Vision Document is submitted with these representations**.** Barratt Redrow welcomes the opportunity to work proactively with the Town Council to deliver this development. 1.6 Barratt Redrow raises concerns regarding the pre-submission LNDP2, which is considered to fail a number of the Basic Conditions required to be met to enable a draft neighbourhood plan to proceed to a referendum, these include1: • Condition a. having regard to national polices and advice contained in guidance issued by the Secretary of State; • Condition b. having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders; • Condition c. having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. The applies only to Orders; • Condition d. the making of the neighbourhood plan contributes to the achievement of sustainable development; • Condition e. the making of the 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 the area); • Condition f. the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations; and • Condition g. prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for neighbourhood plan. **2. LYDNEY NEIGHBOURHOOD PLAN 2 PRESUBMISSION DRAFT** **General Commentary** **Failure to Meet Basic Condition A - Having regard to national policies and advice contained in guidance issued by the Secretary of State** 2.1 Barratt Redrow raise in principle concerns with the lack of acknowledgement of the draft LNDP2 to the draft National Planning Policy Framework (‘draft NPPF’). Whilst not yet formally published and therefore can only be afforded limited weight at this stage, due regard must be given to the emerging National Policies noting that the draft NPPF is likely to be published in the Summer 2026. This could be in advance of the LNDP2 proceeding to referendum. Whilst draft NPPF Annex A Paragraph 6 confirms that neighbourhood plans submitted to the LPA (Regulation 15) before the date of publication should be prepared in accordance with the current Framework (December 2024), the policies contained within the Framework are a material consideration that must be taken into account in decision-making from the day of its publication (Annex A Paragraph 1). Therefore, even in the event that the LNDP2 is made, decision making will still need to consider the proposed development against the policies contained within the draft NPPF and the need to significantly boost the supply of homes (HO13), The draft NPPF also emphasises the clear direction of travel and intent from the Government that neighbourhood plans must be prepared with due regard to local housing need, and plan accordingly. 2.2 There are a number of draft policies contained within the draft NPPF, which directly relate to the preparation of neighbourhood plans, including draft Policy PM5: Neighbourhood plans, which states that:

		"Neighbourhood plans allow local communities to plan positively for their areas by identifying and addressing community priorities that can be met or supported through the planning system. They should do this by: ***a. Allocating land to meet the development needs of their designated area**, where it is appropriate to do so; and* *b. Setting out policies which address particular local issues, these should relate to site specific matters or, where appropriate, may cover wider issues such as the provision of infrastructure and community facilities, regeneration opportunities, design requirements (including design codes), local environmental improvements and the conservation of local heritage assets."* *(**Boyer Emphasis**)* 2.3 Even in acknowledging that the LNDP2 benefits from the transitional arrangements contained within the draft NPPF Annex A, there is a considerable lack of residential allocations contained within the LNDP2, particularly noting the town's position within the settlement hierarchy as one of the most sustainable locations for development and capable of supporting strategic growth. The LNDP2 also fails to take into account new allocations proposed within the Revised Draft Local Plan presented at Regulation 18 consultation (January 2026) and only identifies one opportunity for Housing for Elderly People. Whilst it is noted that the emerging Local Plan is not due to be adopted until after the LNDP2 is made, it must be recognised that the emerging Local Plan is based on up-to-date housing market evidence and the local housing need for the district, which is significantly higher than the current housing requirement identified within the adopted Local Plan. Due regard must be had to this updated evidence, which is based on the December 2024 NPPF Standard Methodology figure. 2.4 Even in the context of the NPPF (2024), the LNDP2 fails to proactively plan for growth. The key tenet of the NPPF (2024) is to 'support the Government's objective of significantly boosting the supply of homes' (Paragraph 61). The Strategic Environmental Assessment Screening Report, prepared by Enfusion, states on page 17 that *"Most LNDP policies aim to restrict the extent of development…"* which further reinforces that the LNDP2 does not aim to meaningfully contribute to the spatial strategy and therefore fails to meet Basic Condition A. **Failure to Meet Basic Condition E - Conformity with strategic policies of the development plan** 2.5 The adopted Local Plan for the FoD is substantially out of date, with the Core Strategy adopted in 2012 and the evidence that underpins this would have been prepared prior to any NPPF being published. The strategic policies contained within the adopted Local Plan must also be considered in this context and cannot, therefore, be relied upon as a robust basis upon which to examine a neighbourhood plan. Therefore, whilst it is acknowledged that the housing requirement within the LNDP2 accords with the Core Strategy, the Core Strategy is substantially out of date. 2.6 The evidence that supports the Core Strategy also cannot be relied upon as a sound basis to prepare a neighbourhood plan. It is welcomed that this is somewhat recognised by the LNDP2 which is supported by an updated Housing Needs Assessment, however, this does not make any new assessments in regard to total housing need for Lydney and instead relies upon adopted Policy CSP. 5 – Housing as a basis for total housing need. The Core Strategy was adopted in 2012, with the plan period ending in 2026. The adopted FoD Local Plan is therefore substantially out of date, with the evidence that underpins this would have been prepared prior to any NPPF being published. 2.7 This is a considerable oversight of the HNA and the LNDP2, which has failed to properly assess the true housing need for the town. 2.8 The significant need for market housing within Lydney is evidenced through the FoD's updated Strategic Housing Market Assessment that underpins their emerging Local Plan, and which accords with the 2024 NPPF, as referenced above. 2.9 Barratt Redrow strongly consider that the land north of Highfield Road should be included as an allocation within the LNDP2 to ensure the Neighbourhood Plan aligns with the adopted and emerging spatial strategy for the FoD Local Plan and to ensure that the LNDP2 is able to meet Basic Condition E and its local housing need.

		Failure to demonstrate meeting Basic Condition F – Compatibility EU Obligations 2.10 The submitted LNDP2 is supported by a Strategic Environmental Assessment ('SEA') and Habitats Regulations Assessment ('HRA') Screening Report prepared by Enfusion. 2.11 The SEA Screening Report sets out the Criteria within the Schedule 1 SEA Regulations to conduct a Screening Assessment of the LNDP2. Criteria (1a) assesses the degree to which the plan sets a framework for projects and other activities, either with regard to location, nature, size and operating conditions or by allocating resources. Where it was assessed as follows: *"The NDP does not set out a programme or framework for large scale projects. The plan is consistent with the district Local Plan (which was subject to SA/SEA during its preparation) and therefore, does not set an additional framework.* *The NDP does not propose allocation sites for development projects."* 2.12 Whilst Barratt Redrow agree that the LNDP2 does not set out a framework for large scale projects or formally allocate sites, it does identify an opportunity for Housing for Elderly People. Barratt Redrow strongly consider that there is no evidence to support the suitability, deliverability and achievability of this Site, as no formal appraisal of the Site has been included as part of the evidence base, which would have been included within an SEA, if one had been undertaken. **Response to Lydney Draft NDP2 Draft Policies** 2.13 Notwithstanding Barratt Redrow's concerns outlined above, the following responses are provided below in response to the specific NDP2 policies, and these are set out in chronological order below. **Vision and Objectives** *Vision* 2.14 Barratt Redrow broadly supports the draft LNDP2's vision, in the sense that it aims to provide homes 'to meet changing needs', however, raise concerns with the lack of acknowledgment for affordable and open market housing need which has been recognised within the FoDC's vision. 2.15 The draft vision contained within the FoD draft LP acknowledges that there is a significant affordability crisis within the authoritative boundary, highlighted through the worsening affordability ratios, which are far higher than other regions and at country level. It must be recognised that the identification of residential allocations can proactively improve affordability issues by increasing the supply of housing to meet demand, thereby reducing overall house prices by ensuring supply meets demand, and through affordable housing polices, which require new market developments to deliver a proportion of affordable homes. 2.16 Similarly, it is disappointing that the overall housing need of Lydney is not referenced within the vision. The vision must place greater emphasis on the need to meet the Town's housing need in full to reinforce the Council and Government's commitment to significantly boosting the supply of homes. *Objectives* 2.17 Barratt Redrow are supportive of Objective 1 (Development) in principle, which recognises the promotion of Lydney as 'the gateway to the forest', however, believe that greater recognition of, and emphasis on both market and affordable housing should be presented within the text. Whilst it is acknowledged that mixed use development is supported where this includes housing, this support must extend to residential development noting the clear affordability crisis that is being experienced both within Lydney and within the wider authority boundary.

		2.18 Similarly, Objective 4 (Housing and Community Infrastructure) is supported in principle, and Barratt Redrow agree that housing development should be sustainable and accessible whilst meeting the evidenced need of local communities. 2.19 The LNDP2 must recognise that new housing development that is positioned in well-connected and sustainable locations accords with the overarching tenet of National and Local policy and therefore must be supported. To this end, Barratt Redrow are promoting land north of Highfield Road, which would deliver market and affordable homes in a sustainable location, whereby future residents would benefit from accessing sustainable modes of transport, including walking, cycling and public transport. The new homes (both market and affordable) would benefit from being able to access existing services and facilities along with new infrastructure associated with the development. 2.20 Objective 7 of the LNDP2 is also supported in this regard. Land North of Highfield Road is in close proximity to public transport connections and would support sustainable travel. If allocated, the site would make financial contributions towards local transport facilities, supporting future residents of the site and existing residents within the wider community. **Built and Natural Environment** *LYD ENV1: Location of New Development* 2.21 The principle of Policy LYD ENV1 is generally supported, insofar as it supports development outside settlements boundaries when this is in accordance with the adopted development plan or national planning policy. This would appear to accord with the direction of national policy, highlighted through the draft NPPF (2025) which includes a focus on strengthening the presumption in favour of sustainable development to significantly boost the supply of housing. 2.22 Barratt Redrow, however, strongly oppose the policy's overly restrictive requirements when it comes to facilitating the provision of new housing allocations outside of the settlement boundaries. 2.23 The current policy wording of LYD ENV1 states that development outside of settlement boundaries will only be supported where it is also providing business uses to support new or existing businesses, or supporting sustainable rural tourism or leisure developments, or retaining or improving the provision of accessible local services and community facilities or provides for essential transport infrastructure. This indicates that residential-led developments outside of settlement boundaries would not be supported. 2.24 The policy must be reworded to state that residential development will be supported where it accords with criteria a) (accords with adopted or national planning policy) and b) (is well related to Lydney's existing built area). Any criteria beyond this must be considered as housing restrictive and therefore would not accord with the key tenet of the NPPF. This is particularly relevant noting the historic under delivery of housing both within Lydney and the wider Forest of Dean area. *LYD ENV2: Protecting and enhancing Lydney's Natural Environment* 2.25 Policy LYD ENV2 sets out clear measures for the protection and enhancement (where appropriate) of Lydney's green and blue infrastructure, consisting of key environmental assets, such as woodlands, hedgerows, and water bodies. It is also noted that Lydney sits within the context of the Severn Estuary European Marine Site, which is designated a Ramsar site, Special Area of Conservation (SAC) and Special Protection Area (SPA). Barratt Redrow acknowledge and support the need for new development to avoid harming or resulting in the loss of these assets and acknowledge that this accords with local and national policies. 2.26 Similarly, Barratt Redrow recognise the importance for new developments to protect, enhance and deliver green and blue infrastructure. 2.27 Policy LYD ENV2 states that development will be expected to maintain and protect blue and green infrastructure, and applicants will be required to demonstrate how relevant proposals protect and enhance green infrastructure assets. 2.28 Barratt Redrow do not object to the principle of aspiring to enhance existing green infrastructure, however, strongly recommend that this should not be included as a requirement within the policy. It is not justified for new developments to be required to enhance existing infrastructure and indeed, this will not always be possible. The overarching ecological mitigation hierarchy is clear that where a potential loss or

