

**Forest of Dean District Draft Local Plan
Responses Report
April 2025**



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Forest of Dean District Draft Local Plan

Number of Representations: 59

Support: 11

Object: 12

Observations: 36

Support:

- Support the emphasis in the draft plan on addressing the impact of the climate emergency through truly sustainable development and protecting and enhancing the unique natural environment of the Forest of Dean. Welcome FODDC's commitment to nature's recovery and the protection of our valued landscapes. Support the core policies (LPI-3) and the main thrust of all LPs from 4-26 plus LP31 and in particular endorse LP5 (Development in the Countryside). (CPRE).
- The conclusions of the Settlement Keynote are broadly supported. It recognises that the historic pattern of development is one spread between settlements largely in accordance with historic size and significance rather than the predominance of any one settlement. The recognition of Sedbury/Tutshill as a Tier 2 Large Village is supported; alongside distributing development primarily within the top three tiers of the settlement hierarchy. Sedbury/Tutshill are identified throughout as being part of Chepstow for functional purposes and therefore benefit from the services, facilities, and employment opportunities associated with the regional centre of Chepstow despite it being located outside of the Forest of Dean. This relationship with Chepstow is considered to support Sedbury/Tutshill as more sustainable location for development than its categorisation as a Tier 2 Large Village alone would suggest.
- English Bicknor Parish Council supports the Plan -this is due to the plans having little impact on the village. (English Bicknor PC).
- RPC supports the broad priorities and objectives set out in the FoDDC's Council Plan 2028-2028.
- As a rural parish RPC agrees that priority two is of particular importance and that the Plan and related sustainability appraisal must provide policy and drive Planning development decisions that achieves the objective described.
- Requests the FoDDC Planning Department works with RPC to pursue a LVL designation for the Redmarley conservation area. The settlement boundary clause, as mentioned, is deleted from the Plan and the boundaries enforced.
- RPC agrees and supports the assessment that the Glynychbrook site is not suitable for development. (Redmarley PC).
- Staunton Coleford Parish Council has no objections to the Staunton plan, which limits new developments to 'in-fill' and expansion of existing sites. Moreover, the Council supports the plan's recognition of the Village's environmental and scenic qualities, which are to be protected. (Staunton Coleford PC).
- The Forest of Dean is an attractive place to live and work and with improved internet connectivity there are many small technology and software/service companies that wish to offer an attractive environment for their workforce.
- Review SA assessment for Land at Driffild, Lydney.
- Review SA assessment for Glynychbrook – change to 'Unable to meet SA Criteria' (significant landscape and visual impact on the countryside, harm to national landscape, poorly located for

access to public transport services as alternatives to private car usage, loss of good quality agricultural land, ecology impact, flood risk).

- Well-balanced plan.
- Need for a variety of types of housing, to include smaller units for single people.

Object:

- The draft plan must not deal with only housing but be more joined up considering road infrastructure as well as other facilities required by an enlarged population.
- Harm to irreplaceable habitat. (Woodland Trust).
- To keep adding dwellings onto existing estates and expecting local infrastructure to support and sustain the increase is nothing short of ludicrous negatively impacting the quality of life of both current and future residents. New developments should also have the capacity for future development.
- This draft plan lacks any credibility and needs to be reviewed.
- The Regulation 18 consultation should be repeated.
- These proposals are meaningless without infrastructure plans to back them up.

Observations:

- Labour Party Reform and NPPF changes will impact on Plan. Revised Standard Method and 81% increase in housing needs. Greater emphasis on the need to deliver sustainable housing sites like the redevelopment of Beachley Barracks. The site should be allocated for up to 800 dwellings rather than 600 as proposed. (DIO).
- It is evident that the groundswell of objection (to new settlement) arose specifically in relation to the notion of a new settlement at Churcham, rather than the principle of a new settlement in the round. Second Preferred Option no longer included a new settlement, though the supporting evidence continued to recognise the long term sustainability merits of a new settlement in light of capacity constraints at the existing urban areas. Black Box are promoting a new settlement option as the most sustainable way of meeting long term housing needs over the plan period and beyond, and promoted the site off the M50 known as Glynchbrook as the most suitable location at which to deliver a new settlement. Grave soundness concerns in relation to procedural matters associated with the local plan evidence base, supported by a legal opinion and expert review (regarding new settlement no longer in strategy).
- Level 2 Strategic Flood Risk Assessment (L2SFRA) and a Water Cycle Study (WCS) documents are essential. As the SFRA and WCS are yet to be produced, we cannot give confidence at this stage of our support of the Plan. If at Regulation 19 the Plan is still not supported by these evidence base documents and alterations made where necessary to reflect the findings of the evidence then we would at that time be making representation that the Plan is unsound. (EA).
- Carry out a "Strength of wording", review to review the use and frequency of any weak, ambiguous, unquantified, or other terms that are open to interpretation. Examples would include words and phrases such as "Where appropriate", "'Where viability constraints allow' or 'where possible/practical' or 'if feasible', 'Consider' or 'could' and 'Usually', 'normally', 'suggest' or 'encourage'. (EA).
- Several projects being carried out with the EA (which may help with joined up working). (EA)

- Disappointing to note that only 1 of the 103 policies specifically references 'community' and that was more in the context of physical community buildings rather than the opportunities that the plan brings about to help shape communities of people, through good physical design of housing developments, and proactive community building principles.
- Involve local town and parish councils to help influence design - they often know how a site works better than a developer.
- Consideration should be given for future schemes/growth - ensure there is central space to bring all phases of development together - such as a 'Bells Field' in the middle of multiple developments - we feel this is missing from Lydney's developments.
- Need to design with community in mind to prevent further 'dormitory town' feeling. Give people reasons to interact! (Forest Voluntary Action Forum).
- FoDDC should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the emerging Local Plan's decision-making and scoring should be robust, justified and transparent.
- Concern among officers that the proposed spatial pattern of housing allocation will make it challenging to fund and provide for infrastructures that are necessary to achieve goals of the draft Local Plan. (GCC).
- Significant concerns with the Council's assessment of sites during the Sustainability Appraisal (SA) process. The assessment for our client's site at Lydney (Lydney 11) takes account of a larger area that was submitted through the March 2024 Call for Sites submission and we are concerned that this assessment of an enlarged area has influenced the site's score against SA criteria. We have provided an SA summary of our site.
- The general approach to developing a strategy is broadly consistent with those in Herefordshire. We do not consider that the plan raises any strategic cross boundary issues. Regarding Gypsy and Traveller site provision we note that there are no sites allocated in the Regulation 18 . This is the same position as the Herefordshire Regulation 18 plan and this may be an area where Herefordshire and the Forest of Dean councils can explore to identify any sites that would meet the needs of both local planning authorities in this regard. Opportunity for consistent policy approaches to certain strategic cross boundary issues e.g. Hereford and Gloucester Canal, nutrient neutrality. Biosphere reserve -might have implications for Herefordshire depending on where the boundary is drawn including any buffer and transition zones and how this work is progressed. (Herefordshire CC).
- Council will need to ensure that they have, and continue to, engage effectively with neighbouring areas with regard to housing needs, infrastructure delivery and other key cross boundary issues. HBF considers that the Council may need to extend the plan period to ensure that the Plan will still provide 15 years on adoption. It will also be important for the evidence base supporting the Plan to cover the relevant period. Extending the Plan period will of course also have a consequential impact through increasing the housing requirement. (HBF).
- MCC want to be a supportive neighbour and not seek to hinder the needs of the FoD. Note the proposal to focus development along the Severn estuary. There is a need to protect the interests of Monmouthshire's communities and the potential impact on Chepstow, Monmouth and surrounding areas therefore needs to be carefully considered. (MCC).

- Requires a transport strategy and transport assessment which identifies the highway and transport infrastructure necessary to deliver the Plan and address any severe and/or unacceptable safety impacts on the SRN. Expect existing and forecast future SRN issues to be reflected in a robust evidence base supporting the emerging Local Plan to 2041. The need for any strategic highway mitigation and the likely scope and scale any improvements is therefore currently unknown.
- Details of the infrastructure required to support new developments should be highlighted in the relevant policies of the Local Plan and these requirements should also be closely linked to the IDP (especially where there is an identified for mitigation on the SRN), to ensure that the necessary infrastructure is delivered. The IDP should be linked to Policy LP.103 Monitoring. (National Highways).
- Lydney - already many new properties but no or insufficient supporting infrastructure; Newent is surrounded by Grade I agricultural land; Beachley with no certainty of the military property becoming available, and with poor access to Chepstow and beyond. Affordable properties should include those owned by local authority / housing associations; The provision of schools, surgeries etc must be completed before the development is completed, and not as an after thought or not at all; The inclusion of green spaces in developments is important. It is accepted that ownership of properties rather than renting is a 'British phenomenon'. There needs to be some radical thinking about the future. With an aging population and lack of employment opportunities driving younger people away, the logical conclusion is that villages will become 'ghost villages' occupied by those with money from outside, buying up properties as second / holiday homes / Air BNB etc. (Newland Parish Council).
- Planning policies should enable the delivery of essential healthcare infrastructure and be prepared in consultation with the NHS to ensure they help deliver estate transformation. (NHS Property Services).
- Unclear whether the text in green boxes is intended to represent actual policy wording or whether this is confined to the purple boxes with the green forming part of the explanatory wording. This may cause confusion as to interpretation of the plan in future if it is adopted in its current form.
- Concerns regarding accessibility for those who may struggle with literacy and comprehension and also a need to explain the messages in a different way to those on the neurodivergent spectrum. Generally, those from marginalised situations on the edges of society have not seemed to be engaged in the process, given that over 90% of those we engaged with had not heard of the Local Plan process or plan at all. Little consideration of socially isolated groups. It is a comprehensive document that is filled with complex terminology and formal language which features no consideration or accommodations for typically excluded groups including those with a learning disability or ADHD for example. Suggested areas of improvement: Using simplified language in place of professional terms, when professional terms are required, could involve a 'word bank'/glossary; Replacing large chunks of text with concise sentences covering key information; Utilisation of visual materials - tables, images, infographics, and maps to transmit accessible information; Providing examples that are familiar to residents to illustrate explanations - direct application of policy to a familiar subject could be a helpful tool.
- Website enhancement - we noted that the feedback lacked functionality - it was difficult to use and kept requiring repeated logins to provide any comments on different areas - this could be off-putting when trying to provide feedback.

- Sufficient Section 106/CIL contributions for social/education and health infrastructure to serve new development. Important of community meeting spaces and provision to connect people. (Salvation Army).
- It would be beneficial to see the new Local Plan recognise the role of Housing Associations and encourage developers to have early active engagement with Housing Associations in the next round of consultation. (SWHAPC).
- Only part of the District Council area is served by Welsh Water infrastructure, we serve Sedbury and Tutshill with both a potable (clean) water supply and public sewerage provision, and for the settlements of Coleford and Lydbrook we are responsible for public sewerage only. (Welsh Water).
- Grave concerns around the credence and cognisance given to the historic environs of the area, with the need to conserve these by legal means.
- The Statutory Forest boundary is a historic royal estate, formalised in 1327, thus its protection where a hedgerow survives on its course is governed by The Hedgerow Regulation Act 1997, an addition to the Environment Act 1995.
- The protection of this hedgerow is covered by Schedule II, Part I Archaeology and History, clause 1 and 4 (a). Ancient and Historical Greens in the Statutory Forest should also be protected under this arrangement in respect to NPPF Green Space.
- If the Council are serious about the significance of the Forest and its heritage then we believe this plan also needs to be strengthened to reflect this heritage and uniqueness of the area.
- Developers should also be working the highest possible standards contained within the "Building with Nature Framework(BwN20)", the 'Historic England HEAG321, Adapting historic buildings for Energy & Carbon Efficiency' and the recently published 2024 'Rural Housing Design Guide' from the English Rural Housing Association. It is a serious flaw that these documents are not referred to by the Plan in its current form.
- The Local Plan fails in some part to provide guidance or vision to contribute to a strong, responsive, and competitive economy that supports growth and innovation through local employment and in attracting new businesses to the area so providing a mixed economy.
- FODDC should explore the employment of an officer to bring inward investment into the area which would attract employers, especially those developing green technologies and emergent new technologies.
- Loss of homes to holiday lets (40% of housing stock in central Parkend for example is anecdotally being reported as holiday lets) through local taxation could be considered.
- We feel the lack of any comment in the Local Plan on the impact of second homes/holiday cottages/Air BnB represents something of a black hole at its core.
- There needs to be a greater emphasis on community-led building projects that meets the needs of residents, environmental concerns and provides employment opportunities.
- Local issue with long-term empty or derelict properties. Mrs Sheward's Shop, Folly Cottage and at least one house in Woodland Road (ex-council) are prime examples in and around Parkend. This does not appear to be mentioned in the Plan.
- It seems that the Plan should really seek to actively encourage full time occupancy of what already exists in the area before supporting extensive new "needed" developments, which in fact may not all be "needed".

- Sling – changes to allow for building on an historic meend (also has a Roman Road), which should be protected. Iron mine in close proximity and with the British Pit also being nearby there is potential undermining in this area.
- Concerns about the proposed development land off Driffield Road – increased traffic flow impacting on Primrose Hill. Need to maintain the Public Rights of Way crossing this area. Also extremely worried about the impacts of this development on the already overstretched infrastructure. (West Dean PC).
- The roadshows were not helpful and were considered amateurish. Insufficient details were provided, handout provided very little useful information and not enough to make an informed decision. Staff appeared unprepared for the questions asked and could not answer questions, an assumption that residents only wished to know about housing provision / allocations in their area. The diagrams on display were too small to read; The display documents only showed housing whereas residents are also concerned about lack of transport, healthcare and employment. It would have been useful to have a Summary or Recommendation of Findings. (Woolaston PC).
- WCC Highways seeks to understand the approach for modelling and assessing the impact of planned growth, particularly associated with development in/around Newent and connecting north into Worcestershire. WCC Highways seeks to understand the approach for developing the transport evidence, including modelling, that will underpin and support future plan-making stages. (Worcestershire CC).
- Redevelop the derelict land on the Lydney industrial estates to provide business premises, a decent retail park and entertainment facilities to further reduce travel out of the area (and corresponding traffic problems on the A48).
- Provide subsidies or grants for existing houses to upgrade to solar panels and better heat management (cooling as well as heating) rather than focusing solely on new builds.
- Improve the kerbside.
- Subsidise or cap local rents for people who want to open businesses in the area, and incentivise affordable rents by capping business rates.
- Provide better healthcare utilising the Lydney hospital or the Dilke for holistic wellbeing, not just NHS services.
- Reopen Lydney Hospital and Dilke Hospital. New Cinderford Hospital with 22 Beds is totally useless.
- Also we need Walk in Surgeries.
- July and August is a bad time for consultation.
- With climate breakdown and the collapse of nature likely to accelerate further in the next few years, this plan may be our last chance to challenge the severity and frequency of the weather extremes likely to hit us.
- Request that option I (new settlement) be reconsidered as the key strategic option for the Local Plan.
- Need for land for food production (without destroying soils, rivers or wildlife) and prioritise the highest grade agricultural land accordingly?
- Better insulating properties that are reliant on fossil fuels. Enable current industries to decarbonise.
- Local transport hubs that will decarbonise the commute to work/school/etc?
- Identify areas where we could build long term evacuation centres for those negatively impacted by weather extremes - flooding and wildfires in particular?

- Promote and include One Planet and Low Impact developments?
- Our Global targets suggest all areas of biodiversity interest be under inclusive spatial planning and/or effective management processes by 2030. Loss of areas of high biodiversity importance, including ecosystems of high ecological integrity, are brought close to zero.
- Ensure that the sewage infrastructure is built by the water companies to reduce river pollution from raw sewage discharge.
- Suspect many of the policies however could be wishful thinking and could deter new development owing to their overtly prescriptive nature particularly in relation to green issues.
- West Dean PC notes the improvements made to the Local Plan following a previous consultation response to the Local Plan in 2022, and we would commend the work undertaken by Councillors and Officers to bring forward a much-improved plan that seeks to place climate change, protection and enhancement of biodiversity and sustainability at its core.
- The Forest of Dean by its very nature is classified as sparse rural district council, which is reflected in National Local Council classifications, this Local Plan should be seeking to protect and enhance these very characteristics, these are what makes the area a tourist attraction. We also believe that the recognition of the area as a National Landscape should be explored further.
- There needs to be a greater emphasis on community-led building projects that meets the needs of residents, environmental concerns and provides employment opportunities. (West Dean PC).
- With climate breakdown and the collapse of nature likely to accelerate further in the next few years, this plan may be our last chance to challenge the severity and frequency of the weather extremes likely to hit us.

Draft Officer Response

This section contains 11 representations of support for the principles of the plan and these comments are noted and welcomed. Many refer to specific policies or allocations and these are considered in the relevant section/policy comments. Support for the Settlement Hierarchy Paper is also noted

A number of responses refer to the NPPF December and the changes that will result from this. The Plan represents the FoDDC's considerations at the time of preparation early 2024. Among other important changes, the NPPF December 2024 included a new standard methodology for housing requirements. This commands a significant uplift in the housing requirement to 600 new dwellings per annum. In consideration of these changes the Council will consider whether the agreed strategy will be capable of delivering the new increased number (amounting to an increase of approximately 82% on top of the delivery currently planned for) and a decision made regarding the need to review the strategy and all potential options for delivery. All reforms to the NPPF will be taken into account and a review of the strategy may be required. Subsequent changes to the agreed strategy will be subject to further Regulation 18 consultation.

The support for a new settlement is noted in some of the responses. If the current strategy is reviewed the Council will consider all options available for a revised strategy. Any proposals to change the strategy will be subject to consultation.

Regeneration team will work closely with GCC officers to bring forward sites, the current development strategy was agreed in Oct 2023 and the Local Plan seeks to allocate strategic sites in the most sustainable locations. We will continue to work with Monmouthshire County Council and Herefordshire County Council regarding strategic cross boundary issues.

FODDC will liaise with GCC to undertake and update the transport evidence base to inform the development of the Local Plan.

A review of the Infrastructure Delivery Plan will be undertaken inform the development of the Local Plan. It will be a requirement of any development that it is able to provide for its infrastructure needs.

All settlement summaries will be updated with latest information.

The blue boxes set out the policy, the green boxes are an explanation of the policy. This will be made clearer in the document.

Early engagement between housing associations and developers is encouraged.

The relocation of A&E facilities to Cinderford was not a consideration of the Local Plan but a decision made by the Health Authority.

We welcome and value feedback from the consultation events, it will be used to inform the preparation of future consultations.

Agree that community-led projects can provide wide scale benefits across the community. The Local Plan does not have a specific policy for this, but appropriate schemes would be supported by relevant policies in the plan.

All comments of support, concern and general observation are noted. Also agree that climate change is of high importance.

Chapter I

Preface and Supporting Text

Number of Representations: 18

Support: 7

Object: 5

Observations: 6

Observations:

- Prepared prior to General Election but will the final preface need to reflect that DLUHC no longer exists? (Regeneration, FODDC)
- Propose that the Coleford settlement boundary should be looked at with a view to amending it to allow for smaller in-fill sites to be considered for development.
- One such site is land adjoining The Golf Club, Five Acres, Coleford (Title NGR266653) subject of a previous planning application P0195/03 & pre application enquiry in 2014. The site currently sits outside the settlement boundary immediately west of property Deanhurst. A review & amendment of the settlement boundary to include all of said site, would increase the potential for development in accordance with strategy for Coleford & Cinderford.
- It has been a very difficult frustrating period for local plan making with frequently changing central government policy.
- The draft NPPF 2024 sees a challenging doubling of housing need which will need to be addressed.
- Building Regulations should continue to set & enforce energy use standards. Proportionate approach for existing buildings.
- The principles and targets are supported householders need to be encouraged and supported in improvements that are achievable and affordable.
- Para 1.8 supports renewable energy installations. Wonderful in theory what safeguards are being proposed in terms of visual impact & pressures for related development such as more overhead lines?
- Biodiversity net gain needs to take into account the application. Not just apply as if a housing estate is under the planning application.
- The restoration of a canal can bring so much diversity that is not just land based. (Herefordshire & Glos Canal Trust)

Support:

- Welcome Paragraph 1.3 & the acceptance that ".....as an overall theme, climate change is the fundamental influence on the contents of the LP etc." (EA)
- Generally, support the draft Forest of Dean District Local Plan have several concerns regarding specific wording & phrases suggested changes to make the document more robust. Section I – Preface National policy, as reflected in the Overarching National Policy Statement for Energy (EN-1), sets out that (paras 3.3.25 - 3.3.26): "Storage has a key role to play in achieving net zero and providing flexibility to the energy system, so that high volumes of low carbon power, heat and transport can be integrated. Storage is needed to reduce the costs of the electricity system and increase reliability by storing surplus electricity in times of low demand to provide electricity when demand is higher;"

- Support the statement at paragraph 1.4 that the FoDD LP will encourage new renewable energy installations, including both generation and storage developments.
- Agree with aim but suggest flexibility retained to ensure local people are not deterred from making affordable improvements - 'something gets you somewhere'.
- BNG 10% + supported in principle but human and nature conservation must be balanced and viable.

Object:

- Paragraph 1.9 reference to BNG object to the requirement to seek net gain in excess of the required minimum. The PPG advises development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat.
- The transport system is already polluting the A48.
- We have to wait 6 weeks to see a doctor at present.
- The infrastructure will NEVER be built.
- As for the environment this would be a catastrophe.
- The only benefit for all this would be extra Council Tax and jobs for the building industry
- If the drivers coming from the A48 Lydney direction were not considerate in letting us into the traffic we would NOT be able to leave Beachley as it is.
- The idea of any more traffic joining this road is UNTHINKABLE.
- I have lived in Broad St for 47 years enjoy the fields & woods environment outlook.
- Building houses in the field behind would devastate that outlook
- The fields below the hill soak up the water runs into the 12 foot deep gully, used to be a slate quarry at the bottom of my garden which runs along all the houses in Broad St, fills with excess water from the field up to six foot of it.
- If the field covered with tarmac & concrete it would have an adverse potential flooding to the houses along the old road, the bottom of the gardens in broad Street, even the houses you build.
- The old road passed the chapel the water is like a river across there
- They said on the Tewkesbury Road developments they will put drainage in and look what happened there all the house get flooded.
- You really need to talk to the residents in future developments in Hartpur.
- Objection is made to the Local Plan period which is from 2021 – 2041
- Repeated changes to the planning system have caused plan adoption to slow down as LPAs pause the process to consider the implications of changes.
- The NPPF paragraph 22 states that: "Strategic policies should look ahead over a minimum 15 year period from adoption 13, to anticipate & respond to long-term requirements & opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages & towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery"
- In light of the amount time it can take to progress the plan once it has been submitted, the plan period should be amended to at least 2043, ensuring at least the minimum 15 year plan period from adoption so that the plan is able to respond to long-term requirements & opportunities & take on board the new housing figures based on the revised Standard Method.

- Object to the planning application to build at Newent, its incompatibility with FODDC's commitment, having declared a Climate Emergency, to achieving the goal of Net Zero carbon emissions by 2050 & the simultaneous duty of care the Council holds in meeting the fundamental needs of its constituents.
- Quote from the UK Fires Report 'Absolute Zero. "UK FIRES is a research programme sponsored by the UK Government, aiming to support a 20% cut in the UK's true emissions by 2050 by placing Resource Efficiency at the heart of the UK's Future Industrial Strategy." <https://ukfires.org/impact/publications/reports/absolute-zero/>
- I believe it makes sense that the Forest of Dean should future-proof this District's ability to feed itself.
- Suggestion, for optimal efficiency in vegetarian food production, is to retain the most fertile land for food production.
- As farm land around Newent is prime agricultural land, it will give the highest yields for equivalent input compared with farmland in almost any other area in the country.
- I would suggest that the responsible decision of the FOD Councillors to the constituents would be to retain the farmland around Newent and not to give planning permission for building works.
- At I.4, the draft plan states that the changes that are likely to be required may see a 12% growth in the number of dwelling and associated facilities. What is this based on? Using the numbers presented in the plan for the indicative rate of provision, does not take into account different sizes of household. What evidence do you have of what types/sizes of household are likely to be required? Does your estimate of potential dwellings include flats or small elderly persons bungalows or supported accommodation? (Mitcheldean PC).

Draft Officer Response

All comments of support, concern and general observation are noted.

Agreed, the Draft Local Plan needs updating and revising to reflect changes in Local Government, acknowledge the change of name from DLUHC to MHCLG as well as any other important changes such as the revised NPPF (December 2024) and other emerging centre government policies and guidance which have a direct impact on the Local Plan.

Comments relating to individual settlements or sites, such as redefining settlement boundaries, allocation sites, etc.) will be considered on a case-by-case basis and revised where considered appropriate.

Agreed that the plan-making process has experienced frequent changes, particularly with regards to central government policy. Whilst this is a challenge, the Local Plan will need to reflect the most up-to-date changes to legislation/policy and this may result in further work and amendments being made to the Plan, such as the need to reflect the significant uplift in housing numbers.

Whilst Building Regulations work alongside the planning process, the Local Plan does not seek to duplicate Building Regulations. Energy use and carbon efficiencies are however dealt with in the Local Plan, in particular, policies LP.2 and LP.3.

Renewable energy is strongly supported by the new NPPF (December 2024), it is also a means of reducing reliance on carbon, which is an aim of the FoDDC Council and therefore the Draft Local Plan also promotes a move towards renewable energies as well as other carbon management measures.

However, it is agreed that renewable energies can have other consequences, such as overhead lines. The infrastructure required to join into the national grid is the responsibility of the network provider and often it is the case that overhead lines are used as they are the most cost effective. However, it is also noted that technologies are constantly evolving which may benefit visual impacts. It is also recognised and agreed with that flexibility in the policies should be ensured so as not to deter local people from making affordable improvements. The relevant policies will be reviewed with this in mind.

Agreed that Biodiversity Net Gain should be a thread that isn't just considered at planning application stage but also runs through the Local Plan. Policies LP.12 and LP.13 in particular highlight the importance of biodiversity and biodiversity net gain. However, it is also recognised that the Local Plan needs to balance human and nature needs, and a Viability Assessment on the local plan will be carried out in the near future to provide evidence for this, particularly in respect of exceeding the national minimum of 10% BNG.

Agreed that the restoration of the canal can have many benefits, including and not limited to biodiversity.

It is understood that traffic on the main routes, such as the A48 is a problem with regards to congestion and pollution. The Local Plan strategy seeks to be the most sustainable whilst providing the housing supply that is demanded from central government. The Council continues to engage with statutory bodies and stakeholders to improve transport networks, public transport services, and create more opportunities for active travel, whilst also providing opportunities for local employment.

It is also recognised that wide-ranging infrastructure as well as services/facilities are currently lacking in some areas of the district and there is concern that this will worsen with an increase in development. In general, and where appropriate, infrastructure needs are identified and funded through Section 106 contributions identified through planning applications. Relevant bodies, such as GCC, NHS, Water Companies, etc, are consulted and have the opportunity to request the necessary funding. With regards to Doctor's surgeries, the NHS is consulted on the local plan and on individual planning applications and are able to request S106 contributions as and where appropriate. The Local Plan is able to allocate land for future services/facilities, which would allow and encourage doctor's surgeries to locate there should they wish to (taking into account that Doctor's surgeries are generally run as independent businesses and therefore work to their own business model). Furthermore, work continues to be carried out on the evidence and the Infrastructure Delivery Plan. Results of which will be reflected in the site allocation and infrastructure policies in the Local Plan.

Concerns regarding environmental and landscape impacts are understandable and will be considered in as much detail as possible at the site allocation stage as well as during any planning application stages. The Local Plan has to supply a certain number of houses as well as employment and other types of development and naturally this will cause changes to the natural and built environment. The purpose of the Sustainability Appraisal, the Local Plan allocations and policies, and the planning application process is to ensure that impacts are mitigated as much as possible, and that the benefits of the development outweigh the harm.

Flooding issues are also considered in detail during the plan-making process (including Strategic Flood Risk Assessments) as well during the planning application process to ensure that any potential harm is mitigated in an appropriate manner. Admittedly it is not always possible to improve upon a current poor situation, but development should not exacerbate that. Statutory consultees and other relevant

stakeholders are regularly engaged and consulted for expert advice on issues such as flood risk and appropriate mitigation. The water companies have a duty to provide the necessary infrastructure for development and are made aware of where future development will be in the District, so that they are clear on what and where their future spending needs are. Where possible, housing is planned for outside of any floodzones.

Agreed that public consultation is important, and as the plan-making progresses there will be further public consultations and events for residents. Town and Parish Council are also welcome to request updates and discussions with the Local Plans Team throughout the year and particularly during consultation periods should they wish.

Agreed that there may be a need to revise and extend the plan period, and this will be considered and amended if considered necessary.

Objections to the planning application in Newent are noted, however, this has now been granted planning permission on appeal.

Agreed, food production and the retention of sufficient quality agricultural land for such, is very important. It is recognised that some of the farmland around Newent is of high quality (Grade 1) and this is taken into account when assessing sites for future development.

With regards to increase in housing numbers required across the plan period, this is calculated using the Standard Method (which is a central government calculation which the Council has to adhere to). The Council seeks to provide a mix of housing types and this is evidenced by Housing Needs Assessments and is reflected in the Local Plan (LP.1). Furthermore, if a site is required to provide affordable housing, there is scope for the Strategic Housing Officer to request the types/mix of housing which is considered to be the most appropriate for that area. However, it can be a challenge to demand smaller units and bungalows for market housing schemes as developers often prefer to build larger family dwellings for the higher returns on their investment. This is certainly a matter which will be considered in more detail and policies will be reviewed/revised where appropriate to reflect this.

Chapter 2

Context and Supporting Text

Number of Representations: 31

Observations: 14

Support: 12

Object: 5

Observations:

- Typo - Council Plan 2024-2028.
- Why is housing & services to support housing given development priority? What evidence is there that the demand for employment land is lower?
- What proportion of home workers versus site based employment? Increased emphasis on home working is cited with no explanation as to where this sits compared to traditional place-based work.
- Please include reference to access to Colleges, the University and other training providers as well as schools. Access to vocational training for students is a key issue in FOD. The Vision (Para 2.16) also refers to schools only? (Regeneration, FODDC)
- Context says is especially important that LP delivers in accord with the need to reduce carbon emissions and encourages as wide a range of good practice is possible. (EA)
- Paragraph 2.3 confirms that the total housing requirement of the Local Plan is 6,600 dwellings using the Government's standard methodology.
- It remains unclear if all neighbouring authorities are able to meet their own housing & employment needs if the Forest of Dean has been requested to accept any additional need. (National Highways)
- Note FoDD contribution is set at 310 dwellings per annum (para 2.3) the total requirement over 20 years is 6,600 dwellings, equivalent to 330 dpa to be delivered between 2021 & 2041 (para 8.1) as per rate set in 2024 (LP.29).
- We note the DLP does not have a housing shortfall there is no need for additional homes to be delivered elsewhere.
- We support the preferred approach that will ensure that the identified housing needs can be met without requiring further development opportunities in neighbouring local authority areas. (Worcestershire County Council).
- Para 2.3. The lower housing numbers & projected build rates are welcomed. Will changes in Government policy affect these figures?
- Para 2.8 Typo on first line. Is the decarbonisation target 2030?
- A river crossing at Lydney to access the Bristol/Glos railway & M5 should remain a long term aspiration.
- Essential given the draft NPPF new definition of housing need doubling the housing requirements within FDDC.
- You need to be strong around transportation and facilities with this scale. Do not be pushed over. (P Mason)
- Different forms of travel can be support by a restored canal.
- Cycling for work is one way that a canal towpath can support the different modes of travel.

- The council need to look at helping the Herefordshire & Gloucestershire Canal Trust in gaining access to wider canal corridor so a good width towpath could be developed from Dymock to Gloucestershire. (Herefordshire & Glos Canal Trust).
- The draft plan does not go far enough towards realising this vision by not allocating enough deliverable sites to meet the housing needs of the District over the plan period it would be increasingly difficult for the stated demographics to find suitable accommodation in the District.
- First time buyers and older people looking to downsize to suitable accommodation, it fails to capitalise on readily deliverable opportunities for increasing the plan's provisions for housing & affordable housing in sustainable locations.
- Whilst the plan's vision is commendable there are significant concerns over whether it would actually be realised.

