



# Forest of Dean District Local Plan 2021 - 2041

## Issues and Options September 2019



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# 1 Introduction

## Purpose

**1.1** This document sets out the issues and basic options that have so far been identified for the review of the Local Plan (LP) for the Forest of Dean. It considers how the issues are derived from the initial vision, from the context in which the plan will exist and from external influences including national guidance. It shows what the high level options for the way in which the plan will approach the future provision for the area may be, given the likely indicative scale of that provision. Finally, it considers the implications for the possible content of a LP in terms of the policy areas that need to be covered in order to address the issues that have been identified.

**1.2** At this stage apart from the approval of the process and the endorsement of the vision and the issues that follow there are no expressed preferred option or options. This document supports an Issues and Options consultation that will inform the decision to be made in the light of the responses to consultation and any other evidence.

## Introduction to Plan Review

**1.3** A plan review as defined in the national guidance (including the National Planning Policy Framework (NPPF) and related National Planning Guidance (NPPG), begins with the consideration of whether the existing document is still fit for purpose. It may then find that some elements are and other are not.

**1.4** The context and overall objectives of a Plan shape its content. In the case of the context a much greater focus on climate change has emerged and many councils have now declared a climate emergency, with accompanying resolutions. Although climate change was a theme in the 2012 CS and also the AP, it will be an issue of much greater prominence in the review reflecting the Council's priorities and delivering actions where it can through policies and proposals. Equally whilst sustainable development was defined in earlier plans and development that was increasingly sustainable was sought and often achieved, there is now a much greater urgency. The following short definition therefore will underpin the new LP which will then apply it to the three objectives in the NPPF.

### Definition of Sustainable Development

Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.

1987 Bruntland Commission

### Question 1

***Do you agree that the LP should take as an initial theme the above definition of sustainable development?***

## Introduction 1

**1.5** In the case of the FoDDC Plan the need is for a comprehensive new plan which runs forward to 2041. A full review of the existing policies is needed in order that a plan capable of accommodating the changes that are expected between now and that date can be developed. It may not mean that the entire range of existing policies is changed although they must be reviewed (considering whether they remain fit for the purpose for which they were intended and whether that purpose is still appropriate). The policies that allocate land for particular uses are the most obvious ones that will be reviewed and where necessary replaced. Many of them have been implemented or are in the process of being implemented, some may fail because they have not been implemented and others may be removed or amended due to changing circumstances. A new set of policies identifying land for development is required to provide an adequate supply. New policies may be necessary for a variety of other reasons, for example in order to reflect current guidance and to ensure that the new plan can protect what is necessary whilst delivering sustainable development over the district.

**1.6** Once the intent of renewing a plan is established, the first step is to define the areas in need of review and at the same time to consider the options that are available. These may be defined with reference to the aims and objectives of the plan and from the ways in which it can address any issues that have been identified. Final options usually emerge after a process involving the preparation and testing of drafts. All will be supported by a range of evidence that will be developed over the life of the plan, or at least until it is adopted.

**Question 2**

***Should the plan look forward to year 2041? Should the plan review and change, where necessary, all of the current AP and CS?***

**1.7** In support of the whole is a Sustainability Assessment (SA), a process which will continually shape the emerging plan or strategy. This will show how the options and then the policies and proposals deliver against a variety of tests based on sustainability. These include impacts on CO<sub>2</sub> emissions for which the intent is that the FoDD achieves a figure of net zero by 2030. The plan itself will follow the stages whereby issues and options are established, and a draft whole plan is prepared and refined. This will be further tested through consultation and other evaluation and will then be refined to result in a version to be submitted for examination. The examination will look for a plan that is "positively prepared" (meets the needs of the area and any neighbouring needs that are agreed as being met within the area), justified in terms of an appropriate strategy supported by evidence, effective (deliverable) and consistent with national policy (NPPF 36).

**Question 3**

***Do you agree with the need to bring carbon emissions down to zero by 2030?***

## 1 Introduction

**1.8** The evidence base will be developed in a manner which will provide progressively greater detail as the plan evolves. It is not for example possible to carry out detailed assessments of sites until they are defined but general themes and broad locations can be evaluated as basic plan options and broad issues are identified. These when related to the vision and the overall needs can be used to inform initial options. Options at this stage are broad spatial strategies that may be part of the final plan in order that it may deliver what is required. They need to be realistic in terms of being able to be delivered but remain subject to much further study and consultation in order to refine and select the most appropriate strategy for the draft plan. The draft plan is expected to be a complete and detailed version of the plan. It is then subject to consultation and review before the next version is compiled. This is published, is open to comment and is then submitted to the Secretary of State.

**1.9** This document demonstrates how the basic plan issues are derived and relates these to possible spatial strategies. These strategies take account of current evidence including indications of the scale of new development that may be needed. Equally importantly they include the present broad understanding of the many physical constraints that may apply over the district. Although the supporting evidence is incomplete, it will provide a realistic guide sufficient to derive initial options. From these it will be apparent what additional specific evidence is likely to be needed. At a strategic level the SA will be able to look at the options and help refine, reject or select them having also informed the process by which they were derived.

**1.10** It is very likely that further issues will be identified during the plan making process, and it is certain that the range of options will vary. The final plan is likely to take forward a strategy that has features of more than one option. The final strategy may have some "headline" major allocations but also incorporate a range of more incremental changes such as "x dwellings/ ha to be allocated across a range of larger villages". This is largely because the plan overall must address a range of issues which require a wide range of spatial solutions. The content of the plan and the evidence on which it is based will inevitably change as it evolves. Whilst this paper is based on the current situation, it will be essential that the LP that is eventually submitted takes account of the latest available material that it is able to consider.

## Background 2

**2.1** A plan end date of 2041 is considered appropriate. A commitment for such a review was given at the recent AP examination and in any event government policy now requires a plan to have at least a 15 year life on adoption. As a consequence of the review of the LP, it is likely that the various NDPs (Neighbourhood Development Plans) prepared under the guidance of Parish Councils and which also form part of the Development Plan will need to be reviewed. The councils concerned, and any others, are also encouraged to take an active part in the LP review process.

### Plan Vision

**2.2** As a preparation for the 2041 Plan the broad aims and objectives of a new plan were discussed. An exercise with elected members in 2018 resulted in a draft vision which is as follows:

#### Vision

- In 2041 younger people are more likely to want stay in the district with good access to education, employment and housing.
- The needs of an ageing population have also been incorporated into the design of new development.
- It is a place where healthy lifestyles are an everyday part of living and working in the district.
- The implementation of sustainable development enhances the quality of life for residents and visitors alike.
- The diverse landscapes and heritage of the area is so distinctive that it is nationally and internationally recognised.
- A thriving tourism market is underpinned by a high quality natural and built environment.
- The lack of affordable housing has been addressed through imaginative and sustainable ways providing an appropriate range of tenures which support local communities, services and facilities.
- The area has resilient and diverse employment opportunities with strong links to good local schools embracing, in particular, industries of the future.
- The district is better connected through improved transport, digital and mobile data connections which reduce the need to travel and provide a distinctive local offer.
- The Forest of Dean is known as an amazing place to start and grow business.
- The district is actively engaged in pursuing a low carbon future and new development is designed to adapt to climate change.

#### Question 4

***Do you agree with the Vision above, and are there any particular aspects of it that are especially important?***

## 2 Background

**2.3** The Vision sets aspirations for the FoDD and realising them is the key aim for the LP. The role of the LP is to identify and then address the issues involved through policies and proposals. Implied within the Vision are other important issues which will also give rise to actions for the new plan. Uppermost in these is that the plan must enable the delivery of sufficient housing in accord with identified needs. Needs of an area are currently identified using a nationally applied method which identifies the numerical requirement. It is then necessary to ensure that this can be delivered by making sufficient land available again with appropriate additional allowances to ensure that the numbers required can be built at the rate required. The LP is a land use plan but can influence other aspects. Its implementation is through enabling change to accommodate the future needs of the FoDD but also in ensuring the fabric of the area is well protected and that changes lead to a more sustainable (long term enduring) future.

**2.4** The LP will need to reflect the policies of the FoDDC and its corporate priorities and balance these against the external influences. The Council's corporate priorities are reviewed on an annual basis. Of particular importance is the need to ensure that the plan delivers a sustainable strategy which is compatible with the Council motion on climate change which contains the following wording:

***...to help deliver carbon neutrality through all relevant strategies and plans...***

**2.5** The LP will therefore need to ensure that its policies and proposals adopt this as a key aim and deliver real change which will maximise its contribution to achieving the FoDD target of zero carbon by 2030.