		negative impact on green/blue infrastructure functionality or ecological system/network is unavoidable, it is accepted that mitigation measures are appropriate and should be required and detailed. This must be reflected within the policy wording. 2.29 Land north of Highfield Road is able to provide substantial areas of green infrastructure in the form of extensive areas of Public Open Space across the central and northern areas of the Site. This will provide an attractive and accessible space which will function as both a recreational opportunity and as a habitat for biodiversity. As shown on the indicative concept Masterplan, primary routes incorporate green/blue verges, SuDS 2.30 features and tree planting. This will provide high quality links between existing green infrastructure assets bordering the site, ensuring continuity for local fauna and aligning with criterion a of LYD ENV2. 2.31 It is welcomed that the LNDP2 does not prescribe the biodiversity net gain requirement to be met on development sites, rather, states that all development must secure net-gains for biodiversity in accordance with national policy. This ensures that the LNDP2 is future proofed and accords with the draft NPPF (2025) which is clear that the request for net gains beyond the mandatory 10% is not justified. *LYD ENV3: Protecting Lydney's Heritage* 2.32 Barratt Redrow does not object to this draft policy, which appears to accord with local and national policy. It must be acknowledged that, where a proposed development is likely to result in a less than substantial harm on a heritage asset, this level of harm must be weighed against the public benefits of the proposals. Barratt Redrow recommend that wording to this effect is included within the draft policy to ensure it fully accords with national policy. As noted at Regulation 18 stage, the Land north of Highfield Road does not contain any listed buildings nor fall within the setting of any listed buildings or other designated or non-designated heritage assets. *LYD ENV4: High Quality Design and Local Distinctiveness* 2.33 LYD ENV4 requires developments to contribute positively to the character and distinctiveness of Lydney, as per the Lydney Design Code and Guidance Document (2024). Barratt Redrow has specific comments to make in response to the Design Code, and these are set out in the proceeding section of these representations. 2.34 The development requirements included within the policy for Lydney's various character areas are overly onerous and do not offer any flexibility to the development industry. Local vernacular is an important consideration when assessing the suitability of the design of new developments, however, the policy at present is extremely restrictive and, without clear justification, will prevent the timely delivery of much needed housing, further worsening the affordability issues experienced within the town. 2.35 Barratt Redrow strongly agrees that the current design requirements set out within this policy are rephrased to represent 'aspirations' that must be given consideration rather than requirements to be met. Consideration must also be given to the Government's draft Design and Placemaking Planning Practice Guidance, which defines the issues that can be addressed within a Design Code. To avoid duplication of requirements, regard must also be had to any Design Code that is produced at a local authority level through the emerging Local Plan. Multiple Design Codes would not be an effective means to deliver suitable homes and would cause ambiguity within the development industry. 2.36 Any future applications for land north of Highfield Road will be supported by a 'Building for Healthy Life Assessment' ensuring compliance with criteria 8 of LYD ENV4. *LYD ENV6: Flooding and Water Management* 2.37 Policy LYD ENV6 is supported in principle and Barratt Redrow acknowledge the need to provide adequate SuDS on site and manage surface water sustainably. This draft policy is considered to accord with local and national policy. 2.38 SuDS have been carefully integrated within the indicative concept masterplan for land north of Highfield Road, which will include strategic attenuation basins. Built form is also proposed to be contained entirely outside of any areas at risk of flooding.

		Housing and Community Infrastructure *LYD HC1: Housing Choice for Everyone* 2.39 The general principles of Policy LYD HC1 are supported by Barratt Redrow who are committed to delivering good quality and energy efficient homes with all their developments. Whilst it is welcomed that the draft policy makes reference to subsequent updates to housing needs assessments for evidencing appropriate housing mix on new schemes, it must be acknowledged that market evidence provided by an applicant, which is current at the point of application submission, can also serve as suitable evidence to support a scheme's housing mix. Such market evidence will be up to date and is likely to reflect the current market need far better than evidence base documents that quickly become out of date. Barratt Redrow note again that the Housing Needs Assessment for this LNDP2 uses evidence based on an out-of date strategic policy and it therefore cannot be relied upon as a sound basis to evidence the appropriate housing mix for residential-led market development. 2.40 Part 2 of this draft policy specifies required dwelling tenures, making specific reference to a need for 'dwellings with more than 3 bedrooms'. It is understood that this evidence has come from the HNA, which has cross referenced with the Gloucestershire Local Housing Needs Assessment (2020). This is over five and a half years old and therefore Part 2 is not justified and not supported by appropriate evidence. This does also note accord with the strategic policies of the Local Plan (Basic Condition E), it applies a restriction on housing tenure without being supported by appropriate evidence on need. It is strongly recommended that this part of the policy is omitted. *LYD HC2: Protecting and providing community facilities* 2.41 Barratt Redrow supports Policy HC2 to protect existing community facilities and provide additional community facilities where there is local evidenced need. 2.42 As shown on the indicative Concept Masterplan, the land north of Highfield Road has reserved potential land to be used for community facilities subject to local need. This includes potential employment, education and commercial uses, depending on market evidence. **Accessibility and Transport** *LYD TRAN1: Sustainable and Active Travel and Improvements to transport infrastructure* 2.43 Barratt Redrow support the principles of LYD TRAN1 in seeking to promote sustainable and active travel and to ensure that the transport implications of development in Lydney are appropriately considered. 2.44 Whilst elements of the draft policy are supported, including the recognition that developments should proportionately contribute towards connectivity and Lydney's sustainable travel network, ensuring the provision of safe access and egress, and creating an accessible development, the quantum of criteria included within this policy is extensive, extending from a) to o). 2.45 A number of the criteria do not consider site specific constraints. Criteria i) requires for public rights of way to be protected and enhanced. Whilst Barratt Redrow does not disagree with the principle of this criterion, it does not allow for the possibility whereby it is more suitable to divert PRoW, moreover, it may not always be possible to improve the wildlife corridor network, and mitigation should be considered appropriate where the ecological mitigation hierarchy has been followed. 2.46 The draft policy should also make clear that development will not be constrained where sustainable transport opportunities are limited due to site constraints, but the impacts on the highway network can be appropriately mitigated. *LYD TRAN2: Public rights of way and wildlife corridors* 2.47 Barratt Redrow support the draft policy's recognition that revisions may be required to existing rights of way to allow for planned development. In the context of land north of Highfield Road, as shown on the indicative Concept Masterplan, an opportunity has been identified to enhance the existing PRoW to provide a new green active travel route through the Proposed Development, linking with the wider area.

		Review of the Local Housing Need Assessment 2.48 The LNDP2 is supported by Housing Needs Assessment (HNA) for Lydney, prepared by AECOM in 2024. This has been used to inform policy HC1 of the draft LNDP2. Whilst it is acknowledged that the report provides guidance on the mix and tenure which may be needed going forward, Barratt Redrow have significant concerns with the lack of up-to-date evidence within the report regarding total housing provision, which does not give certainty in respect of overall need. 2.49 Barratt Redrow has outlined below four key issues in relation to the HNA. *Issue 1: Lack of new assessment in regard to housing requirement despite significant change in circumstances affecting the adopted Local Plan housing requirement* 2.50 The HNA does not make any new assessments in regard to total housing need for Lydney and instead relies upon the adopted FoD Core Strategy Policy CSP. 5 – Housing as a basis for its assessment. The Core Strategy was adopted in 2012, with the plan period ending in 2026. The adopted FoD Local Plan is therefore substantially out of date, with the evidence that underpins this would have been prepared prior to any NPPF being published. 2.51 The HNA identifies a housing need in Lydney of 900 homes (based on FoD Core Strategy Policy CSP. 5). The HNA does not quantify an updated estimated need for market or affordable housing over the Neighbourhood Plan period and instead provides only a percentage of housing mix. Whilst this may assist in shaping the composition of development, it does not establish the overall amount of housing required. 2.52 This demonstrates that the HNA does not provide an objective or up-to-date assessment of housing need for Lydney. There is a reliance on out-of-date strategic policy position and an absence of locally derived updated evidence, which means that the HNA does not establish a robust basis for determining overall housing requirements in the Neighbourhood Plan Area. 2.53 This view is enforced by national policy. Paragraph 69 of the NPPF states that: *"strategic policies should set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need retesting at the neighbourhood plan examination,* ***unless there has been a significant change in circumstances that affects the requirement."*** ***[Boyer own emphasis]*** Furthermore, Paragraph 70 states that: *"Where it is not possible to provide a requirement figure for a neighbourhood area33, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority."* 2.54 Footnote 33 is relevant in this instance, as it accounts for instances where trategic policies for housing are out of date. 2.55 The adopted FoD Core Strategy is over fourteen years old and, is an area where there is a proven lack of housing land supply (latest appeal decision, dated August 2025, identified supply to be between 1.81 years and 1.93 years2). 2.56 In accordance with NPPF Paragraph 69, there has been a significant change in circumstances, which warrants the need to re-establish the housing requirement figure for Lydney. *Issue 2: Lack of consideration of up-to-date housing need evidence published as part of the emerging FoD Local Plan* 2.57 The emerging Local Plan is based on up-to-date housing need evidence and requires the District to deliver 600 homes pa. Lydney has been allocated to deliver 1,800 homes across the emerging plan period and has been identified as one of the most sustainable areas for growth in the district.

		2.58 Barratt Redrow note that Paragraph 52 of the HNA, however, references Policy CSP. 5 as 'emerging' policy. This is adopted policy. This raises further concerns to the accuracy of the HNA and should be amended accordingly. *Issue 3: Inadequate focus on specialist housing rather than market and affordable need* 2.59 The HNA is also overly focused on specialist housing, including that for older persons and adapted properties. Whilst Barratt Redrow agree that it is important to consider such provisions, overall, this need comprises a relatively small proportion of the overall housing need across Lydney and greater emphasis must be placed on market and affordable homes. *Issue 4: Reliance upon superseded Census Data* 2.60 Lastly, Barratt Redrow have concerns with the accuracy of the assessed need and provisions set out in the HNA due to the age of the data used to prepare the report. Despite being published in February 2024, it is noted that some data is used from the 2011 Census which is considerably outdated, noting there is a subsequent 2021 Census data. **3. LYDNEY DESIGN CODE** 3.1 The following Chapter provides commentary on the Lydney Design Code ('LDC'). 3.2 Barratt Redrow supports the Design Code in principle and welcomes its role in providing a robust framework to secure high-quality, character-led and sustainable development in Lydney. 3.3 It is considered that the Design Code will be most effective where it provides clear direction, whilst retaining sufficient flexibility to respond to varied site contexts, environmental constraints and evolving design solutions. This would support the delivery of well-designed, sustainable and inclusive communities while ensuring that the Code remains robust, proportionate and capable of supporting future growth in Lydney and ensure that housing growth is not stagnated. 3.4 The comments set out below are intended to be constructive and evidence-led, supporting the Design Code in principle whilst highlighting areas where additional clarity and flexibility would help ensure the Code is robust, proportionate and capable of supporting deliverable development on emerging Sites. **Chapter 1: Introduction** **Objectives** 3.5 Barratt Redrow supports the main objective of the Design Code to ensure future planning applications and developments remain sympathetic the character of the Parish and the named key design elements. 3.6 Land north of Highfield Road is able to meet these key design elements through the delivery of a sustainable development that will respect the existing character of Lydney and create a sense of place, provide extensive areas of high-quality public open space that will enhance the existing landscape and improve connectivity and movement throughout the Site and wider area, through a range of active travel measures. Opportunities for active travel throughout the Site have been identified on the accompanying indicative Masterplan. **Planning Policy and Guidance** 3.7 Barratt Redrow welcomes the acknowledgement of both National and Local planning policy and guidance, including National Model Design Code, National Design Guide and adopted FoDDC Local Plan and associated Supplementary Planning Guidance. 3.8 However, Barratt Redrow raises concerns that the LDC references the 2023 National Planning Policy Framework, which was superseded in 2024, with a further update expected in 2026.

