

## Detailed Comments in relation to Draft Neighbourhood Plan for Lydney

Page 9. Is the Employment site referred to the new Fish Smokery complex? If so, it now has outline planning permission including some reserved matters.

Page 11. The new District Plan will not be adopted in 2025 as it still has to be substantially revised to accommodate the new Government's Housing requirements.

There are 4 Forest towns in total with 3 in the south area of the district.

The housing numbers need updating by FODDC.

Page 12. Evidence base. Should be National not Nationals.

Page 13. Map doesn't show Lydney Town Station. Only parts of Lydney in Flood Zone 3 not all of the town. Has the very latest map been used as it has been revised since the flooding?

Map 3 Doesn't show Harbour annotated. Also doesn't show Dean Forest Railway connected to the main line at Lydney Junction.

Page 14. Lydney Harbour photo out of date. It was taken before it was spoilt by all the safety fencing!

Page 15. Is the Cross by the Town Hall a Village Cross or Town Cross?

The Vertical Farm on the Bypass has sadly closed.

Page 17. No reference to the need for public transport links to the Station from the rest of the town.

Are the NPPF references up to date as a new version was produced in December 2024 and January 2025?

Page 21. Typo under (7) to enable.

Page 28. LYD ENV 1 (2) development will **only** be.....

Page 32. Map 5. Shouldn't the land south of the lake be open space up to the bypass? What about the Marsh? What about open space and play areas on the new estates? Railway lines not annotated.

Page 44. Only 1 wind turbine at Alvington the other one is near St Briavels.

Page 46. The recent Tidal power report on the Severn Estuary raises doubts over the practicality of such schemes owing to silting, fish movement and navigational problems especially to the ports such as Portbury, Avonmouth and Sharpness and threatening their existence.

Page 63. Why a picture of a bowling green under Town Centre policies?

Page 70. Where is the Marina Campsite? Should provision be made for Coach Parking, Camper Van parking and toilets at the Bus and Railway Stations? Should seek extra carparking and environmental enhancements at the railway station.

Page 73. No practical solutions to dealing with ever larger HGVs entering and passing through the town. Should a western relief road be suggested to link the Bream Road with the Bypass? This would take all the traffic heading to and emanating from the Coleford area and not visiting Lydney with massive environmental gain to the town.

Page 75. The Hospital has now closed sadly.

Hope these comments are useful!

Martin Hillier

Wyedean Housing Association

Wyedean Housing Association welcomes the opportunity to respond to the Regulation 14 consultation on the Lydney Neighbourhood Plan 2025.

We would like to commend the Steering Group, Town Council, and wider community on the development of a thoughtful, forward-looking plan that clearly reflects local priorities and a strong commitment to sustainable and inclusive growth.

As a housing association with a long-standing commitment to supporting affordable and high-quality housing across the Forest of Dean, we are particularly encouraged by the plan's focus on:

- **Providing a mix of housing types and tenures** that meet the needs of current and future residents, including young people, families, and older members of the community.
- **Promoting well-designed, energy-efficient developments** that are sympathetic to Lydney's heritage and natural environment.
- **Supporting infrastructure, active travel, and local employment opportunities** to ensure that housing growth is accompanied by the facilities and services residents need to thrive.
- **Recognising the importance of affordability and accessibility** in new developments, aligning with Wyedean's own objectives of building inclusive and resilient communities.

We support the Plan's strategic objectives and policies and look forward to ongoing collaboration with local stakeholders to deliver its aims. We believe the Neighbourhood Plan will provide a strong and positive framework for managing growth and development in Lydney and ensuring that it continues to be a vibrant and sustainable town.

Please do not hesitate to contact us if we can assist further as the Plan progresses.

Historic England

Thank you for your Regulation 14 consultation on the pre-submission version of the Lydney Neighbourhood Plan.

While the email received below relates to an extension of the consultation period it would appear that we didn't receive the original consultation.

Having considered the Plan I can confirm that there are no issues or other matters associated with it upon which we wish to comment in detail.