Support:

- Welcomes the Council's Vision with regard to affordable housing at paragraph 2.16, (South West Housing Association on Planning consortium)
- In general, support the FoDDC LP vision to pursue a low carbon future, adapt to climate change, & implement sustainable development where healthy lifestyles are an everyday part of life. Support better connectivity across transport, digital and mobile data, along with the FoDDC LPs aims to meet the needs of its communities. (Cheltenham, Gloucester and Tewkesbury Strategic and Local Plan (SLP) team)
- Rural/Forest locations (small villages & hamlets) outside main settlements benefit from fibre to home & competitive delivery of regular household needs (food, personal products, shopping) via the main supermarkets, food box deliveries, amazon etc.,
- A spatial strategy correctly should focus most development at the main settlements there needs to be flexibility to support relevant scale development within rural/open countryside/forest communities.
- Small scale housing & employment opportunities should be considered on their merits in these locations & previously developed land prioritised.
- Fibre to the home makes working from home & rural/forest locations viable and attractive.
- Small businesses should be positively supported.
- Patterns of working changed post Covid flexible home working is prevalent.
- The AI revolution & Golden Valley technology park provides exciting opportunity for high value employment locally.
- Support all the elements of the Local Plan Vision would have liked to have seen a reference to protecting landscape in the 3 Priorities, alongside decarbonisation and nature recovery (Priority 2). (CPRE)
- Through the involvement of the Lydney Park Estate, our client's legacy aspiration is to foster the creation of a sustainable, landscape-led expansion to Lydney.
- Concentrating a new strategic site adjacent to one of the District's largest towns meets the general aims of the plan-making section of the presumption in favour of sustainable development & represents a sustainable approach to accommodating a significant proportion of the Council's development needs over the short-medium terms.

- Supports the scope of topics presented via the Vision, which in turn seeks a better environment for today & tomorrow; increased availability of housing of different types & tenures; enhanced transport connectivity & improving health and wellbeing. (Savills).
- Please don't only be guided by environmental factors this document seems incredibly heavily weighted to it. Whilst I support balance of practicality accessibility & transport is needed.
- Priority 2 decarbonisation & nature recovery pleased to see separate policies set out in the plan that distinguish between the two whilst emphasising the importance of their interdependence - you cannot achieve one without the other.
- Do not feel that this is reflected in the LP vision. The decarbonisation aspect is addressed, a further bullet point on the vital role of nature recovery is missing. e.g. a point could be added to read 'The biodiversity across the FoDD is protected and enhanced, with high-quality green infrastructure integrated into all development, to support nature recovery and the wellbeing of existing and new residents within the district.' (GWT)
- 2.8 support priority 2 this hasn't been overtly translated in the local plan vision (2.16) which envisions the diverse landscapes & heritage of the area is so distinctive that it is nationally and internationally recognised. Would welcome a reference to natural heritage.
- Section 2.14 refers to 'potential' rising sea levels more extreme flood events. Isn't there more certainty to current predictions than this implies?
- The district is actively engaged in pursuing a low carbon future and new development is designed to enable this while being able adapt insert 'and prevent' climate change? (EA)
- (Natural England) The objectives of the local plan should be outlined more clearly; they are currently unclear and thus less effective, should be set out in further detail set apart from the vision.
- The vision & objectives should avoid generic statements & reflect local circumstances.
- The strengths & natural feature's the county have to offer should be stressed and highlighted in this section.
- Could the aim to be carbon neutral by 2030 be set as an objective here? Could the protection and enhancement of the Wye Valley and Forest of Dean Bat sites SAC & Malvern Hills & Wye Valley national landscapes be set as an objective?
- NE recommend making a link between the vision, objectives & the Core policies. E.g. Sustainable Development (LP.1) is the 1st core policy in the local plan. Policy LP.3, Policy LP.8 & Policy LP.10 could also be mentioned more explicitly in the vision & objectives section.
- Would be more ingrained 'green threads' throughout the local plan. Focus should be maintained on implementing the specified green 'threads' as strongly as possible throughout the plan process.
- The Plan's vision & emerging development strategy should address impacts on and opportunities for the natural environment & set out the environmental ambition for the plan area.
- The plan should take a strategic approach to the protection and enhancement of the natural environment, including providing a net gain for biodiversity, considering opportunities to enhance and improve connectivity.
- Where relevant there should be linkages with the Biodiversity Action Plan, Local Nature Partnership, National Park/Area of Outstanding Natural Beauty Management Plans, Rights of Way Improvement Plans and Green Infrastructure Strategies, Nature Recovery Network.(NE)

Object:

- Mitcheldean Parish Council object - Para 2.6 Does protecting the environment and supporting nature include building on valuable farmland?
- Para 2.7 Does building on valuable farmland meet the demands for conservation and protection of the environment? (Mitcheldean PC)
- The current proposal to build 6600 dwellings within the FOD the Government has now increased that to 12000+ dwellings. The latest census (2021) put the population of Lydney at 10,043 (https://www.citypopulation.de/en/uk/southwestengland/admin/forest_of_dean/E04004313_lydney/).
- 12000+ homes (with a conservative estimate of 2 persons per dwelling) would require an area & infrastructure support more than twice that of Lydney (as it currently stands).
- Current infrastructure of the Forest of Dean (roads, doctors, schools, dentists etc) would not be able to cope with such a large, major expansion.
- Every single dwelling added to the area will have an adverse effect on the local population seriously degrade the quality of life of the current residents experiencing ever decreasing access to local infrastructure support.
- The only viable, sustainable option is establish a completely new town (even two) would necessitate the incorporation of schools, GPs, Dentists, road structures etc, as Bradley Stoke in North Bristol did during its development.
- Para 2.3 if the proposed changes to the Standard Method come into effect the subsequent version of the LP will need to make provision for at least 597 dpa.
- The overall housing requirement should be increased.
- To extend the plan period to at least 2043
- To provide for sustainable development long term continuity & to address the priorities of the Council's Plan 2024-2028 to include a new settlement located West of Severn.
- Paragraph 2.1 Is noted the plan does not propose sustainable development which addresses the needs & relates well to the neighbouring authorities.
- No evidence of the duty to co-operate & opportunity to consider a new settlement at a highly sustainable location providing a long-term strategy to meet not only the needs of the district, but also to assist in meeting the needs of the adjacent authorities in the Gloucester, Cheltenham Tewkesbury Strategic Local Plan, has not been considered in the Reg 18 Plan.
- Para 2.2 is noted. The inclusion of a new settlement i.e. West of the Severn will provide the population of the area - new and existing households, with sustainable travel opportunities and enable a shift to more sustainable living.
- Provides an opportunity to meet housing needs close to where they arise.
- Is highly deliverable & can bring forward opportunities for travel by means other than the private car reducing carbon emissions.
- Would complement the development of sites in the forest towns & enable a lesser amount to be dispersed to the major villages, whilst also "future proofing" the strategy.
- A new settlement located at the confluence of the A40 & A48 to the west of Gloucester, straddling the boundary between FOD & Tewkesbury (between Churcham & Highnam) should be included in FOD LP.
- Previously considered in earlier draft consultations

- This location is capable of accommodating & delivering significant development during the plan period.
- West of the Severn can accommodate approximately 3,000 dwellings approximately 2,000 dwellings located in FOD & approximately 1,000 dwellings located in Tewkesbury Borough.
- A far more sustainable location than Beachley Barracks.
- Would go some way in meeting the housing shortfall derived from the proposed changes to the Standard Method.
- West of Severn can provide considerable social, environmental & economic benefits to the local & wider areas & satisfy many of the Council's priorities as set out in the Council Plan.
- Given that Cheltenham, Gloucester & Tewkesbury Strategic Local Plan Issues and Options consultation raised the issue of a new settlement straddling the boundary of Tewkesbury Borough & FOD between Churcham & Highnam, issues surrounding housing need should be addressed in the preparation of the FOD LP as part of fulfilling the duty to cooperate.
- The duty to co-operate is strengthened in the proposed changes to the NPPF published on 30th July 2024.

Draft Officer Response

All comments of support, concern and general observation are noted. Typographical errors will be reviewed and amended.

The housing numbers required across the plan period are calculated using the Standard Method (which is a central government calculation which the Council has to adhere to). With the changes to the NPPF (December 2024) this has resulted in a significant uplift in housing numbers required (from 6600 in the Draft Local Plan to 12000 after the NPPF changes). Housing development and services to support it are a major consideration as they may require significant land allocation. Employment is also a key factor in the Local Plan and both policies and allocation sites for employment uses are included and promoted. Evidence on employment (such as Economic Needs Assessment and other employment reports) is consistently gathered throughout the plan-making process which informs the amount of employment land which should be allocated. It is also taken into account that much of the existing employment land in the current local plan (Allocations Plan 2018) has not been developed and there are existing units vacant. Furthermore, planning applications for new employment uses have not significantly increased.

The Plan seeks to encourage business of all types and sizes.

Information on how and where people work is gathered from the latest census data. Additionally, the Economic Needs Assessment will also cover this and gather the necessary evidence on employment within the District. It is noted that improved fibre connections improve the scope for working from home and in more rural locations.

Noted and agreed that reference should be made to Colleges, the University and other training providers.

Agreed that it is especially important to reduce carbon emissions.

Paragraph 2.3 confirms the total housing requirement at the time of publishing the draft Local Plan, however, this has since increased to 12,000 units over 20 year plan period, owing to the updated NPPF (December 2024).

Currently, the FoDDC expects to meet its own housing need, however, in the light of the new NPPF and the significant uplift in housing need, this situation may change if considered necessary. The Council's Strategy will also need to be reviewed and revised in order to meet this higher need and allocated sufficient deliverable sites.

Comment regarding long-term aspiration of a river crossing is noted, however, this would not be a sole decision for or financed by FoDDC (it would be led by GCC and other transport bodies, such as Network Rail).

Transport and associated infrastructure is led predominantly by Gloucestershire County Council. The Council engages regularly with GCC Highways and makes them aware of the potential development sites. Issues such as public transport hubs, highway networks, parking provision and traffic management measures are discussed with and the remit of GCC Highways. Equally, GCC Highways comment on allocations and on individual applications and request necessary highway works/mitigation and contributions.

Agreed that the restoration of the canal can have many benefits, including and not limited to active travel. The Local Plan seeks to protect and support the canal restoration route. And all comments of support with regards to tourism, active travel and leisure on the canal-side are noted.

Noted that housing for the differing demographics across the District needs to be provided for, such as smaller housing units for first time buyers, or down sizers, etc. The Council seeks to provide a mix of housing types and this is evidenced by Housing Needs Assessments and is reflected in the Local Plan (LP.1). Furthermore, if a site is required to provide affordable housing, there is scope for the Strategic Housing Officer to request the types/mix of housing which is considered to be the most appropriate for that area. However, it can be a challenge to demand smaller units and bungalows for market housing schemes as developers often prefer to build larger family dwellings for the higher returns on their investment. This is certainly a matter which will be considered in more detail and policies will be reviewed/revised where appropriate to reflect this.

Noted that there is a wish to see a reference to protecting landscape and natural heritage in the 3 Priorities, however, these are the Council Plan priorities, not the Local Plan's. However, the Local Plan still seeks to protect landscape and natural heritage within its strategy and policies.

All suggestions for amendments to policy wording and supporting text will be taken into consideration and revised where appropriate.

Up-to-date evidence is gathered with regards to flooding and rising sea levels and this is reflected in the Strategic Flood Risk Assessments and Water Cycle Studies which are being worked on.

The Local Plans team will endeavour to outline the objectives of the local plan more clearly where considered necessary, however, the Vision was agreed by Councillors in 2019.

Agreed that the county has many strengths and natural features which should be highlighted within the document without causing duplication and keeping the text as succinct as possible.

The Local Plan seeks to take a strategic approach to protect the natural environment, to provide opportunities to enhance and improve (BNG/GI) as well as linking up with other strategies where possible. The relevant policies provide more detail on this.

Agreed that valuable farmland is important for the conservation of the environment. However, there is limited brownfield land within the district and therefore it is not possible to accommodate the high housing supply need without building on greenfield sites, which are often farmland. However, the Sustainability Appraisal seeks to highlight that the land with a lower quality of farmland is preferable to that of higher quality (grade 1).

Agreed that 12000 new homes will require a large amount of land for building and infrastructure. Furthermore, comments regarding the need for infrastructure delivery and investment are noted. This is an issue across all of the planned development in the District, and will be addressed through a mixture of liaison with various stakeholders (such as GCC, NHS, water companies, etc.) and Section 106 contributions. The Council is consistently gathering evidence and that includes a Viability Assessment, Infrastructure Delivery Plan and Infrastructure Funding Statement. This evidence will inform the Local Plan strategy and policies.

Comments regarding the sustainability of establishing a completely new town and the submitted potential sites for new settlements are noted. Whilst this was not part of the Regulation 18 Draft Local Plan, it is highly likely that the Local Plan Strategy will need to be reviewed and revised in order to accommodate the high uplift in housing numbers required. A new settlement(s) would be one of the options available. The Council also regularly engages with neighbouring authorities under the Duty to Cooperate legislation.

Agreed that there may be a need to revise and extend the plan period, and this will be considered in detailed and amended if considered necessary.

Overview and Supporting Text.

Number of Representations: 8

Observations: 3

Support: 4

Object: 1

Observations:

- It would be difficult to suggest Beachley isn't in the South and here you indicate a lack of suitability which seems at odds with the proposals.
- A new entry exit point at Lydney would provide options. Flooding affects the access into the FD from Gloucester.
- Paragraph 2.14 re 'Areas at risk from flooding are unsuitable for almost all forms of development', we consider that some of the areas proposed for development are at risk of future flooding i.e. at Sedbury and Tutshill, especially with the impacts of climate change. (Glos wildlife Trust).

Support:

- The lacking transportation factors are clear here don't lose sight of these.
- Real investment in transport infrastructure is required to enable your proposals without significant impact on residents.

- Encouraging & supporting home working provides a fabulous opportunity with the planned Golden Valley technology park.
- Lydney River crossing at location of the old rail crossing to Sharpness. Restoring a bridge link for active travel (cycles and walking) and car or rail should remain a target.
- Simply relying on cycling, walking & public transport for an area of limitations is incredibly naive.
- Support the identification of opportunities to develop in locations with access to the rail network favouring sites that are easily accessible & can allow travel in a sustainable manner (para 2.15). (Worcestershire County council)

Object:

- Paragraph 2.12 - FODDC is part of the Gloucestershire Housing Market Area identifies there is a daily flow of commuters to the surrounding centres which "brings issues such as traffic congestion & is not sustainable
- "The Reg 18 Plan states that there are opportunities to address some of these issues in the LP.
- One of the most significant ways of addressing these issues is to include a new settlement at West of Severn which can offer transport choices including public transport as the proposal includes a transport interchange.
- Opportunities exist for potentially extending the eastbound bus lane on the A40 at the A40/B4215 Highnam Junction it commences earlier at Highnam Roundabout to provide a significant advantage for buses travelling to Gloucester via the Transport Interchange Hub.
- There is also the potential to construct a pedestrian/cyclist link to the existing footway/ cycleway that commences at Highnam Roundabout continues east along the A40 to Over Roundabout from where cyclists can gain access to Gloucester via the National Cycle Network providing opportunities for 'Park & Cycle' from the Transport Interchange Hub.
- West of Severn would provide a sustainable development offering a genuine choice between different modes of travel for new residents in a location where there are opportunities to intercept a significant number of commuter car trips on both the A40 and A48 corridors,
- More sustainable modes of transport including bus, bicycle, and e-bike, which will help the SLP authorities to achieve their target for new homes, whilst meeting their strategic objectives of prioritising sustainable transport & active travel meeting the challenges of climate change.
- Paragraph 2.13 acknowledges that the western & southern areas of the district are heavily constrained less appropriate for new development, the eastern area of the district is less constrained & therefore far suitable for sustainable development.
- Land West of the Severn accords with paragraph 2.15 i.e. a location "that allows travel in a sustainable manner and & easily accessible are favoured & will deliver better on climate change as well as providing a more long term prospect for continuing sustainable development beyond this plan period."
- Mitcheldean Parish council object to 2.14 It is not just areas currently at risk from flooding that should be protected from development, necessary to protect areas which could be flooded due to lack of soakaway when a field is built on.
- Loosing fields to building would put more strain on neighbouring roads and dwellings.

Draft Officer Response

The concerns regarding traffic congestion, pollution and general road conditions are noted. This is an issue which is considered in great detail, and also forms a basis for the strategy with the aim of reducing out-commuting. The Council engages regularly with GCC Highways and makes them aware of the potential development sites. Issues such as public transport hubs, highway networks, parking provision and traffic management measures etc. are discussed with and the remit of GCC Highways. Equally, GCC Highways comment on allocations and on individual applications and request necessary highway works/mitigation and contributions. Walking and cycling paths are encouraged through Policies 24 and 25. It is recognised that better bus services are required and this continues to be an aspect for further work. Bus companies are consulted on the draft plan and their input is taken into account. Bus services are generally run by private companies. An active travel strategy is in development for the District.

Comments regarding a proposal for 'West of Severn' development and the transport choices it can potentially offer are noted. The proposal, however was not needed for allocation as part of the consultation Draft Plan strategy. The Plan represents the FoDDC's considerations at the time of preparation early 2024. Due to changes in the NPPF December 2024 there may be a need to review the strategy. Any proposals would need to be evaluated against any other options in the event that additional land was shown to be needed to meet the Plan's housing requirement. Subsequent changes to the agreed strategy will be subject to further consultation.

It is acknowledged that Beachley is located in the south of the District. It is understood that Beachley Barracks is likely to become available in the latter part of the plan period and is a large area with previously developed land. The Local Plan must address its future and at the same time consider how it may contribute to the future needs of the FoDD, the mixed use allocation forms part of the Local Plan strategy.

Flooding issues are also considered in detail during the plan-making process (including Strategic Flood Risk Assessments) as well during the planning application process to ensure that any potential harm is mitigated in an appropriate manner. It is not always possible to improve upon a current poor situation, but development should not exacerbate it. Statutory consultees and other relevant stakeholders are regularly engaged with and consulted for expert advice on issues such as flood risk and appropriate mitigation. The water companies have a duty to provide the necessary infrastructure for development and are made aware of where future development will be in the District, so they are aware of location of future needs. Where possible, housing is planned for outside of any floodzones.

Comments regarding a Lydney River Crossing for active travel (from Sharpness) are noted and whilst a project like this would be worthwhile pursuing in terms of sustainability and active travel, it is however costly. This type of scheme would need to be managed and funded by Gloucestershire County Council and potentially with funding from other sources. In the meantime, the Council regularly engages with GCC on all such related issues.

Vision and Objectives and Supporting Text.

Number of Representations: 10

Observations: 4

Object: 1

Support: 5

Observation:

- Hereford & Gloucestershire Canal can help with this vision
- It is a place where healthy lifestyles are an everyday part of living and working in the district.
- Cycling along the towpath to work or play.
- Walking along the canal
- The diverse landscapes and heritage of the area is so distinctive that it is nationally and internationally recognised.
- Canals bring heritage alive locks are operated the same way today as they did when first installed
- A thriving tourism market is underpinned by a high quality natural and built environment. Canal have been shown to improve visitor numbers. (Herefordshire & Gloucestershire Canal Trust)
- This Vision makes reference to young people staying in the Forest & the need to positively address areas such as the access to employment and training.
- Consider the opportunities & the connectivity/accessibility required to deliver skills & training to residents within the district together with employment opportunities.
- This Vision also refers to digital and the need for connectivity.
- FODDC may review the policy wording to enable it to be more proactive & flexible in assisting the telecom industry to improve the digital infrastructure e.g. the installation of masts & antenna; the use of public sector assets to host such technology and infrastructure with attraction of investment by suppliers.
- GCC welcome the focus & priority of regeneration across the Forest, as the heritage of the local area provides for some repurposing of sites & buildings for new, unique & emerging industries & sectors e.g. conversion of a former into vertical farming in Lydney; retrofitting a former quarry & diving centre into a marine research facility etc.
- Vision section could be expanded to include another bullet along the lines of: "a district with a high quality, healthy environment, with attractive open spaces, clean air, vibrant and inclusive sports and cultural facilities and communities engaged in the development of the area". (GCC).
- The Local Plan fails in some part, (although land has been identified for commercial and employment use) to provide guidance or vision to contribute to a strong, responsive, and competitive economy that supports growth and innovation through local employment and in attracting new businesses to the area so providing a mixed economy. We urge the FODDC to explore the employment of an officer to bring inward investment into the area which would attract employers, especially those developing green technologies and emergent new technologies, which would bring highly skilled employment opportunities to the area and prevent outward migration of people looking for employment opportunities.
- This local plan needs to provide a vision for the future. A vision that provides for local employment, reduces the need for travel (especially using private vehicles), that provides homes that young people can afford to buy or rent to reduce the outward migration of our young people. The plan also has to enable and enhance community cohesion whilst also providing for our aging population.(West Dean PC).

Object:

- This section only includes the vision. There are no objectives to explain how the vision will be monitored or achieved.
- The Vision is in principle supported.
- The inclusion of a new settlement will address many aspects of the vision.

Support:

- The FOD must retain & enhance its local distinctiveness in a sustainable way: this is fundamental to that vision for local residents, the wider economy, its heritage and unique environment. (Coleford TC)
- It is Redmarley Parish Council's view that the enforcement of this vision must be maintained in the decision making made by the Planning Committee, it is regularly not the case.
- Local input via RPC is essential to ensuring correct planning decisions are made. Sadly, this input is generally ignored or not sought at all.
- Support bullet 1 & its position at the top of the list, given achieving net zero carbon emissions & carbon neutrality by 2030 is a central theme running through the document (para 1.2 & policy LP. 1 refer).
- The Forest of Dean vision (para 2.17) is welcomed by National Highways as they relate to sustainable transport aligned with NPPF (National Highways).

Draft Officer Response

Overall there is support for the vision. Comments to the objectives and monitoring are noted. The monitoring section of the plan refers to the methods used and to the Annual Authorities Monitoring Report. Many components of the vision are addressed by other documents such as the Council Plan.

Plan Order

No comments

Context for Strategic and Core Policies and Supporting Text.

Number of Representations: 5

Observations: 2

Support: 1

Object: 2

Observations:

- May be small in comparison to development at Lydney & Churcham but the increase in terms of residents, transport, facilities etc proposed for Beachley is not 'small'.
- Paragraph 2.19 & Policy LP.27 This mentions the significant current focus on major development of growth in Lydney due to current allocations, two current significant employment sites have not yet been developed. What barriers do these have which can be addressed to accelerate and bring forward land? (GCC)

Support:

- Lydney makes sense & will likely now need to take x2 the draft increase based on the 2024 NPPF new standard method.
- The additional homes provides the opportunity to collect funds for a new Sharpness/Lydney crossing with lobbying Government for Homes England funding.

Object:

- I think it is disingenuous to suggest that the Beachley development is small given it's proportion to the current housing position.
- Paragraph 2.18 - 2.20 The NPPF refers to strategic & non -strategic policies (paragraph 20 & paragraph 28 respectively), it is not clear from the Reg 18 Plan which policies provide the strategy (it is assumed that these are the Core Policies) confusingly the Plan refers to strategic policies which set the context for the LP in a manner set by the core policies. It would be helpful if there was a clear distinction between strategic & non-strategic policies. As per NPPF plans should make explicit which policies are strategic policies & where a single plan is being prepared in this case, the non-strategic policies should be clearly distinguished from the strategic policies.

Draft Officer Response

Comments and support are noted. Future versions of the Local Plan will clearly set out the strategic policies.

The Council will work with GCC to bring sites forward.

The reference to Beachley being smaller scale was in relation to the size of allocations at Lydney. Beachley and Newent are still considered strategically significant.

Chapter 3 Core policies and Supporting Text.

Core Policies

Number of Representations: 5

Observations: 2

Support: 3

Object: 0

Observations:

- E.g. (through locally sourced materials such as timber) (FC)
- A canal can help reduce flooding and improve biodiversity against having SUD's that are a waste of space and potential dangerous areas for children. (Hereford Canal Trust)

Support:

- Would reiterate the overarching benefits of the efficient re-use of a previously developed site which should also be factored into the sustainability benefits.
- NE strongly welcomes the core policies in this section. welcome the explicit reference to Climate Change adaptation (Policy LP.3) and Sustainable Development (Policy LP.1).
- The core policies represent a positive awareness of the need to protect the environment.

Draft Officer Response

Support and comments noted.

Policy LP.1 Sustainable Development

Number of Representations: 22

Observations: 5

Object: 1

Support: 16

Observations:

- Larger developments especially should add to, and not detract from a thriving local scene. (Coleford TC)
- Environment Agency Replace point 1 with the following '(we have cross-referenced with the Herefordshire LP) - It must be demonstrated that all developments have reduced their vulnerability to and provide resilience from the impacts of a changing climate in respect to water efficiency and flood risk'. This aligns with the Flood Risk Activity Permitting principles and those of 'making space for water' it also can feed into paragraph 3.8.
- Welcome the statement all new development must contribute to carbon reduction to support FOD being a zero-carbon district by 2030 and remaining so thereafter.
- EA strongly support requirement 6 to be designed to maximise green infrastructure (GI), support nature recovery, improved biodiversity (including but not limited to any requirements for net gain), making optimum use of and enhancing water courses and other features'. Suggest insert 'and restoring'

- 7 Schemes that are net exporters of renewable energy will be encouraged subject (as with all proposals) to their compliance with the remainder of plan. Can this be strengthened?
- Regarding Policies LP.1 and LP.3, and "Climate-Proofing", how far can developments houses be made "retrofit-ready"?
- Also states: "All new development must be sustainable and bring a net positive impact on the environmental, social and economic conditions of the area through design, location and use.." consider adding ", reuse and end-of-life planning" to the end of that phrase.
- Previously suggested adopting a policy around the sustainable management of derelict buildings advocate a specific Policy or similar around "Minimum Dereliction/Demolition", (unless necessary such as an unsafe or otherwise unusable structure,) with any buildings being refurbished, well-insulated and returned to use to minimise the carbon emissions, rather than passively or actively allowed to become derelict and then demolished.
- You may be able to inventory buildings in the District that could be candidates for such a policy, your Council may even own some of these, there may also be issues with RAAC in legacy buildings.)
- Is there a mechanism to ensure that buildings not subject to any Listing or Conservation requirements are not allowed to become derelict?
- What mechanisms will be put in place to ensure that any environmental commitments made or referenced in the Plan will be delivered by the companies doing the construction? Examples could include SUDs schemes, permeable pavements, planting schemes, grey water storage, etc.
- Is it possible to mandate the outright elimination or minimise the use of plaster and plasterboard in residential construction? surplus or damaged "new" plasterboard can be segregated/recycled during construction it is much harder once it is integrated into a building and bonded to wood, concrete/masonry, laminates and metal or plastic. Are less "hazardous legacy" alternatives available?
- Before the road is legally adopted and "normal" waste and recycling collections commence occupants may find it difficult managing their waste because roads have not been finally surfaced, lighting and signage (road names) to be installed and large vehicles needing access and causing obstructions.
- Council may want to deliver new bins to multiple houses in one delivery better managed so that residents are encouraged to separate their waste effectively as soon as they move in
- EA advocating the adoption of "Whole Life" plans (or Building "Logbooks"), to help reduce energy, conserve water, control carbon emissions and waste, during construction, all subsequent stages of use, maintenance, refurbishment and enlargement, repurposing at end-of-life, access to information works can be planned based on a full understanding of the structure and materials used over the lifespan of the building also assist in eventual dismantling and recycling.
- New developments should allow for additional waste storage and segregation at source, e.g. food wastes, electricals and batteries. ("Waste Ergonomics"-the right types of bin in the right location).
- Accessibility considerations around handling waste are also a factor, can infirm or disabled residents move bags or bins easily when segregating waste?
- What can be done to better manage bulky wastes such as Mattresses, appliances and furniture?
- Building design can also help to minimise problems such as fly tipping in insecure communal or parking areas. (EA)

- GCC Transport Planning support the draft LP's ambitions of sustainability and active travel, especially welcome protection of land to ensure cycle accessibility between Newent and Gloucester.
- GCC recommend Requirement 3 could reference the "Active Travel England Standing Advice Note: Active travel and sustainable development" Active Travel England Standing Advice Note: Active travel and sustainable development (publishing.service.gov.uk) to help support design and transport consultants preparing a development proposal, local highway and planning authorities in their role as consultees/ decision makers for planning applications. It sets out national design standards and criterion to achieve high quality infrastructure.
- An additional requirement could be created, referencing the GCC EV Strategy vision: As part of the commitment to reducing the impact of transport on climate change, the vision is to improve accessibility across Gloucestershire through low carbon modes. For journeys that are unavoidable by motorised transport, a commitment to encouraging a switch to Ultra Low Emission Vehicles (ULEVs) to facilitate through enabling access to a charging infrastructure network.
- GCC is committed to exploring opportunities to implement interchange hubs in the FOD as part of our decarbonisation work; supporting the opportunity for individuals to switch to sustainable transport modes for all or some of their journeys.
- An interchange strategy for Gloucestershire - this provision west of the River Severn which will be met by supporting key express bus routes - highlighted in the BSIP - particularly on the A48 from Chepstow, via Lydney into Gloucester.
- While there is a policy on active travel, cycling and heritage rail, there is no policy on buses, rail services or shared mobility such as car clubs or car sharing. (GCC).
- HBF caution the realism and deliverability of seeking a net zero commitment in advance of national policy.
- HBF does not support Councils setting their own standards question if this is the appropriate method to achieve the desired outcome(s).
- HBF is concerned the Council is adding to the complexity of policy, regulations and standards housebuilders are already expected to comply with which undermines economies of scale for product manufacturers, suppliers and developers.
- HBF would highlight the publication 'Future Homes, One Plan Building a generation of high quality, affordable and sustainable homes and communities, together'
- "Local planning requirements must align with the overall plan for improving performance standards at national level.
- The government has provided further advice for local authorities "the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards can add further costs to building new homes adding complexity and undermining economies of scale." <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/HCWS12312>.
- Be consistent with national policy
- Request the Council rely on the Building Regulations process to manage improving energy efficiency standards no policy on this issue is needed in the LP.
- Should be examined in broad terms in examining site allocation policies for Newent.

- Development should respect its context including effect on neighbouring properties, including privacy, overshadowing, noise impacts, potential smell etc.
- No reference to Design Guides, space standards, vehicle parking etc.

Object:

- This plan appears to assume that any development will only be new build sites. This is not acceptable.
- This does not follow the environmental principles of sustainability, which might often colloquially embodied as "Reduce, Reuse, Recycle".
- There is no policy related to making better use of existing building stock. For example, targeting priority policies at reducing the number of housing properties standing empty, upgrading existing housing (insulation, heating, social availability) or repurposing unused commercial buildings.
- It appears to be the assumption that the only feasible development is that new houses must be built on previously undeveloped land. This is false, wasteful and dangerous.
- Financial, social and environmental responsibility, should be an overriding principle to adopt policies that follow the sustainability hierarchy, should be a Priority Core Policy of the Plan. Once established, all other policies would naturally follow from this premise.

Support:

- Bullet point 4 Policy LP.1 defines 'larger schemes' over 25 dwellings. It is not clear if this definition applies only to LP.1 or if the threshold has any significance in other policy areas. E.g. Policy LP.2 is supported by text which says that "larger schemes may require considerable supporting information and may involve a range of solutions". Clarification is sought from the Council.
- Support the principle to ensure all new development has a net positive impact on environmental, social and economic conditions of the area through design, location and use, echoes the objectives of the NPPF.
- To place development where there are services, transport and employment (set out in Policy LP.4).
- It will result in high quality schemes being delivered that contribute to achieving the councils strategic objectives, including the ambition to become resilient and low carbon.
- Support reducing the need to travel (para 3.1 Policy LP.1).
- The Sustainability Appraisal (SA) supporting the draft Local Plan Appendix I - Site Appraisals, would reiterate the overarching benefits of the efficient re-use of a previously developed site which should also be factored into the sustainability benefits.
- Glos Wildlife Trust recommend that the wording in point 6 be strengthened to read 'to be designed to maximise high-quality, multifunctional green infrastructure (GI)' concerned that carbon neutrality is being described as the 'overall aim' of the plan here.
- A sustainable future relies upon addressing both the climate and ecological crises together.
- GWT strongly recommend text on page 5 is amended to read "The above policy sets out the overriding principle that development that takes place must do so in a sustainable manner and in doing so, demonstrate that it contributes to the overall aim of carbon neutrality and nature's recovery by 2030".
- In point 7, consider recommending that 'new development undertakes a health impact assessment (HIA) to help achieve the principles listed'.