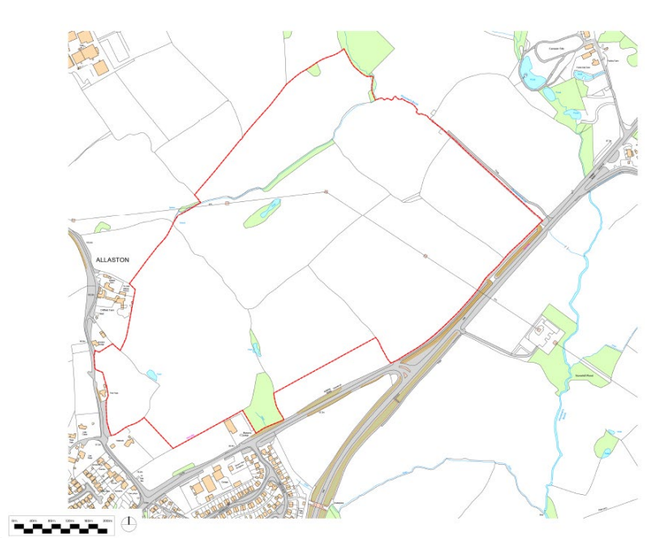
		The Design Code should have regard for the most up-to-date national planning policies to ensure consistency with national guidance and consider the latest draft Design and Placemaking Planning Practice Guidance. **Chapter 4: Design guidance and codes** **Local character and built form** *LB.01 Pattern of development, layout and grain* 3.9 Barratt Redrow does not object to the design principles set out to ensure that new development responds positively to the existing character of Lydney. However, Barratt Redrow consider that it is important that these principles are applied flexibly to new development to allow for schemes to respond to site-specific conditions. 3.10 The layout of the Proposed Development responds sensitively to the Site's topography and existing landscape features and seeks to retain and enhance existing vegetation, while also delivering a range of Green Infrastructure. As shown on the indicative Concept Masterplan, the Proposed Development promotes a pedestrian friendly layout, utilising the existing PRoW to promote active travel and providing linkages to the wider area where possible. *LB.02 Enclosure, building lines and boundary treatments* 3.11 Barratt Redrow support the recognition that development should respect the differences in character areas to help integrate development with the surrounding countryside. However, some of the design principles are overly prescriptive and do not have regard for site constraints, including existing landscape features and topography. For example, a consistent building line may not reflect the character of some character areas or optimise effective use of land. 3.12 The LDC should provide greater flexibility to allow for innovative design responses, particularly where site constraints are concerned. *LB.03 Density and building heights* 3.13 Whilst we do not object in principle to these design principles, Barratt Redrow strongly object to the principle that development should be restricted to two storeys, as it is noted in the supporting text that there are higher buildings of three storeys in the town centre and in some of the recent 21st century development in Lydney. Taller dwellings can also be used as key buildings to signpost key green spaces and destinations, or to provide enclosure and overlooking to key routes and amenity areas, adding variety and interest in the streetscape. A 2-storey restriction is wholly inadequate. 3.14 Accordingly, there must be flexibility within the guidance to allow for new development to effectively use land and to achieve high-design quality without uniformity, as encouraged in LB.02. As also stated within the set-out design principles, subtle variation in height is encouraged as it adds visual interest, it would also ensure more efficient use of land, as advocated by the NPPF. *LB.04 Architectural details, materials and colour palette* 3.15 The Design Code identifies a desire to restore a sense of place and identity to Lydney through the use of architectural details, materials and colour palette to enforce the local character and provides examples of existing local vernacular. Barratt Redrow support the recognition of local character and welcome the acknowledgements that detailing can be interpreted using contemporary methods to avoid a 'pastiche' of existing local vernacular. Barratt Redrow welcomes this flexibility. 3.16 The identification of a locally informed materials palette within the Design Code is welcomed and provides a helpful framework for achieving contextual design. However, the guidance should more clearly recognise the need to balance design aspirations with cost and viability considerations. There are a range of high-quality modern and alternative materials available that can achieve a comparable visual and

		functional outcome, and the guidance should allow flexibility to incorporate such solutions where appropriate. A more balanced, design-led approach would ensure that material choices support both quality placemaking and deliverability. **Access and movement** *AM.01 People friendly streets* 3.17 AM.01 sets out an extensive and highly detailed list of requirements which risks being over prescriptive, and duplicates elements of LYD TRAN1. This could constrain development through a lack of flexibility and prevent innovative design. AM.01 should focus on key principles, rather than an exhaustive checklist. 3.18 Barratt Redrow understands the importance of ensuring that places are accessible to everyone, through various measures including the width of footways. However, consider that the LDC should have regard for sites that are located on more undulating topography. The width of footways is also discussed within the Manual for Streets (MfS), which is the leading technical guidance on layout and connectivity. Any Design Code prepared at a neighbourhood level must not contradict the content of MfS. 3.19 In relation to edge lanes and tertiary streets, the LDC states that '*Cul-de-sacs must be avoided*'. Barratt Redrow suggest that the requirement for avoiding the use of cul-de-sacs should be omitted. In many authorities, cul-de-sacs are often considered to be a safer environment for children, therefore rendering this part of the text unnecessary. Within the MfS, cul-de-sacs are identified as suitable variations in layouts and are recommended when planning residential and mixed-use neighbourhoods. The text should therefore be updated to remove the requirement for avoiding the use of cul-de-sacs. *AM.02 Vehicular and cycle parking* 3.20 Parking standards, both vehicular and cycle parking, and the provision of electric charging should be considered on a site-by-site basis. As currently drafted, Barratt Redrow consider that AM.02 does not allow sufficient flexibility, and that rigid adherence to these standards will affect viability and put the deliverability of sites at risk. **Landscape and heritage** *LH.02 Views and landmarks* 3.21 Barratt Redrow acknowledge the topography of Lydney and the views it provides and how this may be affected by new development. 3.22 Land north of Highfield has considered the topography of the Site, keeping residential development off the highest and steepest parts of the Site. The indicative Concept Masterplan shows extensive, high-quality areas of public open space in these areas which will provide accessible Green Infrastructure for existing and future residents and protect and enhance the existing views. **Green and blue infrastructure** *GS.01 Resilience to flood risk* 3.23 Barratt Redrow supports draft policy GS.01 in principle, however, notes that one of the overarching principles is to "*form a "SuDS train" of two or three different water management approaches".* This does not have regard for site constraints and is inflexible. Drainage schemes must be considered on a site-by-site basis and are constrained by a site's topography and ground conditions. 3.24 Barratt Redrow welcomes the acknowledgement that the collection of surface water is not always possible. *GS.02 Green spaces* 3.25 Barratt Redrow supports these design principles and recognises the importance that green and open spaces play in promoting the wellbeing of people who live, work and visit Lydney.

		3.26 Land north of Highfield Road will provide extensive, high-quality areas of public open space that will be accessible to existing and future residents and connected to the wider area through a series of identified opportunities for active travel routes. *GS.03 Street trees and vegetation* 3.27 While the provision of street trees as part of high-quality, green and attractive streetscapes is supported in principle, the design guide is considered overly prescriptive and lacking sufficient flexibility to respond to site-specific circumstances. 3.28 The requirement for consistent or extensive street tree planting across all streets does not adequately take into account the constraints that often influence street design, including highway geometry, visibility requirements, underground utilities, drainage infrastructure, and the need to accommodate pedestrian, cycle, and vehicular movements. 3.29 Furthermore, the guidance risks prioritising a single design feature over a more balanced, design-led approach to placemaking. High-quality streets can be achieved through a variety of landscape and design measures, and street trees should form part of a coordinated strategy rather than a mandatory or uniform requirement. There may also be circumstances where alternative forms of planting or green infrastructure are more appropriate or deliver greater overall benefit. *GS.04 Biodiversity* 3.30 While the objective of enhancing biodiversity and incorporating green infrastructure is supported in principle by Barratt Redrow, the approach as currently drafted is considered overly prescriptive and insufficiently flexible to respond to site-specific circumstances. 3.31 In particular, the requirement for comprehensive landscape buffers and the alignment of rear garden boundaries to form continuous wildlife corridors imposes a fixed design solution that may not be appropriate in all cases. The inflexible approach does not adequately reflect the wide range of site constraints that can influence layout, including topography, drainage, existing features, site shape, and access arrangements. A rigid application of these requirements risks leading to inefficient layouts and could undermine design quality and effective placemaking. 3.32 Furthermore, the prescribed approach may conflict with other important design objectives, such as creating active frontages, achieving natural surveillance, and delivering legible and well-integrated development. Biodiversity enhancements can be successfully delivered through a variety of design responses, and the policy should allow for this flexibility rather than mandating a single solution. 3.33 It is therefore recommended that Policy GS.04 be revised to adopt a more flexible, outcomes based approach that supports biodiversity net gain while allowing for design responses that are appropriately tailored to individual site characteristics. This would better align with national policy and support the delivery of high-quality, sustainable development. *GS.06 Sustainable Buildings* 3.34 Barratt Redrow does not object to these design principles and recognises the importance of achieving high quality and sustainable buildings. However, a key principle states that *“Building performance in terms of ‘conservation of heat and fuel’* ***over and above building regulations****, should be a key design driver for new development”* ***[Boyer own emphasis].*** 3.35 Barratt Redrow strongly objects to this. Dwelling energy efficiency is addressed in Building Regulations. The NPPF is clear that local policies must not set out requirements that exceed Building Regulations unless this is fully justified and supported by proportionate evidence. 3.36 There is insufficient justification or evidence in this instance to support this requirement, and this must be removed from the design code. **Checklist** 3.37 The inclusion of a checklist is welcomed as a practical tool for demonstrating how the Design Code has informed design. Barratt Redrow, however, has a number of fundamental concerns regarding the content of the Design Code, and is concerned that its principles are overly onerous and will further stagnate housing delivery within Lydney, worsening an existing affordability crisis.

		3.38 Barratt Redrow strongly advise that the Design Code is revisited and that additional flexibility is factored into the principles, rephrasing a number of the requirements to 'aspirations' to ensure sufficient flexibility for schemes to respond to their site constraints. Barratt Redrow considers that it is important to recognise that alternative design responses may achieve the same objectives. **4. LAND NORTH OF HIGHFIELD ROAD, LYDNEY** **Introduction** 4.1 Barratt Redrow is actively promoting land north of Highfield Road, Lydney, for residential development, able to accommodate up to 640 homes. Further information regarding site description and planning considerations are detailed below and illustrated in the accompanying Site Location Plan (**Appendix One**) and indicative Concept Masterplan (**Appendix Two**). These representations are also supported by a Vision Document. 4.2 Barratt Redrow has commissioned a number of technical reports to demonstrate the Site's suitability for residential development, and these are summarised below. **Site Description** 4.3 The Site is located to the east of Lydney, north of Highfield Road. It spans an area of approximately 43ha and consists primarily of open agricultural fields. The Site is bound to the east by Plummers Brook, to the north by further agricultural land and to the west by minor residential development along Driffield Road. Mature trees and hedgerows form a natural and robust boundary along the southern edges of the Site, along Highfield Road. Electricity cables traverse the Site and there are three pylons within the Site boundary. **Indicative Concept Masterplan** 4.4 As shown in the accompanying indicative Masterplan, prepared by Roberts Limbrick, the Site offers an opportunity to deliver a high-quality, sustainable, landscaped development. This would provide homes and a neighbourhood that complements the existing character and local needs of the area. 4.5 The indicative Masterplan has been informed by a Vision Document, Transport Appraisal, Preliminary Landscape and Visual Assessment and Ecological Constraints and Opportunities Report. This confirms that the promoted site can accommodate up to 640 dwellings alongside extensive areas of public open space, including provision of extensive, high-quality areas of POS landscaped area to the north of the site and strategic and informal play areas. This will be delivered alongside ecological improvements, including the provision of biodiversity net gain. 4.6 The indicative Concept Masterplan confirms that there is the potential for the proposed development to include land that could accommodate community facilities subject to local need. This includes the potential for employment, education or commercial uses. **Landscape and Design** 4.7 A Preliminary Landscape and Visual Assessment has been prepared by FCPR which confirms that the Site and surrounding area are not covered by any national designations for landscape character or quality designations. 4.8 The LVA assesses that the Site is located on a sloping landform, which allows for views across the Severn Valley from the upper parts of the Site in the northwest. The LVA acknowledges that these views are restricted from the lower levels of the Site due to the mature hedgerows and tree lines, and that they are also limited to the north by the rising landform. While these views are most prominent from nearby properties, users of nearby PRoW's and nearby roads, visibility generally becomes more limited with distance as views tend to be filtered by hedgerows, trees and intervening topography. These views have been incorporated into the indicative Concept Masterplan, through the provision of extensive, high-quality open space on the highest land on Site. This protects the views but also provides an enhanced landscape to future and existing residents.

		4.9 The LVA assesses that the Site and local context has the ability to absorb change in the form of a suitable well-designed development, subject to GI proposals and consideration of site constraints, including the topography of the Site. The LVA suggests that GI proposals should retain the existing field boundary vegetation, in combination with additional planting to strengthen the landscape structure and to help break up built form within views. The LVA also suggests that connectivity both through the proposed development and to the surrounding PRoW network should also be considered. 4.10 A PRoW crosses the Site, and this has been incorporated into the indicative Concept Masterplan, providing an opportunity for enhancements and connection for the future existing residents to local designations and the surrounding countryside. The indicative Concept Masterplan has identified this as an opportunity to provide enhanced new green active travel routes. **Ecology** 4.11 The site is not located within any statutory ecological designation. 4.12 An Ecological Constraints and Opportunities Report has been prepared by GE Consulting which confirms that subject to Stage 2 Surveys and the subsequent results being used to inform the development design and implementation of the recommendation measures for habitat retention, creation and enhancement, no significant reduction in the ecological interest of the Site or its surrounds is likely to arise a result of its development. 4.13 The Ecological Report concludes that beyond the normal requirements to avoid impacts on protected species and maintain key elements of the habitat resource of the Site and its surrounds, there are no overriding nature conservation constraints that would preclude the development nature of the Site. **Highways/Access** 4.14 Transport Technical Note has been prepared by Lime Transport. 4.15 The primary vehicular access will be from a four-arm roundabout onto the A48/Highfield Road. The accompanying note confirms that there is sufficient highway land in and around the proposed site access to accommodate for a regular sized roundabout, and to account for any earth works without the need for third-party land. 4.16 Regarding pedestrian and cycle access, the note identifies a minimum of three options to access the site, and that the walk-distance between the north-east portion of the site and existing amenities and facilities within Lydney are broadly similar. 4.17 The note recommends that all three pedestrian/cycle accesses proposed are incorporated to encourage the use of Active Travel. These have been incorporated into the indicative Concept Masterplan. **Flooding and Drainage** 4.18 The Site is located primarily in flood zone 1, which indicated minimal flood risk. Adjacent to the A48 and along the eastern boundary lies some small areas of land within flood zone 2 and 3, associated with Plummer's Brook. Parts of the site are located within areas identified at risk of surface water flooding, from as low as 1 in 30 to 1 in 1,000 events. These areas of flooding expand with the annual likelihood. 4.19 As shown on the indicative Concept Masterplan, built development will be contained entirely outside of any areas at risk of flooding (from all sources), with the areas of both fluvial and pluvial flooding kept entirely free from development. SuDS have also been incorporated into the indicative masterplan throughout the Site. **Heritage**