**2.6** The draft Vision suggests the following areas which may form or underpin issues for the LP:

| Key point from Vision as amended   | Principal matter(s) raised   | Overall issue(s)                                   |
|--|--|--|
| <p>Deliver Carbon neutrality through strategies and plans.</p> <p>The district is actively engaged in pursuing a low carbon future and new development is designed to adapt to climate change.</p> | <p>Overarching need to ensure that LP meets its requirements in a manner that helps achieve carbon neutrality</p> <p>LP to prioritise and promote sustainable future- and demonstrate that it is doing so against benchmarks</p> | <p>All Sustainability, design, environment</p>     |
| <p>In 2041 younger people are more likely to want stay in the district with good access to education employment and housing.</p>   | <p>Housing availability, type and total supply,</p> <p>Access to educational opportunities</p> <p>Range and availability of employment</p> <p>Attractive environment</p>   | <p>Housing, employment, environment, education</p> |
| <p>The needs of an ageing population have also been incorporated into the design (delivery) of new development.</p>  | <p>Housing availability, type and supply</p> <p>Access to facilities.</p>  | <p>Housing, access to facilities</p>               |

## Background 2

| Key point from Vision as amended   | Principal matter(s) raised   | Overall issue(s)   |
|--|--|--|
| It is a place where healthy lifestyles are an everyday part of living and working in the district.   | Design of inclusive development and its environment<br><br>Accessible recreation space<br><br>Walk/ cycle provision  | Environment, housing, design                                 |
| The implementation of sustainable development enhances the quality life for residents and visitors alike.  | Improve access to facilities<br><br>Approve long term enduring designs and plans<br><br>Development that takes place is future proof and sustainable   | Environment, design, economy, access, overall sustainability |
| The diverse landscapes and heritage of the area is so distinctive that it is recognised nationally and internationally.  | The importance of protection and enhancement of the landscapes<br><br>Policies that support conservation and development that is compatible  | Environment, sustainability                                  |
| A thriving tourism market is underpinned by a high quality natural and built environment.  | Need for robust conservation policies<br><br>Allocations that maintain the quality of the environment  | Environment, economy   |
| The lack of affordable housing has been addressed through imaginative and sustainable ways providing an appropriate range of tenures which support local communities, services and facilities. | Delivery of affordable housing<br><br>Affordable housing to address local need<br><br>AH in locations which benefit from and support local services  | Housing, sustainability                                      |
| The area has resilient and diverse employment opportunities with strong links to good local schools embracing in particular industries of the future.  | Range of employment and educational opportunities<br><br>Need for policies to deliver and support diverse economic opportunities<br><br>Enable employment change for example to more IT based and additional homeworking | Employment, sustainability                                   |

## 2 Background

| Key point from Vision as amended  | Principal matter(s) raised  | Overall issue(s)       |
|---|---|------------------------|
| The district is better connected through improved transport, digital and mobile data connections which reduce the need to travel and provide a distinctive local offer. | <p>Policies that support sustainable locations</p> <p>Enable service provision in an efficient manner</p>   | Access, sustainability |
| The Forest of Dean is known as an amazing place to start and grow business.   | <p>Quality of environment</p> <p>Physical support for new business,</p> <p>Sustainable locations and a range of sites</p> <p>Policies to support enterprise</p> | Economy, environment   |

### Key Issues

Overall the aim of the LP must be to produce a sustainable long term outcome and direction for the FoDD. This must be an outcome achieved through the application of policies and proposals that are able to provide a long term basis on which to guide development that is likely to be required to meet the needs of the area. Within this overall theme, there are a number of key issues and others derived from them:

| <u>Plan issues with key issues in heavy type</u> | <u>What LP needs to do</u>   |
|--|--|
| Overall issue: a sustainable long term outcome   | Prioritise and promote sustainable future and deliver on sites and by strategy (enable delivery). <u>NOTE: a sustainable future includes delivery of development that is compatible with climate change and promoting actions that reduce carbon emissions in recognition of the declared and acknowledged climate emergency</u> |
| Access   | Policies to ensure good physical access and digital access/ connectivity overall and for identified development locations  |
| Access to facilities                             | Ensure efficient and effective access to facilities/ services from new and existing development locations- physical and electronic access  |

## Background 2

| <b><u>Plan issues with key issues in heavy type</u></b> | <b><u>What LP needs to do</u></b>  |
|---|--|
| Access by a variety of means of transport               | Policies to use public transport, walking and cycling and to encourage provision to enable walking/ cycling as well as promoting/ allocating sustainable locations |
| Access to employment opportunities                      | Provide opportunities for a range of employment including home working   |
| <b>Create and retain balanced communities</b>           | <b>Provide a mix of housing and employment and other development, alongside recreation opportunities and community facilities</b>                                  |
| <b>Ability to adapt and innovate</b>                    | <b>Plan to be able to cope with some degree of change including new initiatives and designations. Facilitate appropriate exemplar schemes</b>                      |
| <b>Conservation- built environment</b>                  | <b>Support conservation through policies and proposals.</b>  |
| <b>Design</b>   | <b>Policies to achieve good overall function, appearance/ quality of design/ energy efficiency and resilience</b>  |
| Design accessibility                                    | Policies to ensure accessibility within development for a variety of means of transport  |
| Design durability                                       | Need for long term enduring designs and plans  |
| Design inclusive  | Ensure the design of inclusive development (reference in policy)   |
| <b>Economy</b>  | <b>Promote a more diverse and robust economy support and promote a range of opportunities (sites and activities)</b>   |
| Economy widen range as appropriate                      | Identify range of employment opportunities   |
| Economy employment range of sites                       | Provide a range of sites   |
| Economy support for enterprise                          | Policies to support new and existing enterprise  |
| Economy- sustainable tourism                            | Promote to increase overall benefit/ quality   |
| <b>Education</b>  | <b>Access to educational opportunities and ensure provision where there is new development</b>   |
| Education new opportunities                             | Facilitate new and improved educational opportunities  |

## 2 Background

| <b><u>Plan issues with key issues in heavy type</u></b>   | <b><u>What LP needs to do</u></b>  |
|---|--|
| <b>Environment</b>  | <b>Net gain principle applied to carrying capacity and protection; overall sustainability</b>  |
| Environment avoid flood risk                              | Take account of flood risk and likely changes to risk including changes in sea level, increase in extreme events   |
| Environment- green infrastructure                         | GI policies to identify land and principles  |
| Environment- landscape protections and enhancement        | Protection and enhancement of the landscapes, identification of locally valued landscapes  |
| Environment quality of allocations                        | Allocations that maintain the quality of the environment and seek improvements where possible  |
| Environment quality overall                               | Aspirational policy for improvement/ enhancement and overall approach  |
| Environment resilient against climate change              | Policy to ensure resilience of allocations and individual allocations that comply. Policies to support and encourage renewable energy, additional tree planting for sequestration etc.       |
| <b>Housing</b>  | <b>Mix of types and overall delivery sufficient to meet needs, deliver Affordable Housing all to be long term sustainable in terms of location and construction</b>                          |
| Housing AH addresses local needs                          | Allocate sites that can provide affordable housing to address local need, enable "exceptions" sites. Allocations and delivery policies provide housing as far as possible where it is needed |
| Housing AH in locations to benefit from services          | AH in locations which benefit from and support local services  |
| Housing numbers   | Allocations must be deliverable/ developable-adequate overall housing supply 5 year and plan period  |
| Housing type  | Housing availability by type including self build and tenure   |
| <b>Previously developed land- make best use of</b>        | <b>Policies to support and bring forward previously developed land</b>   |
| Spatial strategy that is accepted/ supported by residents | Planned changes need to be explained and understood/ accepted by community   |

## Background 2

| <b><u>Plan issues with key issues in heavy type</u></b>  | <b><u>What LP needs to do</u></b>   |
|--|---|
| <b>Town centres- support and vibrancy</b>  | <b>Effective TC policies for sustainable active places (mixed development)</b>    |
| <b>Other Major site specific issues</b>  |   |
| A48 connectivity   | Addressing the constraints imposed by A48 at Gloucester and Tutshill              |
| Gaining positively from West of England and South East Wales City regions                                  | Plan policies which take advantage of nearby major strategic plans and strategies |
| Gaining positively and being part of the Gloucestershire Plan (benefitting from it and contributing to it) | Plan solutions which take account of and benefit from Gloucestershire strategy    |

**Question 5**

***The above table contains a list of key issues, do you agree with them and are there any that are especially important?***

## 3 Key Issues

### Future Capacity

**3.1** A new plan must provide for a comprehensive range of land uses to be accommodated in a manner compatible with its conservation and sustainability objectives. Much of the plan is likely to be concerned with these and ensuring new development is appropriate. It is, however, the need for additional housing that will create the most pressure and greatest change in the FoDD. There is a real need for additional housing to meet the needs of the area and whatever the precise figure meeting this requirement it is likely to be the single most extensive new use of land in the plan. Alongside housing, other uses must be accommodated and where appropriate promoted so that services and employment can be made available. Although housing is generally developed where a plan identifies suitable opportunities, these need to be realistic and able to attract developers, whether from the market or the social sector. Sites (allocations) need to be supported by evidence that they are likely to be viable whilst at the same time being suitable in terms of the wider sustainability (including climate change) objectives of the plan.

**3.2** In considering the basic plan options it is appropriate to base these on the way in which the needs for new housing can be met. Services and employment may be made available or may already be accessible depending on the nature of the option(s). New or existing infrastructure may be used but it needs to be able to be accessed or provided.

**3.3** A new plan may allocate land for its entire life in detail or use a combination of strategic and local policies in order to show how its requirements can be met. The latter approach may involve not identifying precise areas of land for the later part of the plan period. It may review existing allocations and retain, change or delete them but is most unlikely to delete any that have permission for development. It will also need to verify the expected contribution from sites that will not be identified until they receive permission (windfalls) as well as small unforeseen sites (for example single infill plots). From this it will then be possible to identify the scale of provision that needs to be made through new allocations.

**3.4** It is reasonable to assume that small sites and windfalls will continue to provide completed dwellings. At the current rates this could add in the region of 1480 from small sites and up to 1200 from non allocated sites over a 20 year period (taken as 2021-41). These figures assume that small sites (1-5 net increase in dwellings) will add about 74 per year. The rate during the present plan period has averaged 92pa but since 2010/11 has fallen to just over 70pa having seen a dip during and immediately after the recent recession. The evidence therefore is that the average contribution of about 74 pa is still a reasonable figure and is likely to be a conservative estimate.

**3.5** An alternative method for estimating the likely yield from small sites would be to look at the permissions and make an assumption about their yield based on implementation rates. When this has been applied in the past, it has been assumed that all houses under construction will be completed but that only 60% of those with permission (but not under construction) will be completed. This method could be varied, for example to discount outline permissions, but to assume that those with detailed approval would all or almost all be implemented. Given the "bank" of permissions at present there would appear sufficient to support the 74pa used in the trend based assumption and potentially a figure in excess. One source of permissions and new dwellings is from prior approvals and another from conversions. They come from the direct application of government policy, not through any local plan. Although there are some issues about the product and also the principle of these processes, they do make an additional contribution to supply.