- A typographical error at criterion 3 of the policy, which concerns facilitating for walking and cycling. This requirement should read: "design and location of schemes which provides facilitates facilities for walking and cycling for access to services, employment and for leisure trips".
- Natural England strongly support this policy effective links are made between this target and the aim of healthy places, more active travel and sustainable travel. Could you outline in greater detail how you will do this?
- NHS Property recommend the inclusion of a comprehensive policy on health and wellbeing in the LP, encourage the Council to engage with the NHS on this matter ahead of the Regulation 19 document being prepared.
- Specific policy requirements to promote healthy developments proposals should consider local health outcomes, appropriate to the local context and/or size of the scheme include a Health Impact Assessment.
- Design schemes should encourage active travel, providing safe and attractive walking and cycling routes, ensuring developments are connected by these routes to local services, employment, leisure, and existing walking and cycling routes.
- Provide access to healthy foods, including through access to shops and food growing opportunities .
- Design schemes that encourages social interaction, including through providing front gardens, informal meeting spaces including street benches and neighbourhood squares and green spaces.
- Design schemes to be resilient and adaptable to climate change, including through SUDs, rainwater collection, and efficient design.
- Consider the impacts of pollution and microclimates, and design schemes to reduce any potential negative outcomes
- Ensure development embraces and respects the context and heritage of the surrounding area.
- Provide the necessary mix of housing types and affordable housing, reflecting local needs.
- Provide sufficient and high quality green and blue spaces within developments.
- Support provided Additional words are INSERTED at the end of Paragraph 2: "including by encouraging development on sites which are already in use for similar uses rather than on new sites The use of existing sites has considerable advantages in most cases having regard to the policies about sustainability in the draft Local Plan".
- This needs to fit with the Climate Emergency Declaration and WDPC acknowledges the ambition feel this is restrictive, needs a degree of flexibility and practicality especially around employment.
- Where new development is provided it reflects and reinforces the forest identity through design and materials;
- It protects the forest through including genuine measures to improve and safeguard biodiversity;
- It is not designed around private car use;
- It creates exciting distinctive spaces for communities;
- It meets the needs of people to be integrated.
- New houses in Newent will invariably be volume house built, meet the needs of the builder, the profit motive over the needs of a growing population.

Draft Officer Response

All suggestions for amendments to policy wording and supporting text will be taken into consideration and reviewed where appropriate.

All comments of support, objections and general observation are noted.

The Council's Climate Team is currently working on the potential and possibilities for retrofit across the District.

Currently, it is very difficult for the Council to stop a property owner from allowing their building to become derelict under current legislation. Concerns about the structure of the building can be dealt with by Building Control and issues around noise or inappropriate uses of the land may come under the remit of either Planning Enforcement or Environmental Regulatory Services.

The best mechanisms to ensure that construction companies put in place the environmental commitments is through planning conditions and S106 agreements where appropriate.

The Local Plan cannot mandate the elimination of plaster/plasterboard in construction. This would need to be done through government legislation.

Understandable that living conditions can be compromised during the construction phase, however, this is difficult to control as it is a temporary situation.

Note comments regarding issuing of bins, however, this is not within the remit of the Local Plan.

The EA 'whole life' comments are noted and will be considered in more detail.

Issues such as good practice guidance for recycling/waste storage are more appropriately placed within the Design Guidance. Furthermore if anyone has accessibility or other issues around waste collection, this should be discussed with the Council's waste team.

Comments regarding potential policy for buses, rail services, shared mobility (car clubs/car sharing) are noted and will be reviewed in more detail in collaboration with the Climate Team.

Concerns noted regarding the deliverability of seeking net zero commitment, however, this is a Council objective. The standards which exceed Building Regulations have been considered in detail and judged to be appropriate to aid in meeting the net zero target.

Design Guides, space standards, etc. will be part of the suite of planning documents, which includes the Local Plan. The Design Guide has the potential to include a wide range of issues including climate change, SUDs, creating healthy places, design, materials, etc.

The Local Plan promotes the re-use of Brownfield sites, whilst also acknowledging that much of the housing demand will need to be through allocating greenfield land.

Bullet point 4 (definition of larger schemes) will be reviewed and revised if necessary.

Natural England's comments are noted. The Local Plan aims to create more healthy places, and promote active and sustainable travel through many of its policies.

Note the NHS request for an inclusion of a policy on health and wellbeing. This will be considered in more detail.

The Council seeks to provide a mix of housing types and this is evidenced by Housing Needs Assessments and is reflected in the Local Plan (LP.1). Furthermore, if a site is required to provide

affordable housing, there is scope for the Strategic Housing Officer to request the types/mix of housing which is considered to be the most appropriate for that area. However, it can be a challenge to demand smaller units and bungalows for market housing schemes as developers often prefer to build larger family dwellings for the higher returns on their investment. This is certainly a matter which will be considered in more detail and policies will be reviewed/revised where appropriate to reflect this.

Concerns regarding the volume of houses built and the profit motive of developers. However, this is an issue which is across the board in the UK. The FoDDC has seen a large uplift in housing numbers after the revisions to the NPPF (December 2024) and this results in potentially a larger numbers of houses being built across the District, which is generally taken on by large volume building companies to meet the demand.

Point 6 of policy will be reviewed to assess where it can be strengthened and the text below the policy will also be reviewed to include Nature's recovery.

The ecology and biodiversity of developments will be carefully reviewed and considered when sustainable development is proposed to ensure that the protection and enhancement of biodiversity is secured.

Policy LP.2 Construction and Use of Buildings

Number of Representations: 26

Observations: 10

Object: 2

Support: 14

Observations:

- There must be flexibility for development at existing households.
- Affordability will impact many families.
- An improvement is better than none.
- Proportionate and reasonable.
- Significant opportunity to adapt buildings, including in energy/insulation terms would also conserve some of the heritage, would also allow undesignated heritage value to be conserved and increased.
- BREEAM specifications are now part of the building regime.
- When community is a key part of development, partnerships can achieve real sustainability in the building and its landscape/locality.
- Mitigation is vital to lessen impact in smaller settlements, including market towns, and consultancy comments should be apt, prompt and take into account material considerations from local knowledge.
- Conditions should be applied and need to be checked as fulfilled or enforced as required.
- Situation is always seriously considered, the relationship to transport and access is an opportunity to enhance a relatively poor public transport network to improve the infrastructure.
- The balance of development bringing better infrastructure is vital to maintain the standard of service provision. (Coleford Town council)

- GCC - desirable for Energy Statements to be required for all developments (not just major development).
- Passivhaus design should be encouraged as standard design.
- Renewable energy generation for Net Zero greenhouse gas emissions, preferable that this is met through on-site renewable energy solutions (e.g. roof solar panels, air source heat pumps etc.) and allowing off-site solutions should be the last resort.
- Does not reference emissions from wood burners and heat loss from chimneys.
- Should explore pathways for just transitions to a net-zero future.
- Cheltenham BC have prepared a Climate Change Supplementary Planning Document provides good resource on climate change and construction design for developers may be of use. (GCC)
- With air and ground heat pumps now more readily available, gas should not be an option with good installation in houses. (Herefordshire & Glos Canal Trust)
- It should be referred to in broad terms in examining site allocation policies for Newent i.e. whether site proposals in Newent capable of meeting the requirements. (Newent Town Council)
- Does the development proposed for Newent include autism friendly builds? (Joanna East)
- No reference to Agricultural Buildings. Presumably no new gas/oil installations? What time scale?
- All housing focused & no definition of what constitutes a major commercial/industrial development in terms of scale/floorspace? (Regeneration, FODDC).
- Strategic Land Estates question whether the LPA have thoroughly reviewed the costs associated with this policy requirement. It might be appropriate to encourage the use of locally sourced and or sustainable materials it is not appropriate for this to be an implied formal requirement.
- There is potential for significant impacts from this policy in terms of design, timescale of delivery and in terms of costs, do not consider that any of these have been properly taken into account by the LPA.
- Proposed Amendments to the Policy consideration needs to be given in terms of the potential impact on viability and delivery timescales.
- Note that Proposals for major developments (of 10 dwellings or more) must include an Energy Statement that demonstrates how an operational net zero greenhouse gas emissions balance will be achieved. How is the carbon impact of the construction phase allowed for?
- The construction industry has a very high embedded energy during construction and operational phases.
- EA welcomes the threshold being below 10 dwelling. Are the standards the most up to date and challenging?
- Allowance is needed for the lag in building regulations with respect to radical carbon reduction anticipate renewable energy and green building standards.
- New homes and buildings would need to be of the highest quality, employing exemplar low and zero carbon, and energy efficient whilst creating and storing their own energy.
- Need to address the significant shortfall between the environmental and sustainability standards of existing approved proposals, and the need for radical, coherent comprehensive mitigation and decarbonisation targets.
- A risk it will be very challenging and not possible, to reconcile the scale of proposed growth with the need to 'achieve to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience to the impacts?

- We note the use of the word 'should' in many of the details. Will this undermine the commitments and obligations of developers? (EA)
- Major development under Policy LP.2 is defined as development of 10 or more dwellings and excludes non residential development from its definition.
- Policy LP.2 does not refer to site area unlike the definition of major development in the NPPF which includes residential development on sites with an area greater than 0.5 of a hectare.
- While smaller scale residential development and non-residential development is addressed by Policy LP.2 the use of overlapping definitions that diverge from those used by national guidance/ standards may result in a lack of clarity of what is required for compliance.
- It is suggested Policy LP.2 is reviewed in this context and a clear and consistent set of requirements and definitions adopted.
- Targets set are higher than those under the Government's Future Homes Standard (FHS) to be achieved by 2025.
- The draft net zero and carbon policies should be carefully considered against Building Regulations and the FHS which is being introduced from 2025 to avoid duplication.

Object:

- 'Carbon reduction leading to neutrality is key and the LP is based on the achievement of a carbon neutral district by 2030'. implies a target date of 31 December 2029 leaves just 5 years 5 months to achieve. Suspect it has been proposed by people who are not engineers do not understand the constraints which make it impossible.
- HBF is supportive of the role that Local Plans can play in helping to address and mitigate the impact of climate change.
- Very concerned about the proliferation of climate change and energy policies that are being suggested in some emerging Local Plans.
- Would caution against policies that seek to go further and faster than national policy changes that result in patchwork of differing local standards.
- There is simply no need for Local Plans to include policies on matters already adequately addressed through Building Regulations, other consenting regimes and other regulations. (HBF).

Support:

- The DIO support the Council's aspirations for reaching net zero green house gas emissions from new major developments (through its approach to redevelopment of Beachley barracks) would expect the policy to follow the relevant national guidance in place at the point of delivery.
- (FC) - Replace text para 3.8 with 'the provision of green infrastructure, including urban trees, green roofs and wall, shading and cooling shared spaces, properties and residents'.
- Note The England Tree Action Plan 2021-2024 NPPF references to 'tree lined' streets. Guides - Trees and Design Action Group (tdag.org.uk) for urban benefits.
- (FC) recommend referring to timber construction to have less embodied impact sourced from sustainably managed woodland (eg FSC/PEFC certified) especially if it sourced locally.
- Providing a market for timber, making active management more viable, provide opportunities for biodiversity improvements and carbon sequestration (eg storing carbon in timber, planting more trees to replace what has been harvested).

- Backed up by CONFOR's 'The National Wood Strategy' and previous Governments commitments 'Timber in Construction Roadmap' and the 'Net Zero Strategy'. (FC)
- Needs to be a simple, clear to understand, and proportionate.
- All the carbon zero targets are important not everything will be instantly affordable and achievable.
- Set the right trajectory and retain flexibility and proportionality.
- WDPC note this ambitious aim to build to these standards, but this goes against the Forest vernacular.
- NHSPS fully support policies that promote carbon neutral development, securing of financial contributions where on-site carbon mitigation requirements cannot be met.
- NHS property could benefit from carbon offset funds this would support the NHS to reach the goal of becoming the world's first net zero healthcare provider. (NHSPS)
- Policy requires considerable refinement. It is typical for larger sites to achieve planning permission through outline consent.
- The modelling regulated to energy consumption unlikely to be effectively undertaken at this stage. fabric efficiency alone cannot achieve net zero, decisions around the use of on-site renewables (e.g solar panels) any off-site solutions may need to be deferred until a later stage the Council should apply a flexible approach in terms of conditioning such requirements.
- Natural England strongly support this detailed policy on Net Zero Development. The policy details effective changes that will help achieve Policy LP.1's goal of carbon neutrality by 2030.
- Section 3.3. highlights the multidimensional nature of Sustainable Development and the benefits the policy can produce.
- Welcome the specific focus on adapting existing buildings to maximise environmental gains the policy would be stronger if you implement some of the below advice. This could be added to a 'Net Zero Carbon Toolkit' alongside a Forest of Dean Design Code. Significant opportunities to retrofit green infrastructure in urban environments can be realised through green roof systems and roof gardens, provide insulation or shading and cooling as well as ecological benefits & green walls to provide insulation or shading and cooling & tree planting, including street trees, altering the management of land (e.g. management of verges to enhance biodiversity). The plan could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans. (NE)
- Having majorly differing standards for compliance provides a fragmented approach to net zero targets, can result in lack of clarity what is considered compliant and creating a postcode method of compliance.
- The Government's FHS 2025 seeks a 75% reduction with the remaining 25% reduction being achieved through decarbonisation of the national grid, therefore providing an operational zero approach.
- The draft net zero and carbon policies be carefully considered against Building Regulations and the FHS which is being introduced from 2025 to avoid duplication and any potential inconsistencies.
- This was underlined in the December 2023 Written Ministerial Statement on energy efficiency and environmental standards.
- The Council to be wary of the ways in which policies could impact development viability which may restrict the overall provision of affordable housing in the FOD. (SWHAPC).

Draft Officer Response

Support for the policy is noted. All suggestions for amendments to policy wording and supporting text will be taken into consideration and revised where appropriate.

The Local Plan reflects the Climate and Net Zero Objectives of the District Council which declared a Climate Emergency in 2018 and a Net Zero 2030 Objective.

The standards referenced in this policy are in the main based on energy and carbon intensity, leaving significant room for individual determination by applicants, which will not necessarily be in contradiction with the Forest vernacular in respect to the built heritage of the area.

Regarding comments concerning development of existing dwellings; Policy LP2 supports further development of existing dwellings and Retrofit in paragraph 4.10. A specific reference to retrofit could be added to strengthen this.

The electricity generation intensity of 120 kw / m² / annum is aligned with the FoDDC Net Zero Carbon Toolkit (2021) and will be revised in line with the latest national guidance including the consultation response feedback on the Future Homes Standard 2025 and the development of a District Wide Design Guide.

Regarding comments associated with major developments, such developments will be required to demonstrate an operational Net Zero Balance which may require a renewable energy generation intensity which is greater than the guidance.

The requirements for non-residential are based on BREEAM as detailed in LP2, however this could be reviewed to consider the scale and type of the development, and appropriateness of a BREEAM assessment with consideration given to use of Display Energy Certificate Rating and / or an Energy Statement approach non-residential development. Agricultural Buildings will fall within the description of non-residential.

In response to comments regarding embodied emissions, LP2 includes a requirement for all major developments to demonstrate how they have minimised their embodied greenhouse gas emissions and sets a benchmark of 500ktCO₂e/m².

The Policy is consistent with a number of national standards and will be reviewed in light of any subsequent changes to the NPPF and the Future Homes Standard (and other standards that may be introduced). This may include space heating standards and energy intensity standards for different building types.

In response to comments regarding local materials, building fabric and embodied emissions; Timber construction is one of a number of construction materials and methods which can deliver low embodied carbon, applicants will need to demonstrate how proposals meet any standards specified.

We will give consideration to including reference to locally sourced timber alongside a review of the general guidance on low carbon building materials. The reference to locally sourced materials is highlighted in the policy as a way of minimising embodied emissions.

Passivhaus is encouraged and referenced in Policy LP2 and the policy follows the hierarchy of Fabric First followed by On-Site renewables. Emissions from solid fuel (Wood Burners) and heat loss will be taken into account with overall carbon and energy intensity standards outlined in the Policy.

The plan should also make clear that biodiversity enhancements will be incorporated into buildings through bat/bird boxes, etc. During the planning process developments should show how the LNRS has been considered (when it is published). Schemes which are accredited by Building with Nature and clearly demonstrate that biodiversity will be protected and enhanced should be supported.

Policy LP.3 Climate Adaption

Number of Representations: 20

Observations: 7

Object: 1

Support: 12

Observations:

- LP.3 Vehicle charging points?
- West Dean Parish Council feel that 'Building with Nature Standards' should be incorporated into this policy or the Design Guide from FES NP used as a model for building in the area.
- Newent NP design codes should take this policy into account. (Newent TC).
- Trees can be used along with vegetation for shading for building infrastructure, paths, cycle tracks, for people, beneficial for air quality and great at slowing the rate of rain water hitting hard surfaces in more built up areas.
- Growing local timber can be used for local development will decrease the amount of carbon significantly import 80% of our wood, which is carbon intensive due to transportation.
- It will be sequestered through the growing life of the tree and then stored when it is used as wood product. (Forestry Commission).
- Given the rapid change in technology the proposals are exemplars not exclusive, more techniques will be discovered/applied, but they should always keep the vision at the heart of climate change progress.
- The issue of flooding pertinent to Coleford, high intensity rainfall in a geomorphological bowl one route out from the centre of town is an issue, forward thinking, planning actual investment to address those concerns, efficiently through partnerships at all levels of Council and divisions of skills. (Coleford TC).
- Could we identify areas where we could build long term evacuation centres for those negatively impacted by weather extremes - flooding and wildfires in particular?

Object:

- Question the need for the Local Plan to include policies on matters already adequately addressed through Building Regulations, other consenting regimes and other regulations. (Home builders Federation).

Support:

- Meeting development needs, improving the environment and mitigating climate change lies at the heart of the NPPF's presumption in favour of sustainable development.
- The proposed allocation would contribute towards reducing carbon emissions.
- As noted in Policy LP.2 the goals of Policy LP.3 are supported but parallel sets of requirements and definitions should be avoided.
- Welcome the policy approach to encourage developers to employ a range of measures within designs to adapt to climate change i.e. rising summer temperatures.
- Support the drafting of the text in so far as it provides examples rather than prescriptive measures which may not be suitable for every scheme.
- Water recycling features will be encouraged. (GCC).
- Wording states 'new development must include and demonstrate the effectiveness of a range of measures.' Some are easier and cheaper to achieve and maintain than others and will be preferred by developers. Additional wording could be added to encourage the proper consideration of all measures. For example, including a requirement to justify why certain measures are not feasible so this could be challenged if necessary. (Glos wildlife Trust).
- The policy wording does not mention flood risk this is alluded to within the supporting text in paragraph 3.9, alteration to the text could include “ It is important that new development is seen to demonstrate that it will be suitable throughout its life during which further effects of climate change will be experienced. Many of the other LP policies will also contribute to this aim but the above measures should be considered. It must be located for example free from all forms of flooding for the lifetime of the development, but also will need to be of a design that offers shading, the potential for cooling and does not include for example excessive hard surfaced areas that reflect and absorb heat rendering them unusable. Some comparatively recent developments do this and a combination of density and the use of hard surfaces together with orientation leads to an environment that is unsatisfactory and unhealthy”.
- The potential for an additional point relating to 'Construction and design techniques which may include the following will be required: “Appropriate flood resistance and where necessary flood resilience.”
- Suggest resilience to climate change maintaining a satisfactory environment should make more explicit reference to water resource management (extreme highs and lows i.e. drought and flooding) although being 'free from flooding' is referred to in 3.9 suggest item 4 is expanded includes for example 'maximising the use of existing water resources such as roof or surface water flow'.
- Wetter winters and hotter, drier summers significantly elevates the risk and occurrence of riverbank erosion. Most existing development allows insufficient space along watercourses.
- For natural geomorphological processes will become more active, drives an intolerance of the woody vegetation and natural controls on excessive erosion.
- Has driven management practices that exacerbate such destructive bank protection, incision, downward erosion e.g. dredging, straightening, raising of ground levels, infill within river corridors and floodplains reduces the aesthetic and natural characteristics of watercourses degrades the quality, diversity and richness of blue green infrastructure and its enjoyment by people.

- Reduces the resilience of watercourses and associated biodiversity and habitats to climate change and capacity to adapt to changing conditions including increased flooding.
- "Climate-Proofing", how far can developments houses be made "retrofit-ready"? (EA)
- SWHAPC issues such as climate change mitigation and adaptation should be prioritised, rigid climate change and sustainable construction policies that have the potential to considerably frustrate the delivery of affordable housing should be avoided.
- SWHAPC would like to draw attention to the December 2023 Written Ministerial Statement's comments on efficiency and environmental standards, it is suggested that local authorities should not be setting their own standards.
- Government legislation needed to ensure developers provide schools, shop, GP surgery, public transport, before any development.
- High standard green building should be insisted upon; i.e. solar panels, recycled/ rainwater use, etc.
- Proportional affordable change.
- (NE) The policy links well with Policy LP. 15. needs to be more robust, could the policy reference back to the Vision and Objectives of the local plan to reinforce these core green threads?
- The lack of reference to the climate emergency is concerning. The policy would also be stronger if it explicitly notes the climate emergency as the context for the focus on climate adaptation within the local plan.
- It is noted that the priority 1 of the plan (2024-2028) stated adaption to climate and nature emergencies were vital (pg.11). It is suggested that the plan would be more robust if this core policy LP.3 were referenced back to, in other sections of the local plan.
- The Sustainability Appraisal referred to the adoption of 'Our Climate Emergency Strategy and Action Plan 2022, placing climate action at the forefront of the corporate priorities and the emerging Local Plan. <https://www.fdean.gov.uk/environment/climate-action/our-route-to-carbon-neutral/> Could this be referenced in the policy section?
- The Local Plan should consider climate change adaption and recognise the role of the natural environment for example tree planting to moderate heat island effects.
- Factors which may lead to exacerbate climate change should be avoided (e.g. pollution, habitat fragmentation, loss of biodiversity) and the natural environment's resilience to change should be protected.
- Green Infrastructure and resilient ecological networks play an important role in aiding climate change adaptation.
- The plan could look at ways to mitigate for the consequences of climate change in more detail. 'Nature-based solutions'. restoration of ecosystems for the long-term benefit of people and nature. e.g. Expansion of tree and woodland cover to strengthen woodland habitat networks, protect soils, provide shade whilst capturing additional carbon from the atmosphere.
- Within the Plan suggest including the following actions: 1.Planting on peatlands and other priority habitats must be avoided.2.Identify opportunities to increase tree and woodland cover consistent with the UK target..3.Identify areas where nature-based solutions can provide benefits to people whilst reducing climate change vulnerability in the natural environment.4.Identify habitats and protected sites that are particularly vulnerable to the impacts of climate change and consider how the planning system can work to reduce these vulnerabilities. These actions are integrated into a strategic approach alongside green infrastructure, health and wellbeing, biodiversity net gain,

natural flood management, air and water quality to deliver multifunctional benefits to people and wildlife.

- The Plan should make clear that development will be consistent with these policies, to ensure sustainable development is properly achieved across the Plan period.
- Meaningful targets set that can be appropriately monitored over the Plan period to demonstrate the effectiveness addressing climate change to ensure appropriate remedial action can be taken as necessary.
- Climate change adaption, mitigation links with Nature Recovery aims to expand and connect wildlife habitats to support species recovery, deliver wider benefits such as carbon capture, water quality improvements, natural flood risk management and recreation in line with the Lawton principles 'Making Space for Nature and paragraph 179a. of the National Planning Policy Framework'.
- Note the links in the supporting text to policies on multifunctional open space and enhancements of flood management and green infrastructure through Countryside Enhancement Areas.
- You might find helpful: The Nature Recovery and Climate Resilience Playbook - UKGBC - UK Green Building Council. (NE).

Draft Officer Response

Support for the policy is noted. All suggestions for amendments to policy wording and supporting text will be taken into consideration and revised where appropriate.

Note question about long-term evacuation centres, this is outside of the remit of the Local Plan as it would be a matter for the Council's Emergency Planning team to consider. The Local Plan would only be able to allocate land for such types of uses if it was required.

Policy LP2 is focussed on how we mitigate to prevent or reduce emissions, where as Policy LP3 is focussed on adaptation and how we adjust to the current and future implications of Climate Change. The LP will review any parallel requirements and definitions within LP2 and LP3 to ensure they are complementary and effectively address climate change mitigation and/or adaptation as relevant for each section.

The local Plan is consistent with a number of national standards and will be reviewed in light of any subsequent changes to the NPPF and the Future Homes Standard (and other standards that may be introduced). The Local Plan reflects the Climate and Net Zero Objectives of the District Council which declared a Climate Emergency in 2018 and a Net Zero 2030 Objective.

The adaptation benefits of trees/vegetation is noted and will be incorporated in the next revision.

Natural England feedback will be used to explore and develop better links to our Climate Emergency Strategy and Action Plan, wider and deeper links to the role that the natural environment can play in the policies, links to Nature Recovery and the role of targets, monitoring and reporting.

EV Charging requirements are outlined in LP29.

Chapter 4 Strategy

Number of Representations: 14

Support: 1

Object: 1

Observations: 12

Support:

- The contribution to Forest Planning made through communities is important to underline, notably the number of NDPs and the importance of involving people in shaping their places. Nb. Coleford's emerging Community Regeneration Plan. The potential though the Aurora project in environmental terms - all are bottom-up. (CTC).

Object:

- Key themes need to be inter-connected (not in order of priority). Carbon reduction will not happen with increased building and vehicle use. Infrastructure and community support need to be in place as condition of development.

Observations:

- Statutory forest covers a significant proportion of the south of the district and is emblematic of the area and its identity. Must ensure that development does not give rise to harm or loss of the statutory forest.
- Statutory forest physically constrains settlement expansion. Increase in recreational pressure on the statutory forest. Balancing out housing growth across the district to less sensitive areas is advantageous in this respect.
- The south of the district is disproportionately affected by designated sites (AONB, SACs, SSSI, Severn Estuary Ramsar, SPA), yet has traditionally been the focus of growth in the district. The relatively unconstrained north of the district has been consistently underutilised as a location for strategic growth.
- The Severn Estuary is a physical barrier to the rest of Gloucestershire but also contributes to the charm and attractiveness of the area.
- The A48 is well-used for out-commuting, but is constrained by pinch points at either end, from the Highnam roundabout (A48/A40) in the north east, and at the River Wye crossing at Tutshill and Sedbury, near Chepstow in the south-west.
- The M50 corridor is a significant and unique opportunity feature in the district (to attract and secure investment). Junction 2 of the M50 is the only motorway junction in the District and offers connectivity with the strategic road network for Gloucestershire (M5 corridor and beyond).
- The capacity of the strategic road network in the north of the District is a key opportunity.
- The high levels of out-commuting in Forest of Dean District is a symptom of the District's struggle to attract high quality employment uses and investment as a direct consequence of the limited road infrastructure.
- A spatial strategy which presents further reliance and out-commuting via the A48 will exacerbate capacity issues, while the M50 presents a major and underutilised infrastructure asset in the District.

- LP would benefit from a clearer, more coherent approach to articulating the proposed spatial strategy. The key spatial principles of the plan are fragmented across Policies LP.4, LP.5, LP.27 and LP.29. Commentary on the spatial strategy is spread between the introductory text to Chapter 8, the supporting text of LP.27 and the policy text of LP.29. The plan's spatial principles are disjointed and do not read coherently (contrary to Para. 21 of NPPF).
- Useful if development strategy could be pulled together and contained in one place so it is clear as to how and where the development needs of the area are to be accommodated. It is also considered that the role of each settlement (or category of settlements) in the hierarchy should be made clear along with how much of the District's housing requirement each settlement (or category of settlements) will accommodate.
- There is very little explanation of, and justification for, the plan's development strategy and whether it represents the most appropriate and sustainable strategy compared to other options. Although set out in Sustainability Appraisal to some extent, it would be clearer if the plan itself explained exactly what the strategy involves and why it is considered to represent the best strategy to take forward.
- Whilst Lantar give support to this option in principle and agree that the expansion of the District's existing towns and villages represents the most sustainable growth scenario, it is considered nonetheless that this has not been adequately translated into an appropriate development strategy. In particular, it fails to capitalise on Lydney as the largest and most accessible settlement in the district. Lydney is the only settlement with a passenger railway station and also has a location on the primary road network, providing relatively good connections to Gloucester, south Wales and the motorway network. Furthermore, unlike the other larger settlements in the district, Lydney is not subject to significant land constraints and presents the greatest opportunities for change. The town is also subject to a number of strategic scale employment sites and presents further potential for employment growth which will in turn help to support the sustainability of new housing growth.
- Whilst the draft plan proposes growth at Lydney, this is largely just the reallocation of existing sites from the 2018 Allocations Plan - very little in the way of new allocations. This is not commensurate with the role of Lydney and the better opportunity it presents to accommodate sustainable growth compared to the District's other settlements.
- The published SA is very limited in scope. Whilst it tests the strategy options and individual sites, it fails to test the different growth scenarios at the various settlements identified for selective planned expansion and the capacity of each settlement to accommodate sustainable growth. As such, it does not establish what the most sustainable distribution of development would be amongst the different settlements.
- The role of Lydney now appears to have been watered down in the draft plan. The District's housing need is now set to increase significantly. Council should look again at Lydney's capacity to accommodate growth.
- Question the enhanced role of Lydney as an emphasis on growth in the southern part of the District, as this has proven unreliable in terms of the deliverability rates of housing during previous and current plan cycles. An over-reliance on Lydney in the emerging plan period would see a continuation of these issues.
- Plan should consider sustainable opportunities for housing allocations at appropriate settlements across the District which should be pursued in addition to development at Lydney.

- Plan should consider a much greater role for the northern part of the district to ensure balanced growth across the Authority area.
- Note that the publication of the draft NPPF for consultation on 30th July 2024 proposes significant changes to the standard method.
- The preferred strategy is also heavily reliant on Beachley Camp barracks being released for development by the MOD/DIO. This represents a significant risk in terms of deliverability. Disposal of the site has already slipped to 2029. It must be assumed that there is a risk the timetable slips further, or that the MOD pauses or even reverses its decision to vacate the site.
- Suggest land at Newent (Conigree) has capacity to make a much greater contribution to meeting housing needs in the district more widely.
- Need to be careful about the number of houses built and whether the new residents have the infrastructure and services they need to live meaningful lives. Suggest the use of our protected land, likely flooded land and topography to rebuff the extremes of housing allocations. The plan needs to help meet the carbon net zero declaration for the district, not overshoot it. Firstly, request that the original, and most sustainable option, option 1 be reconsidered as the key strategic option for the Local Plan. The inclusion of new settlements should be based on their ability to build communities, reignite a culture of self sufficiency, reduce transport emissions in particular and carbon emissions generally, which is why their location is critical. (See Limits to Growth e) below). They enable us to build self reliant communities from scratch, a no waste culture, 15 minute towns, increase local food growing potential, nature corridors for wildlife migration and the multiple benefits new eco-settlements can bring. And they help us meet our allocation numbers without changing the character of the district adversely. The Limits to Growth report, suggested that the following needed to be controlled if we were to survive on our one finite planet; a) population increase, b) agricultural production, c) non-renewable resource depletion, d) industrial output, and e) pollution generation:
 - a) There must be a limit to the number of people the Forest of Dean district (or bioregion) can accommodate (with all the services they need). What is the carrying capacity and how could that be calculated? Could the Forest of Dean become self reliant or even self sufficient in the basics needed for a healthy and meaningful life.
 - b) What amount of land do we need to nurture for food production, that it not destroy soils, rivers or wildlife, eliminate the need for chemicals/poisons and synthetic fertilisers and increase the diet for plant based foods to reduce our impact on the climate? Small farms and community gardens/allotments, have been calculated as 35 times more productive than monoculture crops. Can they be planned for? Can we prioritise the highest grade agricultural land accordingly?
 - c) We have a large number of properties using fossil fuels for heating and cooking. How can they be better insulated first and foremost, and then enabled to change to renewable electric power for heating and cooking? Retrofit is part of this plans policies. Can we locate transport hubs that will decarbonise the commute to work/school/etc?
 - d) We have a heritage of industry, thanks to our geology. Can we enable all current industries to decarbonise? Does this plan enable us to upgrade the grid such that industries are able to use local renewables (wind and solar) for their own use.

e) electrifying transport across the piste from household cars to haulage trucks, buses to

- trains will help considerably, as well as reducing carbon emissions. The LP needs to focus on new settlements either end of the A48 & A40 to provide the finance necessary.
- to create transport hubs that are not only easily accessible to the local communities in which they are based, but allow for a transition away from cars by temporarily providing park and ride facilities where possible. This would need linking up with the GCC Local Transport Plan. I believe that insulation of properties should be prioritised to the point that wood burning stoves become unnecessary. I can see how woods and trees will be chopped down and burnt when the next fuel price hike comes into force. Should we also be supporting wood coops planted for firewood for district residents use only?