		4.20 There are no designated or non-designated heritage assets within the Site, nor is the Site in or within the setting of Lydney's Conservation Area. 4.21 There are no known archaeological constraints, and any future development can be subject to surveys and site investigations if required. **Deliverability** 4.22 The proposed development will offer the following public benefits, with align with the three dimensions of sustainability. • The provision of up to 640 market and affordable homes, providing a range of mix and tenure, in accordance with local needs; • The creation of numerous construction jobs per annum during the construction phase and a boost the local economy within Lydney through increased trade as a result of the new homes; • Potential land reserved for community facilities subject to local evidenced need, including potential employment, educational and commercial uses; • Extensive areas of high-quality public open space, including strategic play areas, and proposed walking trails, routes and footways; • Delivery of ecological enhancements and on-site biodiversity net gain; and • Off-site highway improvements to enhance connectivity for existing and new residents. **Summary** 4.23 Land north of Highfield Road is considered to be suitable, deliverable and achievable and available to make a contribution to Lydney's housing supply in the short to medium term. There are no known constraints what would prevent development from coming forward. 4.24 The Site is capable of delivering a landscape-led sensitive development that responds to its location in Lydney. The proposed development would be well connected to the services and facilities on offer within Lydney and would respond positively to the Draft NDP vision, objectives and policies. APPENDIX 1. SITE LOCATION PLAN  

APPENDIX 2. INDICATIVE CONCEPT MASTERPLAN



Vision Statement. Land off Highfield Road, Lydney

1.0 Introduction

This document has been produced by Roberts Limbrick Architects to assist Barratt, David Wilson Redrow South Wales (BDWR) in promoting land to the north of Highfield Road and to the west of the A48 in Lydney within the Forest of Dean - Gloucestershire. The site sits in an attractive, sustainable and suitable location for residential development aimed at supporting the need for quality houses in the region and supporting a new community settlement within the county. Our aim is to deliver a sustainable new community that meets the housing requirements in the area by blending residential development with the natural features of the site all the while respecting the area, ecology, landscape, and ecological features of the site.

This document provides the vision for a new community at land north of Highfield Road and shows how this land can provide an attractive and natural extension to the already established development of Lydney and provide much needed housing for the region.

This document describes how promoting this site will create a safe, healthy and sustainable community set in a strategic and sustainable location creating a place to live for generations to come.

This document sets an emerging vision for the area and for the development proposed here. We are committed to working in partnership with the Forest of Dean Council, stakeholders, local council and existing resident communities to create a natural extension and much needed housing for the district.

This site is being promoted by Barratt, David Wilson, Redrow South Wales (BDWR) who combined have extensive experience and track record in delivering quality, people focused family homes and fostering community cohesion through quality and robust sustainable design. Together, BDWR have years of experience in delivering quality robust and sustainable homes in the Forest of Dean including at Lydney, Coleford and Berry Hill.

Together, BDWR and the wider design team, are focused and recognise the need for residential growth in the region and are all committed to the emerging vision for this site within Lydney.

This proposal seeks to promote the site for residential development with between 560-640 new homes being on offer.

This document will cover the following sections:

• Introduction - The Introduction explains the context of the site and the policy surrounding development here.

		• Development Context - This will give an overview of the development that is already existing in Lydney and highlights how the proposed development will sit within the already developed character. • Precedents, Plans and Parameters - We will illustrate the proposals with regards to parameters, transport and movement, access to amenities, its landscape setting as well as the built form and urban fabric in the surrounding areas. • Conclusion - This will summarise the document. 2.0 About Barratt David Wilson Redrow Homes Barratt Redrow is the nation's leading housebuilder, creating exceptional new places for people to live, work, and enjoy themselves including in the Forest of Dean at Coleford, Berry Hill and Lydney. Our vision is to lead the future of housebuilding by putting customers at the heart of everything we do. We are passionate about delivering sustainable landscape led communities and build high quality homes with excellent craftsmanship and customer care. We take pride in our approach to strengthening communities and make a positive difference to people's lives. Taking action on climate change is vital to achieving this mission and is at the heart of both our business strategy, and the way we design and create new places. Our commitment to delivering outstanding quality in the communities we build is unparalleled, recognised by our host of industry awards, including being named House Builder of the Year at the Construction & Property Awards 2025, the Placemaking for nature award at the CIPR Biodiversity Challenge Awards 2025 and Best Design – three storeys at the Housebuilder Awards 2025. 3.0 Strategic Location Lydney is a historic market town in west Gloucestershire, located on the western edge of the Forest of Dean and on the eastern bank of the River Severn estuary. It occupies a key gateway position between England and South/East Wales. Its strategic location close to the border with Monmouthshire has long served as a local centre for transport, commerce and a residential settlement. The town sits between the Forest of Dean woodlands to the north and east and the River Severn to the south. Historically its harbour and canal were linked to regional trade, especially timber and coal from the forest, highlighting its strategic economic place between inland resources and the sea. In strategic planning documents, Lydney is identified as one of the main centres for future development and growth in the Forest of Dean district, reinforcing its importance in the local settlement hierarchy. 4.0 Policy Analysis and Context **National Policy and Guidance** National planning policy is set out in the National Planning Policy Framework (NPPF). At the heart of the NPPF is the principle of sustainable development, with Paragraph 7 confirming that, "the purpose of the planning system is to contribute to the achievement of sustainable development." Paragraph 8 identifies the Government's three overarching and independent objectives, each of which must be pursued in mutually supportive ways: • An economic objective, supporting a strong, responsive and competitive economy; • A social objective, supporting strong, vibrant and healthy communities; and • An environmental objective, protecting and enhancing the natural, built and historic environment. The draft NPPF, whilst is still subject to consultation, is a material consideration that must be taken into account in the assessment of the suitability of development sites. In this context, the draft NPPF applies a greater emphasis on sustainable development, with draft Policy S5 part h) stating that development outside of settlements should be supported (subject to other policies within the Framework) where the site is within a settlement within which the station is located and is accessible to a railway station. **Local Policy** The Development Plan for Forest of Dean District Council comprises the Core Strategy 2006 – 2026 (adopted February 2012), Allocations Plan (adopted 2018), Cinderford Northern Quarter Area Action Plan (adopted 2012) and made Neighbourhood Development Plans, which includes the Lydney Neighbourhood Plan 2014-2024 (Made 1st October 2015). The Core Strategy identifies Lydney as a Town, the highest tier in the settlement hierarchy, recognising it as one of the most sustainable locations for development and capable of supporting strategic levels of

		growth. The Forest of Dean District Council is currently preparing a new Draft Local Plan (LP), which is expected to be adopted in Winter 2027, in which Lydney is identified as one of the four main towns, retained as the highest tier in the settlement hierarchy, reflecting its size, services and overall sustainability. Within the Draft LP, Lydney is considered capable of accommodating strategic levels of growth. Lydney is also currently reviewing their Neighbourhood Development Plan (NDP), which was submitted to the Council in January 2026 and is undergoing Regulation 16 Consultation. The development proposals set out within this Vision Document align with the adopted and emerging spatial strategies and development management policies and offer an opportunity to deliver much needed housing to the district, enabling the Forest of Dean to meet its identified housing needs. 5.0 Built Form and Surrounding Developments Within the Draft LP there are eight housing allocations identified in Lydney ranging in capacities of between 40- 643 dwellings, this includes several schemes that have achieved consent or have live applications. These are shown on the accompanying site plans. Collectively, they demonstrate that Lydney can accommodate a higher level of strategic growth, with the majority of allocations and consented development focused to the east of the town, within the A48, which acts as a natural boundary to development, framing Lydney from the wider countryside to the east. In this context, land north of Highfield Road provides a logical extension to the east of Lydney which would integrate well with existing and proposed development. 6.0 Site Location & Local Facilities The site is located on the north eastern edge of Lydney, just off the A48. The A48 is a key route through the wider area, heading south to Chepstow and the M4 motorway, and north to Gloucester and the M5 motorway. A number of proposed and allocated development sites to the south and west of the site, reinforces the urban edge of the town to the site boundary. Lydney Town centre is easily accessible from the site and can be reached within 10 minutes by bus or bike, and 20 minutes by foot. Lydney Town centre has a wide range of facilities and services, including large supermarkets and doctors surgery, to help meet the day to day needs of local residents. A number of primary schools are situated within a 10 minute cycle or 20 minute walk of the site. Lydney Train Station sits on the southern edge of the town and offers regular services to Cardiff, Cheltenham and the wider rail network. A small industrial site with combined garage, convenience store and post office sits just to the south of the site. This is easily walkable from the site and will provide daily essentials to the local community. A bus stop is also located here, with services to Gloucester, Colford, Chepstow and Lydney town centre. The range of local services and accessible location, with ease of access to the town centre and public transport options, ensure that this site is well suited and a sustainable location for residential development. 7.0 Landscape & Visual Appraisal The preliminary baseline analysis and field work indicate that the site occupies rising land on the edge of the settlement and is visible from a number of locations in the immediate and surrounding landscape. The most notable receptors include nearby residential properties, users of Public Rights of Way that cross or run adjacent to the site, and road users along the A48, Highfield Road and Driffield Road. While vegetation, existing development and undulating landform provide a degree of screening in many areas, open or partial views are possible from sections of the local road network, nearby footpaths and from areas of land, some of which are elevated to the east and southeast. Visibility generally becomes more limited with distance, where views tend to be filtered by hedgerows, trees and intervening topography, and are often experienced within the wider context of the existing settlement edge of Lydney. Overall, visual effects are likely to be most apparent for receptors in close proximity to the site, with more distant views typically partial, intermittent, or seen in association with existing built form. Where views of potential development are likely, there is the potential for these to be mitigated through consideration of the proposed development layout with built form located predominantly on lower levels with raised areas utilised as areas of open space. Existing boundary vegetation could also be enhanced to help break up and soften views of built form from external viewpoints. 8.0 Constraints & Opportunities

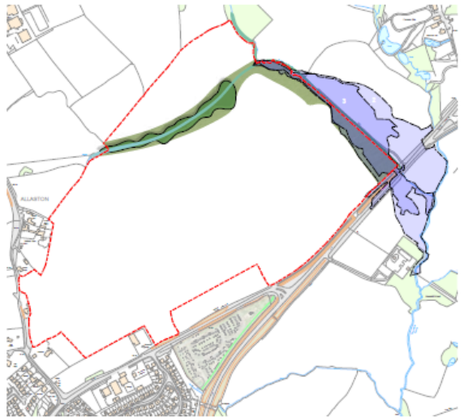
An analysis of the site and surrounding area highlights a number of constraints that need to be overcome and opportunities which will help reinforce the proposed developments sense of place.

1. A overhead electricity line runs through the site, a 60m offset from the lines will be created in which there will be no residential development
2. A ridge runs along the northern end of the site, this is the high point of the site and the topography runs to the north and southern boundaries from this
3. The upper slopes of the site are more visually sensitive
4. A stream runs along the northern end of the site
5. A floodzone sits on the eastern boundary. Development will avoid this area.
6. A series of PROW's run through the site and connect into the wider area
7. Access to the site will be taken off the A48, via a new roundabout
8. A pedestrian/emergency access will be taken off Driffield Road
9. A series of tree belts and hedgerows cross the site and contribute to the landscape character for the area
10. New developments to the south of the site increase the urban edge of the town towards the site
11. The low points of the site are suitable for attenuation features
12. Land to the north of the stream is too steep for development



9.0 Design Principles

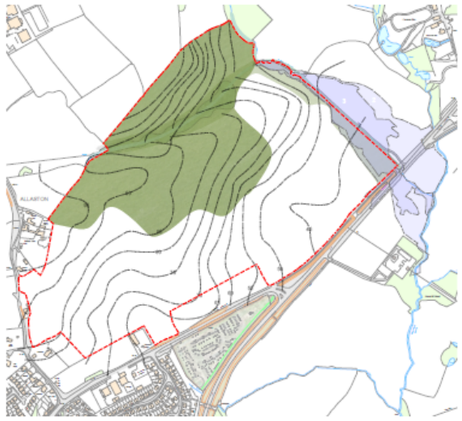
Retain the stream and avoid the flood zone



The stream running along the northern area of the site will be retained as part of the natural landscape character of the site.