We note and applaud the range of policies which celebrate and seek to protect the area's distinctive character and heritage, and single out the Lydney Design Code & Guidance referred to in policy LYD ENV4 for particular praise. This is an informed

document which, through this policy, can assist in ensuring that future change and development will reinforce and enhance the area's physical identity and profile.

Our congratulations to your community in its achievement, and we wish it well in the making of its Plan.

Forest of Dean DC

First of all, the Local Plans team would like to congratulate you on the hard work that has gone into these NDP documents and to thank you for consulting us.

The NDP2 is an attractive and accessible document, making it easy to read for all members of the community. The level of detail is very interesting and is to be commended.

Please note that the Local Plans Team commented on a previous draft of the NDP2 and associated documents on 10th February 2025 (prior to the Regulation 14 Consultation) and anticipate that those comments have been taken into account for this revised document. Having read through the NDP2 and associated documents again, the Local Plans team at the FoDDC, have the additional following comments to make, please also note that some of the comments are from both the Development Management Team and the Conservation Officer:

Updates on the FoDDC Local Plan:

1. Please be aware that there have been some recent significant changes in the making of the FoDDC emerging local plan in light of the significant uplift in local housing need (82%) as a requirement of the updated NPPF (December 2024). In light of the increase in houses required over the Local Plan period, the Council has decided that it will need to re-consider the local plan strategy. It is anticipated that a public consultation will take place throughout August and September 2025 to reconsider the Options available to provide this increase in additional housing. The Options paper will be considered at Cabinet next week (10th July) and you can find all of the relevant details about here (the agenda will go live after 3rd July) : <https://meetings.fdean.gov.uk/ieListDocuments.aspx?CId=115&MIId=5520&Ver=4>
2. At this point, it is anticipated that many of the allocations and policies in the draft local plan 2024 will still go forward. The point of the Options consultation is to consider a strategy which meets the additional housing needs as well. This may result in a higher allocation of housing being delivered in the towns, such as Lydney. However, we are not yet at a point where we can confirm this.
3. Furthermore, owing to the fact that the local plan needs to have at least a 15 years post-examination lifespan and it is anticipated that the plan will not go to examination until 2027, it has been decided that now would be the best time to increase the Local Plan period from 2021-2041 to 2021-2043 (and additional 2 years).

#### Comments on the NDP:

1. In the light of the information about (changes to the Local Plan), page 11 might need a couple of amendments.
2. Page 13, Evidence Base, 1st bullet point – change ‘Nationals’ to National’
3. Page 26, 2nd para – change ‘core’ to ‘Core’
4. Page 30, para. 2 – change ‘These new policy’ to ‘These new policies’
5. Page 31, Landscape Character Context, 4th sentence – change ‘significant’ to ‘A significant’
6. Page 36, 4th section LP16 – change ‘in the maintaining’ to either ‘in the maintaining of’ or ‘in maintaining’
7. Page 44, 2nd column – change ‘the potential is for’ to ‘the potential for’
8. Page 54, Local background and Evidence para – change full stop after the word Cardiff to a comma ‘Bristol and Cardiff, which makes....’

#### Development Management Comments:

9. Concerns with regards to not planning for the growth the Council is now required to find, so question whether the NDP suggested number is enough. Also consider that boundaries drawn are way too tight. This raises concerns that if the NDP goes ahead and the emerging Local Plan follows shortly afterward, the NDP may be instantly out of date.
10. Would like greater focus on connectivity improvements to the housing developments on the fringes of the town
11. Not sure why the policy ENV2 has to say secure BNG. If it's a national requirement a Development Plan has no need to repeat it
12. HC1 is vague , whilst mentioning house types no indication is given as to percentage numbers
13. The NDHA allocations are fair, and the heritage policies/guidance is in line with national policy. May want to give consideration to the use of awning on shop fronts (or indeed some of the Georgian era buildings) for solar shading and shelter. These used to be very widespread in Lydney in the Victorian and Georgian periods.