## Key Issues 3

**3.6** Larger windfall sites will still contribute new dwellings, and an assumption will need to be made in the plan for these. They are sites that were not allocated in a plan at the time they received permission. They therefore include both policy compliant unforeseen sites and those that may not comply with the local policies of the time but are given permission on appeal. The contribution from these sources will fluctuate, but over the last 10 years (2008/9-2017/18) the contribution from these sources was about 46% of the total from large sites (those over 5 dwellings net) or an annual average of 93 units pa against 110 from allocated sites. As more allocated sites are implemented, this percentage may change but the expectation is that there will continue to be a significant supply. Sites from this source are counted in the overall supply and are assessed individually once they receive planning permission. Until that time however an allowance needs to be made on the basis that although they cannot be specifically identified they will continue to come forward. In order to do this in the past an average contribution of 81 units per year was used. As it is unlikely that such sites will provide completed units in the first year, no allowance was included in the trajectory nor is there any allowance for the second year. Thereafter an allowance was made on a sliding scale for 16, 31, 49, 65 and then 81 units per year. For each year after this an allowance of 81 pa was used. It is therefore only at year seven when the full allowance is added to the supply. Until then the allowance is 0, then again 0 and after that approximately 20, 40, 60, and 80% of the calculated average annual contribution. This approach avoids any double counting but also takes account for the fact that sites which are neither allocations nor have planning permission will add to housing supply.

**3.7** For this exercise of deriving plan options and as a means of estimating the future need for allocated sites, it is intended to retain the current methods of accounting for small sites and larger windfalls. Both have been accepted in the recent AP examination and at other appeals and both appear to remain broadly consistent with current evidence. It appears that if anything they are under estimates of the numbers of dwelling completions likely to come from each source.

**3.8** The above allowances would add a figure of about 2680 to the total dwelling supply over a 20 year period. There is one more element of supply that needs to be accounted for. This is the "carry over" from the current supply- namely allocated and permitted sites at the start of the new plan period. The new plan period is likely to be 2021-2041 meaning that it overlaps the existing. Sites currently with permission are likely to contribute new dwellings under the new plan and need to be allowed for. This does not include either variety of windfall (small sites and larger unforeseen sites) as these are to be allowed for by the separate calculations above. The bank of permissions and allocations at the start of the new plan period which are unimplemented can be derived from the trajectory. Looking at the current draft trajectory a figure of about 1500 could be allowed for. This represents the number of dwellings on identified large sites that are not expected to be built by the end of 2020/21, or are not considered realistically to be able to be delivered by that time. In other words the allowance takes into account the fact that the trajectory represents what could be built rather than what may actually be built. It is compliant with government guidance in doing this and takes into account the views of developers. It allows for the fact that individual outlets are unlikely to deliver over a certain number of dwellings and that each settlement will also have a limit on the number of dwellings that can be sold at any one time. This limits the number of outlets. Affordable housing is not constrained by the market and can be delivered in a variety of ways. For the trajectory therefore the limits imposed on settlements and sites are based on the rates of completions of the market housing on each.

## 3 Key Issues

### Question 6

**Do you have any comments on the above (calculation method for delivery of housing and housing trajectory)?**

### Calculation of Need

**3.9** The starting point for the calculation of housing need for an area is now based on a government derived figure and there is now less input required from individual LPAs than with the previous system. This new system is however still evolving and final details have yet to be made available. It is likely that need will be calculated starting with an ONS (Office of National Statistics) forecast for 2014, to which a measure of affordability (ratio of house prices to incomes) will be applied. This is intended to increase the supply in areas where there is poor affordability. From this figure it should be possible to derive a housing requirement for each LPA. Current indications are that this figure for the FoDD would be slightly greater than the current 330pa, possibly about 371 (an increase of about 12%). This may be the baseline figure of housing need for the plan, and 371pa translates to 7420 over the whole 20 year period. It is the equivalent of the 330pa set by the previous method and as adjusted by the examination of the AP. It relates to, on its own does not lead to the figure of the five year land supply. This is calculated by the addition of an allowance to ensure that the available land can provide for the required rate of development. Indications are that, dependent on local circumstances, 5, 10 or 20% would be added to the baseline supply being sought. This would then give the figure that any plan would have to enable for at least the first five years, in order to deliver a five year supply. The figure will be significantly greater than that dictated by the baseline and will require a wider range of sites to be available throughout the plan period. As an example, if the FoDDC need were to be calculated as 371 pa, then 10 or 20% addition would lead to a land requirement of the equivalent of between 408 and 445 dwellings per year. As an example, at the lower end of this range, 20 years at 420pa requires land for 8400 dwellings in total to be made available. A calculation of this nature will replace the one which was used for the adopted AP and is likely to give a higher requirement over the plan period. However, it looks forward in accord with a forecast rather than considering delivery over the whole plan period. The methodology is however still under review and further government advice awaited.

**3.10** Although there will be a carry over from the current plan of any remaining available sites, the 2041 plan will be based on the principle that at the end of its period there will also be sufficient supply to provide continuity. This will however be monitored and is more a matter for plan review nearer the time. At the present stage therefore and taking the current future need indications into account, the new plan may require at least 7420 dwellings over 20 years. This would need allocations to allow for non availability or late availability of some sites so would rise possibly to over 8000 (7420 plus 10% is 8162). Against this, expected small sites and windfall could deliver about 2680 and large carry overs 1500.

**Question 7**

***Given that the above calculation of housing need is an estimate, do you have any comments at this stage?***

**New housing sites required to be identified**

**3.11** The requirement for new allocations is therefore based on a need to provide for the difference between the likely supply that can already be identified from carry overs or from the continuation of small unidentified sites and other windfalls and the total needed. If the total need is say 8000 then there is a need to enable 8000- 2680- 1500 or about 3820 dwellings. To this may be added an addition for non implementation (say 10%), and any carry over beyond 2041. The figure (indicative) is therefore likely to be higher than 3820. As a working estimate and with the certainty that it will change, a figure of about 4000-4200 could be used as an illustration. It does not allow for any carry over into the next plan period but does make other allowances. At this stage without express guidance about how the overall provision should be made it is a working number sufficient to be used to illustrate future strategies. The AP as adopted included land for about 3900 in its housing allocations. A large proportion of these however were carried over from the previous plan.

**Land which may be required**

**3.12** 4200 new dwellings may need 140ha approx. plus strategic landscaping, and appropriate open space, service provision and for larger sites related employment, education and any other required community uses. The 2018 AP allocates about 150ha for almost 3900 dwellings. It is reasonable to assume therefore at this stage that the new plan will need to allocate a similar amount of new land plus any carry over. The bulk of the latter will be at Lydney. Again as an illustration, the entire East of Lydney new development including Oakdale, land east of the bypass and the former foundry covers about 88ha and is expected to be implemented over a period of up to 20 years (from the first phase at Oakdale which commenced in 2011).

**3.13** Sites likely to be allocated in the new plan may include previous allocations carried over providing that they can be supported by sufficient evidence to suggest that they can be expected to be developed within the plan period. Apart from the allocated land east of Lydney, which will be assumed to be developed and developable, all other sites allocated but not developed under the present AP will be reviewed. Where it is concluded that they may be regarded as deliverable they may be retained as allocations, but where there are doubts, options to address non-delivery will be considered alongside the deletion of any allocation. Some of the new plan allocations are therefore likely to be common with the old. Over and above this there is likely to be a baseline of new identified sites and policies that support a general continuation of some of the present policies. It would be both unwise and difficult to stop the evolution of the various settlements in accord with their requirements whilst also taking full account of any constraints. Beyond this level of incremental change lies the most apparent and significant part of any plan strategy whereby major strategic sites are promoted. In order to deliver the likely requirement for

### 3 Key Issues

the FoDD such allocation(s) are probably necessary. These may take any form but would be expected to be mixed developments associated with existing settlements or they could be more freestanding.

**3.14** For a planned neighbourhood or a new settlement, it would be appropriate to consider a development of 100+ ha to accommodate 2000 dwellings along with open space, employment and other uses. Additional allocations in the form of new neighbourhoods such as is being developed at Lydney also must be of sufficient size to enable infrastructure to be provided and to attract an appropriate mix of uses. Such developments have a very long lead time and would be expected to be phased in a manner that could lead to delivery extending beyond the 2041 plan period and certainly not starting until well beyond the start in 2021.

**3.15** Of the notional 4200 new dwellings required on newly identified land, a substantial proportion would be expected to be accounted for by way of planned incremental change on previously developed land, and for the continuing evolution of the settlements concerned. Capacity studies taking account of the constraints that exist are likely to limit the potential delivery of development from the carefully managed evolution of the existing settlements approach even if greater scales of change were merited. Above and beyond allocations and policies that support incremental change, there is very likely to remain a significant requirement for new development to be accommodated in what may be termed strategic sites. In the last LP and in its predecessor the largest strategic sites were the allocations that comprised the Lydney East new neighbourhood. These were first incorporated into a draft plan in 2000 and an adopted plan in 2005 having been discussed from 1996. The development was commenced in 2011.