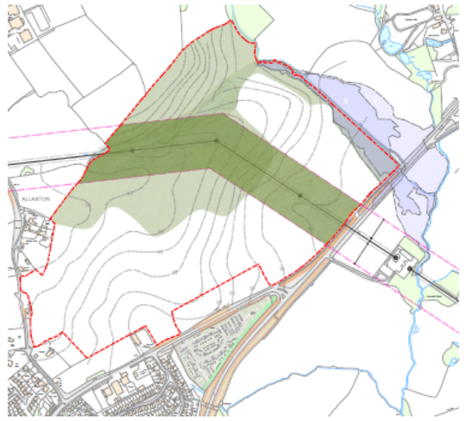
Development will avoid the area of the site within the flood zone, and this shall be retained as greenspace. Attenuation features will be positioned throughout the site to help manage surface water run off within the site.

Development to avoid the more visually sensitive areas of the site



Development shall avoid the more visually sensitive areas of the site, creating a natural greenspace area within the heart of the site. This will offer long range views out into the surrounding area.

Green corridor along the route of overhead lines



Three pylons carrying overhead electricity lines cross the site. A 60m buffer shall be created along the length of this route as a green corridor through the scheme.

Residential development will not be placed within this corridor, although it may be used for commercial, school uses as well as roads and parking.

Existing trees and hedgerows retained



A number of trees, tree belts and hedgerows cross the site and establish a natural landscape character for the site. Wherever possible these will be retained within public open space and form the framework for the development.

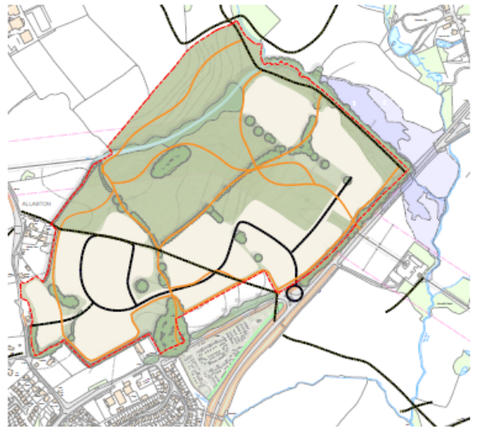
Position of development areas



Development parcels will fit in and around the landscape features and green corridors and spaces, established within these design principles. This tends to be located along the southern and western areas of the site, closest to existing residential areas. Development in the eastern area of the site will form a strong boundary to the town.

Development blocks will be positioned to look out over streets and spaces to create a safe, attractive and active development.

A well connected development

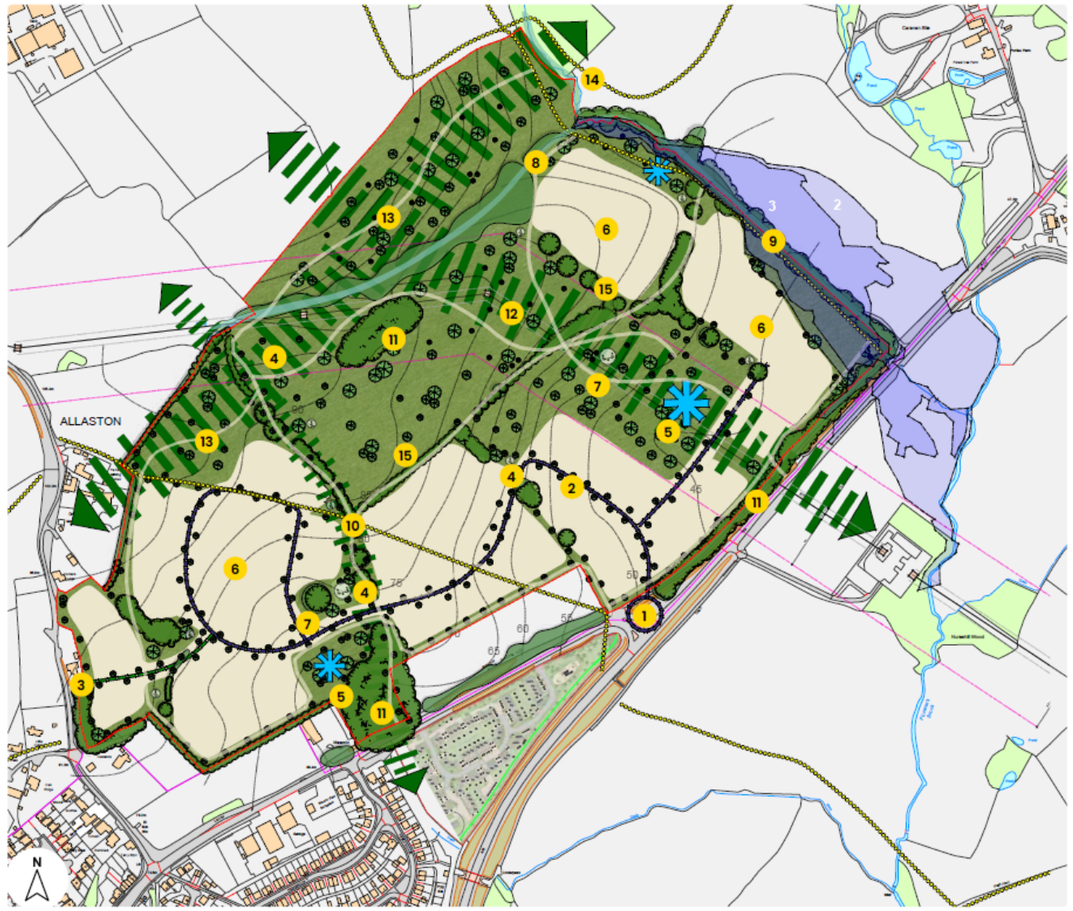


The site shall be accessed off the A48, via a new roundabout. An emergency access shall also be created onto Driffield Road, along the western boundary within the site. This shall be linked via an route that links through and provides a loop within the development.

A series of on street and off road pedestrian and cycle routes will cross the site and public open spaces, linking into the existing PROW's and wider area. This will ensure a well connected and permeable development where walking and cycling along safe and attractive routes is achieved.

10.0 Concept Masterplan

1. Access via new roundabout
2. Illustrative primary route
3. Secondary pedestrian / emergency connection
4. Green corridors
5. Areas for attenuation
6. Development areas
7. Play spaces
8. Offset from brook
9. Development outside of flood zone
10. PROW incorporated into new green active travel corridors
11. Existing hedges and trees protected and buffered throughout
12. Public open space under easement
13. Illustrative circular walking trails and paths
14. Links to wider walking / PROW routes
15. Development kept back from easement, strong frontage onto POS



11.0 Land Use Strategy

Our studies indicate that the site at Lydney is well suited for a residential extension to the town. Development parcels have been designed to accommodate a range of unit types, and bedroom sizes, providing flexibility across the scheme. A significant proportion of the site will be provided as Public Open Space, incorporating green-blue corridors, swales, native planting, attenuation features and accessible recreational areas distributed throughout the development. The landscape buffer along the brook will form a key active travel corridor, contributing to the site's drainage strategy while enhancing the existing environment and delivering ecological benefits.

Pedestrian routes and connections have been carefully integrated throughout the site, linking the development to the existing settlement and providing direct access to footways and active travel routes to local schools, services and facilities. Green infrastructure and ecological buffers are embedded within the design approach, supporting the vision for a sustainable, people-focused and high-quality residential development.

Based on this analysis, the site could deliver in the region of 560-640 homes based on an appropriate density between 35-40 dwellings per hectare.

Key ↓

- Development Area (c16ha)
- Public Open Space and Play and Park
- Existing Trees & Hedgerows
- Attenuation
- Site Area (c43ha)



Landuse Plan

12.0 Landscape Strategy

The landscape strategy for the site is to create a landscape led development, with existing features retained at the heart of the development. These will be complimented by green/blue infrastructure, play spaces, formal and informal open spaces. The green boundaries to the development will be retained and become buffers for the scheme further aiding this habitat gain. Existing hedgerows along the boundary will be retained and development will be offset from these. The tree lined brook will be protected. The brook will be offset and there will be a no development zone to protect tree roots of category significance. A new series of footways will link through the site and also follow the spine routes linking into dedicated cycle/ footways around the POS and further linking to the wider community.
Trees are to be retained where possible although we understand that lesser category trees may need to be removed to facilitate roads and development such as at the access point. Wherever possible, mature trees and those of category significance are to be retained. New native tree and shrub planting will be incorporated into the green streets and it is hoped that these will work in sync with the Sustainable Urban Drainage (SUDs) which are planned across the development.

		The underlying theme here is to aid connectivity within the scheme and the wider development, promoting diversity within the street scape. Native and appropriate planting will feature providing an attractive ecological benefit to the scheme. Landscape Aims: 1. Landscape spaces are multifunctional and flexible to accommodate and adapt to the changing needs of the community. 2. Social interaction opportunities to meet are included. 3. Expansive POS and green blue streets / corridors. 4. Provision of play spaces, including seating areas and naturalistic play such as rocks, boulders and logs. 5. Permeability/connectivity will encourage active travel along the brook and POS corridor (cycling / walking). 6. Creating new vistas and views towards features of interest and onto the brook / existing trees etc. 7. Bringing nature into the development via swales and SUDS within the street - An integrated blue infrastructure strategy. 8. Localised areas of incidental play close to residential units - LAPs. 9. Appropriate native planting which will be complimentary to the scheme. 10. Create a parkland to the north of the brook to boost the offer. 13.0 Movement Strategy The importance of street hierarchy will be evident throughout the site. The following will be implemented to establish the street hierarchy: The streets within the site should be designed in accordance with reviling guidance documents such as Manual for Streets, LTN 1/20 Cycle Infrastructure Design, National Model Design Code, Street Design Guides alongside SPD guidance. The site will promote a street pattern which puts sustainable modes of transport, i.e., pedestrians, and cyclists at the top of the hierarchy, with the routes throughout the site being easy to navigate and promotes active travel over the private car. The streets throughout the development will have a design speed of 20mph or less, with cycle lanes permeating through the site. The new community to Lydney should provide a clear and permeable hierarchy structure of streets, routes and spaces which are direct, inclusive and create safe, attractive and convenient ease of movement by all users and create “Low Traffic Neighbourhoods.” The streets will be designed to give priority to pedestrians and cyclists rather than vehicles. Existing green infrastructure will form the basis of selfsustained movement across the site and will connect the residential areas to the wider open space as well as local schools, employment, and facilities within reach of the development. There will be connections to the existing Public Rights of Way network which surround the site as well as a substantial active travel (green / blue) corridor running through the scheme. 14.0 Drainage Strategy The site will likely be designed to allow for a series of attenuation features within the lower parts of the site. These may include ponds and swales which capture surface water run-off release it at a green field run off rate. These ponds and wetland areas can help enhance the biodiversity and ecological diversity of the area, as well as act as habitat for birds and other flora and fauna. The stream running along the northern end of the site will be retained and included within the wider public opens space. Additional planting along the stream can further enhance its biodiversity and help promote wildlife within the scheme. A full drainage strategy will be prepared at a more detailed stage of development.
LNDP2 19	Gloucestershire County Council	GCC officers have reviewed the consultation materials for the Lydney Neighbourhood Plan 2025-2043 (Regulation 16) consultation by Forest of Dean District Council. Officer comments refer to, among other things: • Making new developments sustainable and climate resilient • Improving access to public transport and active travel infrastructure • Community facilities that can make the area more liveable Officers also highlight areas where information needs to be updated, to reflect current statuses of policies. **THEMATIC SUMMARY**