#### Comments on the Masterplan:

14. Pages 23 and 24 say they need to be updated
15. Very interesting document with some great aspirations

#### Comments on the Design Code:

A very insightful document with a large amount of quality design advice.

#### Development Management Comments:

1. LB 06 only identifies that rear extensions should not be harmful to neighbours yet the bullet point above deals with side extension and does not mention harm to amenity which can equally happen
2. Garages: if they are to be used as parking which is against County highways advice and would suggest that minimum sizes should be specified
3. Public charging, no details of the level to be required. Does this fit with national policy through building regs?
4. The statement that charging points should be located in a way to avoid being blocked by normal cars would be very difficult to implement (there is not enough detail to hook a condition to and be able to implement and enforce).
5. Green spaces...it says it must align with Local Plan standards but the current LP doesn't really have any standards to refer to, so this might need more detail.

#### Other comments:

It is noted from the Modification Statement that the Steering Group's opinion is that the modifications to the plan may not require the need for referendum. However, as you have also pointed out in the document, this will be the decision of the future examiner.

We hope these comments are of some assistance. The Local Plans team looks forward to working with you on the future stages of NDP making process.



To: Sent via e-mail.

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**Our Ref:** 2025/05/LTC-NDPR14/AD

**Your Ref:**

**Date:** 25 June 2025

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Dear Mr Greenfield,

**Lydney Neighbourhood Development Plan 2025-2041 (Modification Proposal)  
Regulation 14**

Thank you for consulting Gloucestershire County Council (GCC) on this matter. GCC officers have reviewed the draft neighbourhood plan for Lydney town and comment on various aspects, that include but not limited to:

- Clarifications related to archaeology and flood risk
- Creating conditions for skills development and attracting jobs
- Addressing health and transport-related social exclusion and inequalities
- Improving rail and bus services, as well as cycling infrastructure

Detailed officer-level comments are as below.

Yours sincerely,

**Amartya Deb**  
Senior Planning Officer  
Gloucestershire County Council

## **DETAILED OFFICER COMMENTS**

### **Archaeology**

The inclusion of **LYD ENV3: “Protecting Lydney’s Heritage”** is welcomed, as is the locally valued Heritage Asset List. It would be useful to those responding to potential future planning proposals if the criteria used to select the structures listed on page 39 were included in the supporting evidence base information.

The same information on the Conservation Areas and St Mary’s Church appears twice on page 36.

### **Ecology**

GCC officers have no further comments.

### **Economy**

GCC officers support Lydney Town Council’s draft Neighbourhood Plan and welcomes the strengthened vision, which presents a more holistic approach to Lydney’s future as a key gateway location to Forest of Dean.

Officers note a slightly reduced emphasis on skills development from the previous vision statement. While this may be implicit in other priorities, it was suggested this remains a vital consideration for the town’s ambitions for encouraging sustainable growth and attracting employment.

The focus on attracting new employers, including the plans for the new food and visitor destination centre at the Dock, is strongly supported. Officers also believe that creating conditions for the retention of existing businesses is equally important, in the light of rapid global events affecting supply chains and industry, and their potential for uncertain changes to local employment conditions.

National strategies like Get Britain Working, the Modern Industrial Strategy, the Clean Power Plan, and Gloucestershire’s emerging Local Growth Plan align well with the draft Neighbourhood Development Plan’s aims.

Recent business and investor consultations highlight the need for strong growth conditions and a skilled local workforce. The Gloucestershire Economic Strategy 2024–2035, its 2023 Evidence Base, and the Forest of Dean Sustainable Economic Strategy all stress the growing importance of green and digital skills.

GCC officers are keen to continue to support the draft Neighbourhood Plan’s ambitions for sustainable economic growth and employment in Lydney.

## **Flood Risk Management**

**Section 1.4** “Introduction to Lydney”, states (page 13):

*Lydney has been defined as a Flood Zone 3 by the Environment Agency.*

Needs to say:

Parts of Lydney has been defined as a Flood Zone 3 by the Environment Agency.