Draft Officer Response

All comments of support and general observation are noted. All suggestions for amendments to policy wording and supporting text will be taken into consideration and revised where appropriate.

Agree that the contribution made to the Local Plan through communities is invaluable and very much welcomed.

Agree that key themes should not be in order of priority, but instead issues such as infrastructure and carbon reduction are interrelated.

It is recognised that the statutory forest is unique and emblematic of the area. As such, the Local Plan seeks to protect it through the strategy for development as well as through individual policies.

Noted that the south of the District has a large amount of designated sites. The Strategy therefore seeks to provide a method of dispersing development in the most sustainable way recognising the where there are constraints and where there are opportunities for development.

Concerns regarding traffic congestion, out-commuting, pinch points are noted, as well as the opportunities of the M50 connections. These are all issues which are considered in great detail, and also forms a basis for the strategy with the aim of reducing out-commuting and creating the most sustainable forms of development. The Council engages regularly with GCC Highways and makes them aware of the potential development sites. Issues such as public transport hubs, highway networks, parking provision and traffic management measures etc. are discussed with and the remit of GCC Highways. Equally, GCC Highways comment on allocations and on individual applications and request necessary highway works/mitigation and contributions. It should also be highlighted that active travel will be promoted, and walking and cycling paths are encouraged through Policies 24 and 25. It is recognised that better bus services are required and this continues to be an aspect for further work.

The concerns regarding having a more coherent approach to articulating the spatial strategy are taken into account. The Plan will be reviewed and amended where considered appropriate. Equally, it will be reviewed as to whether further justification on why the strategy has been chosen may be included, however, these arguments are made thoroughly within the accompanying Sustainability Appraisal, and duplication is not considered appropriate.

Agreed that Lydney is a sustainable location for further growth with the District, particularly taking into account its road network and railway station. It is recognised that Lydney has already experienced a

large amount of development over the last plan period, and the Strategy therefore seeks to sustainably disperse the major strategic allocation sites across the towns in the district (taking constraints into account) as well as Beachley Barracks. Landscape assessments have also directed that larger scale development in and around Lydney could have harmful impacts. Equally, comments of concern about the over-reliance on Lydney are also noted. Given the changes to the NPPF (December 2024) and the subsequent high uplift in housing need in the District over the 20 year period, it is likely that the Strategy will need to be reviewed.

Comments regarding the limited scope of the SA are noted. The SA is an iterative process and will be continually reviewed and revised as considered necessary and appropriate. Furthermore, as mentioned above, given the uplift in housing numbers since the NPPF amendments in 2024, it is likely that the SA will need to revisit the strategy options.

Concerns about the risk of deliverability of the Beachley Barracks have been taken into consideration and it is recognised that it is highly likely that the disposal and redevelopment of the site will be near the end of the Local Plan 2021-2041 timeframe. As such, the proposed housing delivery trajectory across the plan period accounts for this circumstance.

It is noted that Land at Conigree, Newent has been submitted in previous Strategic Housing Land Availability Assessments as having capacity for large housing numbers. The site has also been assessed in the Sustainability Appraisal and does not have a highly sustainable outcome when compared to other sites in Newent. However, as mentioned above, given the uplift in housing numbers since the NPPF amendments in 2024, it is likely that the local plan and the SA will need to revisit the strategy options and potential site allocations across the district.

Infrastructure is certainly an issue which needs to be considered in detail and engagement is continually carried out with the relevant stakeholders in this regard. The Council responded to the Government during the NPPF consultation (Autumn 2024) stating the case for lower housing numbers given the constraints on the land within the forest (such as designations, statutory forest, flooding etc.), however, the Government continued to invoke the significant uplift in housing need.

Agree that a new settlement(s) is an option available for the Local Plan strategy and that they can have environmental benefits.

Note the concerns with regards to the capacity of inhabits within the District which can be sustained, however, it is the Local Plan's remit to provide the most sustainably strategy to supply the housing need (as calculated by the Government's Standard Method).

Understand the need for local food production and to prioritise highest grade agricultural land. A balance between development and food production is important. Whilst Policy LP.6 seeks to promote food production on a local scale, it is recognised that large scale developments often result in loss of agricultural land. This concern is considered in detail and the Sustainability Appraisal takes this into account when assessing sites for potential development.

Retrofit for properties to achieve carbon reduction is currently being worked on in more detail in the Climate Team, and the Local Plan reflects the need for this.

Transport hubs and decarbonising the transport system is agreed with and is under the remit of GCC Highways, who the Council regularly engages with on such matters. Moreover, the Council seeks

to engage with other bodies, such as businesses and communities to work towards decarbonisation. Engagement also takes place with Network Rail.

Policy LP.4 Settlement Hierarchy

Number of Representations: 46

Support: 19

Object: 8

Observations: 19

Support:

- Given fibre to the home, a shift to home working, the effects of AI over the plan period rural work/live units will be in increasing demand and could attract higher value local employment. Whilst checks and controls will be necessary to protect local people from second homes, there are benefits to encouraging such uses. The draft plan has reference to fibre etc but could go further.
- The plan should remain flexible and supportive of appropriate rural redevelopment (previously developed land) and limited appropriate new development.
- Littledean is a settlement with a limited number of facilities, but close to Cinderford (one of the largest and most sustainable settlements). It has A4151 which provides direct vehicular connection to Cinderford and a continuous pavement along the road too which allows for safe pedestrian movement between the two settlements too. There are bus stops along the A4151 in the heart of the settlement which provides access to 16 direct bus journeys to and from Cinderford (and Coleford beyond) as well as to the cathedral city of Gloucester. It is a truly sustainable settlement which can accommodate residential development at a scale. Littledean is a candidate to be a Major Village due to its sustainability and accessibility.
- Support Hartpury as 'small village' and suitable for some new small-scale housing development which could be located either within the settlement boundary as identified in the Local Plan or sensible and appropriate rounding off outside the settlement boundary elsewhere. This would provide a suitable level of growth for Hartpury and result in an improvement to the choice and range of new housing in the village and also support the vitality of existing services and facilities within the village itself and the surrounding area. Note the site at Foley Rise in Hartpury.
- Recommend reconsidering the scale of development considered appropriate in the Large Villages - should set out a higher level appropriate development for the Large Villages due to being sustainable in nature and having the capacity to accommodate further housing growth. This will ensure their continued vitality and viability and identified housing needs are met in full.
- Carbon emissions with countryside development needs to be mitigated both during construction and operation over lifetime of development.
- Lydney is the key service centre in the south of the District and is an excellent location to accommodate sustainable growth in the Forest of Dean and the town benefits from a wide range of key amenities and services and the provision of public transport.
- Typographical error at the second paragraph, which requires that "new development will be closely controlled in accordance with other policies of the LP."

- NE support policy and notes the chosen method promotes additional development within the settlement boundaries; this is in line with the principle that the scale of development should be adjoined to the function of the settlement it is allocated. Policy promotes additional development in a sustainable manner. (Natural England).
- Supported but would be clearer if this policy was redrafted and expressed as the strategy for the district in order to provide a context for the allocations. There are examples where a new strategic allocations need e.g. new settlements and the strategy should reflect their need and provision in the plan period.
- The policy sets out that development will be concentrated in the towns and main villages - logical approach.
- 4.1. Change "between settlements and any other relevant plan policies" to "between settlements, undesirable cumulative effects, and any other relevant local plan policies", 4.2. Change "additional services and infrastructure" to "additional services and new or upgraded infrastructure".
- Suggest the second sentence of paragraph 4.4 (Settlement Hierarchy) is amended to read: "There is still a requirement for this to address all of the other LP requirements but the overall balance may support a proposal which for example needs a rural location, is tied to a particular site, or is supported by other policies such as farm diversification or provision of rural housing for local needs or renewable and low carbon developments."
- Suggest '4.4 There will be exceptions where some development is expected to take place in the countryside (outside and possibly away from defined settlements). There is still a requirement for this to address all of the other LP requirements but the overall balance may support a proposal which for example needs a rural location, is tied to a particular site, or is supported by other policies such as such as tourism and recreation, farm diversification or provision of rural housing for local needs.'
- Support 4.4 subject to the inclusion of the following additional words: After 'or is supported by other policies' INSERT 'such as such as tourism and recreation,'
- Plan seeks to place development where there are services, transport and employment. (CPRE).

Object:

- The wording of this policy is not flexible in terms of re-use and conversion. It insinuates that the re-use of previously developed land would be acceptable if bought back into economic use; this does not include the re-use of the land for residential purposes instead. Furthermore, conversions will more likely be supported if they were to retain an important building. It is proposed that this should be re-worded to be more inclusive. Should a building be deemed to be in a sustainable location and suitable of conversion, this should be just as suitable as a building deemed to be of importance.
- Suggest the settlement hierarchy should be revised and where there is clear and obvious intent to deliver a housing site, then consideration should be given to redrawing the settlement boundary and allocating the land for residential development. Such a policy could dictate the provision of public open space, quantum of affordable housing and direct the design-approach to ensure an appropriate and sustainable response to the site's context.
- Support the continued identification of Ruardean Woodside as a sustainable settlement and the Site (Ruardean Woodside), as demonstrated by the pre-application advice received, is an excellent candidate to assist the Council in meeting that need in a high-quality design-led response to the

context. Suggest that the settlement hierarchy is revisited and that consequent the settlement boundary is redrawn to include the Site, which should also benefit from an allocation policy.

- Policy LP.4 should place a greater focus on growth at large villages, and within this context Land to the West of Church Road, Longhope is well suited to deliver housing development because it is a well-functioning sustainable village. Recommend that the policy be amended to allow Large villages such as Longhope to develop more houses than the 10 currently stipulated. Additionally, it is also proposed that the settlement boundary for Longhope is extended to include Land to the West of Church Road. It has been demonstrated above that Longhope is a sustainable settlement which can easily accommodate 44 dwellings.
- WDPC note that settlement boundaries have been altered in Bream and Sling to accommodate medium to large developments and these go against heritage requirements. (West Dean Parish Council).
- Policy LP 4 places too greater reliance upon 'drawn' settlement boundaries (drawn tightly to the edge of the existing built development) , providing little scope for proportionate new development to help sustain rural communities. Most settlement boundaries are drawn tightly to encompass the existing built form excluding parts of settlements which when viewed on the ground feel very much part of a settlement. E.g. Staunton (Coleford) – suggest including area outlined in purple could be included.
- Para 4.1 Add undesirable cumulative effects after 'settlements.' (Martin Hillier, 300).
- There is no policy that clearly articulates the strategy, instead the section focuses on the Settlement Hierarchy. It is not until Section 8 Delivering the Strategy and Section 9 Housing Policies, in particular Policy LP.29, that the strategy is explained. To accord to para. 20 of NPPF the strategy needs to be clearly expressed in a Policy in the early section of the Plan.
- The spatial strategy section should explain how the vision and objectives of the plan will be met. There should be a policy which states what the overall housing and employment requirements are for the plan period. There should also be a clear distinction between strategic policies and non-strategic policies in accordance with the NPPF. Strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies.
- The timing of publication of the Regulation 18 Local Plan the consultation period coincided with the draft NPPF & the proposed changes to the standard methodology to the assessment of local housing need which forms the basis of strategic policies:
- "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance." (NPPF paragraph 61 / consultation draft paragraph 62)
- The proposed changes to the standard methodology result in an 80% increase in the local housing need figure for Forest of Dean, such that its housing requirement over the 20-year Local Plan period will increase from 6,600 to 11,940 homes.
- Under the transitional arrangements that are set out in the draft NPPF, any local plan that has reached Regulation 18 stage will need to be reworked in order to progress under the new NPPF.
- The magnitude of the changes are such that the draft plan should be completely revised in order to take account of the new approach. The Regulation 18 consultation should be repeated.
- The LP has identified an annual housing requirement of 330 dwellings per annum ('dpa') (Policy LP. 29). This figure reflects the current standard methodology.

- The plan includes a number of allocations including major strategic allocations for mixed use development at sustainable locations, sites identified for development at a number of large settlements, together with "a more proportionate" level of development in smaller settlements. All are broadly in accordance with the settlement hierarchy which is set out in Policy LP. 4.
- The plan also carries forward a number of sites that have been identified for development in the previous local plan. Paragraph 8.3 proposed new allocations. There is an allowance for the contribution of small sites (under five net capacity) and for unidentified sites that are larger but not allocated"
- Paragraph 8.3 of the draft Local Plan. The total expected delivery over the plan period - 7,025 dwellings - is 6.5% above the identified need (based on the current standard methodology) of 6,600 dwellings. We welcome the inclusion of a flexibility margin. Is an important planning tool that will ensure that the housing requirement can be met in the event that some sites do not come forward at the expected rate. This approach is widely used elsewhere in England. Would question whether 6.5% represents a sufficient margin to take account of uncertainties regarding the future delivery of sites in the FOD. Consider that a 10% margin would be more appropriate.
- No evidence has been provided in respect of the basis for the small site & large windfall sources of supply so the proposed level of supply from this source cannot be verified.
- Much greater concern the housing strategy has now been rendered very substantially inadequate as a result of the proposed changes to the standard methodology.
- The Government has set out specific changes to the NPPF to make following consultation, including a number of pro-supply measures to ensure that a pipeline of deliverable sites is maintained at all times. Specifically, to Implement a new standard method and calculation to ensure local plans are ambitious enough to support its manifesto commitment of 1.5 million new homes. Making the standard method for assessing housing needs mandatory, requiring local authorities to plan for the resulting housing need figure.
- Paragraphs 226 to 233 of the draft NPPF, any plan that has reached Regulation 18 stage will progress under the provisions of the new NPPF including the revised standard methodology.
- It is not known whether the proposed changes to the standard methodology will be implemented in their current form, the new Government is keen to revise & update the current approach to the standard methodology.
- The implication of these factors is that the standard methodology figure will rise in a very large number of authorities, including the Forest of Dean.
- Draft Forest of Dean Regulation 18 Plan in light of the Government's recent reforms of the planning system, namely the revised NPPF (July 2024).
- It has adopted a necessarily high-level approach given the magnitude of the changes that are required to the draft Forest of Dean Local Plan to take account of the proposed changes to the standard methodology.
- There are extensive concerns with the draft Plan as it currently stands.
- The introduction of a revised standard method will see an 80% increase in the housing need figure for Forest of Dean District Council, resulting in a requirement of 11,940 dwellings over the 20-year plan period.
- The Regulation 18 Plan does not reflect the revised standard methodology figure and will fail to deliver the required quantum of housing.

- It could not be found sound in its current form and the only way to address the challenge would be to fundamentally review the proposed strategy and repeat the Regulation 18 consultation.
- Welcome the opportunity to comment on the Draft Forest of Dean Regulation 18 Plan.

Observations:

- The constraints of conservation of distinctive character (including heritage) and Forest landscape are key. The defined settlement boundaries should respect separation of settlements and prevent ribbon development.
- The simplified settlement hierarchy is supported, as is the redistribution of settlements between the tiers.
- We agree that it is important to provide a suitable level of flexibility in principle, and that development outside existing settlement boundaries can be consistent with sustainable development in the right circumstances.
- The Plan should provide for a wide range of deliverable and developable sites across the area in order to provide competition and choice to ensure that housing needs are met in full. HBF would suggest that the spatial strategy should recognise that there may be clusters of villages that provide a range of services for that area within reasonable travelling distance of each other, so villages may need to be grouped together. These areas might be able to sustainably support a substantial level of development but may not have all the services within one particular village.
- The plan should recognise that settlements that currently do not have services could expand to include those services if new development is allocated in those areas. (Home Builders Federation, 331)
- Support the inclusion of the Whitecroft- Pillowwell-Yorkley group village at Tier 2 of the hierarchy. The three settlements have considerable functional linkages by virtue of their proximity to one another, and it is right that their collective service offer is considered as a whole.
- Have concerns regarding the reliance on housing delivery in main towns and consider that some of the required growth - particularly noting likely increased housing need - would be better accommodated within surrounding villages in accordance with a more dispersed strategy.
- Hartpury village is well located in terms of access to public transport and has a good range of services and facilities. Given its proximity to Hartpury College and Gloucester, along with its relatively few planning constraints, it is considered to have greater capacity for development than typically ascribed to a 'small village'. Consider that Hartpury be more appropriately categorised as a 'Large village' for the purposes of the Local Plan. (McLoughlin Planning.
- Support Newent being included at Tier 1 of the hierarchy, reflecting its role as the largest settlement in the north of the district and an important service centre.
- Insert '2. Development for agriculture and forestry will in principle' and Insert ' For any proposal, the potential impacts to be considered will include those on landscape, ecology, trees and woodlands including any 'irreplaceable habitats' watercourses, amenity (visual and noise/ disturbance)' .
- Suggested that Beachley isn't a major growth and yet here you accept it is a small village but surely that would indicate the proposal is significant given the context.
- Typo in para.4.4 on reference to Parkend (wrong grammar with brackets).

Draft Officer Response

The settlement hierarchy policy sets out the principle that the scale and nature of development should generally be related to the function of the settlement in order to guide development in a manner that should be sustainable. It sets the context for allocations other than the major strategic sites and to guide non allocated development. There are three key considerations service provision, employment and accessibility. Analysis of these aspects alongside population size contributes to understanding the degree of self-containment at which each centre is currently operating. It also indicates which centres have the social, economic, and transport infrastructure to support further growth without compromising the sustainability of the district. This is explained further in the accompanying Settlement Hierarchy Paper.

Many of the representation refer to specific sites and such concerns are considered in the relevant policy. Other representations were concerned with the appropriateness of specific settlements being in particular tiers in the hierarchy, a review of the settlement services and facilities will be undertaken as part of the sustainability appraisal. The hierarchy is considered appropriate to reflect the function of the settlements and its facilities.

All suggestions for amendments to policy wording and supporting text will be taken into consideration and revised where appropriate.

Policy LP.5 Development in the Countryside (Outside Settlement boundaries)

Number of Representations: 30

Support: 12

Object: 4

Observations: 14

Support:

- Suggest the second criterion of policy LP. 5 (Development in the Countryside) is amended to read: "2. Development for agriculture will in principle be supported as will the diversification of farm enterprises, such as for provision of renewable and low carbon developments. Where tourism and / or recreation uses are proposed the additional requirements of the above paragraph will need to be considered. Landscape impacts, traffic generation and potential noise and other pollution will be amongst the main considerations to be taken into account in the evaluation of development proposals. Proposals should seek to demonstrate that they can use and protect any buildings worthy of retention before proposing new structures. They should demonstrate how they will contribute to the aim of supporting the existing enterprise through widening its range of activity and must be compatible with the environment in which they are proposed."
- We advise that the protection of the Wye Valley and Forest of Dean Bat SAC should be explicitly outlined here (section 4.8). In accordance with the paragraph 181 of NPPF, the plan should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes. (Natural England).

- Agree in principle, but the first sentence of the first bullet point does not make sense and needs reworking. Also the third bullet point needs changing from "Most employment uses will be expected to be concentrated at settlements and within defined boundaries." to "Most employment will be expected to be concentrated at settlements and within defined boundaries."
- I support paragraph 4.11 provided the additional words are included at the end of the paragraph: "4.11 The countryside away from defined settlements is generally less accessible than towns and villages and this will need to be taken into account, along with the potential for using public transport and active travel. INSERT Where a development proposal is sited outside a settlement boundary its proximity to and connections with the settlement will be relevant considerations."
- After the words 'One example is the way in which visitor pressures on the Severn Estuary need to be managed, another is that many areas of the FoD itself are valued for their tranquility and as wildlife habitats and need to be able to be appreciated (and protected) appropriately.' INSERT AN ADDITIONAL SENTENCE Therefore developments which enhance and ensure the continuing viability of established tourism and recreation sites and are sensitive to their context will usually be supported in preference to new proposals for sites which are not presently allocated for such uses.
- Support para. 4.8 subject to amendments in bold: "Some types of development have greater potential for adverse impacts than others and some of these may appear quite subtle and localised when considering individual proposals but seen cumulatively may be unacceptable. The LP seeks to encourage tourism and recreation for example that is in harmony with the environment and enables users to appreciate the environmental context but must recognise the need to guard against such development undermining the qualities of the area that it is seeking to promote. Physical structures may do this and likewise enterprises which generate large amounts of road traffic or concentrate potential activity in especially sensitive areas. One example is the way in which visitor pressures on the Severn Estuary need to be managed, another is that many areas of the FoD itself are valued for their tranquility and as wildlife habitats and need to be able to be appreciated (and protected) appropriately. Therefore developments which enhance and ensure the continuing viability of established tourism and recreation sites and are sensitive to their context will usually be supported in preference to new proposals for sites which are not presently allocated for such uses. As well as tourism and recreation there will be a need to support rural businesses that need to be located in a rural area and enable diversification of existing farms and other enterprises and while these may be increasingly diversifying, they also need to be increasingly sustainable."
- Whilst we support re-use where practical, replacement can represent a better option. Barns benefit from GPDO conversion rights they often then are redeveloped to create single large expensive country houses and the only part retained is a steel portal frame. Surely better to be flexible and enable and encourage replacement in appropriate locations with say a small terrace of x3 cottages in the style of farm workers estate cottages. Flexibility and proportion, less prescriptive.
- Support paragraph 4.11 subject to amendments in bold: "4.11 The countryside away from defined settlements is generally less accessible than towns and villages and this will need to be taken into account, along with the potential for using public transport and active travel. Where a development proposal is sited outside a settlement boundary its proximity to and connections with the settlement will be relevant considerations."

Object:

- The draft NPPF 2024 is changing national approach to grey/GB and needs to be reflected in emerging local plan policies.
- Fibre to the home, household supermarket deliveries to rural locations has completely transformed sustainable locations, employment practices have changed and office working has shifted, AI will accelerate this change – this should be reflected in this policy which retains the status quo rather than taking a more flexible forward look.
- Would encourage the Council to amend the countryside policy to be more flexible and permissive in nature to allow sustainable residential development to come forward outside of defined built-up areas on greenfield sites. Revising the policy to allow sustainable windfall development to come forward would help to meet the district's housing requirement. Council would be able to address housing land supply shortfalls without the need to depart from the provisions of the emerging Local Plan. Council would still have the flexibility to refuse a scheme if it was considered to be unsustainable.
- The policy does not provide any guidance for other types of residential development in these locations; thus, the assumption is that development may not be supported, which would not be in accordance with the NPPF 2023. Recommended the policy is re-worded as to ensure it is compliant with the overall national planning policy framework setting out circumstances within the open countryside outside of settlement boundaries, where residential housing can be deemed as acceptable.
- Any (tourism) new build development would require justification in relation to their proposed location, especially in terms of landscape and visual impacts. This could require some further clarification in regard to 'location'. Suggested wording: “As long as the site is deemed to be a sustainable location and respectful of the character and landscape, it should be deemed acceptable. In light of this, the policy in reference to location of tourism development should include or be similar to the following: Applications for new tourist accommodation, where an evidenced need exists, will be considered on their merits having regard to the sustainability of the site location and nature of the visitor market that they intend to serve.” (NHS Foundation).
- We would not support a tourism and recreational proposal that could have a negative impact on a designated or functionally linked land site, or one that would add a significant amount of recreational pressure to a designated or functionally linked site. Would expect to see a precautionary approach taken where there is any doubt over potential impacts and this approach could be referenced in the LP. (GWT)
- The impact on the Severn Estuary is of particular concern in relation to recreational impacts. The increase in the number of dog owners since the Covid 19 pandemic has been significant. (GWT).

Observations:

- Trend to examine how to balance climate change with the changed requirement by Government for 1.5 m new homes means such designations as Biosphere Reserve could be the way forward. This is building upon the recognition of the natural worth of the Forest, and the early designation of Forest of Dean as the first National Forest Park. (CTC).
- Propose addition of the following text at the end of LP 5.2: “Applications for infrastructure which support a transition to a sustainable, localised food system will be supported. Development for intensive livestock units will only be supported where it can be demonstrated that the proposed

development would not: - Exceed the catchment's nutrient budget - Adversely impact protected sites or woodland in the surrounding area - Adversely impact the quality of freshwater ecosystems through nutrient pollution - Adversely impact the quality of local soils through nutrient pollution. The proposed development must have a comprehensive waste management strategy for livestock excreta including storage, transport and spreading. The strategy must include a plan for the disposal of any excreta off-site, ensuring that it will not be spread in an area in which catchment budgets are exceeded, or in which waste would adversely impact protected sites or woodland. The cumulative impacts of existing agriculture developments will be taken into consideration.”

- Existing trees should be retained wherever possible, and opportunities should be taken to incorporate trees into development. Trees and woodlands provide multiple benefits to society such as storing carbon, regulating temperatures, strengthening flood resilience and reducing noise and air pollution. Ancient woodlands, ancient trees and veteran trees are irreplaceable habitats. In considering the impacts of the development on Ancient Woodland, Ancient and Veteran trees, the planning authority should consider direct and indirect impacts resulting from both construction and operational phases. (Forestry Commission).
- The inclusion of employment uses within LP.5 is questioned given there is a standalone policy for this specific purpose, i.e. LP.43 (Employment Sites Away from Settlement Boundaries) - there appears to be some duplication across the two policies in this regard.
- First reference to Biosphere Reserve - does this need to include more of a definition to explain what BR is & make distinction that it has no statutory designation like AONB etc.
- Tree planting can be beneficial for reducing noise, improving air quality but also water quality and soil quality in areas that produce more pollution e.g. intensive agriculture. The creation of new woodland also needs a long term management plan. (Forestry Commission).
- Poor grammar. Delete 'uses' after employment.
- 4.6. In first sentence delete first "will". Last sentence alter "but also the impact of its use" to "but also the impact of its being and its use".4.7. Alter last sentence from "and the use as well as;.." to "and the use as well;".
- Para 4.6 Grammar + add 'future' before use.
- Needs to take greater account of second homes and holiday let properties and the underlying issues this creates for young people. The Local Plan focuses on tourism as major employment, historically poorly paid and mostly seasonal, which will have a dramatic impact on locals re-housing and affordability and is also contrary to transport use aims and objectives. (WDPC)
- Recommend mention be made of irreplaceable habitats - their value and sensitivities to development, and that their loss cannot readily be compensated for. (Forestry Commission).
- There is a cross reference to specific sites referred to in policy LP.43 (which does not mention any sites in Newent). It is noted that sites referred to in LP. 43 are at least 1.8ha and many are larger. Newent Parish Council supports the development of tourism and quality food/wine-related tourism as a key element of the local value-added economy. The Newent area, including beyond the parish boundary, contains important local employment locations that are in the open countryside. The Draft Local plan should give consideration to the important economic sectors and enterprises outside settlements in the north of the District and where appropriate consider referring to them in LP.5 and including them within LP.43. (NTC).

- The inclusion of employment uses within LP.5 is questioned given there is a standalone policy for this specific purpose, i.e. LP.43 (Employment Sites Away from Settlement Boundaries) - there appears to be some duplication across the two policies in this regard.
- Often the case that tourist destinations do not correspond with settlement boundaries, and that accommodation needs arise elsewhere. However, as currently drafted, the policy will not encourage investor confidence in the delivery of new proposals to support the visitor economy in the District. Recommended that the policy includes more positive wording to express support for such proposals, alongside a more up to date evidence base.

Draft Officer Response

Policy LP.5 establishes the circumstances under which certain development outside the settlement boundaries will be supported in principle. The policy applies to development for tourism and recreation, agriculture, employment uses, and replacement dwellings. Policy LP.43 supports development of existing sites. The policy will be reviewed in light of the revised NPPF December 2024.

All comments of support and general observation are noted.

All suggestions for amendments to policy wording and supporting text will be taken into consideration and revised where appropriate.

It is acknowledged that the rural nature of the district may limit some mixed use developments on some of the smaller or more rural sites, although food or community based schemes are also applicable. However, the local plan strategy, and this policy in particular, seek to encourage the most efficient, sustainable and appropriate mixed uses of all sites across the district, and particularly within the larger strategic allocations.

Each allocation site will be reviewed to ensure that the opportunities are maximised in each at a sustainable level.

The need for balance between development and food production is noted. Whilst Policy LP.6 seeks to promote food production on a local scale, it is recognised that large scale developments often result in loss of agricultural land.

It is noted that many acronyms are used throughout the Local Plan, and a glossary is included at the end of the document. However, every attempt will be made to use the full words at least once within each section of the plan, as appropriate.

It is acknowledged that commuting is inevitable given that this is a rural district, however, the Local Plan and Policies LP.6, LP.39 & LP.40 seek to encourage an increase in employment, with the aim to reduce out-commuting.

The policy will be reviewed to consider including reference to Agroforestry, cultural initiatives and 'meanwhile uses', noting each of their benefits. It should be noted that since the consultation for the draft plan, the NPPF has been amended (December 2024) with significant increases being made to housing need. In the light of this, the Local Plan will continue to be reviewed and strengthened to provide as much sustainable mixed-use development as possible, particularly within the towns. It is noted that more employment and mixed-use development would be welcomed within Newent.

Policy LP.6 Mixed Land Uses

Number of Representations: 12

Support: 3

Object: 0

Observations: 9

Support:

- Support, but have concerns with the potentially open-ended nature of the policy and risk therefore that the application of the policy may have on housing delivery if applied incorrectly. The rural nature of the authority also raises questions with regards to the ability to deliver this policy ambition in a number of areas and therefore the focus should be on maximising the opportunities presented by sites such as Beachley Barracks that can provide a critical mass of housing that can deliver community uses as part of the proposals. (DIO).
- We would like to see mention of a balance between development and food production, with the provision of food security (Newland Parish Council).
- 4.17. 2nd box. What is "GI"? Explanation of initials required in text, not just in the compendium towards the end of the document.

Observations:

- Policy LP6 Mixed Uses presents an approach to the balance of infrastructure and development, but the way in which this is applied in detail (with applications) is moot. This is particularly true where developers are looking with increasing challenge at viability of sites, and specifically at affordable housing. Proportionality needs to be thought through. The degree/extent of one use to another will depend on location, type, and the needs of the economic driver. The relative benefits need to be defined and clearly specified, with mitigation as required. (CTC).
- Can we include reference to arts, culture & leisure as part of policy definition? (Regeneration, FODDC).
- Don't fall into a trap of thinking large scale commuting won't happen, the area is now a satellite of Bristol and as such , given the woeful transport links there this proposal is of huge significance.
- Consider Agroforestry schemes which will allow for mixed land use agriculture, food production, and increased tree canopy and open spaces. Agroforestry can reduce soil erosion, improve water and air quality, provide shelter for livestock and crops, reduce flood risk, improve food, fuel or timber production potential, increase biodiversity, capture and store carbon, improve climate change resilience. (Forestry Commission).
- Cultural initiatives as part of the community-based scale aspect can be mentioned. Potential to include something on temporary basis within vacant or underutilised spaces in advance of more comprehensive development. These "Meanwhile Uses" provide both short-term opportunities for activating and re- vitalising local places and communities."Meanwhile uses" are temporary uses on vacant land or in vacant buildings which can ensure that temporarily vacant buildings or land are efficiently used in a way that stimulates the vitality, vibrancy and viability of an area. These could include converting spaces for local creative, leisure and enterprise uses including temporary markets, and infrastructure enabling the creating and experiencing of arts and culture, and creative flexible workspaces.
- Longer term benefits of "Meanwhile Uses" may include social impacts including community and cultural development, sustainable local enterprise and local employment.