		This GCC officer-level response to the Regulation 16 consultation draft of Lydney town's Neighbourhood Development Plan (NDP) in the Forest of Dean District, highlights a range of inter-related issues: **Climate and nature** – GCC officers highlight achieved environmental milestones (such as the recent removal of Air Quality Management Area in Lydney and the publication of Gloucestershire Local Nature Recovery Strategy). Officers encourage the plan makers to further the neighbourhood plan's ambitions in decarbonisation through transport and building sector. **Health and wellbeing** – GCC officers note the importance of protecting people's health from changing climate and air pollution. Risks include exposure of residents to CO2 and NO2 emissions; as well as rising temperatures (that are noted to affect the older population disproportionately). Towards safety of the residents, officers advise slowing down traffic speeds to 20mph and improving public bus service. **Roads and places** – GCC officers recommend seeking funding towards innovative transport solutions such as demand-responsive services and active travel in new developments. Officers request further recognition of libraries as part of "community facilities". Tackling flooding ensures lives are not disrupted and properties are not damaged. Officers recommend the inclusion of water course maintenance, and natural flood management in the draft plan. To support the above, officers point to local evidence (specific to Lydney town, the Forest of Dean District, and Gloucestershire) as well as national guidance documents (that apply to the neighbourhood more generally). **DETAILED OFFICER COMMENTS** **Archaeology** GCC officers have no further comments to make. **Climate Change & Air Quality** Air quality targets GCC officers note, that the previously declared **Air Quality Management Area (AQMA)** in Lydney has now been revoked. This is to be updated in the draft neighbourhood plan under consultation. To further secure health of their residents and their environment, GCC officers would encourage plan makers in **setting more ambitious targets for air quality**. By UK standards, the Forest of Dean District no longer has exceedances in nitrogen dioxide (NO2) levels. However, by EU and WHO standards1 1 Some figures of pollution in Forest of Dean suggests that by EU standards, 56% of monitoring sites in the Forest of Dean District are in exceedance of desirable threshold set for the pollutants. By WHO standards, this figure rises to 93% of monitoring sites in Forest of Dean District. , the district is far behind. In Gloucestershire, Cheltenham Borough Council and Gloucester City Council have adopted their own targets to close the gap against EU and WHO prescribed standards. Making developments sustainable GCC officers welcome the objective of **"sustainable transport"**. This holds potential towards further improvement of the area's air quality, and in ensuring Lydney's NDP can contribute to climate change mitigation. Given that the transportation sector contributes 34% of all CO2 emissions in Gloucestershire, GCC officers would welcome a more ambitious transport policy. In addition to comments made by transport colleagues below, we would encourage reference(s) to the following where possible: Secure cycle storage in both residential and commercial developments. A barrier to cycling uptake includes unsecure cycle storage where users do not feel comfortable using them, due to risk of theft. Showers, lockers, changing rooms and dry rooms in commercial developments to help encourage active travel commuting. And, where appropriate: • Developer contributions towards electric vehicle car clubs with new development, particularly residential dwellings. • Developer contributions towards the expansion of existing demand-responsive bus transport (e.g., GCC's Robin bus service) where development is of sufficient scale to support such services. GCC officers **would welcome a reference to** "extreme heat" and "building for heat resilience". A recently published Climate Vulnerability Risk Assessment (CVRA) 2025 [PDF] has identified "extreme heat" as an impact of climate change in Gloucestershire. The

		elderly are more vulnerable to the impacts of extreme heat. In 2021, 22% of Gloucestershire's population was 65+. Between 2018 and 2043, the number of people aged 65+ in Gloucestershire is projected to increase by 52.5%. **Exposure of future home occupiers to air pollution** is a particular concern (Public Health England notes that "poor air quality is the largest environmental risk to public health in the UK".) The CVRA reports that within Gloucestershire, Forest of Dean District has the largest proportion of people (5.5%) with "poor or very poor health". Thus, in addition to lowering pollution levels in the neighbourhood, GCC officers strongly advise that residential developments in areas where occupiers will be vulnerable to high levels of pollution, must evidence suitable mitigation measures. Please note, GCC officers do not support residential dwellings with non-openable windows and mechanical ventilation to mitigate pollution. It is expected that residents should be able to open their windows without being vulnerable to pollution. The above is also linked to improving energy efficiency of the buildings to enable a shift to low-carbon future. If as part of the design, mechanical supply and extract ventilation systems are at all considered, GCC officers encourage heat recovery to be incorporated into the design towards meeting the current building regulations regarding conservation of fuel and power. Wildfire Risk Finally, on the longer term, the CVRA has also identified the Forest of Dean District among areas within Gloucestershire to be most at **risk from wildfires**. As a more recent instance, the assessment also notes, how during August 2022, in Cherington (Cotswold District) a wildfire spread across 50 acres of farmland. **Ecology** GCC officers welcome the vision and objectives as well as policies of the draft Neighbourhood Plan of Lydney town, that hold promise in ensuring that all new developments will: protect and enhance local wildlife; enable nature recovery; and make provision for blue and green infrastructure. GCC officers have the following comments to make: • "Key Wildlife Sites" are now referred to as "Local Wildlife Sites" and are designated by the Local Wildlife Sites Partnership. • GCC officers no longer use Strategic Nature Area (SNA), as areas identified for biodiversity enhancements fall under the remit of the Local Nature Recovery Strategy. • It would be good spell out what is meant by net gains for biodiversity i.e. all relevant new development will need to deliver 10% Biodiversity Net Gain (BNG), following the Biodiversity Gain Hierarchy e.g. on site in the first instance, then offsite, preferably as close to the development site as possible, etc. • The draft neighbourhood plan will need to update the section on Local Nature Recovery Strategies. The **Gloucestershire Local Nature Recovery Strategy (LNRS)** was published in January 2025. This now means that the neighbourhood plan must "have regard" to the LNRS**.** To help plan makers formulate appropriate policies, the Gloucestershire LNRS and related guidance are made available on the GCC website: **Link:** https://www.gloucestershire.gov.uk/planning-and-environment/ecology-and-landscape/gloucestershire-local-nature-recovery-strategy/ Habitat Regulation Assessment (HRA) Screening GCC officers note that the draft neighbourhood plan's HRA screening has concluded that the plan "is not likely to have significant effects on European/internationally designated sites, either alone or in combination with other plans and projects". However, the draft plan's Masterplan Framework also references the *2017 Lydney Severn Estuary Visitor Survey and Regeneration Strategy* which was work undertaken as part of FoDDC Local Plan to assess recreational pressure on the Severn Estuary SPA/SAC/Ramsar. The results of this visitor survey concluded that there was recreational pressure on the Severn Estuary from housing and tourism development from around the Estuary and that a Recreation Mitigation Strategy was required within the local planning authority areas of Forest of Dean District Council, Gloucester City Council, Stroud District Council and Tewkesbury Borough Council. Cheltenham Borough Council Cotswold District Council. Therefore, there does appear to be "in combination" effects, which could have implication for Lydney's neighbourhood plan under consultation. **Economy & Growth** GCC officers have no further comments to make.

		Education GCC officers have no further comments to make. 6 **Flood Risk Management** GCC officers hold that the policy “LYD ENV6 on Flooding and Water Management” is comprehensive and takes a good overview of flood risk. The draft plan would however, benefit from the inclusion of the following: • Inclusion of **watercourse maintenance** (this could perhaps be in the background section). GCC’s Flood Risk Management recently cleared significant stretches of watercourse, whilst reinstating previously decommissioned channels. Works were undertaken in 2025 supported by no reported property flooding during Storm Claudia, a comparable event to the one in 2020 which resulted in property flooding highlights the importance of keeping the watercourses clear. After GCC’s initial intervention, maintenance liability reverts back to riparian owners – although in some sections, this will be undertaken by the respective Internal Drainage Board as part of their priority maintenance programme. • More mention and **a map of surface water flood risk.** Much of the flooding history in Lydney is related to **surface water or flash-flooding** – overwhelming watercourses, combined sewers and other infrastructure leading to a significant proportion of the overall property flooding count. It is essential for this to be more clearly acknowledged in the document. • Mention (either within Policy LYD ENV6 or background) of the significant potential for **Natural Flood Management (NFM) in the upper catchments**. Referencing perhaps the GCC-led scheme in the Cannop catchment which has delivered NFM at an unprecedented scale and brought significant reductions to flood peaks and therefore flood-risk betterment to Parkend, Whitecroft and Lydney. • Mention of the combined sewer network being outdated and unable to cope with higher-order rainfall events. GCC officers feel it is important to reference the need for new developments to discharge surface water to watercourses where possible, which further highlights the need to regular watercourse maintenance as mentioned above. **Libraries** Policy LYD HC2: Protecting and providing community facilities GCC officers welcome that Policy LYD HC2, point 3 offers support to “improvement of quality” and “additional provision” of community infrastructures. It is noted that specific mention is made to "educational facilities, wheels and skate parks, health services and places to meet and socialise" within the definition of community facilities. For completeness GCC officers would request that libraries are included in the list under point 3, noting that Lydney library is referred to in the section preceding the policy on page 56. To learn more about GCC’s Library Strategy 2023-2028, please visit: https://www.gloucestershire.gov.uk/media/rtpo01ny/gloucestershire-library-strategy-2023-2028.pdf **Minerals and Waste Planning** GCC officers have no further comments to make. **Transport Planning** GCC officers are pleased to see that the Lydney NDP makes references to active travel links such as Swan Road to the rail station and harbour. The following would further strengthen the transport policy: • Add a vision for active travel, to create a safe, accessible, and sustainable environment where walking, cycling, and wheeling are the preferred modes for short journeys. This supports health, reduces congestion, and lowers carbon emissions. • Identify a network of routes to safeguard key walking and cycling corridors linking homes to schools, shops, and green spaces (similar to Map 14, but specifically for active travel). • GCC officers strongly recommend referring to the County-wide Cycling and Walking Infrastructure Plan where it connects Lydney to local towns and villages.

		• New developments must be connected directly to the existing active travel network and key services such as education, retail and green spaces, without detours or barriers. The NDP should require new housing and commercial developments to include segregated cycle lanes, wide pavements, and secure cycle parking. Officers advise referencing inclusive design and ensure all active travel infrastructure meets Local Transport Note (LTN) 1/20 standards on Cycle Infrastructure Design for accessibility and safety. To enhance quality and safety of built environments, GCC officers advise the following to be incorporated into plan making: • Introduce 20mph zones where people want to walk and cycle. • Integrate walking and cycling paths with landscaping to enhance biodiversity and user experience with green corridors. • Monitor trip rates and air quality. • Introduce targets, for example - aim for 50% of local trips under 2 miles to be made by walking, cycling, or wheeling within 10 years. • Review active travel use and infrastructure quality.
LNDP2 20	Historic England	I can confirm that there are no issues associated with the Plan upon which we wish to comment.
LNDP2 21	Savills obo Hallam	**Introduction** I write on behalf of our client, Hallam Land, in response to the public consultation of the emerging Lydney Neighbourhood Development Plan 2025-2043 (the NDP). These representations follow on from submissions to previous FODDC consultations in 2021, 2022, 2023, 2024, 2025 and more recently the Revised Draft Local Plan 2025-2045 (the DLP), which closed in March 2026. Our client controls the Land West of Lydney, which is identified as a draft allocation in the DLP, subject of draft Policy RLP.43. This letter sets out Hallam's response to the NDP and documents supporting the Plan, where necessary. As a general point, Hallam consider that it would be more effective to finalise and make the NDP after adoption of the DLP, ensuring an aligned and durable policy basis for the plan period. However, we remain committed to engaging with the NDP in any event. **Policy Context** The Localism Act (2011) makes provision for Neighbourhood Planning, empowering local communities to develop a shared vision for their neighbourhood and deliver the sustainable development they need through planning policies relating to development and use of land. For a Neighbourhood Plan to proceed to a referendum, the Localism Act (2011) requires the appointed Examiner to consider whether it meets the 'basic conditions' set out at Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended) and summarised in Paragraph 065, Reference ID41-065-20140306 of the Planning Practice Guidance (PPG). The National Planning Policy Framework (NPPF, December 2024) adds that these basic conditions and other legal requirements are tested through an independent examination before the plan can proceed to referendum (NPPF paragraph 38). Within the context of reviewing neighbourhood plans, the Plan-making section of the PPG sets out that *"individual policies in a neighbourhood plan may become out of date, for example if they conflict with policies in a plan that is adopted after the neighbourhood plan becomes part of the development plan. In these cases, the more recent policy takes precedence"* (Paragraph: 072 Reference ID: 61-072-20190315). a **Emerging Neighbourhood Development Plan 2025-2043** *Risk of Conflict with the emerging DLP* We acknowledge that national planning guidance outlines that a neighbourhood plan can come forward before an up-to-date local plan is in place (PPG – Neighbourhood Planning, Paragraph: 009 Reference ID: 41-009-20190509). Indeed, it is clear from the Regulation 14 consultation documents that some consideration has been made to the emerging planning policy position. Nevertheless, this sequencing inevitably creates a degree of uncertainty, as a neighbourhood plan developed in the absence of up-to-date planning policies at the local authority level may not fully reflect the direction or scale of growth that will ultimately be established through the emerging local plan. Given the NDP is likely to be adopted before the DLP is in place, there is a risk that its policies may conflict with, or be overtaken by, the policies of the DLP once adopted. This could result in the NDP becoming outdated relatively quickly, thereby limiting its long-term effectiveness and

creating tension within the development plan framework. In particular, if the DLP introduces revised design guidance, infrastructure priorities or other development management policies, the NDP policies may require early review or may be afforded reduced weight in decision-making once the strategic context changes.

As such, while the NDP may progress legitimately in the current policy vacuum, the absence of an up-to-date DLP increases the likelihood of a disconnect between policies at the local and town-wide levels, reducing the durability of the NDP once the new DLP is adopted.