Without qualification this statement makes the whole of Lydney undevelopable. It would be useful to include, or reference, the map (on page 50) showing the extents of Flood Zone 3.

The lack of definition is repeated in the section (on page 31) entitled Lydney’s Blue Infrastructure – The Rivers Severn Lydney, canal and ponds and page 47 under **LYD ENV6**.

References to the need for SuDS on page 47 *et seq.* are welcome, it is something that is covered in other legislation but can’t be re-iterated too much. The LLFA will use **LYD ENV6** in assessment of development.

## **Minerals and Waste Planning**

GCC officers have no further comments to make.

## **Public Health**

GCC officers welcome the opportunity to comment on the draft Lydney Neighbourhood Development Plan and on matters specific to the health and wellbeing of residents that live, work and take their enjoyment in Lydney and the surrounding neighbourhood area. Officers recognise the work done by the town council and the local steering group engaging with the community and key stakeholders in the drafting of this plan and the interest in supporting the needs of communities within Lydney and the surrounding area. This work has clearly shaped the plan objectives and informed the priority setting process.

With regard to **Section 2.2:** “Neighbourhood Plan Objectives”, officers welcome the promotion of wellbeing and health drivers across the objectives. The Forest of Dean Integrated Locality Partnership has recently started work to look at the mapping community services and provision in the east Lydney area. The area was selected based on health outcome data presenting higher rates of obesity, smoking and depression along with higher rates of frailty. This mapping work will identify

opportunities and gaps in provision to provide targeted support to help improve outcomes. Officers propose that the draft Neighbourhood Plan Objectives could be strengthened further by a topic area/objective that actively seeks to address health inequalities within the area and support the most vulnerable groups in the community.

### *Housing and Community Infrastructure*

Officers welcome the plan's approach (**LYD HC1**) to both recognising the changing needs of housing over a life course and ensuring that mix and tenure of housing provision will provide high standards of affordable, accessible dwellings, and that accessibility to the local facilities is a primary consideration. Accessible housing design (M4(2) Category 2 homes and M(4) 3 Category 3 homes) is essential in meeting the needs of individuals with disabilities and health challenges, but also the wider systems in society including adult social care and the NHS. Improving the quality, affordability, availability, and suitability of housing is one of the seven priorities in the [Gloucestershire Joint Health and Wellbeing Strategy](#).

Responding to an ageing demographic is a key issue nationally and locally, and it is important that we support our local population to 'age well' by supporting the maintenance of health and wellbeing into older age. The [Chief Medical Officer's annual report 2023: health in an ageing society \(www.gov.uk\)](#) underlines the geography of older age in the UK. The report makes it clear that the increase in an aging population will be in England's rural and semi-rural areas. Thus, it should be a key area of focus for plan makers in the Forest of Dean.

Younger people with disabilities have more complex housing and care needs and should also be considered as part of plan making. To support this the Local Government Association has collected a [range of resources](#) to support decision makers in ensuring there is sufficient good quality housing and care to meet the current and future needs of the youth population, along with a guide, published in 2020, to support commissioners of specialist housing to ensure that developments are affordable and sustainable to meet local need: [Specialised supported housing: guidance for local government and NHS commissioners \(www.local.gov.uk\)](#).

GCC officers believe that the draft plan would benefit further from highlighting the importance of social connections in the district – particularly for older people who are vulnerable to social isolation and/ or loneliness due to loss of friends, family, mobility, health or income – all harmful to health. Accessible community facilities and spaces can play a key role in supporting social connections. Plan makers may wish, if not already, to familiarise themselves with the 2022 Director of Public Health annual Report for Gloucestershire, "[No person is an island: Social connections in Gloucestershire 2022/23 \(gloucestershire.gov.uk\)](#)". The report highlights both the power of social connections but also the challenges, many of which are experienced

by those living in rural areas across Gloucestershire<sup>1</sup>. Crucially, it sharpens a focus on the work being done to tackle social isolation and the responsibility we all share in supporting those most in need. This work also underlines the importance of considering how communities create opportunities for social connections across the life course.