**3.16** Summary of possible housing required, 2021-41.

| Source  | Possible number (dwellings) | Approximate area in ha (8000 dwellings is 267 ha) |
|---|-----------------------------|---|
| Existing permissions carried over   | 1500                        | 50  |
| Small sites 1-5 dwellings at 74pa,  | 1480                        | 49  |
| Unidentified windfall sites as above  | 1200                        | 40  |
| Sub total   | 4180                        | 139   |
| Balance to be found from total requirement of 8000  | 3820                        | 128   |
| Balance plus non implementation allowance (10%) of allocations- this is the possible requirement for new sites- | 4352                        | 145   |

## Question 8

*Do you have any comments on the possible land requirement?*

### Designated Areas and Sites/ Other Constraints

**3.17** The spatial options for a plan depend not only on what change it has to accommodate but also and crucially on the environment (and environmental capacity) of the area in which they will be delivered. Having indicated that there is likely to be a need for strategic sites to be identified, it is necessary to look at some important (initial) constraints before the basic options can be identified. These will be the subject of a great deal of further study throughout the plan process but this initial stage is an essential step in setting out initial options. It will set some of the context and help to ensure that the options are at least broadly credible. The constraints will be considered in a great deal more detail elsewhere not least in the SA.

### Statutory Forest

**3.18** The statutory forest boundary makes up a large proportion of the FoDD. Within it are many freeholds and substantial parts of some of the largest settlements in the district. The woodland and associated non planted areas, many of which form settlement boundaries or lie within them are owned by the Crown and cannot be developed. Land within the freeholds can be considered in the usual way in the LP but these areas are almost all tightly defined by areas of forest (Crown land). Their expansion for built development into the surrounding forest areas (planted or not) is not possible. The current AP policies map shows the statutory forest and in addition there are some outlying woodlands where the same restrictions apply. Whilst expansion of built development into areas of woodland would normally be a difficult process, in the FoD it is not possible. In addition to this much of the woodland is either ancient woodland or is former ancient woodland and that too is protected from development including under the revised NPPF. The statutory forest boundary and the freeholds within it cover about 17% of the district which is approximately 9358ha.

### Designated sites

**3.19** There are a great variety of statutory and non statutory designated sites in the FoDD. Nationally important sites of ecological importance (eg. SAC, Special Areas of Conservation) and Ancient Monuments are spread throughout the FODD. The main areas where ecological designations are concentrated are the Wye Valley, close to the Severn Estuary and the Forest of Dean itself. Nationally important sites are in effect absolute constraints and would rule out development of them or where it would be likely to have an adverse effect on them. The basic guidance is in the NPPF which establishes a hierarchy but the importance of "locally significant" features and designations is such that plan allocations should avoid or improve the setting of these. Many of the designated areas are also within other protected areas such as the FoD itself or the Wye Valley AoNB.

## 3 Key Issues

**3.20** There are two AoNBs affecting the FoDD. Whilst these are not absolute constraints on development, major new development would not be expected (NPPF172). The current identified AoNBs are affected by other constraints and compliance with this aspect of national policy is an essential part of any strategic development option.

**3.21** The various designated sites are shown on the current Policies map which accompanies the Allocations Plan.

### Areas prone to flooding

**3.22** Throughout the FoDD there are areas that are at risk from flooding, including areas of low lying land associated with the Severn Estuary and the River Wye. In addition, there are floodplains associated with smaller rivers such as the Leadon and the Lyd. These limit the scope for development in some areas though not to a great extent. The majority of the areas concerned are unlikely to be considered for development but where watercourses run through existing settlements (for example Lydney and Newent town centres) there are limitations imposed by this. Broad areas that lie within flood zone 2 or 3 would need to be excluded from those considered for most new development.

**3.23** Flooding from surface water is a more local matter and individual sites will need to take account of this, with particular regard to that associated with the rivers and some of the areas low-lying land. Areas prone to rapid run off also impose additional constraints.

**3.24** As an initial guide the EA mapping of flood risk areas provides guidance suitable for this strategic level of evaluation. It is normal practice to allow for the effects of climate change in planning for future development and the LP will need to do so, taking account of the latest available evidence in respect of the possible rise in sea level, and other potential changes such as the possibility of more extreme flood events. These considerations are likely to influence the plan and its options in providing for a sustainable long term future.

### Relief

**3.25** Relief is not an absolute constraint on development in the FoDD, however there are areas where slopes are acute or where landforms are broken and complex that would make development very difficult (if it were even desirable because of landscape issues). Most of the higher land is in the south and west of the district, and other constraints also apply to much of these upland landscapes. Some are protected for ecological importance, much lies within the statutory forest and the Wye valley AoNB for example.

### Accessibility

**3.26** Constraints tend to be interrelated. For example, areas of complex broken relief may be less accessible, woodland may be more likely to be of ecological importance and areas further away from the large settlements tend to be less well served by roads suitable for a variety of traffic. Accessibility in the physical sense is often cited as a major constraint to development in the FoDD. It does limit options and there is a perception of relatively poor access to much of the district. In addition there are clearly apparent "pinch points" at the Gloucester and Tutshill/ Sedbury extremes of the A48. A response to these issues is generally twofold. Plans may seek improvements and may also try to identify opportunities that make the most of the existing infrastructure. In

## Key Issues 3

addition, development proposals may seek to identify opportunities that depend less on physical access for volume or heavy traffic. This, which includes the encouragement of improved IT connections is an important aspect of how the LP may be made more resilient as well as sustainable.

**3.27** Access to the rail network is via a single passenger station at Lydney, or another out of the district at Chepstow. This could only conceivably change with significant major investment and is an important consideration in evaluating development locations and options.

### Landscapes

**3.28** The various landscape characteristics over the FoDD bring a variety of constraints and opportunities for development. Many of the more complex landscapes are areas where other constraints apply and this is especially true in respect of the FOD and the Wye Valley. Other landscape areas are however vulnerable to change and need to be respected in considering development opportunities. Low lying land near the estuary is especially vulnerable and like other areas may also be affected by other designations and therefore need to be protected. Major development will inevitably have an impact on a landscape and its assimilation into an appropriate setting with suitable design is essential. Some landscape types are much more able to accommodate change than others.

#### Question 9

*The above are basic constraints to development. Would you agree or wish to add or remove any of them?*

### Major constraints in the largest settlements

**3.29** The settlement pattern in the district is quite varied and includes most notably a distinct and relatively concentrated form around the edge of the statutory forest. There are four towns, three of which are of a similar size and the fourth, Newent is slightly smaller. All serve their surrounding hinterlands, are relatively sustainable locations for development and have been the subject of relatively large changes under the AP and the previous Local Plan. They are however each affected by some of key constraints including those listed above. The extent to which these apply is a major consideration in framing Issues and Options for the 2041 LP. In addition, there are some particular characteristics that need to be taken into account which affect the potential for the accommodation of further change.

### Lydney

**3.30** There are a high level of commitments in Lydney which will be built out over a number of years. They are sufficient to provide for a build rate up to the maximum that is assumed to be able to be sustained over a period that extends well into the next plan period. Further allocations even if there were land available would not therefore necessarily add to the numbers able to be delivered per year but could extend the time over which new housing could be delivered in Lydney.

## 3 Key Issues

There were about 1600 outstanding housing commitments in March 2019. A realistic assumption for housing delivery in Lydney may be that new building at about the current rate will continue until at least 2027/28 and that the current committed sites may even then not be completed.

**3.31** The above consideration does not in itself rule out further allocations at Lydney which could serve the latter part of the new plan period. There is scope for a degree of change but there are some very real physical constraints which preclude major additional development. There may also be a case for a period of assimilation following the final development of the land to the east of the town. Policies to support and bring forward additional employment services and other facilities will need to be reviewed and are expected to be part of the new plan alongside the continuation of the regeneration theme. The areas of land involved are likely to be similar to those already allocated (but not developed) under the 2026 AP.

**3.32** The proximity to the Severn Estuary is a constraint on development, although with the possible exception of the lowest lying land not an absolute one. Strategies to ensure there is no undue pressure on the estuary from recreation are already needed and will continue to be necessary. Areas prone to flooding will need to be avoided. The town shares part of its boundary with forestry commission woodland which is one constraint and the landscape forms another. When read alongside the land limited by flooding and the separation imposed by the railway and bypass, the potential for the identification of major sites is further reduced.

**3.33** As far as the plan options are concerned, There may be some limited scope for new allocations at Lydney but on initial examination of the basic constraints, landscape, ecology, land use (forest), and potential flooding will be limiting factors. For the purposes of plan options, a small additional allocation may be assumed, albeit site(s) have yet to be identified.

**3.34** Lydney does interact with the other forest towns and is in a position to attract trade which may at present be lost to Chepstow. Its position on the A 48 is an advantage but the A48 itself is constrained where it leaves the FoDD at Chepstow and close to Gloucester. The main line station is a major advantage over other locations.

### Cinderford

**3.35** In Cinderford the main constraints are more apparent than in Lydney and some are absolute, limiting scope for change. There are about 600 housing commitments identified in the current plan to 2026. These are associated with a variety of new and previously developed sites. While there may be some scope for additional previously developed sites to be identified this is limited especially in view of the need for all sites to be able to show that they are viable however they may be developed. The current commitments include land which may be developed in partnership with Homes England and much of this is owned by the FoDDC. Outside the land currently identified for some form of development, the opportunities are very limited. It is not possible to entertain options that involve incursion into the statutory forest. Other landscape constraints would also preclude much of the land to the east of the settlement, where the settlement is not directly bordered by forest. Only about 20% of the settlement boundary is not within the statutory forest and also less than 25% of the settlement itself lies outside it. The boundary not within the forest largely comprises very prominent and attractive land which tends to be steeply sloping.

**3.36** Cinderford is in a position to have some influence outside the district and being close to Ross could compete to a degree. It is well related to interact with the other forest towns and is the closest of the three to Newent. The LP will be expected to continue to support the present FoDDC regeneration policies and especially the development of the Northern Quarter.