- Support but consider the specific wording is too precise and may not relate to each potential mixed use development proposal in the future. This is in specific reference to the 'land for food production'. This would be easier to accommodate should a residential mixed-use development come forward, however within a potential development without the residential element, this is unlikely to be favourable and could appear out of place. It is noted the sub-text 4.14 notes that the policy supports the complementary facilities such as GI or provision for food production close to housing; however, this is not detailed within the policy itself. Recommend that the policy is re-worded to either remove reference to this or be more precise on the requirements regarding types of mixed-use developments and their specific criteria. (NHS Foundation).
- The policy notes, "the evaluation of proposals will include their ability to access services and facilities by active travel using appropriate recommended distances". These distances are not set out; thus, it is unclear on how this would be applied to mixed use developments. Suggest policy is re-worded to include clear guidance on the recommended distances in which the policy will be assessed. (NHS Foundation).
- Aspirational but considered fairly weak policy and should be strengthened. NTC are concerned about the potential impacts arising from creation of monolithic areas of housing development areas to south of town and would recommend and welcome a more flexible approach the existing proposed site allocations to allow for more mixed uses within them, to provide a more varied built environment within the town that provides services, employment and housing, consistent with the existing character of Newent. The opportunity for the allocation of further mixed use sites should be explored, to the north side of Newent, to counterbalance the strong pull that further development on the south side of town would exert. (NTC).
- The proposed allocation on Land South East of Newent (promoted in part by Strategic Land Estates) provides a real opportunity for a primarily residential, but mixed-use development which provides the significant benefits to the town. Mixed use developments such as land to the South East of Newent, have a key role in helping to minimise travel needs, whilst at the same time improving the services and facilities for both existing and future residents.

Draft Officer Response

All comments of support and general observation are noted.

All suggestions for amendments to policy wording and supporting text will be taken into consideration and revised where appropriate.

It is acknowledged that the rural nature of the district may limit some mixed use developments on some of the smaller or more rural sites, although food or community based schemes are also applicable. However, the local plan strategy, and this policy in particular, seek to encourage the most efficient, sustainable and appropriate mixed uses of all sites across the district, and particularly within the larger strategic allocations. Each allocation site will be reviewed to ensure that the opportunities are maximised in each at a sustainable level.

The need for balance between development and food production is noted. Whilst Policy LP.6 seeks to promote food production on a local scale, it is recognised that large scale developments often result in loss of agricultural land.

It is noted that many acronyms are used throughout the Local Plan, and a glossary is included at the end of the document. However, every attempt will be made to use the full words at least once within each section of the plan, as appropriate.

It is acknowledged that commuting is inevitable given that this is a rural district, however, the Local Plan and Policies LP.6, LP.39 & LP.40 seek to encourage an increase in employment, with the aim to reduce out-commuting.

The policy will be reviewed to consider including reference to Agroforestry, cultural initiatives and 'meanwhile uses', noting each of their benefits.

It should be noted that since the consultation for the draft plan, the NPPF has been amended (December 2024) with significant increases being made to housing need. In the light of this, the Local Plan will continue to be reviewed and strengthened to provide as much sustainable mixed-use development as possible, particularly within the towns. It is noted that more employment and mixed-use development would be welcomed within Newent.

Policy LP.7 Infrastructure

Number of Representations: 29

Support: 14

Object: 2

Observations: 13

Support:

- Needs strengthening around the provision of services and utilities etc.
- Infrastructure availability and capacity are crucial for sustainable development. If capacity is lacking within the water or sewerage network and not planned within the AMP capital investment programme, solutions can be delivered through the requisition provisions of the Water Industry Act. The requisition provisions do not apply to Wastewater Treatment Works (WwTW) and should WwTW upgrades be required it may be necessary for the developer to utilise planning obligations or a commercial agreement to deliver any necessary upgrades. (Welsh Water).
- Existing infrastructure must be protected against the effects of climate change.
- Replace with: 3. contribute to (maintaining and where practicable enhancing) existing and/or deliver new GI (including street trees) as appropriate and commensurate to the scale and pattern of development. Potentially delivered in conjunction with and contributing to any required biodiversity net gain (BNG), SUDs, open space for recreation, land for allotments or other provision. (Forestry Commission)
- Recommend strengthening the wording around GI to read 'contribute to new and/or enhanced high-quality GI and share and/or take advantage of it alongside and possibly in conjunction with any required biodiversity net gain (BNG), SUDs, open space for recreation and wellbeing, land for allotments or other provision.' (GWT).
- Our Site is able to fulfil all three requirements of this policy which relates to being supported by infrastructure. The scale of the site means it can accommodated some infrastructure alongside

housing and community uses as well as a connecting road which is very unlikely to be delivered as part of the new sites that have been selected for allocation in Lydney.

- Policy should reflect the need for the timely delivery of infrastructure (should be provided prior to occupation). For larger sites, phased delivery of the development and associated infrastructure may ensure that the site remains viable. Any mitigation detailed within the transport evidence base should be linked to an appropriate Local Plan site allocation or general infrastructure policy and be included in the Infrastructure Delivery Plan (IDP). (National Highways).
- Where development is to impact on the railway and level crossings, certain infrastructure may be required in order to mitigate the additional risk generated by commercial development. Level crossings can be impacted in a variety of ways by planning proposals. Network Rail has a strong policy to guide and improve its management of level crossings. Without significant consultation with Network Rail and if proved as required, approved mitigation measures, Network Rail would be extremely concerned if any future development impacts on the safety and operation of any of the level crossings listed. The safety of the operational railway and of those crossing it is of the highest importance to Network Rail. Where level crossings are impacted by a development infrastructure, may be required to mitigate the additional risk (funding secured through S106 agreement). (Network Rail).
- Government legislation is needed to ensure developers provide schools, shop, GP surgery, public transport, etc before any development. In addition, high standard green building should be insisted upon; i.e. solar panels, recycled/ rainwater use, etc.
- What is "GI"?
- Efficient provision will mean providing for active travel or being in a location where it will be a realistic option, reducing the need to travel by ensuring services are readily accessible and using land for more than one purpose such as recreation and flood storage or using a transport corridor for GI. The early planning, design and coordinated delivery of grey, blue and green infrastructure will be critical. IT infrastructure and access to it will also be taken into account and is a requirement. (Forestry Commission)
- Health infrastructure should be clearly identified as essential infrastructure, with an expectation that development proposals will make provision to meet the cost of healthcare infrastructure made necessary by the development. In areas of significant housing growth, appropriate funding must be consistently leveraged through developer contributions for health and care services to mitigate the direct impact of growing demand from new housing.
- The significant cumulative impact of smaller housing growth and the need for mitigation must be considered. The NHS, Council and other partners must work together to forecast the health infrastructure and related delivery costs required to support the projected growth and development across the Local Plan area.
- Recommend a specific section in the document that sets out the process to determine the appropriate form of developer contributions to health infrastructure to ensure that the assessment of existing healthcare infrastructure is robust, and that mitigation options secured align with NHS requirements and formulation of appropriate mitigation measures.
- Recommend that the Council engage with the relevant Integrated Care Board (ICB) to add further detail within the Local Plan and supporting evidence base (Infrastructure Delivery Plan) (NHS Property Services).

Object:

- Geographic constraints of the Forest lead to acute traffic congestion as cars seek to leave the area for employment. The bottlenecks at Highnam, Chepstow and Monmouth are, following a lull during and after Covid, becoming serious again – new development will worsen situation. Whilst siting most housing development in towns and villages with good access to A roads is welcomed, the pollution resulting from these bottlenecks will (even allowing for a gradual shift to electric cars) again lead to the Plan failing in its sustainability ambitions. (CPRE).
- The government recommends that when preparing a plan strategic policy-making authorities use available evidence of infrastructure requirements to prepare an Infrastructure Funding Statement – to date no Infrastructure Delivery Plan has been produced to support the Plan and no viability assessment has been undertaken. The policy does not recognise that requirements need to be justified and will be subject to viability.

Observations:

- Fix the roads and infrastructure before any more development (traffic lights, pot holes, etc.).
- Examine site allocation policies for Newent i.e. whether there is or can be sufficient infrastructure in Newent to meet requirements arising from allocations. (Newent TC)
- HBF understand the previous government's intended reforms to infrastructure funding are no longer being progressed. As such the Council may need to revisit the wording of this policy to ensure it remains up to date. (Homes Builders Federation, 331).
- No reference to the infrastructure requirements of waste water treatment or sewerage and limitations that adequate treatment facilities should have on development (EA).
- Active Travel is a beneficial response in climate and health terms, but also needs the linkages available to mesh with the transport networks (NB including strategic and local public transport). The Forest rail links are very much southern, which supports the point made re transport corridors. (CTC).
- Walking and cycling references should also include "wheeling" to tie in with the emerging FoDDC Active Travel Strategy and to be more inclusive. Suggest changing the policy order and group all the infrastructure related policies together - so that the current LP10 and LP11 follow LP7? Suggest separate policy for Digital Infrastructure (broadband & mobile phone) - to specify minimum digital connectivity standards for new housing & employment generating uses. (Regeneration, FODDC).
- GCC's Countywide Cycling Infrastructure Plan (CCIP) and Local Cycling and Walking Infrastructure Plans (LCWIPs) will be key documents (GCC).
- Concerns about the infrastructure in Beachley (vehicles, no main drains beyond Loop Road, no shops, post office, doctors surgery, schools, inadequate bus services. During any construction work all heavy vehicles should use only the Beachley Road and not Loop Road which is a very minor road used by many local people and has no footpaths.
- WCC notes that it was unlikely any FoDD land needs will be expected to be met in South Worcestershire, nor the reverse. Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. Duty to co-operate. (Worcestershire County Council).
- Proposed development by Allaston Road and Driffild Road will diminish the visual aspect when approaching from the south. Could be mitigated by releasing land to the east between the bypass and the railway line e.g. Hurst Farm and Plummers Farm. Drainage and run-off could then be

mitigated by improvements to Plummers Brook. Significant improvements will need to be made for vehicular access - proposed access through Augustus Way and Allaston Road will not be adequate for the volume of traffic generated. A second access onto an improved Driffild Road will be essential. Any residential expansion of Lydney must be conditional on services such as health, education, public transport and police being in place before commencement; and any s.106 monies must be ring-fenced for the benefit of Lydney and its residents.

- Paragraph 4.18 - Emergency Services Infrastructure (Police, Fire and Ambulance) should be added to paragraph 4.18 so that it is fully clear that Policy LP.7 will apply to Emergency Services Infrastructure. Such provision must be planned and provided for in advance, as failure to plan for this would put peoples' lives and property at a constantly higher risk of danger. The infrastructure needed takes the form of new on or off-site provision or improvements to the capacity of existing emergency and rescue services infrastructure either on or off-site. (OPPC).
- EDUCATION - School places in Forest of Dean are meeting the current needs. Surplus places in "school place planning areas" varies from 22.99% surplus places to 2.42% surplus places, where 5% surplus places are recommended to allow for flexibility. This enables GCC to identify areas under pressure to expand. Many small village schools have developed over several decades & often have constraints and expansion is difficult. GCC who commission school places will need to conduct a strategic increasing pupil places options appraisal across the district as and when housing numbers become clearer. Early years: Whilst the current need has been met, in some areas additional early years and school places may be required because of new housing developments as per the draft plan. Where additional provision is required GCC will seek developer contributions to fund the facilities and to meet that demand. Primary: Based on January 2024 pupil numbers, there are 13.55% surplus places across the Forest of Dean district. While this is higher than the National Audit Office best practice recommendation, it is not unusual to have surplus places in rural areas with a significant number of small schools. Nb. due to the small size of schools, even minor population changes across the district can have a significant impact on some individual schools. Secondary: In the Forest of Dean, there is a legacy of surplus places which in most cases means, that additional demand of places (emerging from natural growth and new housing developments) can be contained within existing schools. However, FODDC officers should bear in mind that significant scale of developments will require targeted planning to increase capacity in appropriate locations; and developer contributions will be required to enable those expansions to deliver school places to meet the needs of those developments. Officers recommend a reference on the requirement for Section 106 contributions to fund new school places to be included. (GCC).
- We need to make sure we have the sewage infrastructure built by the water companies to reduce river pollution from raw sewage discharge. Our three rivers are affected. If we need call a moratorium as Herefordshire have done then lets do so. It might well be worth exploring the legalities and costs but would be good to put that out there at the very beginning infrastructure.

Draft Officer Response

All comments of support and general observation are noted. All suggestions for amendments to policy wording and supporting text will be taken into consideration and revised where appropriate.

The policy wording will be reviewed to consider if it is necessary to strengthen the policy, in particular around the provision of services and utilities and also with regards to GI.

Comments relating to individual sites and their potential for development with the provision of necessary infrastructure are noted and will be reviewed as part of the Sustainability Appraisal process and/or the Strategic Housing Land Availability Assessment (if the site has been submitted).

The National Highways comments are noted, and work continues to be carried out on the evidence and the Infrastructure Delivery Plan. Results of which will be reflected in the site allocation and infrastructure policies in the Local Plan.

Comments and concerns raised regarding the safety and operation of Network Rail operational railway and level crossings are noted and will be addressed where relevant within site allocations policies.

'GI' is 'Green Infrastructure'. It is noted that many acronyms are used throughout the Local Plan, and a glossary is included at the end of the document. However, every attempt will be made to use the full words at least once within each section of the plan, as appropriate.

In general, and where appropriate, infrastructure needs are identified and funded through Section 106 contributions identified through planning applications. Relevant bodies, such as GCC, NHS, Water Companies, etc, are consulted and have the opportunity to request the necessary funding.

It is noted that the NHS recommends a specific section in the document to set out the appropriate form of development contributions to health infrastructure. It will be considered what level of detail will be required, keeping in mind that the Local Plan does not set out the process for developer contributions in general.

Note the concerns regarding traffic congestion, pollution and general road conditions. This is an issue which is considered in great detail, and also forms a basis for the strategy with the aim of reducing out-commuting. The Council engages regularly with GCC Highways and makes them aware of the potential development sites. Issues such as public transport hubs, highway networks, parking provision and traffic management measures etc. are discussed with and the remit of GCC Highways. Equally, GCC Highways comment on allocations and on individual applications and request necessary highway works/mitigation and contributions. Walking and cycling paths are encouraged through Policies LP24 and LP25. It is recognised that better bus services are required and this continues to be an aspect for further work. Bus companies are consulted on the draft plan and their input is taken into account. Bus services are generally run by private companies.

The Council is continually gathering evidence and that includes a Viability Assessment, and Infrastructure Delivery Plan. This evidence will inform the Local Plan strategy and policies.

Comments regarding waste water treatment/sewerage infrastructure are noted and it will be considered if this policy should include reference to that. However, it is also highlighted that policy LP.21 deals with flooding and water management. The council engages regularly with the water companies who are aware of the need to provide the necessary infrastructure for the forthcoming development through the Local Plan. Agree that river pollution is an issue, however, a moratorium on development for that reason is outside of the remit of the Local Plan.

With regards to construction work in Beachley, this will be considered and dealt with as appropriate at any future planning application stage, where GCC Highways request a Construction Management Plan.

The Council will continue to regularly engage with neighbouring authorities under the Duty to Co-operate.

Para.4.18 will be reviewed to consider adding Emergency Services Infrastructure.

Comments received with regards to education and school places are noted, and Council continues to work alongside GCC Education to supply the required educational places through Section 106 agreements.

This policy will be reviewed and strengthened with regard to green infrastructure as appropriate.

Chapter 5 Sustainability and Climate Change and Supporting Text.

Number of Representations: 8

Observations: 1

Support: 3

Object: 4

Observation:

- The use and protection of agricultural land is not directly treated in the draft plan.
- Conflicts around the world constantly remind us we need to be increasingly self-sufficient in food production.
- Farming dominates the rural environment in terms of landscape and biodiversity.
- Sustainable agriculture is key to any attempts to halt and reverse the loss of habitats and wildlife in the countryside.
- CPRE would like to see the following reflected in a specific LP policy:- Greater emphasis on a brownfield first approach. This is not mentioned in LPI, 2 or 29.- A presumption against development on best and most versatile land (BMV) - agricultural land classification grades 1, 2 and 3a as defined by Government. (CPRE).

Support:

- Pleased to see a number of individual policies set out in this section, addressing important matters relating to protecting and enhancing biodiversity. (GWT).
- NPPF Paragraph 174(d) (policies and) decisions should minimise impacts on and provide net gains for biodiversity. Paragraph 180(d) encourages development design to integrate opportunities to improve biodiversity, BNG offers opportunities for protecting (retaining) trees & woodlands, new planting & enhancement of existing trees & woodlands.
- Ancient woodlands, veteran and ancient trees are irreplaceable habitats, it is essential they are considered appropriately to avoid any direct or indirect effects that could cause their loss or deterioration.
- Any development or plan should aim to deliver high standards of net gains and ecological connectivity that supports wider ecological networks, in line with good practice.
- This will also be a requirement as part of the local nature recovery strategies being driven by the Environment Act 2021 and we advise that plans should anticipate this to maximise environmental benefits.
- The Local Plan should be considered as a crucial & timely opportunity to secure significant and strategic, plan-led environmental gains that coincide with UK Government commitments regarding halving emissions & protecting 30% of nature by 2030, towards a net-zero carbon & nature positive economy.
- Policy LP9 Existing trees should be retained wherever possible, and opportunities should be taken to incorporate trees into development. Forest Research. Paragraph 131 NPPF seeks to ensure new streets are tree lined, that opportunities should be taken to incorporate trees elsewhere in developments, that existing trees are retained wherever possible.
- Appropriate measures should be in place to secure the long-term maintenance of newly planted trees.
- Ancient woodlands, ancient trees and veteran trees are irreplaceable habitats.

- Paragraph 180(c) NPPF development resulting in the loss or deterioration of irreplaceable habitats should be refused.
- The planning authority should consider direct and indirect impacts resulting from both construction and operational phases.
- Refer to Natural England & Forestry Commission joint Standing Advice for Ancient Woodland & Ancient and Veteran Trees in line with the NPPF.
- Buffer zones can protect ancient woodland and individual ancient and veteran trees provide valuable habitat for woodland wildlife, such as feeding bats and birds.
- Where development can't be avoided a 15m minimum buffer referenced in the Standing Advice to protect detrimental direct and indirect impacts of nearby developments, including activity and light spill to woodland.
- Advise a condition is added to any development near ancient or non-ancient woodland to secure significant gains should help to safeguard the future condition and extent of ancient woodland.
- Principle is supported by the Environment Act 2021 including the requirement for BNG and Local Nature Recovery Strategies which should prioritise protecting and enhancing existing habitats value. (FC)
- Natural England welcome the explicit link between nature conservation and the ecological emergency.
- Note section 5.1 which effectively outlines the nuanced drive towards creating a 'net gain' in biodiversity whilst also allowing development.
- Importantly, the plan acknowledges specific factors of nature conservation for the FOD. Wye Valley and Forest of Dean Bat sites SAC (section 5.1) & Severn Estuary SAC/SPA/RAMSAR (section 5.3) the importance of these internationally protected sites is made clear.

Object:

- Vital that the plan make explicit reference to geological conservation and the need to conserve, interpret, and manage geological sites and features in the wider environment.
- NE advises adding in a policy for soil protection that includes best and most versatile agricultural land, in line with paragraph 174 a) & b) of NPPF and the government's 25 Year Environment Plan.
- Decisions about development should take full account of the impact on soils, their intrinsic character & sustainability of the many ecosystem services they deliver.
- Would advise that the plan refers to sources of Agricultural Land Classification and Best and Most Versatile mapping and data www.magic.gov.uk website and Natural England.
- Mitigation should aim to minimise soil disturbance and to retain as many ecosystem services as possible through careful soil management during the construction process.
- Advise the policy should support developments that enhance soils, avoid soil sealing and provide mitigation to avoid soil disturbance.
- To support plan allocations (and subsequent planning applications) sites (over 5ha agricultural land) should have a site-specific Soils Management Plan informed by a detailed Agricultural Land Classification (ALC) & soil resource survey, in line with: the Defra Code of practice for the sustainable use of soils on construction sites.
- Strongly advise that the plan refers to soils issues within relevant policy areas such as renewable energy, climate change, green infrastructure & biodiversity net gain, flood schemes, managed realignment, development design & landscaping.

- During construction Sustainable soil management should aim to minimise risks to the ecosystem services which soils provide, through provision of suitable soil handling and management advice ensure that sufficient site-specific soil survey data is available to inform decision making.
- Policy Omission: Air Quality Natural England is concerned at the lack of an Air Quality proposal. We would expect that the local plan should introduce a policy on Air Quality. (NE).
- These housing proposals will not tackle climate change, on the contrary, will exacerbate it. They are certainly not sustainable, as required by the plan.
- Recent housing development has put a particular strain on the A48 to the South of the Forest with commuting from the Bristol area leading to queues back onto the Severn Bridge.
- No reference to the NPPF and irreplaceable habitats in this paragraph. Because they are irreplaceable, no net gain can be made if they are lost.
- Sustainable development should make a positive contribution to these internationally scarce habitats. (WT).
- Serious omission in the Local Plan policies. There should be a 'dark skies' policy. FOD is a stronghold for horseshoe bats, a 'dark skies' policy is absolutely essential.

Draft Officer Response

Amending policy for irreplaceable habitats information on buffers - not specific distances will be considered.

More information in relation to LNRS will be included in LP9.

Agree with the comments regarding incorporation of trees.

Agree, there are some sites where development on sites will never achieve a net gain as habitats are irreplaceable.

The title of LP8 to "Biodiversity and Geodiversity Protected Sites" will be considered as need to acknowledge it's just not nature conservation.

Air Quality will be considered in the next draft of the Local Plan needs adding in somewhere. will consider amending policy for irreplaceable habitats information on buffers - not specific distances. Add to LP9. need to add more information in relation to LNRS.

Agree with the comments regarding incorporation of trees. Agree, there are some sites where development on sites will never achieve a net gain as habitats are irreplaceable. Alter 5.I add irreplaceable habitats into policy LP8 A dark skies policy will be considered for the amended draft plan.

Alter 5.I add irreplaceable habitats into policy LP8.

A dark skies policy will be considered for the amended draft plan.

Agree policy omission for BMV - soil conservation. However there is a question of balance, in that brown field sites can be some of the most biodiverse land, with many rare and threatened species. Any wording about brown field should have this as a caveat. If changes are to be made then this needs to be included within any policy. The LP should be read "in the round" but this is particularly important and often overlooked.

Policy LP.8 Nature Conservation - Protected Sites

Number of Representations: 11

Observations: 5

Support: 5

Object: 1

Observations:

- LP.8 needs amending to include other protected sites, e.g. SPA and SPAs
- Is very clear at designated levels, but less clear at local scale.
- Areas such as mesnes (meends) which give different ecologies, often reflect multiple previous uses should be included for consideration. This would link into policies LP9 and 10 as well as LPI 1.
- How is the list of major sites in LPI 1 going to be identified? What criteria? What scale/degree of rarity/ peculiarity to Forest of Dean?
- Another key concern is the scowles where geology, habitat and heritage are implicit and irreplaceable.
- BNG and upgraded environmental regulation have raised the protection levels, but mitigation conditions are needed where development is permitted.
- As with infrastructure, the cumulative effect of permitted applications must be considered in localities, as well as each application being dealt with on its own merits.
- Existing and aged green corridors are very much under threat e.g. on the edge of the Green Ring in Coleford.
- There is scope for more Local Green Spaces to be included to address specific /smaller scale BNG for smaller sites LPI2/13. (Coleford TC).
- The policy sets out the framework for decision-making in relation to potential impacts on nature conservation sites. (Newent TC).
- This section needs to be improved and strengthened about National Landscapes and their protection. (West Dean PC).
- EA welcome the reference to the 'declared ecological emergency' and the environment of the FoDD as both complex and vulnerable to change.
- It's acknowledged that many areas have statutory protection and the wider network is intrinsic to resolving the ecological emergency this could be more explicitly addressed as in 5.4 and LP 11.
- EA agree some developments will be well placed to deliver on site gains to the aims and objectives of BNG is for watercourses and their immediate corridor to be excluded from the 'red line boundary' so they are not included in the baseline metric and not suggested for uplift.
- Highlight that the current BNG working riparian zone of 10m should be seen as indicative only and many or most watercourses have a much wider zone or influence or riparian zone to be protected enhanced or restored.
- Local sites: welcome the inclusion of local sites in the hierarchy of sites the deficiencies of the current system should be acknowledged.
- The network of local/key wildlife sites is not up to date and many citations need updating (there have been legal/planning challenges in other parts of the country due to old citation date).
- When a site was last surveyed is not always good quality data.
- A lot of watercourses are not currently designated despite having high biodiversity value advocate that more sites of this type to be designated in this way across FOD.

- Issues have occurred where landowners have cleared/managed land to remove biodiversity to streamline the planning process and remove requirements for biodiversity.
- In certain circumstances where a local wildlife site has been degraded over time we would still want to see local wildlife site citation data as baseline data in the BNG process.
- No mention of Wye and only states zone of influence not species or habitats of importance or high value in FOD.
- Welcome FOD adoption of what is now a multiauthority approach to acknowledging and mitigating the impacts on the Severn Estuary SAC/SPA/Ramsar through developer contributions.
- Emphasis to date has been on recreational impacts on birds, strongly advocate that includes other designated features, migratory fish assemblage that use or have the potential to use existing or restored functionally linked land outside the protected site boundaries and are therefore impacted by the proposed allocations.
- The 'scoping in' of fish as qualifying features in the HRA relates to the impacts of the plan on the migratory fish assemblage and relevant for consideration under the habitat's regulations and application of the wise use of water provisions in Ramsar.
- Increased strain on sewerage system, sewage treatment and the quality of treated effluent and untreated storm water.
- Increased impermeable runoff and urbanisation.
- Decreasing water quantity from increased groundwater and surface water abstraction.
- Affects of urbanisation - low summer flows.
- Deterioration in habitat quality.
- Simplification and loss of or channel, riparian and floodplain habitats.
- Loss and reduction in linear and lateral connectivity (EA).

Support:

- Agree in principle with this policy. suggest that re National Sites change "Exceptions will only be considered where the benefits of development at the site clearly outweigh the impact development...." to "Exceptions will only be considered where the benefits of development at the site or in the defined Impact Risk Zone (SSSI IRZ) clearly outweigh the impact development &...".
- This requirement equally applies to SPA/SAC and Ramsar internationally designated sites.
- The following sentence could be added to the end of the 'International Sites' paragraph: 'If suitable mitigation/compensation cannot be demonstrated, development will not be permitted.'5.3 could refer directly to the new Severn Estuary Mitigation Strategy. (GWT).
- Not about housing need or numbers per se. It's about type of need.
- Where new development is provided it reflects and reinforces the forest identity through design and materials;
- It protects the forest through including genuine measures to improve and safeguard biodiversity;
- It is not designed around private car use;
- It creates exciting distinctive spaces for communities;
- It meets the needs of people;
- New houses in Newent will be volume built/ meet the needs of the builder and the profit motive over the needs of a large and growing population.

- Natural England generally welcomes this policy as it distinguishes between the hierarchy of international, national, and locally designated sites.
- NE would ask that the wording of designated sites is strengthened, to highlight the importance of these key protected sites and reasons for protection. Specifically, the Wye Valley and Forest of Dean Bat Sites SAC and Severn Estuary SAC/SPA/RAMSAR.
- Natural England advise that the plan should strive be more robust and identify opportunities to enhance protected sites, local wildlife sites and geological sites.
- The Local Plan should be screened under Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended) at an early stage outcomes of the assessment can inform key decision making on strategic options and development sites.
- May be necessary to outline avoidance and/or mitigation measures at the plan level, usually considered as part of an Appropriate Assessment, including for project level HRA work to ensure no adverse effect on the integrity of internationally designated sites.
- May also be necessary for plans to provide policies for strategic or cross boundary approaches, particularly in areas where designated sites cover more than one Local Planning Authority boundary.
- NE advise that the policy should also include the protection of Functionally Linked Land (FLL) to the Severn Estuary.
- Future development within the Severn Estuary catchment needs to consider the issue of Functionally linked land. The Severn Estuary SPA is notified for wild bird assemblages while the SAC and Ramsar site designations include migratory fish. These supporting habitats can play an essential role in maintaining SPA/SAC species populations, and proposals affecting them may have the potential to affect the European site.
- Recent case law reinforces the need for (EIA) and HRA to consider mobile species when outside the boundary of the relevant European site.
- NE would draw attention to the potential for functional linkages with land and watercourses in Gloucestershire.
- For birds associated with the SPA, survey work has been completed to map land within the Severn Vale providing shelter and feeding opportunities for SPA wild birds during the wintering and passage phases.
- One of the key areas to consider is Aylbuton Wharth, a sensitive area along the Severn Estuary designated for wild birds. The local plan policy should make specific reference to functional linkage between Aylburton Wharth and the Severn catchment. an example of a freshwater catchment providing habitats for the designated mobile/migratory species of fish. (NE).

Object:

- The use of planning conditions to ensure that harm is "satisfactorily mitigated or adequately compensated for" is wrong, are not enforced and are often unenforceable.
- Does the lighting on the CNQ Spine Road meet the technical specification set out so that it does not affect the Horseshoe bats?
- There are numerous examples in the Forest of Dean of planning conditions that are currently ignored, and wildlife is consequently being harmed.

Draft Officer Response

Support for policy noted.

It is considered the policy adequately addresses local sites, priority habitats and species are considered in Policy LP.9. The policy will be reviewed alongside LP.9 and amended as appropriate.

Agree - there is a need to up-date the LWS system in the county....

Other aspects of water course protection (HRA or other) are assessed during a planning application

Reference will be made to the Wye Valley and Forest of Dean Bat SAC Development Management guidance and the Severn Estuary Mitigation Strategy.

The mitigation Strategy may be reviewed and new wording will be considered to reflect this.

Agree - The policy fits in with HRA. A paragraph could be included stating how international sites must be considered at planning stage to ensure impacts could be avoided and mitigated for and emphasise the importance of functionally linked land.

Reference will be made to relevant National Landscape management plans.

The title Nature Conservation is considered appropriate in referring to all types of nature conservation. A soil conservation policy will be considered. Officers will be looking to liaise with GWT to update LWS.