### Green and Blue Infrastructure

GCC officers would encourage further exploration in the plan regarding the health benefits from green and blue infrastructure. There are well-known physical health benefits, but the restorative properties of the natural environment cannot be understated. People living in areas with less access to green space are more likely to be in poor health, as access to green space is lower in more deprived areas, and deprivation is itself strongly associated with poor health: [Relationship between access to green space and health \(www.health.org.uk\)](http://www.health.org.uk). Giving consideration to high quality green and blue infrastructure across all stages of plan-making and development will support the improvement of health and wellbeing and build a sense of community and place.

### Accessibility & Transport

Designing in active travel as standard will help improve access and connectivity for the district's population in future years and we welcome the proposed active travel improvements and infrastructure proposed in **LYD TRAN1 & 2**. Providing the operational and physical improvements to the infrastructure for new schools and workplaces that reduce speeds and potential conflicts with motor vehicle traffic, and establish safer and fully accessible crossings, walkways, trails and bikeways, provides the opportunity to get people out of the car, improve their health and aid the push towards net zero. [Gloucestershire's Pupil and Wellbeing Survey 2022 \(www.gloucestershire.gov.uk\)](http://www.gloucestershire.gov.uk), found that the most important reasons that pupils gave for their decision to be more physically active were getting fit, enjoyment and meeting new people.

Furthermore, the propensity to walk and cycle has the potential to contribute to an improving picture of air quality across the plan area. Air pollution has negative effects on health throughout the life course, from pre-birth to old age. The plan's policies based around sustainable travel will contribute to improving the air we breathe. Children are especially vulnerable to dirty air. Evidence shows that there is a strong link between air pollution and the worsening of asthma symptoms, and it also plays a part in causing asthma in some. Among children with asthma, those exposed to higher levels of air pollution suffer more frequent chronic respiratory symptoms.

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<sup>1</sup> A local survey reveals that 5% of social care service users aged 65+ had little social contact with people and felt isolated, and a further 15% had some social contact but not enough: [Summary \(gloucestershire.gov.uk\)](http://www.gloucestershire.gov.uk).

Research has shown that nursery and primary school children can be exposed to as much as 30% more pollution as a result of being smaller and closer to exhaust fumes when walking along busy roads, compared to adults. Designing-in the “habit for movement”, drives further co-benefits to health including, reduced non-communicable diseases burden (cardiovascular and respiratory disease), injuries, and better mental health.

### Design Codes and Guidance

It is encouraging to see design codes being driven by local context and that key actors within the planning system understand the importance of adhering to the codes and guidance when commenting on applications. The link between the built environment and health is long established and neighbourhood design plays a significant role in shaping our health behaviours. Planners, developers, and designers can shape an environment to either encourage physical activity or design out the need or ability to be active. Equally, the suite of planning policy and guidance (national and local), is well represented in the plan<sup>2</sup>.

### **Transport Planning**

GCC officers would like to thank Lydney Town Council for the opportunity to comment on the draft Neighbourhood Plan. Officers support the plan’s objectives to not only improve the transport network for local community access but also Lydney’s wider connections to the Forest of Dean.

Transport Related Social Exclusion (TRSE) is a key issue facing the district, with 31,848 (36.7%) of residents living in neighbourhoods at high risk, nearly 20% above the UK average (see [Midlands Rail Hub’s Social Mobility Report](#)). Reportedly, Lydney East is in the highest at-risk category, ranking 398 out of 32,844 areas nationally.

Key to the neighbourhood plan should be an aim to reduce barriers to allow residents to access opportunities, amenities and social connections, in order to safeguard and create thriving communities; we believe enhanced integration between transport modes and high-quality local active travel routes will facilitate this.

The railway station provides a key gateway to the Forest of Dean, and we suggest that this is worth highlighting in **Section 1.4**. Improving connectivity to Lydney Town Centre and wider district from the station is of strategic importance. We would also welcome a mention of the Lydney bus station, which is included in our list of transport interchange hub locations.