### **Coleford**

**3.37** Coleford currently has a similar number of housing commitments to Cinderford (600). It is for current planning purposes regarded as Coleford town together with a nearby arc of settlements which have as their "outer" boundary forest or forest waste. Although functionally together, planning policy seeks to retain a physical separation between Coleford and the settlements nearby. There is no need to retain a functional separation, but assuming the physical visual gap is to be retained this is a major constraint. The maintenance of the gap is strongly supported by the AP and the NDP. Other landscape constraints exist such as the close proximity to the AoNB, and the relief and broken yet attractive nature of the land to the north of Berry Hill. Aside from the current opportunities identified in the AP there may be some scope for additional housing but after initial consideration it would appear limited. The policies which identify the gap and protect it are local policies seeking to protect the environment in the manner advocated in the NPPF. The recent NDP is clear in its protective approach as is the AP. Although this approach could be changed to enable the development of land between Coleford and the surrounding settlements this would be a fundamental change leading to a less easily interpreted landscape and also a much less attractive and locally distinctive one. The approach would be contrary to national policy. Promoting this change would make it very difficult or impossible to demonstrate that new developments would add to the overall quality of the area, and they would be likely to fail to be sympathetic to local history and their landscape setting.

**3.38** The above constraints apply to all types of development and although there are current sites identified for new employment uses around Coleford, these are in relatively short supply.

**3.39** Overall, although constrained, the basic principle that Coleford should be able to accommodate a degree of change as with the other towns should be accepted. It is a relatively sustainable location. As indicated above however, outward expansion will need to be relatively modest and limited in particular by landscape and the forest boundary.

**3.40** Coleford is well placed to benefit from changes in the other two forest towns and to complement them. It could potentially have some influence outside the district but this is likely to be at a low level given the nearby presence of Monmouth.

### **Newent**

**3.41** Unlike the other three towns, Newent is not constrained by the presence of the statutory forest or related woodlands. It is set in an attractive rural setting. There are in the centre a large number of Listed Buildings which mainly lie within the Conservation Area. Land around the town is variously constrained with the notable case of the protected route for the canal to the north and the area potentially at risk from flooding beyond that. Some areas in the centre are also at risk from flooding whilst accommodating a variety of town centre uses. Overall there are areas that are less constrained around the town and could offer some potential. The need to provide access to the centre and to ensure that any development that does take place does not do so to the detriment of the centre is an important consideration. Overall there is identifiable potential in Newent though

### 3 Key Issues

not necessarily very great. Outstanding commitments for housing (about 370 on large sites) are generally likely to be taken up in the short to medium term. There is some scope for further employment land to be developed and also need.

**3.42** Newent's relationship with the remainder of the FoDD is more detached than is the case in the forest core (Cinderford, Coleford and Lydney) so any shared benefits from additional development would be less apparent than between the three towns. It is also in a position where commuting to Gloucester/Cheltenham is most apparent and maintaining or improving the sustainability of this relationship is an issue for the new plan.

#### **Tutshill/Sedbury and Beachley**

**3.43** Tutshill/Sedbury is functionally part of Chepstow and is situated at the extreme south of the FoDD. Many of its principal interactions are not with the FoDD. There are some major constraints that affect the area but equally some opportunities. Both the Wye and the Severn are internationally important protected areas (SAC). The area is one that is along with Chepstow experiencing considerable current housebuilding activity and the three sites within the FoDD (all under construction) are likely to be completed in the short- medium term with approximately 246 new dwellings. Beyond the current commitments there is scope for additional development but this would need to fully address any access issues both locally and on a wider basis.

**3.44** Situated further south on the peninsular is Beachley, which contains at present a MoD camp around a smaller settlement and an area of settled dwellings formerly a series of huts. The latest defence review (2016) suggested that the MOD would seek to close the camp by 2027 and if this intention remains the Plan will therefore need to address the future of this area probably considering a variety of potential uses. Beachley Peninsular is constrained by access and by its proximity to the Severn and Wye estuaries but if the camp is vacated there will be opportunities for beneficial change.

**3.45** The southern part of the FoDD and the Tutshill/Sedbury and Beachley area in particular is in a strategic position within the FoDD at the "pivot point" between the West of England and the South East Wales City region. This may produce both pressures for development and provide scope for benefits.

**3.46** As it is located at one of the identified A48 pinch points, Tutshill/Sedbury and Beachley is the focus of current discussions about how possible solutions to benefit both Monmouthshire and Gloucestershire, as well as the wider areas may be implemented. At a wider level, the accessibility to the FoDD from Bristol and Southeast Wales and ensuring any interaction is of benefit to the FoDD is an issue for the Plan.

#### **Question 10**

***The main settlements listed above have some major constraints as well as opportunities, do you agree with these or are there some opportunities that need to be explored further, or some constraints that have not been included?***

***The conclusion above means that there are likely to be some changes proposed in the settlements listed but that the scale of these is limited by the constraints identified.***

### **Larger Villages**

**3.47** In addition to the settlements above, there are large villages which have in the past seen varying degrees of change and have featured in allocations in the past and current plans. As part of this options exercise it is considered that some overall "baseline" level of change is likely to continue on the lines of steady incremental growth in keeping with the identified constraints. This level of change is in keeping with the expectations that the settlements concerned will continue to evolve. For the purposes of considering issues and options however, one option may be to consider if there is scope for allocations in any of the larger villages for major change in comparison to the current policies which apply.

**3.48** The basic general constraints described above apply throughout the FoDD and affect some of the larger villages. Some straddle the statutory forest boundary, others are close to the Severn or partially within AoNB. As part of the current exercise of identifying issues and assessing possible options, the following should be considered.

**3.49** Bream is constrained by landscape and the forest boundary but also in some areas by ground conditions and proximity to protected SAC sites. It is a large village well placed for access to Lydney and also well served by its own shops and other facilities. The population is about 3100 making it the largest in the FoDD after the towns and Tutshill/Sedbury. The physical limitations referred to above are in some cases absolute and the overall effect is to limit the potential to identify opportunities that would bring a greater degree of change than a policy of modest incremental change would suggest.

**3.50** Drybrook and Harrow Hill together have a population of about 1650 and are close to Cinderford and also Mitcheldean. They have reasonable services and general access although parts of both are locally served by narrow lanes. The main constraints are landscape and the forest boundary which with the variable relief, limit development potential.

**3.51** Mitcheldean is with a population of about 2700 large with major employment in the form of Vantage Point, an integral part of the village. It is close to Cinderford and accessible from the main road network. The village is regarded as a sustainable location with services and employment. Landscape and ecology are constraints which need to be balanced against the level of services and employment that is available together with the generally reasonable accessibility.

**3.52** Newnham has a range of services and is accessible by road. The village is centred around a Conservation Area and close to the Severn Estuary. It is also constrained by the landscape setting and various protected sites. There is an existing allocation for expansion to the north which is defined only by the present AP. Future change would need to be shown to be compatible with the conservation and landscape conservation and would probably mean that any opportunity would involve additional land to the north of the present allocated site.

**3.53** The Lydbrook/ Joys Green/ Worrall Hill area is variously constrained though it forms an extensive group of three distinct but related settlements. Relief, AoNB and the Forest boundary are the main constraints with steep valley sides and limited access to some areas being notable characteristics.

### 3 Key Issues

**3.54** Whitecroft/ Pillowell/ Yorkley are limited by Forest boundary but with some scope for change-accessible in some areas and some services and employment. Away from the forest boundary the landscape is in many cases open and prominent giving emphasis to the forest edge location.

**3.55** Although there is undoubtedly scope for some additional change in the larger settlements, this generally lies within the area of incremental change and there are more fundamental constraints in most that would limit more major change. The exceptions may include Tutshill/ Sedbury and development in this general area is examined as part of this options exercise.

#### Question 11

*One approach is to look at the settlement hierarchy and propose development in keeping with this, is this the right general approach, if not why not? Are the constraints referred to the right ones?*

#### Question 12

*Does the need for sustainable development mean trying to locate new development where there are existing services or where new can be provided?*

#### Other options

**3.56** From the above it is plain that capacity for future change may be limited if the options use only development around the existing settlements and the key characteristics of the area are to be retained. There is a finite capacity which is close to being reached in a number of the larger existing settlements. Changes to the local planning policies could be made to enable further development in some cases and these may be implied in options that are presented below. Some may not be appropriate and will be excluded as the LP progresses. Changes in national policy are not anticipated so it is necessary for any options proposed to be compatible with this.

**3.57** Although much of the above discussion is formed around the need to accommodate new housing, there are other types of development that will need to be provided for. In addition to meeting the need for quantity of development, the way in which it is planned must have a positive influence on the environment and will need to take place in a manner consistent with the plan's and the council's carbon reduction actions and policies. This may influence the location of new development and will certainly affect its nature, as well as design, construction and orientation.

## Relationship with plan vision and objectives 4

**4.1** The plan's vision and objectives set the context for its local dimension, and whilst many of the items in the draft vision can be found in other plans they are the result of considering them in the context the local (FoDD) situation including them as appropriate.

**4.2** The contextual material for the LP includes the Council's Corporate Plan which is at the time of writing being compiled. It is expected to feature and emphasise the importance of the reduction of carbon emissions, the need for affordable housing, regeneration and the conservation of the environment. It should be possible to identify the various elements of the corporate plan which have land use implications embedded in the LP in order that it can deliver its part of the agenda. Policies and proposals in the LP will have a direct relationship with the corporate plan and be able to demonstrate how their outcomes relate back to the corporate plan.

## 5 Context

**5.1** Issues and Options cannot be prepared without reference to the surrounding areas and the FoDD is one that is surrounded by some quite different areas with strategies that may differ from its own. They do however share some common features and their areas of influence overlap for a variety of interests. All are seeking to accommodate growth in a sustainable manner though some have quite significant aspirations. In the absence of any formal strategic plan, it is still necessary to ensure that the land use plans of one area are compatible with another. All should share the (variously expressed) wider aims of achieving sustainable development. There are overlapping economic plans and strategies both current and in preparation which will affect and may benefit the FoDD.