Policy LP.9 Habitat and Species Protection

Number of Representations: 10

Observations: 3

Support: 5

Object: 2

Observations:

- Provides a framework for considering impacts arising from development on species and habitats. (the prose could be clearer). (Newent TC)
- EA wording slightly tweaked here to include additional legislation not just limited to NERC, BAP and LNRS. For example, wording to the effect of *"including, but not limited to"* e.g. *CROW Act or Habitats Regs or the non-statutory status e.g. red list species.*
- Welcome the inclusion of the restore and recreate a preserve wording as well stronger than 'seek to' would demonstrate a clearer commitment.
- LNRS allows for measures to address the rapid decline of what were/are considered common or widespread species, would advocate more explicit reference to Species and habitats that are not yet acknowledged as priority species or habitats. (EA)

Support:

- Coleford Town council Policy LP8 is very clear at designated levels, but less clear at local scale. Areas such as mesnes (meends) which give different ecologies, and often reflect multiple previous uses should be included for consideration. This would link into policies LP.9, LP. 0 & LP.1

- Not about housing need or numbers, type of need and where new development is provided.
- Should reflect and reinforces the forest identity through design and materials;
- Protects the forest through including genuine measures to improve and safeguard biodiversity;
- It is not designed around private car use;
- It creates exciting distinctive spaces for communities;
- It meets the needs of people approaching retirement.
- The new houses that come into Newent will be volume house built meet the needs of the builder, the profit motive over the needs of a large and growing population
- Replace with: 'The early provision of tree and ecological assessments to inform design is essential. Tree and ecological data, assessments and plans are typically a requirement of planning applications. The informed use of tree and ecological data can support compliance with the above policy.' (Forestry Commission).
- For clarity, it would be useful to define what is included under ancient woodland in a footnote or a reference signposted on the definition of ancient woodland. The Biodiversity action plan and Local nature recovery strategy (LNRS) are mentioned here. Perhaps it should read Biodiversity action plan, to be superseded by the LNRS once published/adopted. (GWT).
- Recognise that these present key constraints and opportunities will help guide the distribution of uses, help shape shaping the public realm, the connectivity between green & blue infrastructure across the Site and surrounding area.
- Support the requirement that "development should avoid adverse impact on existing biodiversity and geodiversity features as a first principle, in line with the mitigation hierarchy".
- The provision of multi-functional green corridors and ecological links for protected species across the Site will help meet these objectives.
- These policies should be amalgamated to create one overarching policy relating to ecology and habitat/species protection. This will also help to avoid any confusion when developers refer to different ecology policies during the development management process.
- Natural England welcome the strong language planning permission will be "refused" for development which results in the loss, deterioration or fragmentation of irreplaceable habitats.
- Note the explicit reference to the mitigation hierarchy.
- NE welcomes the implementation of The Gloucestershire Tree Strategy and forthcoming Action Plan.
- Note the focus to protect ancient woodland as an irreplaceable habitat are pleased to see the linkages made with the Nature Recovery Network.
- The plan should be more robust: Protected Habitats Natural regeneration should be encouraged when located adjacent to existing woodlands to deliver extra wildlife benefits from scrub development.
- Where there are inappropriate existing forestry plantations on former priority habitat (e.g., heathland, peatland, ancient woodland sites) LP's should seek to restore these habitats by supporting plantation removal, replacement with broadleaved woodland, allow the ground flora and understorey to develop along with a more natural woodland.
- Further detail should be added to this policy to ensure the local plan prioritises the protection of habitats and species, in line with its central vision to protect "its diverse landscapes and heritage" and produce one of the core green threads from the vision to the local plan policies.

- Enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds.
- Local ecological networks form a key part of the wider Nature Recovery Network proposed in the 25 Year Environment Plan opportunities should be explored to contribute to the enhancement of ecological networks.
- Biodiversity Action Plans to identify the local action needed to deliver UK targets for habitats and species, identify targets for other habitats & species of local importance a useful blueprint for biodiversity enhancement in any area.
- Consideration should be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land.
- The LP should be underpinned by up-to-date environmental evidence include an assessment of existing & potential components of local ecological networks, inform the Sustainability Appraisal, ensure that land of least environment value is chosen for development, mitigation hierarchy is followed, inform opportunities for enhancement as well as development requirements for sites.
- The policy should seek to be less generic and more proactive. Section 5.4 refers to irreplaceable habitat and a wide variety of vulnerable species. The policy would be more robust and offer greater protection if it explicitly mentioned the habitats and species.
- The River Severn and Severn Estuary includes migratory fish assemblage species including salmon, twaite shat and lamprey, eels and silver eels.
- The policy should stress the widespread connectivity and restoration needed to optimise value and connectivity of forest.
- Relevant to the bat populations, could the policy outline tool such as setting up signs in areas where these species are present, to encourage stewardship behaviour?
- Concerned at the lack of specific mention of the Bat SAC and bat guidance. Survey guidelines for the Bat SAC.
- Development proposals may require a range of ecological surveys & assessments for a range of species & habitats, this guidance only relates to guidance in relation to activity surveys for Horseshoe bats useful in early stages of the planning process and pre-application advice
- The aim is for a clearer approach for considering the impacts of development on the Wye Valley and Forest of Dean Bat Sites SAC. Development proposals that could affect the SAC trigger requirements of the Habitats Regulations.
- Welcome conversations with the Council, once this document has been published.
- Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species.
- Planning positively for ecological networks will also contribute towards a strategic approach for the creation, protection, enhancement and management of green infrastructure, paragraph 181 of the NPPF.
- Natural England and the Forestry Commission have produced standing advice on ancient woodland, ancient and veteran trees. (NE).

Object:

- Well written policy the rest of the plan should respect and be consistent with this policy outline.
- Outlined 8 site allocations within Chapter 11 - Strategic Sites and Settlements contradict or conflict with this policy where they contain or are adjacent to irreplaceable habitats development

here will contribute to loss, deterioration or fragmentation of irreplaceable habitats, including ancient woodland and veteran trees.

- WT do not believe these situations would be considered wholly exceptional circumstances or that the 'benefits outweigh the harm'. (Woodland Trust)
- The use of planning conditions to ensure that harm is "satisfactorily mitigated or adequately compensated for" is wrong are not enforced and are often unenforceable.
- Does the lighting on the CNQ Spine Road meet the technical specification set out so that it does not affect the Horseshoe bats?

Draft Officer Response

All suggestions for amendments to policy wording and supporting text will be taken into consideration and reviewed where appropriate. All comments of support, objections and general observation are noted.

The policy will be revisited to strengthen the wording and will look at the benefits combining LP8 and LP9. all comments will be taken in account and amended where appropriate.

Agree will review the possibility of including more information on irreplaceable habitat in the description and stipulating that direct environment of habitats is very important for example impacts to ancient woodland include impacts on the surrounding environment as a whole and not just on the trees. We agree more details is needed on LNRS.

Agree - consider amending in accordance with Natural England's comments. Internationally designated sites and their qualifying features should be considered early on in the planning process.

Rather than list all types of wood included in ancient woodland examples of other irreplaceable habitat. The description section could include information on all irreplaceable habitat and the NE consultation.

The sites will need to be checked a 15m buffer from ancient woodland edge is required within NE standard advise.

Policy LP.10 Green and Blue Infrastructure

Number of Representations: 14

Observations: 4

Support: 10

Object: 0

Observations:

- Cycle Routes to be designed to prevent adverse impacts on Green Infrastructure and Historical remains. Future maintenance?
- Would encourage further exploration in the plan regarding the health benefits from Green Infrastructure (GI).
- Note the reference to Building with Nature Framework in the plan and welcome it. (GCC)

- LP8 is clear at designated levels, less clear at local scale. Areas such as mesnes give different ecologies, reflect multiple previous uses should be included for consideration. would link into policies LP.9, LP.10 & LP.11. (Coleford Town Council).
- EA - does not define what blue infrastructure is, how the policy will contribute to the same aims aligned to green infrastructure.
- De-culverting and/or water course regeneration, provide both ecological and flood risk benefits, aligning to the 'making space for water' principles.
- The removal of culverts could be included as an example within the text of paragraph 5.10.
- Recommend a paragraph be added below the 1st, to explain BI – “Blue infrastructure relates to water-based features (either existing or proposed) which can provide ecological corridors and other benefits, for example managing flood risk by making space for water and water quality at a local level by incorporating or enhancing wetland features. In combination Green and Blue infrastructure can therefore provide flood attenuation, improvements to water quality, water resource management, contribute to cooling effects and many other benefits encompassed under the concept of BNG and this policy.”
- The wording of LP needs additional information on importance of blue infrastructure and positives of it in rivers, ponds, wet woodlands, wetlands, canals, estuaries, peat.
- Functions and expectations of GI are referenced e.g. as space for nature, recreation, routes for active travel and flood storage) are often underestimated at master planning stage, inadequate space provided.
- Ensuring green space provision doesn't e.g. end abruptly at the floodplain i.e. areas left undeveloped outside the floodplain with access all year that aren't always muddy.
- Ensuring species rich grassland that requires agricultural management or allows access for farm machinery/provision for grazing animals outside the floodplain and safe from dogs.
- Ensure amenity and landscape quality of SUDS makes a meaningful attractive contribution to space where residents live, work and relax outside
- Retrofitting of green and blue infrastructure enhancement and restoration measures should be incorporated throughout the district.
- Can ponds and wetland areas as well as more urban features such as rilles and cascades and other moving water features be provided to attenuate rainfall runoff, store water, and cool the air, whilst providing useful habitat? As mentioned in 5.6 this is about improving overall natural connectivity. (EA).

Support:

- Replace 'Provision will be in proportion to the scale and nature of the development proposed, and be guided by the need for improved biodiversity and local priorities for nature's recovery. ' (FC).
- Herefordshire and Gloucestershire Canal support aspects of this policy.
- The SWHAPC does not object in principle to green and blue infrastructure policies reflecting the Strategic Framework for green infrastructure in Glos.
- Policies should not be rigid, overly strict, allowing for flexibility to ensure that affordable delivery is not hindered.
- The Canal & River Trust do not own/ maintain Herefordshire & Gloucestershire Canal support plans for its restoration led by Herefordshire & Gloucestershire Canal Trust.

- Life is better by water, agree that the canal is an important form of blue infrastructure support this policy.
- Provision should be made here for tree lined streets. The Woodland Trust Tree equity score shows that trees and woods are not distributed equally.
- Social housing should include good canopy cover and access to green space, would ask for a minimum of 30% tree canopy cover in all new developments.
- Welcome the assessment of the site's value should discount any intentional degradation or reduction prior to assessment."
- Newent Town Council - links requirements to provide green and blue infrastructure to the strategic framework for green infrastructure in Glos (core to the development of the Local Nature Recovery Strategy). Opportunities and priorities for BNG will refer to it.
- NTC welcomes initiatives to restore Herefordshire and Gloucestershire Canal, strongly support its future role as a transport artery, tourism generator and leisure and habitat resource.
- NE consideration whether the Council could set a requirement for a minimum amount of green/blue infrastructure for development sites. In the same manor that Policy LP. 12 requires 20% BNG.
- Consider and be resilient to the impact of climate change and include natural solutions/measures alleviate the impact of climate change, e.g. carbon sequestration, natural flood/surface water management, helping with urban cooling, provision of SUDs, microclimate adaptation.
- Green infrastructure can be part of an overall nature recovery network.
- Local approach to green infrastructure should be informed by the forthcoming Local Nature Recovery Strategies will set out what sort of habitats/features are priorities for an area and in what locations. (NE).
- Ask that reference to 'high-quality, multifunctional' GI is included rather than just reference to GI a huge difference between the quality of GI delivered as part of developments, encourage GI of a high standard that delivers for both nature and people.
- No mention of using Building with Nature or similar GI frameworks, given its mention in the preface, has it been unintentionally missed, would like to see this added in.
- LNRS could be mentioned up front e.g. the sentence be amended to read 'They must consider how any measures will relate to any necessary provision of BNG and how they relate to and make a positive contribution to nature recovery, for example, by ensuring alignment with the Gloucestershire nature recovery network'. reference is made later in the policy to nature recovery strategies and is mentioned within policy LP.13 is fundamental to this policy must inform the design of GI, maximise opportunities to support nature recovery. (GWT).

Draft Officer Response

All comments of support, objections and general observation are noted.

All suggestions for amendments to policy wording and supporting text will be taken into consideration and reviewed where appropriate.

The policy will be reviewed to include references to the Building with Nature framework. Some of the paragraphs will also be reviewed to provide more information on blue and green infrastructure and the Council will review and seek to strengthen the policy.

When assessing applications the council will seek to ensure that there is appropriate green and blue GI and will seek to make links to the NRN. The council will review the policy to also ensure that the forthcoming LNRS is referred to.

Policy LP.11 Green Infrastructure Allocations and Supporting Text.

Number of Representations: 13

Observations: 5

Support : 8

Object : 0

Observations:

- Areas such as mesnes should be included for consideration would link policies LP9 and 10 as well as LP11.
- How is the list of major sites in LP11 going to be identified? What criteria? What scale/degree of rarity/ peculiarity to Forest of Dean?
- Key concern is the Scowles where geology, habitat and heritage are implicit and irreplaceable. Examples such as these can add to the understanding of how these policies work.
- BNG and upgraded environmental regulation have raised the protection levels, but mitigation conditions are needed where development is permitted.
- As with infrastructure, the cumulative effect of permitted applications must be considered in localities.
- Existing and aged green corridors under threat e.g. on the edge of the Green Ring in Coleford.
- Scope for more Local Green Spaces to be included to address specific /smaller scale BNG for smaller sites LP12/13. (Coleford Town Council)
- Mentions a list of important/major sites to be identified and incorporated into the local plan. Would value sight of/consultation on this list likely to include suggestions adequate/ important blue infrastructure sites or aspects as well.
- Para 5.6 welcome the intention to preserve and enhance the GI network and improve and protect it, the inclusion of a stronger wording such as 'restore' would make a clearer commitment/ acknowledgement that much of the blue infrastructure is degraded and modified and needs tangible interventions. (EA)
- No green infrastructure site allocations proposed yet.
- Newent Neighbourhood Plan likely to identify green infrastructure priorities for Newent Parish, Local Green Space designations, priority areas for BNG, important nature, leisure corridors, and open spaces. (Newent Town council)
- No details of sites included or future maintenance.
- Paragraph 5.6 - request specific mention of street trees is made within this section. Regarding achieving synergies with grey, green and blue infrastructure, need for early consideration and integration of all three into design, careful consideration of onward delivery/construction. Noting the potential for either synergies, cost savings or conflicts, increased costs and failed delivery. (FC)
- Paragraph 5.7 a bit wordy agree with what it is trying to say.

Support:

- Paragraph 5.11. Last line should read "approach that will benefit the area."
- Welcome reference to Natural England's GI Framework in Section 5.8. should assist the council in delivering this policy.
- Draw your attention to NE Accessible Natural Greenspace Standards (ANGSt) published on the Green Infrastructure Framework - Principles and Standards for England website.
- Natural England suggest the local plan reference the emerging Local Nature Recovery Strategy is a statutory requirement under the Environment Act 2021.
- Each LNRS will be specific/tailored to its area, contain a local habitat map, written statement of biodiversity priorities. Statutory guidance for responsible Authorities sets out what the strategy is aiming to achieve, what practical actions will help do this, propose where actions could be carried out for best effect, to connect and expand existing areas that are important for nature. GOV.UK (www.gov.uk).
- Expect LNRS to propose actions; the creation of wetlands; restoration of peatlands; planting of trees and hedgerows; more sustainable management of existing woodlands and other habitats like grasslands.
- NE are aware of ongoing projects in the wider Gloucestershire area that the Forest of Dean could participate in. Gloucestershire Wildlife Trust has a Tree Scapes Project Severn Treescapes | Gloucestershire Wildlife Trust. (NE)
- Welcome "the assessment of the site's value should discount any intentional degradation or reduction prior to assessment."
- NE welcomes the detailed policy on green infrastructure allocations.
- Section 5.7 strongly outlines the impact of green infrastructure on allocations and the role of the Local Nature Recovery Strategy; is a strong and robust policy.
- Note the support in the local plan for the Gloucestershire Local Nature Partnership emerging Green Infrastructure Framework; this should be referenced to correctly incorporate green infrastructure in the future. (NE).
- List of major sites identified" is missing and marked as still to be provided.
- "(list of major sites to be identified)" - when will these be identified?
- Herefordshire and Gloucestershire Canal should continue to be a protected route and this would support the Green Infrastructure allocations. (Herefordshire & Glos Canal Trust).
- Para 5.7 – 5.12 all a bit wordy, agree with what it's trying to say.

Draft Officer Response

All suggestions for amendments to policy wording and supporting text will be taken into consideration and reviewed where appropriate.

All comments of support, objections and general observation are noted.

GI allocations are under review and will be allocated based on the NRN and the priority habitats and species identified within the LNRS and on areas where it is clear that habitat connectivity and wildlife corridors could be achieved.

Policy LP.12 Biodiversity and Biodiversity Net Gain

Number of Representations: 46

Observations: 18

Support: 12

Object: 16

Observations:

- As with infrastructure, the cumulative effect of permitted applications must be considered in localities, as well as each application being dealt with on its own merits.
- Existing and aged green corridors are very much under threat e.g. on the edge of the Green Ring in Coleford.
- Scope for more Local Green Spaces to be included to address specific /smaller scale BNG for smaller sites LP12/13. (Coleford Town Council).
- Suggest evidence is provided to demonstrate how 20% is deliverable in the District. paragraph 5.13 states a net gain of 20% "is considered viable. "is needed to be in accordance with national guidance (PPG Section 6 Biodiversity net gain - Paragraph: 006 Reference ID: 74-006-20240214).
- Neither draft policy LP.12 nor its supporting text provide satisfactory justification for seeking to double the statutory requirement, bringing LP.12 into direct conflict with the PPG. As per the judgement in R (Mead and Redrow) v SoS LUHC [2024] EWHC 279 (Admin), the PPG should be treated as a statement of national planning policy.
- The proposal to seek 20% BNG brings the draft plan as a whole into conflict with national policy.
- This goes to the heart of soundness, and the policy should be amended to reflect the statutory requirement for 10% BNG.
- PPG updated in February 2024 to provide greater clarity.
- 20% BNG not justified, effective or sound. The Environment Act 2021 sets out a minimum 10% BNG.
- Any requirements that go beyond 10% BNG need to be clearly justified, and evidence demonstrating the implications of delivering a higher BNG percentage needs to be provided.
- Policies LP12 and LP.29 are in conflict with each other.
- The Council's current evidence base does not adequately demonstrate why this requirement is necessary.
- Policy should be amended to reduce the requirement to 10% BNG in line with the PPG. would ensure that developments leave more biodiversity than was previously the case would not be overly burdensome on developers consistent with national policy.
- GCC officers welcome the focus of the draft Local Plan on habitat protection, green infrastructure, and Biodiversity Net-Gain (BNG).
- This along with Forest of Dean's existing ambitions of conserving and enhancing biodiversity in the district brings a variety of opportunities to plan for the future of Local Nature Recovery in the district.
- "Leveraging Natural Capital in Forest of Dean" suggests how habitat connectivity can be piloted and scaled-up across the district to bring about co-benefits of meeting net-zero targets, attracting economic development, and offering alternative outdoor recreational greenspaces.
- Habitat connectivity should also be thought of along walking and cycling links, where opportunities can exist to maintain or reconnect habitats. (GCC).

- Sport England supports the requirements of BNG, however have a concern, with school/town or parish council developments that playing fields will be used for providing BNG, which can conflict with site or partial sites which the primary use is as playing fields.
- The BNG can reduce the amount of playing field area, depending on the type of BNG proposed, e.g. the introduction of deciduous plants can lead to higher maintenance costs ditto for self-seeding plants.
- Care therefore is need, to protect the playing fields. (Sport England).
- LP.12 Smaller developments not defined.
- Given the land area likely required to achieve such targets and the fact that the Council is anticipated to need to find more homes, such a policy requirement would likely jeopardise the soundness of the Plan.
- Newent Town Council will consider identifying priority locations for BNG in the parish (with cross reference to LP.10 and LP.11).
- The council should only seek a minimum of 10% Biodiversity Net Gain and Reconsider the additional policy wording to ensure it is consistent with recently published legislation and planning guidance.

Support:

- Replace with 'BNG may be provided more remotely if it cannot be accommodated close to the site concerned and preferably in locations where it will contribute to nature's recovery, supporting and improving ecological networks within the FoDD.' (FC).
- Replace: Exceptionally, where the nature of the site makes any BNG on site impossible the total provision may be commuted, preferably to a nearby location addressing the nature recovery priorities of the locality. (FC)
- Agree with the justification of a 20% biodiversity net gain requirement because of the FoDD's ecological important natural assets.
- Particularly welcome is "the assessment of the site's value should discount any intentional degradation or reduction prior to assessment.
- Net gain of 20% is unrealistic it is considered that a local target of 15% is more realistic and likely to be more sustainable. (Woolaston Parish Council).
- (The National Trust) generally supportive of 20% Biodiversity Net Gain target within the policy, would be good to understand how the current 10% mandatory BNG is developing in practice, consider that the policy needs to be more precise about the types and size of development it is applicable to.
- EA strongly support the 20% target highlighting the high value and need of biodiversity in FOD it is also more likely to result in genuine uplift than 10%.
- Most of discussion is about 'land' wording should try to incorporate value of water environment as many planning applications are failing to address river units correctly.
- There is huge potential and need for opening migratory routes for fish, including longitudinal connectivity along watercourse, lateral connectivity to floodplain and off stream habitats.
- Restoration of peat and mire restoration in the FOD in relation to BNG and other policies should be highlighted.
- Particularly important areas and watershed of main catchments in the area including Woor green.

- Re-introducing common sundew which disappeared in the early 1990s needs to go hand in hand with shallow peat mapping across the forest, evidence is building up that they offer significant carbon storage and well as reduction further loss of methane.
- Creation of wet woodland also relevant
- Paragraph 5.14, also comments under 5.1, regarding red line boundaries and riparian zones in relation to BNG. (EA).
- GWT support the proposal for development to achieve BNG of at least 20%. aware that following re-wording in planning policy guidance (PPG) it has become essential that councils put forward a very solid case for increasing the level of BNG requirement to above 10% at examination.
- Some councils are developing supplementary documents to set out their specific need, along with an evidenced viability assessment. development of these supporting documents should be considered, if not, strongly recommend that they are.
- Where development sites are proposed which include core, high or medium opportunity habitat (the nature recovery network), would like to see evidence that opportunities for BNG have been maximised and this made explicit in the new LP.
- A glass ceiling for BNG should not be set for sites such as these, as they are key to improving nature connectivity. (GWT).
- Where new development is provided it reflects and reinforces the forest identity through design and materials;
- It protects the forest through including genuine measures to improve and safeguard biodiversity;
- It is not designed around private car use;
- It creates exciting distinctive spaces for that it meets the needs of people to be integrated.
- The new houses in Newent will invariably be volume house built and meet the needs of the builder/ the profit motive over the needs of a large and growing population.
- The DIO supports the objective to maximise BNG where possible, refer back to the tests of soundness which the Local Plan will be subject to at Examination Stage must be justified and therefore prepared based on proportionate evidence as set out in paragraph 35 of the NPPF, it does not appear that sufficient evidence has been produced to demonstrate that the inclusion of 20%+ BNG would not prejudice the delivery of growth and development within the district.
- As such we recommend that further evidence needs to be produced to demonstrate the viability of Policy LP.12 prior to submission of the Plan.
- With regards to Beachley Barracks the project team has already undertaken assessment of BNG potential and opportunities for the site and have provided information within the previous representations and Call for Sites submissions to date.
- Didn't see that any viability assessment of this policy had also been undertaken.
- Previous advice to support Local Plan Reps issued in Sept 22 included conclusions likely to be similar and the key issues in the context of the Local Plan remain.
- A net-gain of 10% (or 20%) could only be achieved through the combination of off-site habitat creation/ purchase of biodiversity credits, the reduction or modification of urban development within the current development.
- NE welcomes the proposed 20% BNG and the mitigation hierarchy.
- NE recommends reading this report which illustrates the viability of achieving the 20% BNG. Viability-Assessment-of-Biodiversity-Net-Gain-in-Kent-June-2022.pdf (kentnature.org.uk).

- Should refer explicitly to the statutory framework for BNG and should be consistent with, but not duplicate, the statutory provisions.
- The plan would be more robust if it made connections with the Local Nature Recovery Strategy.
- Set out the approach to on-site and off-site delivery across the plan area and for specific site allocations. On-site net gain provision should be considered before delivery off-site, in line with the Biodiversity Gain Hierarchy can also help to provide biodiversity gains close to where a loss may have taken place or is proposed and can increase access to nature for local communities.
- Local plans should describe and identify the priorities for habitat creation or enhancement in different parts of the plan area in line with paragraph 185 of the NPPF and informed by emerging Local Nature Recovery Strategies.
- Identifying these priorities on the Proposals Map will help demonstrate the relationship between development sites and opportunities for biodiversity net gain. Local ecological networks can be identified and mapped, with policies identifying appropriate levels of protection (safeguarding) opportunities for development to create, restore or enhance habitats or improve connectivity. Further guidance can be found in Planning Practice Guidance for the natural environment.
- Local plans may also consider allocating sites, which could deliver BNG units over the plan period and meet the need for local off-site provision, where on-site delivery is not feasible Local design codes or development management policy for specific sites should set out further detail on implementing strategic plan policies for BNG and wider Green Infrastructure.
- The Government has published information on BNG - draft Planning Practice Guidance 'good practice principles' for biodiversity net gain by The Chartered Institute of Ecology and Environmental Management (CIEEM) which may also be useful.
- These principles form the basis of the BS8683:2021 Process for designing and implementing biodiversity net gain. (NE).

Object:

- Is likely to put more applications in the position where off-site credits are required, where the relevant acquisition and legal mechanisms are not in place to facilitate this.
- The result is delay to the grant of planning permission and implementation.
- Where reference is made to the impact of BNG within the Local Plan Economic Viability Assessment (2021) (the figure quoted is 10%.
- Pegasus are wholly unconvinced that that the application of this policy (especially upon the larger allocations) has been viability tested.
- It should be noted that the work undertaken by DEFRA to inform the national percentage BNG requirement found that 20% new gain requirement would add about 19% to the net gain cost, over and above the minimum requirement of 10%.
- Should amend the policy so that it is consistent with national policy and guidance. Failure to do so will have implications on other policies as the viability of proposals will be affected e.g. the delivery of affordable housing.
- Our understanding is that there will be no flexibility for the DLP to set out an alternative approach to this proposed legislative requirement.
- Will potentially have significant impacts across a range of development sites that have an important role to play in order to ensure the plan delivers a mix of suitable sites across the District.

- It is often challenging under the current Metric used to calculate BNG to deliver 10% net gains on sites introducing a higher requirement of 20% will be unachievable for some sites, if not the majority.
- To ensure that delivering housing to meet the identified needs is at the heart of the DLP ensure delivery is not compromised strongly recommend that the Council review the approach to BNG change the requirement to 10%.
- This policy should be amalgamated with Policies LP.9 and LP13 to create one overarching policy relating to ecology and habitat/species protection. (Savills).
- 20% is excessive and is not taking in local conditions. (Hereford & Glos Canal Trust).
- Should not deviate from governments requirement for 10%.
- It is important that BNG does not prevent delay or reduce housing delivery.
- The council will need to ensure its approach to BNG fully reflects all new legislation, national policy and guidance.
- HBF involved in future Homes Hub, on BNG preparedness note the final version of DEFRA BNG Guidance published 12.02.2024, PPG February 14 2024.
- Important Local Plans do not introduce policies that undermine BNG delivery or conflict with national approach.
- Large and complex sites where development is phased, guidance is clear that the 10% must be delivered at the end of development and this may not result in 10% on each phase.
- Care is also needed in terminology to ensure it reflects national policy and guidance.
- The Whole Plan Viability Assessment should clearly set out how it considered the implications of mandatory BNG how it was arrived at using the most up to date BNG costs information available.
- LP to explain how it links into the emerging Local Nature Recovery Strategies. LNRS will be an important part of setting a spatial strategy for Nature.
- Important for this Local Plan to be kept under review and further public consultation on the interaction between the two documents and/or changes to Local Plan policy to reflect the LNRS may be needed.
- Ensure the Local Plan fully considers & evidence how BNG has formed part of the site selection process understanding the BNG requirement, including undertaking an assessment of the baseline to support the allocation.
- Understanding the BNG costs and viability for the site and considering how this may impact other policy requirements such as affordable housing, other s106 or CIL contributions.
- HBF suggest particular care is needed to avoid confusion between the well-established mitigation hierarchy and the new BNG hierarchy.
- The policy wording and/or supporting text to be clearer about the differentiation between the mitigation hierarchy and the BNG delivery hierarchy.
- The Reg 19 Plan should do all it can to explain how the two hierarchies work in different ways and that they seek to achieve different aims.
- Suggest the use of the term "BNG spatial hierarchy" may help with this issue.
- Reference could be made within the Plan to the small sites metric. intended to be less complex statutory metric that can be used to set out how 10% BNG will be secured on small sites for on-site BNG delivery.
- The national mandatory 10% BNG policy will apply to small sites from April 2024. (HBF Home builders Federation).

- Should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified.
- The justification within the supporting text suggests that because the Forest has a diverse and valuable ecology it is likely that even sites which are allocated or otherwise proposed for development will have a high value, appears to be no evidence to support this assumption it does not appear that any viability work has been undertaken to demonstrate that sites within the FOD could support an increase in BNG.
- There appears to be no evidence to support this assumption and in the case of strategic allocations such as on land South East of Newent (LP.74) that any viability work has been undertaken to demonstrate that the allocation could support an increase in BNG requirements.
- An increased BNG requirement may reduce the delivery of affordable housing across the FOD.
- To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development.
- Proposed Amendments to the Policy to ensure that the policy is consistent with statutory requirements, it should only seek a 10% Biodiversity Net Gain. Set in line with legislative requirements.
- Development of many sites in the FODDC area is already marginal/unviable due to lower development values (compared to other parts of the county). Placing a burden of doubling the BNG requirement over/ above the statutory requirement will result in many marginal sites becoming completely unviable.
- Small and Medium Enterprises (SMEs) will be disproportionately impacted by this proposed policy.
- Will heavily restrict the amount of development that can be undertaken through constricting the area of a site that can be built on or requiring developers to purchase expensive off-site credits which would be subject to costly and lengthy legal proceedings.
- Many sites would simply remain undeveloped.
- The delivery of BNG is a compliance matter that is covered in other legislation.
- To double what is required nationally will only serve to complicate the determination of applications and prevent necessary development from being implemented.
- Will reduce the number of sites being developed and thus prevent sites delivering any BNG.
- The imposition of a BNG requirement double that of the national requirement will thus reduce BNG delivery overall.
- The provision of BNG is a legal requirement irrespective of the Local Plan, including a specific policy serves no useful planning purpose.
- Consideration will also need to be given to how the policy will be implemented.
- Principally, the points identified relate to duplication or ambiguity within policies and which therefore risks conflict with paragraphs 16 and 194 of the NPPF.
- It is important to note that with the exception of Policy LP.12 the substance of the Draft Plan and its policies sets out a clear and positive vision for the Forest of Dean.

Draft Officer Response

Support and comments noted. All suggestions for amendments to policy wording and supporting text will be taken into consideration and revised where appropriate.

The policy would be applicable to all sites subject to mandatory biodiversity net gain.

Smaller sites as defined by BNG legislation.

Habitat within the area are unlikely to require large section of sports field for BNG requirements.
Schools are CC applications.

We are unable to confirm where landowners will wish to provide their mandatory BNG, however there will be offsite options for landowners who are unable to provide BNG onsite.

Impacts to habitats and biodiversity, and green infrastructure are considered when assessing applications and each application is assessed on its own merits and in accordance with policy and guidance.

There are a number of representation in support and objecting to the policy and appropriateness of 20% BNG. The council supports 20% BNG. Further information will be provided on BNG. There is no intention at present to combine policies other than possibly LP.8 and LP.9. There are clear differences between the purpose of policies.

Statutory credits are only advised as a last resort to gain BNG and if statutory credits are used evidence will be required that the applicant has tried to acquire offsite net gains and that net gains cannot be provided onsite.

Policy LP.13 Biodiversity Generally and Supporting Text

Number of Representations: 22

Observations : 5

Support: 12

Object: 5

Observations:

- As with infrastructure, the cumulative effect of permitted applications must be considered in localities, as well as each application being dealt with on its own merits.
- There is scope for more Local Green Spaces to be included to address specific /smaller scale BNG for smaller sites LP12/13. (Coleford Town Council).
- In substantive terms Policy LP.13 is supported it is questioned whether it would be better served through its incorporation into a Supplementary Planning Document ('SPD') help to streamline and clarify the Draft Plan would allow for the specific BNG measures being sought to evolve with the needs of the District.
- Suggest that "Proposals or ...;" is not what is intended, and that the wording used should perhaps be "Proposals for.."
- LP.13 Typo- proposals 'for'.
- In the (St Briavels and Brockweir PCs) Biodiversity duty action plan we have stated as our parish targets that Local Plan policies and Local Nature Recovery Strategy need to fully protect and address biodiversity priorities within the parishes by 2030.

- Our Global targets suggest all areas of biodiversity interest be under inclusive spatial planning and/or effective management processes by 2030. Loss of areas of high biodiversity importance, including ecosystems of high ecological integrity, are brought close to zero.
- Is there a need to increase the areas of wildlife potential registered for protection from development? Could we combine SSSIs with key wildlife sites under one protected banner? Can we work out (and increase if necessary) 30% of the land be protected for nature by 2030 as per the government policy.