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<sup>2</sup> Please note that we anticipate an update to Manual for Gloucestershire Streets in 2025/26.

We welcome the specific mention of the railway station in **Section 3.4**, in particular, improving the local bus offering and linking it with the rail timetable. We would request that the bus service “72” is explicitly mentioned as well as the “23”, as this provides an existing connection to/from Chepstow, Lydney, Cinderford and a limited service to Mitcheldean.

There may be limited utility in providing a new bus service from Chepstow through to Gloucester, given that there is an hourly existing rail service. Any new/extended bus service is likely to involve a significant degree of public subsidy, and therefore maybe difficult to implement. The plan could also mention an aspiration for more frequent rail services to support its objectives. Engagement with operators to explore an extension to bus services to/from Lydney railway station will be required, something which GCC could support with.

In **Section 3.4**, it would be worth mentioning our Demand Rapid Transport service, the Robin, which is in operation in the Forest of Dean. This could provide an alternative to plugging the existing gaps in the public transport network, before any aspirations for a new and/or extensions to bus services could come forward.

Under footways and cycle ways (**Section 3.4**), we would also request explicit mention of the shared footway/cycleway between the railway station and Lydney Town Centre, with links to our County Cycle Infrastructure plan network on the A48 and Lydney Recreation Trust Ground.

A brief mention of strategically placed cycle parking would also be welcome, particularly in relation to our interchange hub locations in Lydney Town Centre (existing bus station) and the railway station.

From an active travel perspective, the draft plan talks about congestion in the town, and the need to support access and sustainable travel choices. However, it does not set the scene for the existing network that would benefit from extension and improvement.

For example, *Chapter 3.4 ‘Accessibility and Transport’* and *Map 14 ‘Lydney Movement Network’* do not identify existing cycle routes, although there are some high quality and important connection to Aylburton and the railway station. GCC would recommend highlighting these as important corridors to build upon and extend into neighbourhoods across the town. There are also some on road markings for cyclists along the High Street between the superstore at Oxford Street and Swan Road that could benefit from improvements (see Figures A & B).