### **Wales and Monmouthshire, West of England and Western Powerhouse.**

**5.2** As well as being well located close to Gloucester and Cheltenham, the FoDD lies at the pivot point between the West of England and the relatively densely populated Southeast Wales. It has a functional relationship with all of these areas. These areas have some form of strategic vision with common aims and objectives. Together and when seen alongside any emerging strategy for Gloucestershire or the JCS area, they all aspire to deliver forms of sustainable development. Collectively, all lie within an area known as the "western powerhouse" which is emerging as a regional group seeking devolved delivery of economic growth supported by government. Its major centres are around Cardiff, Bristol and Swansea but included are Swindon and Gloucester/ Cheltenham.

**5.3** Southeast Wales including Monmouthshire is influenced heavily by the major centres of Cardiff and Newport but also parts of the Valleys. It has its own strategy in the form of the Capital Region City Deal and collaboration between the component Local Authorities is extensive. Because the large concentration of population in the southeast, the area has a considerable influence on the FoDD. There is some joint working with the Bristol area in relation to the potential of the wider area including the West of England combined authority. The FoDD lies between the two areas albeit set to one side of the main transport axes. At a more local level Chepstow and Tutshill/ Sedbury are joined. Pressures for development in Monmouthshire are felt also in the south west of the FoDD. Chepstow is quite constrained physically and the future plans for Monmouth suggest that their significant growth pressures may be quite difficult to deal with. Settlements along the Severn such as Magor and Caldicot may see considerable change. These are only 10-15km from the FoDD border. The headline common issue between FoDD and Monmouthshire is travel congestion around Chepstow coupled with the need to accommodate future change. The various local authorities and the Welsh government are discussing this and possible solutions. One may include an additional Wye bridge though it is likely to be very costly and should be considered alongside the potential to improve rail services and other public transport. There is easy access by train to Chepstow/Cardiff and Newport though the frequency of services leaves room for improvement. Access to Bristol is relatively easy though congested at times by road. The rail connection is constrained by the need for a change of service at Severn Tunnel Junction.

### **Gloucester, Cheltenham and the Joint Core Strategy Area**

**5.4** With Gloucestershire being the administrative upper tier for the FoDD and given the proximity of much of the district to Gloucester (and to a lesser extent Cheltenham), the influence of these two centres is very significant whether for the daily flow for commuting or for other services. Strategically the Joint Core Strategy (covering Tewkesbury, Gloucester and Cheltenham Districts) is being reviewed and is addressing the need for additional housing and infrastructure. It is actually

Tewkesbury Borough boundary which adjoins the FoDD but this wraps the western fringes of Gloucester as well as other areas into which the main urban areas will expand. These areas are separated from the FODD by the floodplain of the Severn which limits the western expansion of the city and as a result of this the centre of Gloucester which developed close to the river/ docks is very accessible from the FODD. Access by train to Gloucester and Cheltenham is reasonable from Lydney.

### **Hereford, Worcestershire and the North**

**5.5** To the north of the district there is a range of larger settlements which include Hereford and Worcester as well as smaller centres like Ross and Ledbury. They are all part of the FoDD context as are locations further afield such as may be accessed by the M50 which offers easy if not wholly sustainable connections to the wider motorway network.

#### **Question 13**

***The above areas and strategies all relate to or include the Forest of Dean. How should the Forest of Dean respond? For example, should it place its new development near the other main centres, look to use any improved transport linkages, or co-operate to deliver new infrastructure, etc.?***

## 6 Basic Spatial Options

### Scope

**6.1** At this point there are a number of key factors to be considered which affect the basic options. As additional and more detailed evidence emerges these may change and equally options may themselves change, most probably by blending aspects of one with another. Overall, the quantity of new development that has to be provided for is not yet known and although there are indications (from current building activity) about the likely viability of sites, there will be additional material to be taken into account as the plan develops.

**6.2** At this stage it is necessary to suggest some basic options that may be considered. They are not yet ranked and some will perform better than others under the various considerations that may be applied. The FoDDC does not at this stage support any one in proposing the range of possible options for consultation. To assist the consultation and encourage a wide range of feedback, additional material highlighting various aspects of each may be provided. As is normal for this type of exercise one option to be tested will be the one with minimal intervention, and comments on its performance will be sought alongside those that have a more developed strategy.

**6.3** The key messages so far may be summarised as follows:

- The overall preferred strategy must be one of promoting a more sustainable form of development, especially in respect of selecting longer term enduring locations that reduce the need to travel and can deliver carbon neutral development
- The likely need for change will require strategic solutions beyond simple incremental change at various locations
- Environmental and physical constraints will be an even more significant determinant of strategy than in previous plans especially those arising because of the need to mitigate climate change
- There are carrying capacity issues throughout the district but especially around existing settlements and in the west and south and in respect of their potential to accommodate larger allocations
- Changes in keeping (proportionate to) the general settlement hierarchy are generally more sustainable
- It may be desirable for options to contribute to long term spatial solutions, possibly beyond the plan period
- There is likely to be some capacity for change within existing settlements albeit for smaller scale incremental change
- There is likely to be some capacity for change within existing settlements albeit for smaller scale incremental change
- Unidentified (windfall) housing sites will continue to come forward, possibly at about the same level as is currently experienced and will be part of the incremental change that will be part of all options

## Basic Spatial Options 6

- Small unidentified housing sites are likely to continue to contribute throughout the district at a similar rate to the present allowance and will be part of the incremental change expected to be part of all options
- Government policy may increase some elements of supply, for example that from conversions though not all of these are in sustainable locations
- It is likely that viability will affect the deliverability of some sites identified for a variety of uses especially previously developed land where development costs are high. Sites that may be allocated in the LP will be reviewed against evidence such as the viability study as it is gathered.

### Question 14

*Are the above the right key messages that need to be considered in thinking about development options? Are there any more? Are some incorrect?*

**6.4** Apart from the basic incremental changes that may continue to take place within the FoDD, and provide a degree of change, the following key elements could be considered in creating the main strategic options:

1. **Selective planned expansion of existing settlement(s).** This is limited to those where there may be sufficient scope to provide part of a strategic option by selecting particular settlements and choosing to promote them possibly alongside infrastructure improvements for a greater scale of development than would otherwise have been the case. The description of the settlements and the various main constraints that apply suggests that there are restrictions in terms of the capacity available at many of the existing settlements. An option solely relying on this strategy may therefore only be able to deliver a certain quantum of development. It may also be an option that could pre-empt any longer term strategies because the existing capacity would be exhausted.
2. **Maximum incremental change to the extent of absolute constraints.** This option would simply consider the ultimate capacity of settlements and allow development where possible, it could be similar to the application of the NPPF presumption in favour of sustainable development. This is an option which could also be termed dispersal although the bulk of any change is expected to be directed to existing settlements in a manner that respects the main constraints it relies on the allocation of new sites across the widest possible range of settlements. It is the option most akin to the "do nothing" option.
3. **Planned new settlement(s).** The identification of one or more new settlements and the promotion of a scale of development that would create a community supported by appropriate infrastructure. The option to provide a new or substantially new settlement or settlements which will establish a sustainable long term option.
4. **Negotiated agreement that some development will be passed to adjoining authority(ies).** An agreed major element of the FoDD required development would be met in an adjoining area.

## 6 Basic Spatial Options

**6.5** The last option which may be applied (subject to agreement with neighbouring authorities) is very unlikely. The neighbouring authorities include the JCS area (Tewkesbury) and in that area the current situation is that additional development arising from the needs of that area needs to be accommodated beyond that presently catered for. It is therefore a very reasonable assumption that there will be little or no spare capacity. Planned new settlements offer an option of being able to plan for a long term solution, and can deliver a suitable form and quality of development. Viability may be an issue and external grants often feature in the delivery of the necessary infrastructure as well as the basic development (such as housing, retail etc). There are examples of new settlements spread widely over the country and some have common aspects which help bring forward their development. There is often a long lead time associated with new settlements and infrastructure requirements may be high.

**6.6** The more conventional options all involve taking up finite capacity in various locations which may not be sufficient or deliver the most sustainable spatial solution. In the case of the "maximum incremental change", this will amount to a degree of dispersal where the plan will allow development rather than promoting it in a particular location or locations to the benefit of any strategic aims. The dispersal option will form part of the range to be examined and will provide an illustration of likely impacts through the Sustainability Appraisal and other evaluations. The option of selective expansion is similar to the current plan where the strategy is to provide a new planned neighbourhood in one location which is intended to provide a large proportion of the needs of the area in a location that is sustainable. There are advantages to the relative concentration of change in a location that can benefit from new and existing services.

**6.7** Any preferred option will need to be supported by evidence that it is both able to be implemented and can perform well against the plan objectives, making the best contribution towards the implementation of the overall vision. The basic credentials of the options are set out below.

### Question 15

***The basic options above all assume that there will be a certain amount of change spread across the district anyway, whether new housing, employment, shopping or whatever. It is the strategic (major) changes that the options relate to, so for example any named settlement may have some development but if it featured in a particular option then there may be a specific major new site or new neighbourhood. They are explained in greater detail below.***

***Which option or options would you support (please say why and please do suggest general or specific locations that should be considered for new development)?***

## Basic Spatial Options 6

**Option and detail****Selective planned expansion of existing settlement(s).****Description and comments**

A strategy that enables the promotion of one or more existing settlements and can take advantage of their attributes and respect constraints. Limited by the nature of the settlements that are available to be considered, it is a strategy similar to the current one, though since the arrival of the AP that has been closer to an approach where the overall capacity is realised

## Towns

For reasons previously addressed, out of the four towns, Newent is the one where there is potential for significant change. This is qualified by the need to improve access around the town and also protect the centre. Around the town is predominantly agricultural land and especially to the south and east there may be potential for additional development. Landscape limitations are more apparent to the west of the town though there may also be some potential along with the southwest. Overall there may be limited scope to promote development at a similar rate to that which the AP is presently supporting. This is in itself an increase from the past levels supported in previous plans. The scale of possible additional development could approach that which is being supported by current commitments.