For the reasons above, it may be sensible to consider whether the NDP is timed to evolve alongside the DLP, which would ensure that the Neighbourhood Plan follows the most recent evidence base and up-to-date planning policies of the DLP and that of national guidance.

Plan Periods of the DLP and the NDP

There is a notable misalignment between the plan periods of the emerging DLP (2025–2045) and the NDP (2025–2043).

As drafted, the NDP would run for two years shorter than the DLP it must ultimately conform with. This creates an unnecessary risk of inconsistency, early obsolescence, and potential need for premature review once the DLP is adopted.

To ensure a coherent and durable policy framework for Lydney, it would be far more effective for the NDP to align its plan period with that of the DLP, providing clarity for decision-makers and certainty for those bringing forward development proposals.

Policy LYD ENV1: Location of New Development

The supporting NDP Modification Proposal Statement confirms that Policy LYD ENV1 has been revised from the previous neighbourhood plan consultation draft. The updated policy sets out a series of criteria that development proposals located outside of the Lydney settlement boundary must meet.

The drafting of Policy LYD ENV1 creates ambiguity regarding how its criteria are intended to operate in decision-making. The mixed use of conjunctions at criteria (c)-(g) could generate uncertainty for applicants and decision-makers at the development management stage, as it is unclear whether the policy requires satisfaction of all identified criteria, a combination of criteria, or merely one of the listed tests

As a general point, criterion (a) ends with a colon and criterion (b) ends with a full stop, which appear to comprise typographical errors. Meeting criterion (a) should equate to conformity with the policy as a whole. a

The recommended policy text is as follows:

"LYD ENV1: Location of new development (alternative)

1. *Development within the Lydney settlement boundary, as identified on map 4 will be supported where it can be demonstrated that it is in accordance with other relevant development plan policies.*

2. Outside the settlement boundary, development will be supported where it:

1. *Provides for development in accordance with the provisions of the adopted development plan or national planning policy; or*
2. *b) Is well-related to Lydney's existing built area and sustainable transport infrastructure and road network and it provides improved transport infrastructure to ensure it is well-connected and does not result in unacceptable transport impacts; or*
3. *c) Protects features of nature conservation value, both terrestrial and aquatic, and geological value as part of the design rationale; and*
    - *Supports the sustainable growth and expansion of existing business or the formation of new businesses; or*
    - *Supports the appropriate development and diversification of agricultural and other land-based rural businesses; or*
    - Supports sustainable rural tourism and leisure developments; or
    - *Retains or improves provision of accessible local services and community facilities which cannot be provided inside the settlement boundary; or*
    - Provides for essential transport infrastructure."

Policy LYD ENV3: Protecting Lydney's Heritage

Policy LYD ENV3 seeks to ensure that development provides for appropriate protection and enhancement of the historic environment to maintain local character and distinctiveness.

In the first instance, it is recommended that the title of this policy is amended to reflect the guidance and language used in Chapter 16 of the NPPF which relates to *"Conserving and enhancing the historic environment"*. For this reason, the title of the policy should be amended to (with new text underlined): *"LYD ENV3: Conserving and enhancing Lydney's Heritage"*.

Policy LYD ENV4: High Quality Design and Local Distinctiveness

Our client is supportive of promoting high-quality and locally distinctive design. However when Policy LYD ENV4 is read in combination with the Lydney Design Code, this results in a significant amount of criteria, character-area requirements, and design expectations for applicants to

address. This may lead to ambiguity over which elements constitute policy and which are intended as guidance. As drafted, the policy blurs this distinction, increasing the likelihood of inconsistent interpretation between applicants, the Town Council and FODDC during the determination of applications.
A clearer, more proportionate approach should be applied through the Policy, focusing on strategic design outcomes and deferring detailed design expectations to the Design Code. In this instance, the policy should simply list the development areas set out at criteria (2)-(7), referencing that 'further information on these areas is provided in the supporting Lydney Design Code', or similar wording. a
The recommended policy text is as follows:
"LYD ENV4: High quality design and local distinctiveness

1. *New development should contribute positively to the local character and distinctiveness of Lydney, as described within the Lydney Design Code and Guidance (2024) and should be informed by the design guidance and codes defined within section 4 of the document.*

The relevant development areas in Lydney are as follows:

- The Victorian residential development areas;
- 20th century residential development areas;
- *Late 20th century residential development areas;*
- 21st century residential development areas;
- *Edge residential development areas; and*
- Allaston area

1. *All major development schemes with a residential component should perform positively against 'Building for a Healthy Life 12' or its successor. A 'Building for a Healthy Life' Assessment should be included within the Design and Access Statement. (As a guide, development should seek to achieve a score of no 'reds', design out all 'ambers' and achieve a majority of 'greens')*
    - *Where a design and access statement is required as part of a planning application, there must be a clear and proportionate demonstration of: How relevant design policies and the Lydney Design Code and Guidance, and other relevant design guidance have been integral to the design development process;*
    - *A robust analysis of the context and character of the site and the local area, in addition to the functional requirements of the intended use;*
    - *The design concept and the evolution of the design development through drawings or models, including explanatory text as appropriate; and*
    - *Where relevant, how consultation with communities and other relevant stakeholders, including Lydney Town Council has informed the design."*

Policy LYD ENV5: Low-carbon and renewable energy generation
As a general comment, it is recommended that the reference to *"AA"* should be expanded to *"Appropriate Assessment"* to ensure that this policy can be interpreted by those individuals who do not work in the development sector.
Policy LYD ET2: Supporting Lydney Town Centre
Policy LYD ET2 sets out how the NDP will support improvements to Lydney Town Centre.
The policy includes a requirement to deliver sustainable transport schemes and facilitate active travel (criterion (e)), which is supported. Prioritising active travel infrastructure within and around the town centre, including the promotion of pedestrian and bicycle movements, would help to strengthen sustainable movement patterns, improve accessibility, and support the wider objectives of reducing car dependency and enhancing the quality of the public realm.
This approach is discussed in the Lydney Town Centre Masterplan Framework (May 2024) and we would encourage the Town Council to pursue its proposals to improve the pedestrian and active travel infrastructure in the town centre. a
LYD TRAN1: Sustainable and Active Travel and Improvements to Transport Infrastructure
The policy details the highways improvements planned for Lydney Town Centre, including at the junction of Bream Road and Hill Street, which are supported. For the reasons set out in our response to Policy LYD ET2, we would also encourage Lydney Town Council consider an approach that promotes pedestrian and bicycle movement as part of any scheme brought forward under this policy.
Lydney Design Code (May 2024)
GS.06: Sustainable Buildings
Design Code GS.06: Sustainable Buildings sets out that *"where appropriate new development should consider buildings which operate fully, sustainably off-grid"* (third bullet point).

		Whilst we acknowledge that there is flexibility in the wording of this Code, it will be very difficult for a significant quantum of new development to be wholly self-sufficient in this way. For this reason, it is suggested that this requirement is amended as follows (new text underlined): • *"Where appropriate, new development should consider incorporating sustainable solutions to improve energy efficiency of new buildings. This includes heating solutions such as ground and air source heat pumps, biomass boilers or solar water heating and solutions towards electricity generation which can be generated through use of solar panels and/or a wind turbine and stored in batteries;"* *Revised Date* As a general comment, it is recommended that the date of the Lydney Design Code is updated to reflect the changes made in the January 2026 version. **Summary** For the reasons set out above, Hallam consider that it would be more effective to align the preparation of the NDP with the emerging DLP, by ensuring that the latter is adopted before the NDP. The policies of the DLP are still evolving, and once adopted, will form the higher-level framework that neighbourhood plans must be in general conformity with. Progressing the NDP now therefore carries the risk that elements of its policy framework may quickly become out of date or require early review to remain aligned with the new district-wide strategy. For this reason, the Town Council may consider making the NDP after the adoption of the DLP, which could reduce the likelihood of future incompatibilities and ensure the NDP remains robust and durable over its intended plan period. It is hoped that these representations are of assistance to the Town Council in preparing the next stages of the plan. Our clients would welcome the opportunity to meet with Lydney Town Council to discuss the development of the two Sites in more detail.
LNDP2 22	Environment Agency	The Environment Agency aims to reduce and protect against flood risk, whilst protecting and enhancing the water environment, land, and biodiversity. To assist us in the West Midlands Area in providing the most focused and accurate consultation responses through the Neighbourhood Planning process we have produced the below guidance and pro-forma for you to consider, complete and return to Forest of Dean District Council. You may wish to also refer to the Neighbourhood planning - GOV.UK (www.gov.uk) guidance to assist you in the preparation of your Plan. The Environment Agency, along with Natural England, Historic England, and the Forestry Commission (now known as Forestry England), has also produced some national guidance which offers further environmentally specific information in the context of Neighbourhood Planning and gives ideas on incorporating the environment into Plans. The guidance is available at: How to consider the environment in Neighbourhood plans. In the context of Climate Change there is further information on writing a low-carbon Neighbourhood Plan available at: How to write a neighbourhood plan in a climate emergency. To compliment the above we have produced the following guidance to assist you in the West Midlands Area specifically. This takes you through some of the relevant environmental issues your community should consider when producing a Neighbourhood Plan. We recommend completing the pro-forma to check the environmental constraints specific to your Plan area, which should help identify challenges, inform evidence and policy, and assist delivery of sustainable solutions. This approach will help ensure you have a robust Plan. **Flood Risk:** Your Plan should conform to national and local policies on flood risk. National Planning Policy Framework (NPPF) – Paragraph 170 states that 'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere'. With reference to the Forest of Dean Core Strategy it is important that your Plan is in accordance with Policy CSP.1 - Design and environmental protection and the associated text. Core Strategy Adopted Version (fdean.gov.uk)

		If your Plan is proposing sites for development you should check whether any of the proposed allocations are at risk of river or tidal flooding based on our Flood Map (of modelled flood risk). For example, are there any areas of Flood Zone 3 or 2 (High and Medium Risk). In line with National Planning Policy and, specifically, the Sequential Test, you should aim to locate built development within Flood Zone 1, the low-risk Zone. Our **Flood Map** can be accessed via the following link: Check the long term flood risk for an area in England - GOV.UK (www.gov.uk) In addition to the above you should also check with the Council's Planning Policy Team with regards to other sources of flooding (such as surface water, groundwater, sewers, and historic flooding) as detailed in their Strategic Flood Risk Assessment (SFRA). Gloucestershire County Council as the Lead Local Flood Authority (LLFA), has responsibility for local flood risk management and may hold flooding information that is not identified on our Flood Map. Specifically, some watercourses have not been modelled on our Flood Maps (Our Flood Maps primarily show flooding from Main Rivers, not ordinary watercourses, or un-modelled rivers, with a catchment of less than 3km^2). The SFRA also gives information on the 'functional floodplain', also known as Flood Zone 3b. The National Planning Practice Guidance (NPPG) shows the different Flood Zones in Table 1 in the Flood Risk and Coastal Change Section: Flood risk and coastal change - GOV.UK (www.gov.uk) Any allocations in areas of flood risk should include a consideration of climate change (see below). In the absence of up-to-date modelled flood risk information, or a site-specific FRA, to confirm an appropriate allowance you may wish to utilise the current Flood Zone 2 extent (where available) to indicate the likely, nominal, Flood Zone 3 with climate change extent. Where no modelling or flood map outline is available you will need to consider an alternative approach. Where an un-modelled watercourse is present, or adjacent to a site, then it may be prudent to incorporate a buffer zone, relative to topography, in consideration of flood risk not shown on the Flood Map. Some assessment is necessary in your Plan, to confirm that the site is developable. This includes safe occupation and that there will be no impact on third parties. You might seek opportunities to reduce flood risk. All 'major development' sites with flood risk issues, especially those with ordinary watercourses or un-modelled rivers within/adjacent or near to sites, are likely to need detailed modelling at the planning application stage to verify the design flood extents, developable areas and that the development will be sustainable. **Climate Change:** Your Local Authority's SFRA should indicate the extent of flood zones with likely climate change. The NPPG refers to Environment Agency guidance on considering climate change in planning decisions which is available online: https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances . Please refer to our separate 'Area Climate Change Guidance' (March 2023) for more information on how to consider and incorporate allowances in development proposals. This advises that an allowance should be added to 'peak river flows' to account for 'climate change' which should be specific to a river 'management catchment'. You may wish to use the following link in conjunction with our Area Specific Climate Change Guidance to ascertain the correct climate change peak flows allowances in your area: Climate change allowances for peak river flow in England (data.gov.uk). **Surface water (peak rainfall intensity) climate change allowances should be discussed with the LLFA.** **Flood Defences:** Areas of your Parish, or proposed sites, may be afforded protection by a flood defence/alleviation scheme. Where this is the case, your Plan should acknowledge this and identify the level of protection provided (including any climate change allowance). It should be noted that flood defences are intended to protect existing properties and are not to facilitate new development in areas that would otherwise be impacted by flooding. Any assessment of development behind flood defences should consider the impacts of a breach or overtopping.