Support:

- Is not about housing need or numbers it's about type of need, where new development is provided, reflects/reinforces the forest identity through design and materials; protects the forest through genuine measures to improve and safeguard biodiversity; not designed around private car use; creates exciting distinctive spaces for communities; it meets the needs of people.
- Welcome is "the assessment of the site's value should discount any intentional degradation or reduction prior to assessment."
- The Woodland Trust agrees all new developments should provide measures for improved biodiversity and commends the recommendations listed in this policy.
- It is also excellent to see the paragraph included here on irreplaceable habitats.
- Newent TC Supports proposals for development to conserve or enhance biodiversity.
- The policy makes effective reference to the Gloucestershire Local Nature Recovery Strategy and the detailed specification of at least 2 Swift Bricks per dwelling and opportunities for bat roosts.
- The policy is tailored to the FOD and protects the notable species within the county itself. (Natural England)
- To ensure suitable types and locations, please state in the 2nd paragraph that these measures are: "installed in accordance with best-practice guidance such as BS 42021 or CIEEM".
- For information, it would be helpful to state: "Swift bricks are a universal nest brick for small bird species."
- Also please clarify that this is for: "All new development including extensions should..."
- Make reference to Swift boxes.
- The National Trust support would suggest that reference be made to the provision of or supporting wildlife crossings. Given the habitats and wildlife present within the district, providing safe routes for wildlife across & through infrastructure is vitally important to reduce any conflicts and harm to species and their habitats.
- Support the requirement that "development should avoid adverse impact on existing biodiversity and geodiversity features as a first principle, in line with the mitigation hierarchy" and the provision of multi-functional green corridors and ecological links for protected species across the Site will help meet these objectives.
- These policies should be amalgamated to create one overarching policy relating to ecology and habitat/species protection, will also help to avoid any confusion when developers refer to different ecology policies during the development management process.
- Propose the following addition to strengthen it: "Developments that involve commodities that have a high risk of being linked to deforestation will be required to produce an assessment of the impact of the development on deforestation, and establish a due diligence system for forest risk commodities".

- The following could be added to the first paragraph to strengthen it in relation to nature connectivity: 'Any proposals that include high opportunity habitat as per the nature recovery network, should demonstrate how they have prioritised the enhancement of habitats within that area to support nature connectivity'. It currently reads, supporting nature recovery is encouraged rather than necessary.
- Pleased to see the mention of loss of ecological connectivity in this policy as a reason for not permitting development. Some clarity could be added to define what 'loss of ecological connectivity' would include. Is the intention for this to relate to existing core habitats only, or also high priority opportunity areas for nature recovery identified in the nature recovery network (in the upcoming LNRS)? The loss of these areas would remove some of the key opportunities to extend existing core habitats, not be acceptable for development to take place within these areas and not take it into account (i.e. through the introduction of appropriate GI to support connectivity across the site). A footnote could be added to clarify. (Glos Wildlife Trust)
- LP.13 Change wording from encouraged to something more stringent? All new development should (could this be made a more stringent requirement/stronger wording?) provide measures for improved biodiversity including at least; swift bricks- 2 per dwelling; opportunities for bat roosts within each new dwelling; provision of overhanging eaves suitable for nesting house martins in all development, supplemented by the provision of nest cups; and hedgehog highways integrated throughout the design of development."
- Not just conservation, but enhancement and restoration.
- Included in biodiversity section should be linked to climate change, carbon storage through increased habitat e.g. peat creation within FOD, NFM and possibility of beaver introductions. Non-native invasive species are a serious threat to the native species in the Forest of Dean, control measures should be prioritised where possible as this will be key to improving biodiversity. (Environment Agency).

Objection:

- Policies LP.9 for habitats/species protection, LP.10 for green/blue infrastructure and LP.12 for BNG, it is not clear what the separate purpose of this policy is.
- It is wholly inappropriate to specify the biodiversity measures which new development should include, "at least; swift bricks- 2 per dwelling; opportunities for bat roosts within each new dwelling; provision of overhanging eaves suitable for nesting house martins in all development, supplemented by the provision of nest cups; and hedgehog highways integrated throughout the design of development."
- An individual ecological assessment needs to be undertaken of a site - if the proposed development is shown to cause harmful impacts to bats, birds and/or hedgehogs, the measures described are reasonable, it is not necessary/justified to apply such a blanket requirement to all sites.
- The title of this policy is confusing and should be changed. HBF question the need to include policies on matters already adequately addressed through Building Regulations, other consenting regimes and other regulations. (Home Builders Federation).

Draft Officer Response

All suggestions for amendments to policy wording and supporting text will be taken into consideration and revised where appropriate.

This policy is not about BNG. Amended wording will be considered - not all development will have suitable locations for swift bricks etc. Agree a SPD would be great. See my original suggested policy.

Each application is already assessed with regards to habitats and green infrastructure during the application stage and cumulative impacts are considered.

NPPF states that all development should have a measurable net gain . Net gains are enhancements and not mitigation due to harm from development. Could be inappropriate for swift boxes in some locations (bungalow etc). Incorporation of habitats for species such as swifts has been included within the NPPF.

The policy or supporting text will include references to the LNRS.

Comments regarding the potential to increase the areas of wildlife potential are noted and the Council's ecologists will look into this in more detail. Currently, the draft local plan identifies and protects designated land such as SSSIs and local wildlife sites, etc., whilst also promoting 20% Biodiversity Net Gain and Green Infrastructure. It is also borne in mind that a balance needs to be struck between biodiversity protection and viability of schemes (the Council is consistently gathering evidence and that includes a Viability Assessment).

Policy LP.14 Renewable Energy and Supporting Text

Number of Representations: 18

Observations: 8

Support: 10

Object: 0

Observations:

- Could also include potential multi-use where solar energy panels are sited on roofs which also provide shade in car parks. (Coleford Town Council).
- The National Trust is supportive as a matter of principle, appropriate development can play an important role. Our ownership of land within a Locally Valued Landscape, would want landscape sensitivity, designated and non-designated heritage assets taken into account in the location and design of renewable energy schemes.
- Ecological issues, loss of High Grade agricultural land Para 5.19 Needs amending to refer to cumulative impacts.
- Sport England support need to assess the impact of wind turbines, good source of renewable energy, can interfere with a few sports, cricket and a range of water sports.
- When schemes for wind turbines are proposed where water sports are established a wind shadowing assessment should be undertaken/submitted to prove there will be negative impact on the sports.
- The use of PV in car parks by creating covered areas is something which can be retro-fitted as when designed in with new developments: <https://gratec.com/uk/blog/photovoltaic-shade-for-car-parks/>
- Careful use of playing fields, for ground source heat pumps, depending on the geology can be vertical or horizontal installations.

- Sport England is working with the department of education on a number of pilot schemes around the country.
- With cricket, wind turbines should not be located in the line of sight of bowlers or batsman. (Sport England).
- Paragraph 5.18. 7th Line. I do not understand "(over to tip)". 11th line change "listed buildings" should be changed to "listed buildings and their settings".
- Para 5.18 add 'and their settings'.
- LP14 - is there any scope to reference biomass boilers or anaerobic digestion plants in this section? (Regeneration, FODDC).

Support:

- Ground based solar should only be on non-productive land. Grade 1 and 2 should be for food production. (Herefordshire & Glos Canal Trust).
- 5.17. 3rd line would be better written "&&&...as part of developments &&&".
- 5.19. suggest a further sentence. "Of particular concern is that the cumulative impact of renewables development will not have a negative impact on the FODD and the well-being of its residents."
- It is not clear how this policy will be used to guide development of housing site allocations, with the most significant requirement arising on LP.74. Given the requirements of LP.2 in combination with LP.14.
- Concerned about the potential for additional planning applications for solar development that may be made to support strategic housing development.
- Given existing and consented solar development in the area, concern about the potential for significant cumulative impacts to arise, could impact the area's visual amenity and landscape, impacting the agricultural economy and on which local businesses and tourism rely.
- Would encourage Local Plan policies to set ambitious goals for sustainable construction and energy efficiency in all development to reduce requirements for external renewable energy developments. (Newent Town Council)
- Major allocations must meet the requirements set out in the NPPF and NPPG in relation to flood risk.
- The wording within the policy does hint at ensuring proposals are dealt with sequentially.
- It would be useful to ensure large scale renewable developments are considered in the same way as other strategic allocations in the district applying the same principles for the whole district rather than being dealt with on an individual basis.
- Welcome the support for renewable energy would wish to see explicit reference to the challenges and tests on the water environment not least fish.
- Suggested wording could include all hydropower applications to improve connectivity and habitat quality for aquatic and riparian wildlife including the designated fish assemblage. (Environment Agency)
- Replace wording Policy LP.14: 'The following may be especially relevant in considering potential impacts: 1. Landscape and visual impacts on its features and character. 2. Impact on land use and management (e.g. agricultural potential and existing hedgerows, trees & woodlands)3. How they provide for local needs whether related to a particular development or not. 4. Heritage assets and

cultural impacts. 5. Ecological - species and habitats 5. Likely decommissioning and reinstatement' (Forestry Commission)

- CPRE has been running a campaign advocating a rooftop revolution for the installation of solar panels both on new buildings and retro-fit.
- Also advocate for the government to support improvements in the energy efficiency of our houses. Both strategies would reduce the demand for large field-based installations.
- Pleased to see FODDC encouraging large new housing developments to provide renewable energy on site and energy efficiency in construction (5.17).
- Shame that national policy does not allow the council to make such provisions mandatory.
- Field-based installations, welcome the list of potential impacts set out in LPI4 against which such schemes will be assessed.
- Suggest two further improvements to policy in this area: firstly, that the cumulative impact of adjacent schemes is formally assessed as part of each application; secondly, that FODDC commission a survey with a view to creating a spatial plan for the deployment of renewable energy schemes.
- A spatial plan could take account of the five impacts set out in LPI4 and lead to better sited schemes if necessary. (CPRE)
- (Eden Renewables) LP. 14 should be amended to avoid ambiguity to reflect the current Government's approach to renewable energy "boost the weight that planning policy gives to the benefits associated with renewables" (Written Ministerial Statement by Angela Rayner, the Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government, on 30 July 2024).
- Support paragraph 1 of the policy because it is positively worded it could be clearer suggest it is reworded to match the wording of the NPPF (Para 163(b)). The sentence would then read as follows: "Proposals for renewable energy installations and other low carbon energy developments will be supported where environmental, economic and social impacts are, or can be made, acceptable."
- Sentence 4 of paragraph 2 is ambiguous inconsistent with the Preface of the LP (paragraph 1.4) which confirms renewable energy installations include both storage and generation schemes. To avoid confusion, suggest the wording is amended to read "...Associated infrastructure such as battery storage (standalone or co-located with other technology(ies) will also be generally welcomed."
- Support the pragmatic approach and acknowledgement within paragraph 3 do not support the reference to 'grid connection' when considering the impacts of schemes it is not always possible to include grid connection routes within planning applications. suggest the 'grid connection' reference is deleted.
- It would be helpful to all parties if paragraph 3 was amended, to be consistent with other Local Plan policies including policy LP. 20 suggest the wording is amended to read "The suitability of sites will depend on the scale and nature of any proposal. Proposals must consider any likely impacts associated with the whole scheme including access, transport, construction and operational impacts. The authority's preferred location for renewable energy developments in rural areas is undesignated countryside followed by Locally Valued Landscapes, then the Statutory Forest and finally the Wye Valley National Landscape. The authority will generally apply this sequential approach to locating renewable energy developments, unless the point of connection to

the grid makes this unfeasible. The authority will also look favourably at locations where human interventions exist, such as on land adjacent to and in the vicinity of railway lines and overhead electricity cables and associated pylons. Installations using new or existing roofs (domestic and commercial including agricultural buildings) will be supported though any which result in a significant adverse impact (for example in a Conservation Area) are likely to be considered unacceptable."

- Criterion 1 refers to 'Landscape and visual impacts on its features and character'; it is unclear what this means. For clarity, suggest criterion 1 is changed to two separate headings to read "1. Landscape character impacts 2. Visual impacts"
- Criterion 2 refers to 'Impact on land use (e.g. agricultural potential)'; is also unclear. National policy does not preclude renewable energy developments on agricultural land. Quote footnote 62 to paragraph 181 of the (NPPF) for Renewable Energy Infrastructure (EN-3) sets out that (paras 2.10.29 - 2.10.30): "...land type should not be a predominating factor in determining the suitability of the site location&...."
- National policies demonstrate that the Government acknowledges that some development on Best and Most Versatile (BMV) agricultural land is inevitable if we are to meet its target of 70GW of solar by 2035.
- Ground-mounted solar installations, temporary developments, suggest the potential use of BMV land is reasonable given only 0.5% of agricultural land is needed to meet the Government's target of 70GW of solar by 2035.
- Numerous appeal decisions where planning inspectors have acknowledged that solar farms do not lead to loss of agricultural land. Quotes Bramley appeal decision (APP/H1705/W/22/3304561). Quotes the Scruton appeal decision (APP/G2713/W/23/3315877).
- Would support the removal of criterion 2. Policy LP. 14. suggest criterion 2 is amended to read "3. Availability of a viable grid connection"
- Sentence 7 of paragraph 5.18 should be amended "...Large scale PV installations will require careful assessment in respect of landscape."
- Criterion 3 is unhelpful because developer can accurately know how much electricity generated by its development will be consumed locally or further afield. support its deletion.
- Do not support paragraph 6 of policy LP. 14, which requires the impacts of wind turbines on local communities having to be fully addressed, because it conflicts with current national policy, specifically, the NPPF
- Sentence 4 of paragraph 5.19 should be removed. sentence 4 of paragraph 5.19 should be replaced as follows: "...In the case of ground-mounted solar PV installations, it is acknowledged that there is a suite of mitigation options available to prevent or reduce impacts on buried archaeological matters (including the use of 'no-dig' options such as development exclusion zones or ballast (instead of piled) foundations (such as concrete shoes)), in a way that is not accessible to most if not all other forms of development. Proportionate archaeological investigations should be carried out reflecting the fact that such developments might only displace 6sq m of (horizontal) material per hectare (or 0.06% of the area) as a worst case scenario, but typically it will be much less than this (Solar Energy UK, June 2024, Position Statement: Solar farms and the assessment of buried archaeological remains).
- The statement in the yellow box immediately under the policy wording is helpful we think it could be amended to read "This policy supports renewable energy provision in principle and

applies important safeguarding principles to ensure that proposals are acceptable. It applies the present national guidance in its approach especially in respect of wind energy proposals plus the Energy National Policy Statements (NPSs) (EN-1 to EN-5). EN-1 (Overarching National Policy Statement for Energy) has introduced a presumption in favour of Critical National Priority (CNP) Infrastructure, including solar farms, where the needs case together with the national security, economic, commercial and net zero benefits will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy, in all but the most exceptional circumstances (Paras 3.3.63, 4.1.3, 4.1.7, 4.2.15 and Figure 2). The substantial support for CNP Infrastructure is reinforced in EN-1 because it makes clear that the starting point for decision-making for such a project is that it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances (Paras 4.2.16, 4.2.17 and Figure 2). The current Energy NPSs are material considerations for Town and Country Planning Act applications, and as such should be given significant weight in the planning balance of any relevant determination. The development supported and encouraged by this policy will assist in mitigation of climate change and carbon reduction."

- GWT These schemes and associated infrastructure must not be sited directly on areas of existing high value wildlife habitat, within designated nature conservation sites or areas identified as high priority for restoration or where harm is likely to be caused to populations of vulnerable, threatened and endangered species.
- Onshore wind and solar energy infrastructure have potential to make a major contribution to tackling climate change and its impact on wildlife, thoughtfully located and designed, to avoid adverse impacts on wildlife.
- Would like to see more prioritisation of small-scale wind and solar installations on buildings or within built/fabricated structures (e.g. solar panels in pavements on cycle paths), where they can produce and distribute electricity supplies to help meet local demand.
- Can be developed with no additional land-take and their installation and operation avoids damage and disturbance to wildlife, particularly birds, bats, their roosts and nests.
- Not support renewable and low carbon energy schemes that require excessive land take in doing so, remove opportunities to support nature recovery on large areas of land.
- GWT like to see point two amended to read '2. Impact on land use (e.g. agricultural potential) and on the potential to support nature recovery'. (Glos Wildlife Trust)
- NE are concerned at the lack of reference to the protection of soils and BMV land.
- Section 5.18 states consideration should be given to protected landscapes such as National Landscape's; the policy would be more effective if it outlined in further detail how this will be done.
- NE advise that in order for this policy to be more robust, it should expand on several crucial areas involving renewables.
- The policy should specify that great weight should be given to the protection of the National Landscape. Would like to see the character of protected landscapes conserved and enhanced (both proposed developments close to the boundaries of protected landscapes (within their settings) take proper account of their impacts on the National Landscape.
- Planning decisions should be guided by paragraph 182 and 183 of the National Planning Policy Framework, great weight to be given to conserving and enhancing landscape and scenic beauty

within National Landscapes, National Parks, and the Broads that the scale and extent of development within all these areas should be limited.

- Paragraph 183 requires exceptional circumstances to be demonstrated to justify major development within a designated landscape and sets out criteria which should be applied in considering this proposal.
- Advise that you consult the relevant National Landscape Partnership or Conservation Board. Their knowledge of the site and its wider landscape setting, with the aims and objectives of the area's statutory management plan, will be a valuable contribution to the planning decision.
- A local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to this type of development and its capacity to accommodate the proposed development.
- The new statutory duty to seek to further the purpose of designation should be explicitly mentioned within the local plan. Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023 places a duty on relevant authorities (which includes local authorities) in exercising or performing any functions in relation to, or so as to affect, land in a National Park, the Broads or an Area of Outstanding Natural Beauty in England, to seek to further the statutory purposes of the area. Also applies to proposals outside the designated area but impacting on its natural beauty. Applies to local planning authorities and other decision makers in making planning decisions on development and infrastructure proposals, as well as to other public bodies and statutory undertakers.
- The duty to 'seek to further' is an active duty, not a passive one.
- Importance of avoiding harm to the statutory purposes of protected landscapes also to seek to further the conservation and enhancement of a protected landscape.
- Goes beyond mitigation and like for like measures and replacement.
- An authority must be able to demonstrate with reasoned evidence what measures can be taken to further the statutory purpose the relevant authority should provide evidence to show why it is not practicable or feasible.
- It may be useful to consider the Wye Valley National Landscape Management Plan Wye Valley (wyevalley-nl.org.uk). (Natural England).

Draft Officer Response

Comments made with regard to wording and typos will be amended as appropriate.

The NPPF has now been revised and this policy will be reviewed in respect of this.

Consideration will be given to the production of a spatial plan for renewable energy deployment to support this policy.

Comments regarding potential ecology impacts of Renewable Energy Installations are noted including concerns raised over hydropower.

Ecology and nature recovery will be considered in the revision of LPI4 and the extent to which LP5 (Development in the Countryside) and LPI4 are complimentary.

The consideration of impact on heritage assets landscape and use of agricultural land is included within this policy.

With regards to concerns raised over “cumulative impacts”, Paragraph 5.18 recognises that Large scale PV installations will require careful assessment in respect of landscape which will include potential cumulative impacts.

The Policy supports retrofitting of renewable energy installations including car park canopies consideration will be given to referencing additional retrofit scenarios within the revision of this policy.

Whilst biomass heating and Anaerobic Digestion is Low Carbon, it is not necessarily classed as Renewable Energy and is therefore not referenced in this policy.

Chapter 6 Built, Natural and Historic Environment

Number of Representations: 5

Support: 0

Object: 3

Observations: 2

Object:

- Forest landscapes warrant a stand-alone policy to articulate their importance rather than only being referred to other policies.
- Suggest additions to list of locally valued landscapes – Vale of Castiard, Walmore Common (CPRE).
- Would discourage presenting landscape only within specific policies. NE is concerned with lack of a specific policy on national landscapes. (NE).
- The local plan would be stronger with an independent policy on national landscapes and their protection. We draw your attention to the Wye Valley National Landscape Management Plan (NE).
- Natural England expects the Plan to include strategic policies to protect and enhance valued landscapes, as well criteria-based policies to guide development. (NE).
- Needs to be criteria-based policies to guide location specific development, including criteria on respecting and enhancing landscape character, mitigating for adverse landscape impacts and on delivering landscape enhancement measures where possible. (NE).
- A robust landscape policy would include:-Conservation and enhancement of the landscape, including designated landscapes (where appropriate) and also the wider countryside.-Reference to a Landscape Character Assessment (LCA) within the policy or its supporting text. (NE).
- In cases where there is a lack of evidence on landscape character, advise that a LCA be carried out to inform plan making, taking into account para 170 of the NPPF (NE).
- For National Landscapes, the LPA should seek the views of the National Landscape Partnership. (NE).

Observations:

- A dark skies policy should be included in the policies – crucial for bat population and insect survival.
- There is no barn conversion policy in the LP.
- No real policy details in respect of agricultural workers dwellings.

Draft Officer Response

All comments of support and general observation are noted.

All suggestions for amendments to policy wording and supporting text will be taken into consideration and revised where appropriate.

Comments relating to individual sites and their potential to be added to the Locally Valued Landscape policies are noted and will be reviewed in due course.

Agreed that Forest landscapes are highly important and also that Natural England would encourage a specific policy on National Landscapes. When drafting the policies, it was considered sufficient to include them within the existing relevant policies within the plan. However, the policies will be reviewed and strengthened/revised where considered appropriate.

Additional landscape character assessments/evidence will be gathered over the process of the plan-making period to inform the policies within the Plan.

The Council continues to engage with National Landscape bodies and seek their expert advice through consultation.

The need for a dark skies policy is noted and will be considered for inclusion within the Plan, recognising its importance for biodiversity.

Agreed that there is no barn conversion policy and this is an issue which has previously been considered. It is considered that a barn conversion policy would not be included, taking into account that the permitted development rights have been extended to allow for many types of barn conversions. However, it is recognised that a more appropriate location for promoting high quality development for these types of schemes would be either the Design Guide or as supplementary planning guidance.

There is no policy within the draft local plan for agricultural workers, as the principle of development will be considered against National Planning Policy Framework and whether there is a functional/financial justification for an agricultural worker's dwelling. The design of the building would then be considered against general design policies as well as the Design Guide.

Policy LP.15 Design Principles and Supporting Text

Number of representations: 28

Support: 9

Object: 2

Observations: 17

Support:

- Support FoDDC's aspirations for high design quality.
- Consistent with NPPF.
- Emerging proposals at the site will seek to utilise best practice design to facilitate an inclusive community with integrated active travel.
- Supportive of including SUDS in new development and welcome criterion 7 of this policy (WW).
- If Govt intends the design code to exist at solely a national level, then the distinctive character of regions, towns and localities will be even more at risk. • The Local Authority Design Code needs to be in place. This can also work through NDPs and still apply the design principles in LP15
- Support ambition of policy but evidence of recently completed schemes does not suggest this has been followed through.
- In large developments achieving local distinctiveness is often difficult to achieve.
- Review whether the language of LP15 is sufficiently strong to guide planning officers.
- Note local design guides have not been updated since 1998 – do not deal with such things as energy efficiency or green infrastructure.
- Draw attention to English Rural's excellent new design guide for rural housing.
- Would be an expansion to current AP.4 and is acceptable (NHS).

Observations:

- No pavements does nothing to encourage walking.
- Not clear what is required for compliance to be achieved – suggest more focused approach is adopted.
- Should mention incorporating existing features such as watercourse and hedgerows (EA).
- Policy should link back to LPI0 (EA).
- Welcome inclusion to multipurpose SUDS (EA).
- Would advocate more explanatory text regarding contribution that SUDs makes to GI and quality of development (EA).
- Expanded secure cycle parking should also be included in residential and commercial developments (EA).
- Can LP minimise utility infrastructure on building frontages?
- Ageing society – desire to optimise step-free and wheelchair access within public realm.
- Public art and cultural activity contribute to local character and identity (GCC).
- Could add wording ‘delivering well-designed, inclusive places that include public art and cultural activity considerations’ (GCC).
- Active Travel England Standing Advice Note: Active Travel and Sustainable Development is relevant here (GCC).
- Missed opportunity to refer to benefit of using GI framework such as Building with Nature to support effective GI design.
- Request inclusion of a wording to policy such as ‘x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites’ (National Grid).
- Welcome the specific focus on adapting existing buildings to maximise environmental gains; this will contribute to delivering the objective of zero carbon developments. This could be added to a ‘Net Zero Carbon Toolkit’ alongside a Forest of Dean Design Code. (NE).
- The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Gas Transmission infrastructure and National Grid.
- Advocate high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning & urban design agenda require a creative approach to new development around underground gas transmission pipelines & other National Gas Transmission/National Grid assets.
- National Gas requests the inclusion of a policy strand such as ‘x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites’ (National Gas).
- Newent Town Council should cross-reference the policy to the Neighbourhood Plan design code’s report.
- Could inclusion of grey water reuse be a requirement?
- Could the Local Plan make it legally sound for authorities to turn down applications on grounds of cumulative pollution.
- Wide ranging policy – does not include the use of nature based solutions such as trees or SuDs for good design and environmental management. Should also include canopy cover.

- Development should reflect and reinforce the forest identity through design and materials.
- Should not be designed around private car use.
- Should create existing distinctive spaces for communities.
- Supportive of policy but could be improved by adopting our Active Design Guidance to create healthy places (Sport England).
- Currently amenities are lacking - need to be enhanced, not compromised.
- District Heating – consider locally and sustainably sourced wood-fuels .
- Change wording to ‘energy generation or heating’.
- Change ‘excessive scatter or intensity is avoided’ to ‘excessive light source scatter or intensity is avoided’. Also add ‘Lighting which leads to light shine pollution of designated wildlife will not be permitted.’
- Change wording to refer to excessive light source scatter and impact on designated wildlife to not be permitted. •
- It follows that developers should also be working the highest possible standards contained within the 'Building with Nature Framework(BwN20)', the 'Historic England HEAG321, Adapting historic buildings for Energy & Carbon Efficiency' and the recently published 2024 'Rural Housing Design Guide' from the English Rural Housing Association. It is a serious flaw that these documents are not referred to by the Plan in its current form. (West Dean PC).
- Any development needs to be supported by high standards of design & build guidance, which is currently being consulted on by FODDC, the FES NDP Design Guidance Document, which we would recommend due to its attention to detail, given the high design standards it enshrines & is going to referendum in October, we believe this could form the basis of the FoDDC document. (West Dean PC).

Object:

- ‘Unless it can be demonstrated’ caveat is inappropriate.
- Desperately need to see more detail on public transport.
- No reference to impact on heritage assets, vehicle parking, bin storage, cycle parking and charging points.
- Object to gated communities – they are against character and traditions of FoD and unacceptable.

Draft Officer Response

All comments of support and general observation are noted.

Alongside national-level design guidance, it is intended that a new updated version of a district-wide Design Guide/Code will be published alongside the Local Plan. Larger allocations may also be subject to localised design guides/codes where considered appropriate.

The updated Design Guide will reflect the distinctiveness of the local area. NDPs are also in a good position to include design guidance which highlights and protects the unique character of their area.

Concerns about completed schemes do not always follow guidance/policy, especially larger developments are noted. The Local Plan and associated design guidance strive to promote best practice. Updated policies and design guidance will provide a much stronger baseline than older policies/guidance.

All suggestions for amendments to policy wording and supporting text will be taken into consideration and revised where appropriate.

Comments about more detail on watercourses, GI, hedgerows etc. being incorporated into the policy is noted. However, other policies within the plan also cover issues around water management, landscaping, habitat etc. and duplication is to be avoided.

Furthermore, the forthcoming Design Guide may cover these issues as well. It will be considered whether it is appropriate to include a link to the relevant policies.

The location of utility infrastructure on buildings is often agreed through the utility companies and the Local Plan has little control over this. However, the forthcoming Design Guidance could consider whether it is appropriate to encourage that as much utility infrastructure is located away from the building frontage.

Understood that new development may be on land which is already subject to National Gas Transmission pipelines and this will need to be taken into account during the development design phase. It is also an issue that will be taken into consideration during the planning application stage.

Issues regarding cumulative impacts (such as pollution) are taken into account during the planning application stage, however, it will be considered whether it is appropriate or not to include wording to resist cumulative impacts within the policies themselves.

Agree that the Local Plan should aim to reduce private car use and this is approached through policies and supporting text around active travel options and the overarching sustainability of the strategy.

Reference to using the Active Design Guidance to create Healthy Spaces (Sport England) is noted, and it will be considered if it is more appropriate to include in the policy or within the Design Guidance.

Agree with West Dean Parish Council that developers should be working to the highest possible standards and it will be considered whether the documents highlighted should be within the supporting text of the Plan, or whether they would be more suited to the forthcoming Design Guide. It is recognised that the FES NDP includes high quality design material.

Policy LP.16 Historic Character and Distinctiveness and Supporting Text.

Number of representations: 12

Support: 4

Object: 1

Observations: 7

Object:

- Policy does not reflect national policy, specifically NPPF paras. 207 & 208 (harm or loss of significance should be weighed against the public benefits). Suggest following words 'In cases which cause harm or loss to the significance of a designated heritage asset, this should be weighed against the public benefits (as set out in the NPPF 2023 or equivalent future policy)'.

Support:

- This policy will support and ensure the continue protection of the setting of Westbury Court Gardens and wider Conservation Area
- Policy should included specific reference to the setting of designated and non-designated heritage assets.
- Support but suggest adding to 2nd bullet point 'The built form and setting of the traditional settlements in and around the Forest of Dean (Statutory Forest)and the contiguous woodlands and within the FoDD area of the Wye Valley National Landscape and its setting'.

Observations:

- Newent Town Council should check that the design codes report provides sufficient information for use with this policy.
- Welcome inclusion of a reference to the balance to be struck between sensitive river restoration including WFD and Habitats regulations obligations and historic character such as weir modification or removal and the need to open up culverted watercourse (EA).
- Amend 2nd bullet point to cover setting of traditional settlements in FoD and contiguous woodlands and AONBs.
- A clearer design code for Conservation Areas would be easier to comprehend and apply.
- Good to see that undesigned heritage value is noted.
- Links with the Coleford Community Regeneration Plan.
- Share the draft policy with your Conservation Officer to ensure consistency with national policy. Recently adopted Local Plans in sub region may be useful reference . Need to update your 2019 Heritage Character assessment (include heritage at risk, funding commitments, Lydney harbour, current review of CAs). (Historic England).
- In a Heritage Context (legally) all encroachment settlements started in the same way. The historic forest is a single entity of which certain aspects of the local plan fail to recognise.
- In 6.2 add St Briavels Common, May Hill, Vale of Castiard, Walmore Common and settlements such as Brockweir and Newnham.
- West Dean PC have grave concerns around the credence & cognisance given to the historic environs of the area, with the need to conserve these by legal means. Levelling Up & Redevelopment Act 2023, calls for a HER to be legally established (which it is at Gloucester), presumably following a consultation. Has this been completed? If it has this would contain information of many buildings that are locally significant and as well as other pertinent information.
- CROW Act 2000 makes it essential to take account of the Designated National Landscapes, such as the Wye Valley & Malvern Hills. This means that the insertion of a viewshed around these protected spaces is required, to also consider the impact of developments within these areas adjacent to a National Landscape.
- In certain locations such as Spoon Green (now Clearwell Meend) there is some protection, but with others such as Joyford Green or Knaving Green there is no green space protection acknowledged in the emerging plan. If the Council are serious about the significance of the Forest & its heritage then we believe this plan also needs to be strengthened to reflect this heritage & uniqueness of the area. (West Dean PC).

Draft Officer Response

All comments of support and general observation are noted. All suggestions for amendments to policy wording and supporting text will be taken into consideration and revised where appropriate.

Note comments regarding clearer design code for Conservation Areas. Work is currently being carried out on a SWOT analysis for the 27 Conservation Areas in the District, plus a updated district wide Design Guide will be written and published in due course.

The Council's Conservation Officer is engaged to review all relevant draft policies and their comments are taken into account.

Comments relating to individual sites and their potential to have green space protection are noted and will be reviewed in due course.

Policy LP.17 Locally Distinctive Areas and Supporting Text.

Number of representations: 9

Support: 1

Object: 1

Observations: 7

Objections:

No clear what criteria is used to assess accordance with policy. Unclear why policy is required in addition to LP15.