The other three towns are constrained in terms of new opportunities. There is scope for some additions to sites presently identified and there are considerable commitments in Lydney likely to support new development over a longer period than the next 10 years. The rate of development in Lydney over this time is likely to match or exceed any that could be supported by any other FoDD town (around 150pa). The level of commitments in Cinderford and Coleford will provide some scope for continued development and new sites in both, though limited, will be able to be made available. To promote a larger scale of change in Coleford, there would need to be a change in the protection of the landscape around the town itself. This would not be compatible with the present planning policies of either the FoD or the town council in their NDP.

Overall there is only limited scope for selective planned development at the towns beyond that which is currently committed. Existing committed development is however at a substantial level as a reflection of the requirements to make land available under the current AP. The level of change overall in the towns which is expected to take place will be likely to continue for a number of years and in the case of Lydney well beyond the end of the present plan period.

## 6 Basic Spatial Options

### Large Village(s)

The villages vary in size and potential capacity. When considering the strategy for the FoDD an appropriate starting point is the settlement hierarchy and this enables a group of larger villages to be quickly separated from the remainder. These are considered in greater detail in Section 3 and their relationship with other settlements is also referred to. This in some cases is quite close and the inter dependent nature of some of the settlements means that, for example, services in one may benefit from an allocation in another.

Tutshill/Sedbury functions as part of Chepstow and with a population approaching 4000 is the fifth largest settlement in the FoDD. Current commitments aside there may be scope for additional development under an "incremental" option but also as a planned expansion. The location, while it has a number of constraints, is such that there is some pressure for development. Any new development would need to address the need for infrastructure including the overall links to Chepstow and the M48/A48. There is additional capacity subject to the above at Tutshill/ Sedbury and an addition of about the same scale to the current number on sites that are under construction may be able to be considered. Additional infrastructure may be needed for a greater scale of change.

Bream with a population of around 3100 is the next largest settlement. Its edge of forest location is however a constraint. Additional land with potential for new housing is limited without major changes to the current policy approach. Existing commitments are also limited in extent, because of the constraints (primarily due to about two thirds of the settlement being within the forest boundary). This will limit both the short and long term potential despite the size of the settlement and its relatively sustainable nature due to relatively good accessibility and the service base that it has.

Whitcroft/ Pillowell and Yorkley are a group of villages and are also constrained by the forest boundary and by landscape issues. There may be some limited scope beyond the current plan which allocates one site for mixed development but landscape access and the forest itself are major constraints.

Mitcheldean lies outside the forest boundary and contains a large amount of employment in the form of the Vantage Point Business Park. There is also a range of services which support the resident and day-time population. Although there are clear constraints, there may be scope for additional development(s) in what would be a comparatively sustainable location.

## Basic Spatial Options 6

Drybrook is quite close to Mitcheldean, and is regarded as a large village with a range of services. The current allocations could support about 120 new dwellings. In addition to these the capacity for change is limited due to the landscape and the forest boundary. It is considered that the scope for additional development would be greatly limited by the various constraints that apply.

## Other villages

Within the range of other villages it is likely that there is some potential for additional development broadly proportional to the size of the settlements concerned. There will be a number of additional constraints and also opportunities that will vary this, most notably the limitations imposed by the forest boundary and the comparatively good access and reasonable level of facilities that some have. Without major changes to policy it is however likely that the scope for additional development at villages other than the largest is modest. One policy option may however be to promote a major expansion of one or more villages where their location is broadly sustainable. Such a course of action would depend on the ability to provide sufficient new services and may be regarded more as a planned new or expanded settlement rather than selected expansion utilising existing facilities.

**Maximum incremental change to the extent of absolute constraints**

This type of option is best described as conventional planning where the location of new development is primarily determined by available capacity not a strategy based on seeking the optimum distribution in order to realise what may be other aims and objectives of a plan. Such an option may deliver development that is reasonably sustainable but the option is capacity led and a range of less sustainable dispersed sites would be more likely. Incremental change is probably an element of most options but the main characteristic of this option is that it uses opportunities where they occur. It is a strategy where the overall aims and objectives are simply to accommodate the required degree of change.

## Towns

This option would see the available capacity being taken up in the towns without a set priority or a strategy that promoted one over another. The constraints set out above would however tend to limit the capacity and this may be below the level required to accommodate the scale of development likely to be needed by 2041.

## Large villages

Capacity based allocations would see development promoted where sites could be identified.

## 6 Basic Spatial Options

|                                  |  |
|----------------------------------|--|
| Other villages                   | Capacity based allocations would see development promoted where sites could be identified.   |
| <b>Planned new settlement(s)</b> | A planning option which is being implemented in a number of locations throughout the country. A similar strategy is in place for Ashchurch near Tewkesbury and is being discussed for Sharpness (substantially expanded existing settlements which would amount to new settlements. New settlements feature in areas where there is limited capacity for change and where it is considered that the best strategy is to provide a planned solution rather than a wholly incremental one. This option would be implemented alongside one where other incremental development also took place partly because of the need to provide a range and continuity and partly in recognition that the new settlement option has a very long lead time and could not be expected to be commenced in the first part of the plan period (say pre 2026). |
| One settlement in east/ north    | The initial study of the constraints likely to affect strategic planning suggests that there are areas in the eastern and northern part of the district that are less affected. This general area includes the two main east west routes and the only mainline railway. The area looks to Gloucester and Cheltenham and commuting patterns show this. The movement of road traffic especially demonstrates a significant degree of congestion and major development in the area of the A40/ A48 would need to demonstrate how this could be mitigated.   |
| One settlement in the south      | Although there are some clear constraints, the areas east and north of Tutshill/ Sedbury may offer potential for further development. This could only be realised if the present congestion issues on the A48 are resolved or significantly relieved. In addition there is a current expectation that the present Beachley Camp will be vacated by 2027. Although this is not large, the LP will need to consider what future uses may be able to be accommodated and this consideration should include the option of housing.   |
| <b>Develop outside FoDD</b>      | An option in policy terms but only with the approval of the LPAs where the development would occur. It is unlikely that there will be scope for meeting some of the needs of the FODD outside its administrative area. This is because the surrounding areas themselves are constrained or are under greater pressure for development sites. There are at present no agreements between the LPAs to adopt a cross border solution to meet needs arising in the FoDD.   |

## Basic Spatial Options 6

### Adjoining JCS Area

One of the main areas close to the FoDD which is under pressure for development locations is the JCS. Transferring development from the FoDD to this area is very unlikely to be a workable option. The current JCS is now being reviewed in order to be able to provide sufficient land and is in need of additional land for housing over its lifetime. The options are currently being considered but are based on the development needs of the JCS not accommodating additional growth from neighbouring areas. It is more likely though not proposed in respect of the FoDDC that development needs of the JCS could be met in part outside its area.

### South of District

There is currently a need for development to accommodate the future requirements of Monmouthshire and the West of England, and these two (adjoining) areas are unlikely to be able to accommodate any of the need generated within the FoDD. The reverse may be true especially in the case of Monmouthshire as a significant element of the needs of that area are focussed at the extreme south east of Wales around Chepstow.

**6.8** The above range of possible options is very general. It is clear that there is limited scope for the current planning approach to continue without major impact on one or more existing settlements. For the plan to be able to proceed it must be able to provide for the likely scale and pattern of change that is currently envisaged and more significantly the scale that government requires to be able to be accommodated. A plan that does not do so could not be adopted. It must deliver a spatial strategy that fully addresses climate change by direct allocation of sites, the promotion of development that is more energy efficient and by encouraging renewable generation and carbon sequestration.

**6.9** The next stage in the development of the LP will be to review and refine the various broad options and to prepare a draft plan that is based on a preferred option. This may not be the final choice but is expected to represent the one the FoDDC wishes to take forward. The decision to favour one option or another will be made in the light of consultation responses received and the issues described above.

**6.10** In summary, the options for the future development of the FoDDC will be based on the assumption that the rate of housing delivery that needs to be provided for will be similar to the current one and that the plan will need to provide allocations for the period 2021-41, taking into account at the start of that period those existing commitments carried over from the current plan. It is expected that the LP will make allocations for the necessary housing and other development in a manner that meets the needs of the FoDD within its own boundaries and in a sustainable manner compatible with the regeneration and sustainability aims and objectives of the council.

**6.11** The basic options will include an assumption that about half of the total requirement for new housing will be accommodated on small unforeseen sites, larger windfalls and existing identifiable larger sites. These will need to be supplemented by a number of strategic sites to be identified in one of the following ways:

## 6 Basic Spatial Options

- By selective expansion of towns and villages where there is spare capacity, with some where there are fewer constraints identified as able to accommodate a larger scale of development
- By identification of potential sites in as wide a range of locations as may be regarded as sustainable based on the settlement hierarchy and the identifiable capacity
- By identification of a new or expanded settlement or settlements

### Question 16

***Do you have any further comments on the range of options? It may be helpful to consider the following: are there any particular difficulties with some? Which may be the most sustainable? How may they be implemented? Which general locations may be best suited to further development?***

### Question 17

***What do you think the four towns or any of the specific locations should look like in 2041?***

## Next Steps 7

**7.1** The identification of issues and broad options is intended as a step towards the draft local plan. The discussion of issues shows how these have been derived from evidence which includes guidance at a local level in the form of basic constraints, the draft plan vision but also national guidance about plan making and some of the evidence of likely need. Although much additional evidence is expected to be compiled as the plan evolves, there is currently sufficient to support the identification of the various issues and the basic options.