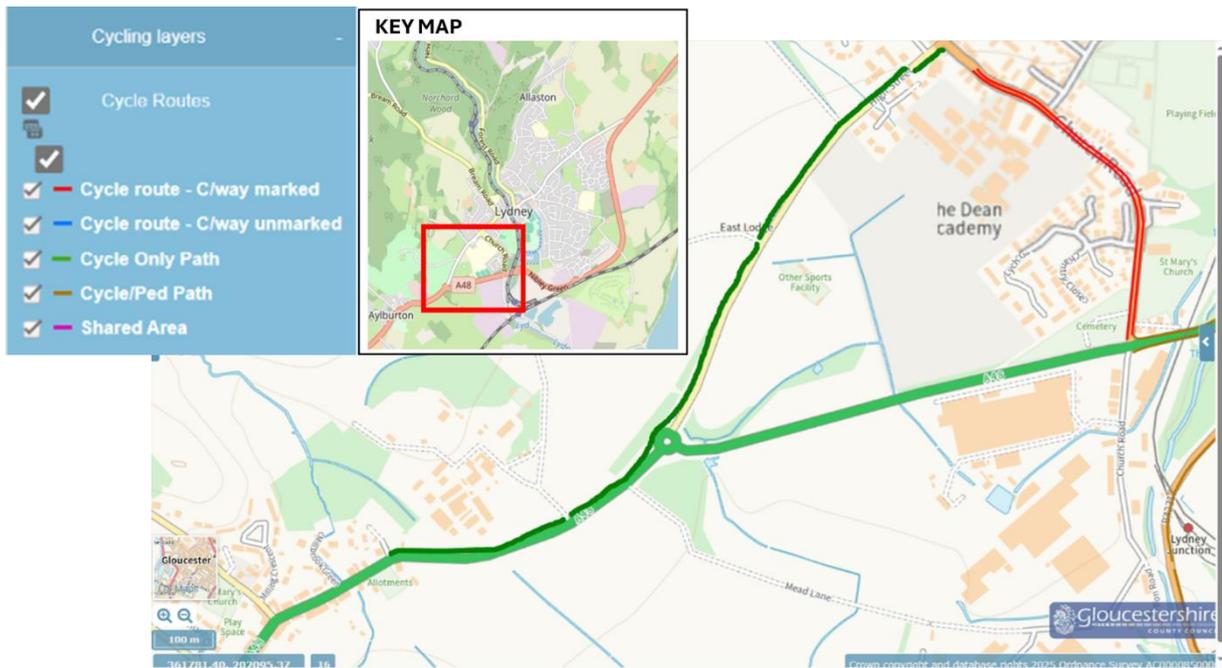


Figure A: Cycle routes in South-West of Lydney. Source: [www.gloucestershire.gov.uk/lcwip](http://www.gloucestershire.gov.uk/lcwip). Open Street Map Data 2024, Crown copyright and database rights 2025 Ordnance Survey AC0000850000

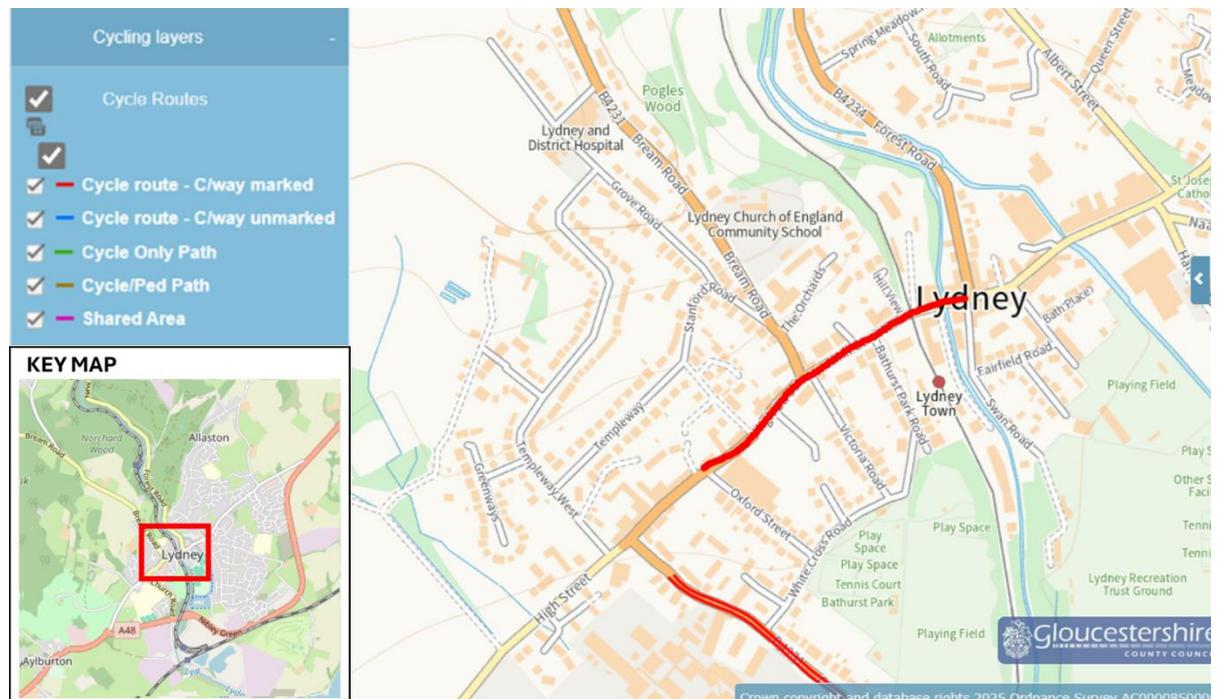


Figure B: Cycle routes in Lydney town centre. Sources of data: [www.gloucestershire.gov.uk/lcwip](http://www.gloucestershire.gov.uk/lcwip). Notes: Open Street Map Data 2024, Crown copyright and database rights 2025 Ordnance Survey AC0000850000

In addition to existing cycle infrastructure, there is latent demand for cycling between Lydney and Chepstow, and Lydney and Coleford, both of which would benefit from being referenced (See Figure C). This is identified in the Countywide Cycling Infrastructure Plan, available at [www.gloucestershire.gov.uk/lcwip](http://www.gloucestershire.gov.uk/lcwip).