		Where it is determined that new development should be behind a flood defence financial contributions may be sought to maintain or improve the structure. **Waste Water Infrastructure:** Waste water infrastructure is also of importance in your Plan. Where housing is proposed you should use the pro-forma to identify the receiving treatment works and whether the housing and/or any employment growth can be accommodated without impacting the receiving treatment works. You should look at physical capacity issues (e.g. network pipes) and environmental capacity (quality of treated effluent) issues. In addition you should contact the Water Company for further advice. Where there is an identified constraint (amber or red) you should demonstrate that there is a solution (it may be already programmed or could be a possible future infrastructure upgrade) to help improve the capacity issue and enable the development to go ahead. This will require consultation with the Water Company, and we have developed some general questions to assist this process. The outcome of this may inform a 'phasing' policy within your plan where appropriate. It may also be necessary to produce an 'Infrastructure Delivery Plan' to set out any key milestones for wastewater infrastructure upgrades and improvements. The evidence you produce should give a reasonable degree of certainty to all parties, helping demonstrate development is deliverable, and importantly ensure that your plan is 'sound'. Note: Government Guidance states that sufficient detail should be provided to give clarity to all parties on when infrastructure upgrades will be provided, looking at the needs and costs (what and how much). The NPPG refers to "ensuring viability and deliverability – pursuing sustainable development requires careful attention to viability and costs in plan making and decision making". Plans should be "deliverable". We would recommend discussions with the Utility Company to ascertain how you can progress with your Plan without impact on the works. To assist in these discussions, we would recommend the following: • What solutions are programmed within Asset Management Plans (AMP)? When will these solutions be delivered? Are there any options for accelerating these schemes via developer contributions? • In the absence of any improvement schemes what could alternative solutions be (type and location of) for short/medium/long term growth. Are these solutions cost prohibitive? • Are there any short-term options to facilitate growth? Some options to consider could be SUDS retrofitting or removing surface water from sewer systems. Utility companies could be asked about what Water Framework Directive (WFD) work they already have programmed into their AMP Schemes for Phosphate stripping or other sanitaries (e.g. ammonia/Biological Oxygen Demand). • With reference to the Nutrient Management Plan (where this is relevant), and Phosphate specific issues, are there any stringent measures factored in to ensure no environmental deterioration? What improvement scheme is, or could be, in place to bring forward development? **Water Management and Groundwater Protection:** In February 2011, the Government signalled its belief that more locally focussed decision making, and action should sit at the heart of improvements to the water environment. This is widely known as the catchment-based approach and has been adopted to deliver requirements under the Water Framework Directive (WFD). It seeks to: • deliver positive and sustained outcomes for the water environment by promoting a better understanding of the environment at a local level; and • encourage local collaboration and more transparent decision-making when both planning and delivering activities to improve the water environment.

		Neighbourhood Plans provide an opportunity to deliver multi-functional benefits through linking development with enhancements to the water environment. Local WFD catchment data can be obtained from: River Basin Catchment Data Explorer. The Forest of Dean District and the Severn and Wye Catchments, fall within the Severn River Basin Management Plan (SRBMP) area and the document highlights key issues and actions for the Severn catchment that should be of use in developing your Neighbourhood Plan. The latest SRBMP was approved in February 2016 (available at https://www.gov.uk/government/collections/river-basin-management-plans-2015). Further details are at: https://www.catchmentbasedapproach.org/severn **Aquifers and Source Protection Zones (SPZs):** Some of your local area, and specific potential site allocations, may be located upon or within aquifers and Source Protection Zones (link below). SPZ 1 is especially sensitive. You might consider these within your Plan and when allocating sites. The relevance of the designation and the potential implication upon development proposals should be seen with reference to our Groundwater Protection Position Statements: https://www.gov.uk/government/publications/groundwater-protection-position-statements Development and surface water drainage will need to be carefully located and designed to avoid pollution risks to waters and address potential environmental impact associated with low flows. For example SuDS may need to provide multiple levels of treatment. To address any quantitative issues with the waterbodies, SuDS should be designed so as to maximise recharge to the aquifer and support water levels in receiving rivers. **Water Efficiency at Neighbourhood Plan Level:** Local Water Efficiency targets may be secured in a neighbourhood plan or higher-level local plan policy. The draft Technical Standards – Housing Standards Review (Paragraph 14) provided advice on more stringent ('optional') water efficiency targets/measures, which go beyond the minimum building regulations standard. Paragraph 14 states that..."Neighbourhood Planning Bodies will only be able to apply the space standard and not optional requirements". These standards have since been enshrined into the Building Regulations (part G) "*The optional requirement only applies where a condition that the dwelling should meet the optional requirement is imposed as part of the process of granting planning permission. Where it applies, the estimated consumption of wholesome water calculated in accordance with the methodology in the water efficiency calculator, should not exceed 110 litres/person/day"*. However, there is no direct responsibility for Neighbourhood Plans to incorporate these water efficiency measures. **Cemetery Allocations: A**llocations for cemeteries brought forwards within Neighbourhood Plans must consider their location in relation to Flood Zones, Source Protection Zones (Any Borehole, including private boreholes, for potable supply should be considered) and Type of Aquifer. We would offer comments primarily in relation to the protection of controlled waters (i.e. groundwater and surface water). Matters relating to human health should be directed to the Local Authority. If steps are not taken to reduce the risks, burials can present a risk to the water environment. The proposed burial ground will need to meet our minimum groundwater protection requirements as set out in the following document: Protecting groundwater from human burials - GOV.UK (www.gov.uk) . **Biodiversity Net Gain:** Development of allocated sites offers the opportunity for Biodiversity Net Gain (BNG) as referenced in Paragraphs 187, 192 and 193 of the NPPF 'Conserving and enhancing the natural environment'. Specifically, any ponds and flood storage areas if designed correctly could also provide opportunity for blue and green infrastructure, such as wetland habitat throughout the year as well as providing a recreation amenity. Whilst we would not necessarily expect to see specific BNG details for allocations within the Plan, there may be an opportunity to promote 'Net Gains' within your Policies. Please see Biodiversity net gain - GOV.UK (www.gov.uk) and Biodiversity Net Gain for local authorities | Local Government Association for further information.

Neighbourhood Plan Environment Agency Pro-Forma

Site Allocation Description e.g. name, type and number of units.	Flood Zone (3/2/1) *	Unmodelled river or ordinary watercourse in or adjacent to site	Other sources of flooding (e.g. SW, GW, SF)	Flood Defence	Aquifer/Source Protection Zone 1 (Description)	Environmental Capacity at Treatment Works (Red – potential showstopper, Amber – possible problem; or Green – likely to be no issues)
Example	2	Y	SW	N	N	Amber
		Y/N		Y/N	Y/N	
		Y/N		Y/N	Y/N	
		Y/N		Y/N	Y/N	
		Y/N		Y/N	Y/N	
		Y/N		Y/N	Y/N	
		Y/N		Y/N	Y/N	

***Note to above:** Flood Zone 3 is the high-risk zone and is defined for mapping purposes by the Environment Agency's Flood Zone Map. Flood Zone 3 refers to land where the indicative annual probability of flooding is 1 in 100 years or less from river sources (i.e. it has a 1% or greater chance of flooding in any given year). Flood Zone 2 is land where the indicative annual probability of flooding is between 1 in 100 and 1 in 1000 years. Flood Zone 1 is the low-risk Zone with a flood risk in excess of 1 in 1000 years.

When considering 'other sources of flooding' you should refer to the SFRA and contact Forest of Dean District Council to ascertain whether the Parish, or specific allocated site, is impacted by surface water, groundwater, or sewer flooding etc. The team and/or the LLFA may also have historic flooding information to help inform your plan. More information on sewer flooding, or plans to remedy such, may be available from the Water Company.

LNDP2 23	NHS Property Services	Support with conditions Part 1 – Loss of Existing Community Facilities NHSPS supports the provision of sufficient, quality community facilities and supports the criterion set out under Part 1 of Draft Policy LYD HC2 which will need to be demonstrated to justify the loss of an existing community facility. This includes criterion (b) for the demonstration of the site or building as being surplus to requirements for community uses subject to other criterion. The NHS requires flexibility with regards to the use of its estate to deliver its core objective of enabling excellent patient care and support key healthcare strategies such as the NHS Long Term Plan. In particular, the disposal of redundant or no longer healthcare suitable sites and properties for best value (open market value) is a critical component in helping to fund new or improved services within a local area. All NHS land disposals must follow a rigorous process to ensure that levels of healthcare service provision in the locality of disposals are maintained or enhanced, and proceeds from land sales are re-invested in the provision of healthcare services locally and nationally. The decision about whether a property is surplus to NHS requirements is made by local health commissioners and NHS England. Sites can only be disposed of once the operational health requirement has ceased. This does not mean that the healthcare services are no longer needed in the

		area, rather it means that there are alternative provisions that are being invested in to modernise services. Where it can be demonstrated that health facilities are surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, it should be clearly accepted that a facility is neither needed nor viable for its current use, and policies should support the principle of alternative uses for NHS sites with no requirement for retention of a community facility use on the land. To ensure the principle of alternative uses for NHS land and property is clearly supported, and for the avoidance of doubt in the interpretation of draft Policy LYD HC2, NHSPS request the following wording (in red italics) is included within relevant supporting paragraphs: Proposed Modification to Supporting Paragraphs: “Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, this will be considered as meeting the requirement/s of Part 1 of Policy LYD HC2.” Part 3 (d) – Improvement or Additional Provision of Health Services and Facilities Part 3 of the Policy sets out the expectation for support to be given towards development proposals which lead to the improvement of the quality or additional provision of specific community facilities, which includes health services and facilities under criterion (d). Where new or improved health facilities are proposed as part of development proposals, we would urge the Council to clearly set out the need for engagement with the local Integrated Care Board (ICB) or successor body to ensure the healthcare service needs in the locality are suitably and sustainably met. As local health commissioners, the ICB are the sole responsible body for the planning and commission for healthcare infrastructure provision. This would enable the local ICB to accurately and suitably assess and determine where there is an identified need for improved or new healthcare facilities and, in turn, would ensure health needs are met at the right place at the right time.

Lydney NDP Basic Conditions Statement Addendum - Consultation Responses (22nd April 2026 and 6th May 2026)

ID Number	Consultee Name	Comment
LNDP1	n/a	No comment – this was a test
LNDP2	Coal Authority	Re: Lydney Neighbourhood Development Plan - Addendum to Basic Conditions Statement Thank you for your notification of 22 April 2026 seeking the views of the Coal Authority on the above. The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas. We last commented on the Neighbourhood Plan on the 26th March 2026. We note that this current consultation relates to an amendment in the form of an Addendum to the Basic Conditions Statement (BCS). I can confirm that the Planning team at the Coal Authority has no specific comments to make on this.
LNDP3	Historic England	I can confirm that there are no comments on this that we wish to submit.
LNDP4	J Davies	Impossible to access this so cannot comment.
LNDP5	Welsh Water	Please note, DCWW do not operate within the Lydney Neighbourhood Plan area and therefore offer no further comments.
LNDP6	K Urch	**Lydney Neighbourhood Development Plan 2 Basic Conditions Statement – Addendum | April 2026** 1. In respect of point (b) above, the Neighbourhood Plan takes account of the Gloucestershire Local Nature Recovery Strategy (LNRS) as it was in preparation at the time the made Plan was being modified **(consultation on the draft Strategy took place in September / October 2026 and it was adopted in February 2026)**. Policies LYD ENV2 and LYD TRAN2 relate to the LNRS. **Comment / Observation** Consultation on the LNRS could not have taken place in September / October 2026 as referenced.

		1. Section 3 - Updated Basic Conditions 1. The making of the Neighbourhood Development Plan does not breach, and is otherwise compatible with, EU obligations. **Comment / Observation** There is little or no evidence in the main body of The Plan to demonstrate that it is fully compatible with current EU obligations as referenced. One trusts that you will find my comments / observations of benefit in finalising the Lydney Neighbourhood Development Plan.
LNDP7	GCC	GCC officers note the additional requirements set out in the draft addendum to the Basic Conditions Statement for the Lydney Neighbourhood Plan 2025–2043, currently under consultation by Forest of Dean District Council. Our officer-level response (dated 01 April 2026) to the Regulation 16 draft of Lydney's Neighbourhood Development Plan has detailed advice in addressing climate change and local nature recovery. These are laid out in sections of *Climate Change, Ecology, Flood Risk Management,* and *Transport Planning*. Officers expect our comments will now be given stronger consideration in light of Sections 98 and 99 provisions of the Levelling-up and Regeneration Act 2023. Given the long horizon of 2043 as plan period, officers would welcome the incorporation of our recommendations into the final neighbourhood plan.