**7.2** The first major consultation in the plan process is the consultation around these Issues and Options. It will seek responses to both and also will canvas suggestions about the content of the plan, to include policies and site specific proposals. Respondents will therefore be encouraged to suggest changes to the Issues and Options, and put forward land for consideration for development as well as sites/ areas that they consider should be protected. There will be material to accompany this document to provide additional guidance on the subjects that respondents may wish to consider.

## 8 Areas of Policy

### Plan Contents

**8.1** The Issues and Options set out above need to be translated into policies and proposals which can be incorporated a statutory LP. While these are all areas where a LP can have influence, there are others of importance where the LP can have little or no impact. It should be written to maximise its impact and make use of any discretionary areas where considered appropriate. It can only have a limited impact for example on agricultural practice and forestry for example. Although it is not just confined to policies that enact development proposals, but most of its headline impacts will arise from the way in which it guides new development. It can and will safeguard much of the district in a manner that protects it for future generations. Although the policies will be reviewed regularly, those proposed in the LP will need to be flexible and able to adapt to some degree of change whilst still providing a clear platform for implementation and a general context for development.

**8.2** The policies and proposals in the LP need to deliver a degree of change appropriate to the needs of the area. They need to work within the strategic context of national and regional development and support and encourage changes necessary for a much more sustainable (enduring) future.

**8.3** There are some basic principles from the NPPF or other national guidance that the LP must follow and which will probably require policies in the LP in order to ensure they are followed. One is that of overall net environmental gain. Another is that the development should add to the overall quality of the area. A third is that it should set out clearly and adhere to a plan for carbon reduction. Proposals for the development of individual sites will need to consider each of the themes below and incorporate matters as necessary. The Plan will address the various issues with coverage probably as suggested below though this section is not exhaustive and will almost certainly change as the LP proceeds.

**8.4** Although there is the option of separating the LP into strategic and local content, it is considered that the review will need to cover the entire period with policies that support the likely development required making relatively detailed allocations accordingly. This will assist the process of assessing how and when the various developments may come forward and provide greater flexibility through a choice of sites.

### Climate change

**8.5** The LP must make a major contribution to the reduction of carbon emissions. It therefore needs to be framed around this objective. As a starting point the location of new development is key, both for strategic and more local allocations. Reducing the need to travel and the ability to access a variety of services including employment using public transport, walking or cycling is essential. The LP will need targets for the performance of buildings during their construction and use. The overall approach in the LP will need to balance the deliverability of sites against their ability to be sustainable and maximise the locational benefits of any allocations. Policies that enable and require off site planting of trees should be able to be included in the LP on the basis of net environmental gain and potentially offsetting of emissions from use and or construction.

## Areas of Policy 8

**Energy use**

**8.6** The design and construction of buildings can be influenced by plan policies in terms of their energy performance through construction and overall orientation to benefit from solar gain without overheating etc. Design policies will need to be included in the LP to ensure that new buildings are energy efficient and that they are suitably orientated. Where possible improved energy efficiency should be encouraged in existing buildings such as when these are converted to another use or extended.

**Energy generation**

**8.7** As well as enabling and encouraging energy efficiency, renewable sources of generation must be promoted. These may be on a micro basis (eg PV on dwellings) or more large scale, for example community wind turbines or larger PV installations. On-site schemes will be supported. The LP will need policies to guide these and support their provision. It should support a variety of means of generation, and storage in a flexible manner in order to cater for changes from national grid to more local networks. Locational guidance or a more general criteria based policy approach could be considered. Though likely to be outside the remit of a LP, a strategic view supporting the principle of tidal lagoons may be appropriate to include.

**Question 18**

*Do you agree with these priority areas, how can the LP best address the issues of climate change and renewable energy?*

**Housing**

**8.8** Housing location and construction are the two key issues. Location must be considered in the sense of sustainability in its Bruntland definition (not compromising future generations by actions today), and in relation to single dwellings, groups and allocated sites whether small or large. In terms of construction, sustainable design that is enduring and aesthetically appropriate will be sought, with the guiding principle that the overall quality of the area should be enhanced by development.

**8.9** Policies directed at location of new housing will need to take into consideration the proximity to other services, jobs and ease of access for employment and social purposes. It means balancing the advantages of existing settlements against each other and the consideration of other solutions where they can be sustainable.

**8.10** Affordable housing remains a major issue and policies to optimise delivery will be essential in the LP. These will need to establish the basis for provision, and set out any preferred needs. Policies for "exceptions schemes" in areas where new housing would not usually be permitted will continue and space standards and energy efficiency are likely to feature.

**8.11** It is likely that the LP will refer to the current space standards used by government and seek new and converted homes that can be adapted to serve the needs of residents during their lifetimes.

## 8 Areas of Policy

### Question 19

***Are these the main areas to be considered for housing policies in the new plan when seeking to deliver the required types and numbers? Are there any others? Are there any particular locations which should be considered?***

### Employment

**8.12** A variety of employment will need to be encouraged in a manner that sees the main locations being sustainable, well located in relation to existing settlements and well related to other new development allocations. The LP should encourage working from home, better IT connections and re use of premises as well as new sites. Employment policies should cover the full range of employment generating uses and although the traditional B classes are important, not concentrate unduly on these. Like other policies those for employment must be appropriate for the FoDD, taking advantage of its assets and recognising its constraints.

### Question 20

***How best can new employment be planned for and what can help deliver it?***

### Natural environment

**8.13** International, national and locally protected sites are abundant in the FoDD and the LP must afford these due weight. Some bring absolute constraints on development allocations, and this applies to areas of influence as well, bringing complex constraints to parts of the district affected for example by bat SAC sites or within the influence of the Severn estuary. The LP must adopt policies that encourage Green Infrastructure (GI) and identify new opportunities for environmental enhancement both on site and where appropriate off site (for example as a result of new development there may be an opportunity for habitat creation, which may be a necessary form of mitigation of the effects of the development concerned). It will need to demonstrate the principle of net gain of biodiversity, and should consider policies that allow carbon offsetting (eg planting of trees in proportion to the carbon footprint of a development).

**8.14** Policies which protect the landscape will feature in the LP both in terms of local settings and features as well as at a broader level of district wide and national landscapes and policies (such as AoNB).

### Question 21

***Are these the right Natural Environment issues to be considered for the LP policies?***

## Transport

**8.15** The LP does not in itself make transport policy although access and accessibility is a key issue. The allocations made by the plan must make effective use of transport linkages and new development must avoid the need for unnecessary travel. Major development should be located in a manner that can use public transport and take advantage of existing services or be able to provide new in a sustainable manner. Developments should also support a shift away from the use of fossil fuels, providing for electric vehicle charging points, for example. Some focus may be appropriate on particular geographic issues and their solution, most notably ensuring good sustainable links where the A48 enters and leaves the FoDD.

## Infrastructure

**8.16** An important area of plan evidence will need to be devoted to infrastructure. The need is for the allocations to be able to be supported by infrastructure that can be delivered or is already available. This will influence the options for development both in terms of what they are and also in their timing. It is likely that major strategic allocations, if any are made, will need significant specific items of infrastructure and these will need to be planned so as to be available when needed. As a result they may have a longer lead in time but equally major allocations may have the ability to deliver what is needed because they are sufficiently large to plan and support what is necessary.

### Question 22

*Do you have any comments on how the plan should consider transport and infrastructure issues, what key items will be needed and how may they be delivered?*

## Built environment

**8.17** Conservation policies are well established at a local and national level and the LP will reflect these and add additional support in respect of design guidance and heritage issues that have been identified as part of the plan making process. Buildings of local importance and other features will be protected in accord with the principles of the NPPF as supported by local evidence.

**8.18** The LP will review the existing policies that address the built environment and derive a range of policies that address the issues identified. There is likely to be a high degree of continuity between the existing AP and the new LP in approach and detail. Policies to identify and protect individual areas are likely to continue and the principle tool of settlement boundaries will almost certainly remain. Quality of design will need to be addressed.

### Question 23

*How should design including conservation be addressed?*

## 8 Areas of Policy

### Town centres

**8.19** Policies will be required which support a range of activity in town centres and take account of the changes in their use.

#### Question 24

*Changing town centres are an important plan issue, what policies and approach should be considered?*

### Health

**8.20** Planning for health is an important principle and increasingly plans are considering policies that support lifestyles that promote health. Accessibility by walking and cycling, provision of homes able to be adapted for a variety of needs and ensuring accessibility to services are key issues that will be reflected in the LP both in general policies and in allocations.

#### Question 25

*How should the LP approach the issue of promoting healthy lifestyles and what policies are likely to be needed?*

#### Question 26

*The questions posed in this document may be used as a basis for responses. However, the purpose of this consultation is to obtain a wide range of responses covering any subject that is relevant to the new LP. If you have any additional points you wish to raise, please do so. There will be further opportunities for comments and for suggesting policies or sites that should be included in the plan, however if you would like to suggest any now we would be pleased to hear about them.*

## Glossary 9

|        |                                     |
|--------|-------------------------------------|
| AH     | Affordable Housing                  |
| AoNB   | Area of Outstanding Natural Beauty  |
| CS     | Core Strategy                       |
| FODD - | Forest of Dean District             |
| GI     | Green Infrastructure                |
| I&O    | Issues and Options                  |
| JCS    | Joint Core Strategy                 |
| LP     | Local Plan                          |
| LP     | Local Planning Authority            |
| LPA    | Local Planning Authority            |
| NDP    | Neighbourhood Development Plan      |
| NPPF   | National Planning Policy Framework  |
| NPPG   | National Planning Practice Guidance |
| SA     | Sustainability Assessment           |
| SAC    | Special Area of Conservation        |