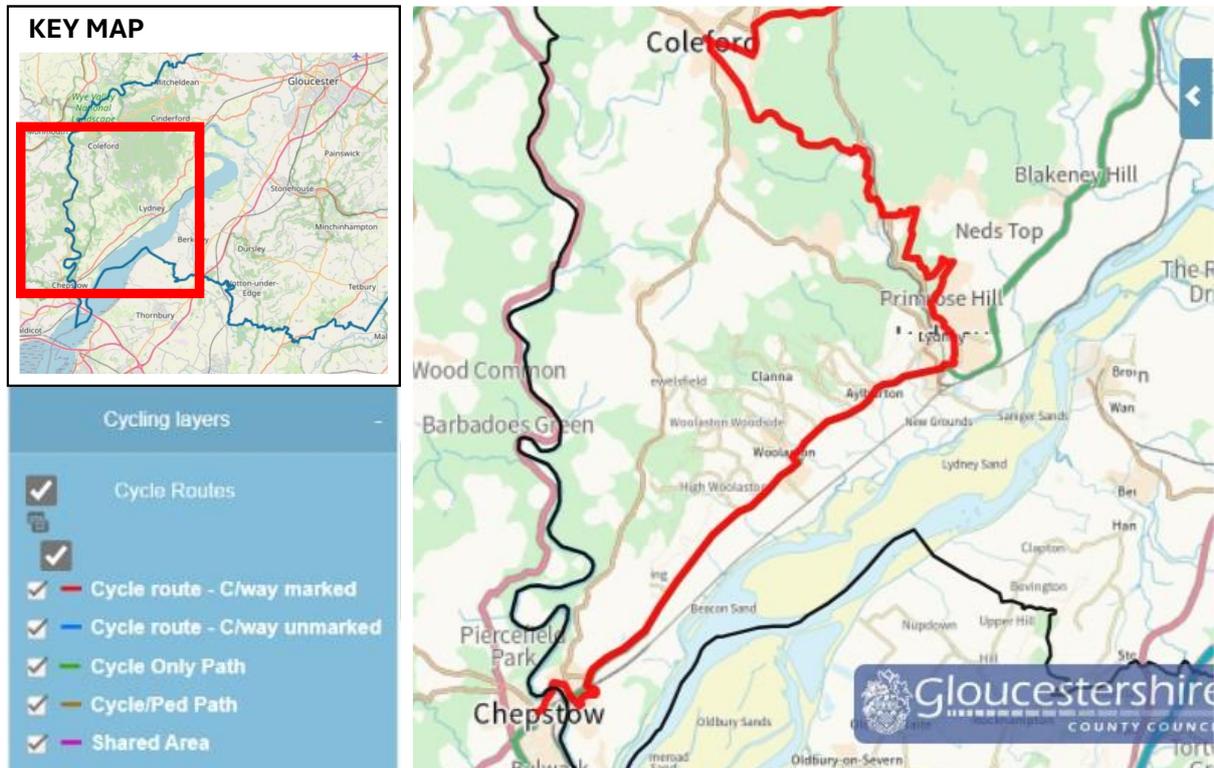


Figure C: Cycle routes between Chepstow-Lydney-Coleford. Source: [www.gloucestershire.gov.uk/lcwip](http://www.gloucestershire.gov.uk/lcwip). Open Street Map Data 2024, Crown copyright and database rights 2025 Ordnance Survey AC0000850000