Policy gives broad discretion to decision makers but very little steer to applicants.

Support:

- Natural England welcomes this policy and the focus on protecting the Statutory Forest. The listing of the LDAs are both clear and concise (NE).

Observations:

- Only consent for housing if provision for 2 cars to avoid the use of forest waste for parking.
- Forestry England sees increasing encroachment on Forest waste.
- Need consult Forestry England for any works on forest waste by service undertakers (deed of easement).
- Newent TC could consider identifying LDAs within parish working with FoDDC criteria/method.
- Policy should be clarified through supporting text.
- In a Heritage Context (legally) all encroachment settlements started in the same way. The historic forest is a single entity of which certain aspects of the local plan fail to recognise.

Draft Officer Response

The intention of the policy is to protect the identified character of the district by ensuring that particular account is taken of important open areas. The policy seeks to ensure any development would be sympathetic to local character and history including the surrounding built environment and

landscape setting thereby establishing (maintaining) a strong sense of place. The LDAs do not preclude development but require proposals to show how they are compatible with a particular area. The LDAs were reviewed to take account of any changed (local) circumstances. The concept is not new and the previous LP policy was considered appropriate. There is additional material in the evidence base.

Policy LP.18 Land of Recreation And Amenity Value

Number of representations: 15

Support: 0

Object: 10

Observations: 5

Support:

- Protection of Important Open Areas with Development Management policy is sensible.

Object:

- Object to classification of land at North St Johns Square, Cinderford. Land is owned by Diocese of Gloucester. No formal rights for public to access land and PROW. No value as a recreational area and no function as a community asset. Views are limited by boundary planting. This is a natural location for in-fill development and improve wider character.
- Object to choice of some of designated sites – do not fulfil ‘recreational, cultural and amenity’ function.
- Examples to be removed from designation:
- Verges in front of Oak Way/Elton Road, Jail (Littledean) as artificially sterilizes wider development.
- Poolway Farm access.
- Other slithers of land or green spaces which are residual in nature and limited amenity value.
- Threshold for inclusion needs to be higher.
- Reinstate IOA to site referred to in P0397/23/FUL.
- Remove IOA off my private land situated beside Cranleigh House and Osokosi on Bailey Hill. The title was put on the land without informing the owners at the time. Remove from IOA designation.
- Puzzled why IOA Keynote has not Object Id Ref Nos.
- Georeferences are incorrect and description has changes. Our lawn and orchard has been conflated with Forest Waste
- Land at Penfold (Pillowell) is legally garden, lawn and orchard (not paddock). As a standalone garden it is unjustifiable to class it as an IOA as it fails to register on any of the objective criteria in keynote 2015. Remove from IOA designation.
- Yew Tree House, Yorkley – the land does not qualify as either paddock or field. It is garden and therefore brownfield land. No public view of garden and cannot provide visual amenity to the settlement. Remove from IOA designation.
- Unable to identify IOAs in the NPPF or other guidance. Policy does not comply with the NPPF (para 106) - the Policy should be deleted in its entirety or amended to "Local Green Space" with the criteria for designation and language used reflecting that in the NPPF. A proper assessment of each site should subsequently be carried out, and only those that are truly Local Green Spaces be identified as such.

- The Keynote even fails to distinguish characteristics of IOAs specific to each settlement. It is a Forest-wide categorisation which fails to carry out the test prescribed by Draft Policy LD.18; to identify whether the land in question contributes positively to the community. There should be an assessment of every parcel of land affected by the designation, which there isn't.
- Most of the sites designated are less than 1ha and are "small sites" as defined by the NPPF. Policy LD.18 therefore significantly hinders the development of small sites, the benefits of which are extolled by NPPF Paragraph 70.
- Policy LD.18 will also severely inhibit the delivery of windfall development throughout the plan period.
- Keynote does not explain why paddocks are important to the character of settlements. It also fails to explain which settlements paddocks are characterful at.
- In this case, the Site is a small part of a larger field. Its historic character is of a closely mown field, but more recently, it has been used to store materials and agricultural machinery. It has no recorded heritage, cultural, or ecological value.
- Do not consider Land at Marians Walk, to be an IOA or a Local Green Space as defined by NLP Policy LD.18 and NPPF Paragraph 106 respectively. The Site is an open field, which only remains undeveloped by lack of intention until this point. There is no public access to the land nor is there cultural or historic importance to the land. The Site is not demonstrably special in anyway. The NDP makes no mention of only part of the Site being suitable or indeed the Site having any community value. The IOA designation is an attempt to stymie the delivery of development on land which is otherwise suitable for development. Remove from designation.

Observations:

- Replacement/substitution which enhances is acceptable.
- DIO seeks clarification on the mapping of areas (which may relate to Beachley Barracks) to understand potential implications for current master planning of site (DIO).
- It would be possible to propose IOAs within Newent if suitable sites exist. The Newent NDP may provide a mechanism to identify IOAs.
- There is no clarity for formal sport here – by not identifying formal sport separately it can reduce the protection/importance of these sites.
- Introduction of deciduous plants and self-seeding plants for playing fields can lead to higher maintenance costs, also cause minor health and safety issues (slippery wet leaves) (Sport England).

Draft Officer Response

All comments of support and general observation are noted.

All suggestions for amendments to policy wording and supporting text will be taken into consideration and revised where appropriate.

It is noted that several objections have been made about the designation of individual sites as Important Open Areas and also the criteria for designation. The IOAs (and keynote) are reviewed during each update of the Local Plan. All suggestions for review of the IOAs will be considered and amended where appropriate. There may be cases where it is considered unreasonable to amend the current status of a site, and each parcel of land will be considered on an individual basis.

Comments and suggestions for the threshold/ criteria for assessment as well as the formatting/layout of the published document will also be reviewed. Every attempt will be made to ensure that the data is accurate within the documents and that the IOA designations and policy LP.18 accord with national policy and guidance.

It is agreed that the designation of a site as IOA can and does result in planning permission being refused for development. However, sites are only designated as such where it is considered that there is sufficient merit in doing so. The Local Plan seeks to accord with NPPF by allocating and/or allowing development of small sites where appropriate. Appeals against refusal of planning permission on the grounds of harm to the IOA are often upheld.

The Council is happy to engage with the DIO to clarify the areas designated as IOA and what the implications would be for master planning.

Agreed that a NDP is a suitable mechanism for proposing additional IOAs within Newent.

Noted that formal sport is not clarified in the policy text and this will be reviewed.

Policy LP.19 New Recreation Land And Uses and Supporting Text.

Number of Representations: 6

Support: 2

Object: 0

Observations: 4

Support:

- The Statutory Forest of Dean should be treated as an ancient forest encompassing all its land uses rather than ancient woodland. It is a cultural landscape which has an active community associated with it who exercise a wide range of traditional practices.
- Great deal of supporting documentary evidence which shows that the Forest of Dean is unique in the UK with its history of timber and mineral exploitation along with sheep grazing.
- The Forest of Dean will continue to provide a sustainable level of high quality conifer and broadleaved timber as well as cultivating opportunities for complementary industries traditionally associated with the area.
- The landscape diversity and structure of the Dean's woodlands has ensured that it remains a stronghold for a number of key species dependent on a variety of conifer, broadleaved and open habitats. These species include Grayling and Small pearl-bordered butterflies, goshawk, nightjar, turtle dove, hawfinch and pied flycatcher. This will be achieved by identifying and maintaining suitable habitats through management planning processes (e.g. wood pasture, acid grassland, heathland, etc). (Forestry England).
- Add to 1st sentence ' and to Forest Law'. Add to 3rd sentence 'but are not part of the statutory forest such as the contiguous woodlands'.

Observations:

- LEAP and LAP equipment does not always arrive when it should in terms of housing occupancy. Noted allotments are included.
- Newent TC is undertaking an audit of land/capacity available for allotments and for burials.
- There is no clarity for formal sport here – by not identifying formal sport separately it can reduce the protection/importance of these sites.
- Introduction of deciduous plants and self-seeding plants for playing fields can lead to higher maintenance costs, also cause minor health and safety issues (slippery wet leaves) (Sport England).
- Add Forest law under statutory forest and add contiguous woodlands .
- (West Dean PC) National policy document in 1947 (Hobhouse Report) asked for the Statutory Forest to be a Conservation Area, this has not been done. From 1990 there has been a legal requirement to provide the correct protection for areas so considered nationally important. The Planning (Listed Building and Conservation Areas) Act 1990, paragraph 69 is the relevant part of the Act. Policy guidance documents from Historic England in support of the Heritage Chapter in the NPPF indicate that a defined landscape that has been identified as nationally important but not designated should be treated as a Non-designated Heritage Asset, and treated the same as one that has been designated. This is not being adhered to and proposed developments in the area of the Statutory Forest can be identified at Drybrook, Cinderford, Milkwall, Sling in the local plan also seem to fall short of this requirement.
- WDPC have concerns around settlement boundaries and the Statutory Forest designation and the protection status this could have on its further encroachment. A Government Paper in 1947 in which the Wye Valley (now a National Landscape), Woolhope Dome and the Forest of Dean Plateau (excluding the Severn side villages from Tidenham to Westbury) including an area defined around Cinderford as a Conservation Area implies that the Designated Statutory Forest should be at least recognised as a Conservation Area.
- We are pleased to see that The Statutory Forest boundary has been flagged up in the plan, but this has to be recognised as an important historical boundary that controlled settlement development from 1327. The line of this boundary should not be overridden and obliterated. Unfortunately, this is being done in the Coleford area by the proposed Broadwell development. Whilst this cannot be undone the historic nature of the boundary should be formally recognised in the emerging plan along with The Statutory Forest boundary markers being listed and treated Listed Buildings, as they are in other previously recognised Statutory Forests (Epping, and a number in the north). The Statutory Forest boundary is a historic royal estate, formalised in 1327, thus its protection where a hedgerow survives on its course is governed by The Hedgerow Regulation Act 1997, an addition to the Environment Act 1995. The protection of this hedgerow is covered by Schedule II, Part I Archaeology and History, clause 1 and 4 (a). Ancient and Historical Greens in the Statutory Forest should also be protected under this arrangement in respect to NPPF Green Space. (West Dean PC).

Draft Officer Response

All comments of support and general observation are noted.

The uniqueness of the Statutory Forest of Dean is noted as is the ability of the forest to provide quality timber as well as providing habitat. The Local Plan seeks to protect biodiversity through several other policies in the plan, such as LP.8-LP.15.

All suggestions for amendments to policy wording and supporting text will be taken into consideration and revised where appropriate.

Concerns regarding timings of LEAP/LAP equipment are noted, however, this is not a policy matter, and should be dealt with through conditions on any planning permission granted and the monitoring of such by the Enforcement Team.

Note that the policy does not clarify sport, as this is dealt with under LP.23. However, policy will be reviewed to consider if there is a requirement to include sport in this policy too.

Note the comments regarding the importance of the Statutory Forest boundary. The boundary is recognised within the planning constraint maps, however, this does not currently designate the boundary as land which is protected, unlike the Statutory forestry land and forest waste (which is protected under Policy LP.18). Any historic boundary markers could be considered for either listing or as a Non-designated heritage asset or protected through a NDP.

Policy LP.20 Locally Valued Landscapes and Supporting Text

Number of Representations: 18

Support: 5

Object: 8

Observations: 5

Support:

- Importance of such landscapes cannot be overstated. These areas are truly valued.
- A significant portion of May Hill is within the ownership of the National Trust. The NT welcomes the continued inclusion of May Hill as an LVL and the protection this policy provides. The views from and to the May Hill are extremely important.
- NE welcome policy. Protective and affective goal to protect and enhance biodiversity. Could a link be made to the core green policy 3 or 5? (Natural England).
- Agree in principle, but list is incomplete. Vale of Castiard should be added.

Object:

- Question need for another layer of protection. Already designations such as AONBs and Statutory Forest. In Coleford the NDP affords protection of Green Ring.
- In respect of Staunton Corse/Lowbands, the policy protects CA and heritage features, not natural features of the landscape/countryside. This is inappropriate.
- Object unless wording is amended to 'The following locally valued landscapes are identified on the policies map. They should be considered alongside other national and local designations such as National Landscapes (formerly called AONBs) and the Statutory Forest. Development within or which would adversely affect them must demonstrate that it does not have an adverse impact taking account of their nature and purpose as referred to below and elsewhere in the LP. Proposals for landscape and/ or biodiversity enhancements of the areas compatible with their function will be supported subject to other policies of the LP.'

- The Coleford LVL should have boundary redrawn as it does not fulfil the criteria set out of providing a largely open setting.
- No justifiable evidence to demonstrate why this land (northern side of Coleford) should be a candidate for LVS. Too much of a constraint on an area where the settlement needs to expand in the future given housing pressures. Leaves LP open to Judicial Review.

Observation:

- Two LVLs are shown in vicinity of Newent, but outside parish.
- Redmarley PC agree with Lowbands designation. Designation was carried out without consulting RPC and all local knowledge ignore. RPC has been pursuing LVL designation for Redmarley village CA, but planning department refuses to engage. RPC request this is rectified and designated. (Redmarley PC).
- Needs strengthening to consider need for National Landscape viewshed and the impact that building in these areas can have on the National Landscape (West Dean PC).
- Extra areas such as Lydney Deer Park, Tidenham Chase, Oaklands Park and Vale of Castiard, Blaize Bailey .
- Policy will not prevent all development. Importance of May Hill within the local landscape and its recreational benefits need to be fully considered in potential development (National Trust).

Draft Officer Response

The Locally Valued Landscapes designated within the Local Plan highlight valued local landscapes which are important both in retaining and also being able to enhance the local distinctiveness of the FoDD. It seeks to ensure that development proposals that are made within them are fully assessed and are not detrimental to the areas that are protected by the designations concerned. It is complementary to the nationally designated landscapes and the protective policies that apply throughout the area especially to open countryside.

With regard to Staunton /Corse Policy LP. 20 defines two areas intended to protect the setting and features within Staunton/Corse and Lowbands. While the landscapes are themselves heritage assets (see NPPF glossary13), the policy approach is principally designed to protect the two Conservation Areas in recognition of their vulnerability to change. This is partly due to the topography and partly due to the nature of the original (Chartist) settlements which were largely composed of modest single storey bungalows set in curtilages of two, three and four acres. The settings are both extensive and vulnerable. They and their characteristics are of national significance and are accorded a high degree of protection under the LP.

The LP (Policy LP59) and Coleford NDP (Policy CNE2) support the designation of the Coleford Green Ring and Locally Valued Landscape. The purpose of the Coleford LVL is to protect the setting of Coleford town and the settlements that form an arc to its north, east and south as well as their setting in the wider landscape.

Support noted for May Hill LVL. Comments noted regarding suggestions for additional LVLs

The Policy will be reviewed as part of the LP process.

Full landscape assessments will be need to undertaken on any application which may affect Locally Valued landscapes.

Policy LP.21 Flooding and Water Conservation and Supporting Text.

Number of Representations: 16

Support:5

Object:2

Observations:9

Support:

- Support rainwater harvesting and grey water recycling systems (WW).
- Support use of SUDS ensuring surface water does not communicate with the public sewer network (WW).
- SUDS and natural attenuation should be multi-functional where possible (to support nature and connecting with nature).
- National Trust supports but feels it could be made stronger on provision of SUDS and natural management of water courses and flood risk which could have multi-functional benefits. Cross referred to SFRA. (National Trust).
- NE expects the Plan to consider the strategic impacts on water quality and resources as outlined in paragraph 180 of the NPPF and to address flood risk management in line with the paragraphs 165-175 of the NPPF. (Natural England).
- The relevant River Basin Management Plans should inform the development proposed in the Local Plan and it should contain policies which protect habitats from water related impacts, including nutrient mitigation, and where appropriate seek enhancement. (Natural England).
- Priority for enhancements should be focussed on European sites, SSSIs and local sites which contribute to a wider ecological network. Plans should positively contribute to reducing flood risk by working with natural processes and where possible use Green Infrastructure policies and the provision of SUDs to achieve this. (Natural England).

Object:

- No development in FZ2 and FZ3.
- Re-use of greywater should not be caveated with 'unless it can be demonstrated this is not appropriate'. Its is highly appropriate to re-use greywater. Could grey water reuse be an enforceable requirement.
- Can Local Plan allow for refusal of applications on grounds of cumulative pollution (factory farming/ IPU)?

Observations:

- For some development that cannot be provided entirely free of flood risk it is necessary to demonstrate that there is no suitable alternative location by applying and passing the "sequential test". There may still be a requirement to apply and pass and by establishing that an exception can apply through a further the "exception test".(EA).
- Sites allocated in the Local Plan will not be required to apply the sequential test at the planning application stage this as the development allocated can take place clear of flood risk but others may need one or both tests should be located in areas of medium to low flood risk as highlighted in the Flood Map for Planning (*) and defined in the National Planning Policy Guidance (*).[The two

*s above are to note that you may wish to include a link within the policy, however we appreciate that you may wish to avoid weblinks in actual policy wording as they can change] (EA).

- Where sites are not entirely flood free, they must clearly demonstrate a sequential approach to layout, use and design in line with national planning policy and guidance taking account of the potential impacts of climate change over the lifetime of the development. (EA)
- Need to demonstrate that the Sequential Test has been undertaken for all the allocations that are ultimately included in the Local Plan. Ensure that a L2SFRA has been undertaken for the allocation sites, and that a document is produced that shows how and why the sites pass the Sequential Test. (EA).
- Need for new development to contribute toward the upgrade and / or maintenance of existing flood prevention schemes where there is a direct/indirect benefit from these being in place. (EA).
- Financial contributions should also extend toward the running of flood warning and flood alert services within the area when a proposed development would benefit directly / indirectly from their provision. (EA)
- It is important that any evaluation uses the most up to date guidance so that the impact of climate change is considered for the lifetime of the development. Apart from the areas at risk from flooding the issues for the FoDD include the resilience of the main access routes (A48 and the railway) and the vulnerability of some areas to a rapid flow of floodwater due to the nature of the catchments at Cinderford and Lydney. (EA)
- LP21 - Flooding & Water Quality

Text changes required:

- “New development must consider whether it is at risk from flooding from all sources and should:
- We would require that points 1 and 2 in the policy be switched round (and 2 reworded as below).
- 4 and 5 may also need to be switched round to follow a logical approach to developing sites.
- Include an additional point at 3 and renumber the rest.
- Apply where appropriate the sequential test to support all future allocations and proposed development
- Demonstrate whether it can should be permitted considering all risks through the application of the exception test or its principles (via where necessary the submission of a flood risk assessment) and relevant guidance.
- Ensure where development is deemed appropriate a sequential approach is adopted in relation to both uses upon the site and layout.
- Ensure for the lifetime of the development it is itself safe and flood risk is not increased elsewhere.
- Demonstrate any mitigation that may be necessary, show it will be effective and how it will be implemented for the lifetime of the development.
- Ensure that risks (including changing impacts due to climate change) are taken account of in for all new development proposals (including changes of use), including incorporating improvements to improving resistance, resilience and safety of the sites concerned.”

Within the additional text the following amendments are requested.

“Para 2

- That it incorporates Sustainable Drainage Systems (SUDS) unless it can be demonstrated that this is not appropriate in a specific location.”
- “Para 3
- Employs where possible is expected to improve or as a minimum or retain natural management of water courses, including removal of culverted sections, reinstatement of natural banks and enhancement and natural methods of retention including of other open drainage features such as ponds and water courses which form part of an overall open space and scheme for green/ blue infrastructure.”

Add the following.

- “Where natural features already occur, these are incorporated into new development layouts as focal points.”

Edit the final sentence.

“Para 4

- Where a flood risk assessment or other supplementary material is necessary it will need to meet the requirements of the LLFA/ EA and address any issues raised by providing appropriate details of any mitigation measures.” (EA)
- The Newent Permo-Triassic Sandstone groundwater body is a principal aquifer within the Forest of Dean district extending from Newent in the south up to Bromsberrow in the north. Principal aquifers are high permeability rocks which store large volumes of water that can be easily abstracted for water supply. (EA).
- This aquifer also supports vital river baseflows which are important during low rainfall periods supporting the ecology in the rivers allowing them to thrive. The aquifers' high permeability means that it is vulnerable to any potentially polluting surface activity from agriculture or small industry in this area. Around 65% of this groundwater body falls within groundwater Source Protection Zones (SPZs) designated around sensitive public drinking water supply abstractions and 100% within Nitrate Vulnerable Zones (NVZs). (EA).
- Groundwater is treated for nitrates by the local water company in the north of the aquifer to make the drinking water fit for human consumption. (EA).
- The groundwater body is at overall 'Poor' status' for both chemical and quantitative status under the Water Framework Directive (WFD). Poor chemical status is due to high and increasing nitrate concentrations resulting in increased water treatment for drinking water supply. (EA).
- River quality connected to groundwater may also be affected leading to deterioration of water quality in rivers. (EA).
- Risks will be managed through agricultural nutrient management campaign work. (EA).
- The need for significant residential and commercial development to provide accommodation and jobs identified in the local plan will necessitate building on brown field sites. There will also be a result increase in pressure on availability of water resources from significant residential and commercial development. (EA).
- There are groundwater abstraction licences within the area and the area is also partially located within groundwater Source Protection Zones. (EA).

- Note there have been updates to guidance and policy relating to groundwater and contaminated land. (EA).
- Preliminary risk assessments should be in accordance with the guidance contained in LCRM. (EA).
- Without a preliminary risk assessment there is a potential for contamination and a possible risk to controlled waters and EA is likely to object. (EA).
- If a preliminary risk assessment has been submitted it must contain sufficient information to be able to recommend conditions for inclusion in the proposed planning permission. (EA).
- The current policies in the Draft Plan do not give enough attention to the protection of groundwater. Include this issue within policies LPI Sustainable Development and Policy LPI5 Design Principles (at criterion 7?) and some editing of LP 21 Flooding and Water Conservation and LP 22 Site Conditions. (EA).
- Flooding and Water Conservation - good to see the references to incorporating SuDS here. Would like to see added that measures where possible include the re-connection of watercourses to their floodplains (which can reduce flood risk, better manage water resources eg during drought, and create valuable habitat benefiting both biodiversity and climate change adaptation) (EA).
- Not all development sites may be suitable for the use of infiltration SUDs techniques as it very much depends on the sensitivity of the location and the conditions of the ground at the site, e.g., ground contamination. (EA).
- Infiltration should only be permitted where there are no contaminants. This should be made clear. (EA).
- Request commitment for clean roof runoff to be directed away from the sewer system and into infiltration drainage or other SuDS system to reduce pressure on the sewer system and reduce instances of combined sewer overflows and associated pollution problems. (EA).
- Any Sustainable Drainage System (SuDS) greater than 2.0 m below ground level is a deep system and are generally not acceptable. All infiltration SuDS require a minimum of 1.2 m clearance between the base of infiltration SuDS and peak seasonal groundwater levels. (EA).
- SuDS attenuation basins should normally be located outside of the 1% annual probability fluvial, with climate change, floodplain to avoid operational issues. (e.g. from the system flooding out during a flood event). (EA).
- Consider rural SuDS and sedimentation control (EA).
- EA expects a Water Cycle Study to ascertain that there will be adequate foul drainage infrastructure in order to deliver sustainable development. This includes waste water treatment capacity as well as the sewerage network. (EA).
- The WCS is particularly important for the Forest of Dean District given the large parts of the area that are not connected to mains foul drainage. We would wish to see this improved in the future and ideally would not wish for new allocations to be allowed where they will not connect to mains foul drainage. (EA).
- WCS should also assess sewage scheme in Beachley (sewer is deep and costly to make connection). (EA).
- Natural management of water courses, including enhancement should include 'and restoration' and natural methods of retention including open drainage ponds and water courses 'and a generous riparian zone which form part of an overall open space and scheme for green/ blue infrastructure. (EA).

- Plan should consider short and long-term mental health impacts of flooding (GCC)
- Policy LP.21 requires that measures should be incorporated to keep use below 1,101 per day. This is a specific requirement for a planning policy and would be better positioned in the supporting text of a policy or in supplementary planning guidance.
- Melt from snow has diminished in frequency but needs to be catered for (CTC).
- Water extraction is having a considerable impact on water levels in the River Wye. Over-extraction exacerbated by agricultural run-off will have serious adverse impacts on biodiversity. (CPRE).

Draft Officer Response

All comments of support and general observation are noted.

The policy and supporting text will be reviewed prior to the next consultation to consider whether they could be worded more strongly and to consider appropriate references to multi-functional uses of water management, strategic impacts on water quality, re-connection of watercourses to their floodplains and also take into account the relevant River Basin Management Plans where applicable.

Comments regarding Green Infrastructure are noted and Policies 10 & 11 relating to GI and Policies 12 & 13 relating to Biodiversity are also applicable to future developments.

The draft Local Plan has concertedly sought sites which are not within Flood Zones 2 or 3, however, there are some exceptions (such as Stowfield, Lydbrook) where part of the site is within those floodzones, but would be capable of providing something other than built development (such as landscaping, SUDs, GI, etc.). The Local Plan will also be subject to and informed by a SFRA and a SFRA Level 2. The EA's advice regarding 'sequential' and 'exception' tests will be taken into account. It is also noted that the changes within the amended NPPF (Dec 2024) will need to be considered.

A water cycle study will be carried out to inform the local plan policies with regards to water resources, quality, extraction, nutrients, and pressure on groundwater sources, waste water treatment, etc.).

All suggestions for amendments to policy wording and supporting text will be taken into consideration and revised where appropriate.

Issues regarding cumulative impacts (such as pollution owing to factory farming/IPU) are taken into account during the planning application stage, however, it will be considered whether it is appropriate or not to include wording to resist cumulative impacts within the policies themselves.

Contributions towards upgrading/maintenance of existing flood prevention schemes which are directly affected by new development would be subject to S106 agreements at the planning application stage.

Preliminary Risk Assessments will be requested where appropriate during the planning application phase and dealt with appropriately in accordance with the expert guidance of the EA officers.

Both the allocation sites and future planning applications sites would be assessed by the EHO (Contamination) Officer, local drainage officer and LLFA, if there is any cause for concern with regards to water management and contamination.

All EA comments regarding requirements of a SUDs system will be taken into account and the policy and guidance reviewed/revised accordingly if considered appropriate.

Policy LP.22 Site Conditions and Supporting Text.

Number of Representations: 6

Support:3

Object: 0

Observations:3

Support:

- **Records indicate coal mining features present at surface and shallow depth – pose potential risk to surface stability and public safety (Coal Authority).**
- Pleased policy acknowledges potential risks from ground instability and appropriate remediation measures should be identified (Coal Authority).
- Welcome notification in the Development High Risk Area a Coal Mining Risk Assessment will be required to support planning applications (Coal Authority)
- Supporting text should mention risk posed by background ionising radiation due to radon released from some FoD rock, and need to incorporate appropriate building features to prevent hazard.

Observations:

- Coal mining, iron mining and potential drift/shaft workings should be mentioned. Voids can be as much as 6 feet and seams can be frequent. These affect groundwater and abstractions. If mitigated, does the resultant salicaceous result drain in same way and are works expertly inspected and reported back on? (Coleford TC).
- Should include river restoration measures. Measures such as opening culverts realigning floodbanks or restoring a naturalistic planform or cross section of a watercourse and its riparian zone should be included in proposals or by exception does not preclude or prevent the future carrying out of plans or projects necessary to restore hydromorphological functioning in line with water framework directive and Habitats regulations requirement (EA).
- Should be improved to ensure developers meet the 6 points prior to planning approval and that capacity has been established and demonstrated with no adverse effects on utilities and services (West Dean PC).

Draft Officer Response

All comments of support and general observation are noted.

All suggestions for amendments to policy wording and supporting text will be taken into consideration and revised where appropriate.

Points raised with regards to groundwater and abstractions and river restoration measures are noted, and will be considered for potential to improve/strengthen the wording of the policy. Furthermore, these issues should also be taken into consideration during the assessment of future planning applications with the expert guidance of the Coal Authority, EA and drainage authorities where appropriate.

Chapter 7 Community and Travel

Number of Representations: 3

Support: 0

Object: 2

Observations: 1

Object:

- There is a very real void of entertainment and facilities in Hartpury.
- Sedbury would be a disaster. Lack of supermarkets in the area. Bus service is very poor and infrequent. Facilities for young children and teenagers is also poor.
- This proposed population growth without further investment is obscene.

Observations:

- Doctors are extremely stretched. No indication of how this would be dealt with.

Draft Officer Response

All comments of support and general observation are noted.

Noted that Hartpury has few facilities and entertainment within the village. This is taken into account when considering the number of houses/level of development which can be accommodated within the village, and is also reflected within the Sustainability Appraisal.

The comments regarding Sedbury (lack of supermarkets, infrequent bus service and lack of facilities for young people) are noted and these types of issues are taken into account when considering appropriate location for sustainable development.

With regards to buses, the Council engages regularly with GCC Highways and issues such as public transport hubs are discussed with and the remit of GCC Highways. It is recognised that better bus services are required and this continues to be an aspect for further work. Bus companies are consulted on the draft plan and their input is taken into account. Bus services are generally run by private companies. Furthermore, walking and cycling paths are encouraged through Policies LP.24 and LP.25.

In general, and where appropriate, infrastructure needs are identified and funded through Section 106 contributions identified through planning applications. Relevant bodies, such as GCC, NHS, Water Companies, etc, are consulted and have the opportunity to request the necessary funding. With regards to Doctor's surgeries, the NHS is consulted on the Local Plan and on individual planning applications and are able to request S106 contributions as and where appropriate. The Local Plan is able to allocate land for future services/facilities, which would allow and encourage doctor's surgeries to locate there should they wish to (taking into account that Doctor's surgeries are generally run as independent businesses and therefore work to their own business model).

Policy LP.23 Community Facilities and Supporting Text.

Number of Representations: 11

Support: 4

Object: 2

Observations: 5

Support:

- Support inclusion of open space as community facilities. Policy still allows for exceptions when it can be demonstrated that the facilities are no longer viable and cannot be made so. Wording of policy is reasonable. (NHS Trust).
- NHS Property Services supports provision of sufficient quality community facilities, but the proposed policy approach is not effective in current form. The NHS requires flexibility with regards to the use of its estate to deliver its core objective of enabling excellent patient care and support key healthcare strategies such as the NHS Long Term Plan. The disposal of sites and properties which are redundant or no longer suitable for healthcare for best value (open market value) is a critical component in helping to fund new or improved services within a local area. Where it can be demonstrated that health facilities are surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, it should be accepted that a facility is neither needed nor viable for its current use, and policies within the Local Plan should support the principle of alternative uses for NHS sites with no requirement for retention of a community facility use on the land. Proposed Modification to Draft Policy LP.23: "Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, there will be no requirement to retain any part of the site in an alternative community use." (NHS Property Services)
- Policy could be strengthened by identifying formal indoor and outdoor sport as opposed to recreation as a catch all. (Sport England).
- To improve effectiveness, urge the supporting text to make clear that viability tests must include efforts to test alternative operational models, e.g. community ownership. (Theatres Trust).

Object:

- Lack of community facilities in Tutshill, Sedbury area.

Observations:

- Loss of community facilities are vital to the identity and functioning of the community. Many small towns have suffered closures and knock-on issues.
- Recognise FE Colleges and University.
- Accessible community facilities and space can play a key role in supporting social connections. See Annual Public Health Report 2022-23. (GCC).
- Wouldn't support development that meant the removal of key recreational space, as contribute to recreational pressure (GWT).
- The Newent NP will be supported by an audit of community facilities (NTC).

Draft Officer Response

All comments of support and general observation are noted.

All suggestions for amendments to policy wording and supporting text will be taken into consideration and revised where appropriate.

NHS concerns about needing more flexibility to dispose of buildings for future funding are noted and will be considered in relation to whether the policy wording or supporting text could be amended to reflect this.

The concern regarding lack of community facilities in Tutshill/Sedbury and other settlements around the district are noted. Policy LP.23 seeks to resist further loss of community facilities whilst encouraging encourage new ones.

Reference to FE Colleges and University in policy/supporting text will be considered.

Policy LP.24 Active Travel and Supporting Text.

Number of Representations: 15

Support: 9

Object: 0

Observations: 6

Support:

- Benefits of integrating active travel routes with GI to provide improved health and wellbeing, increased environmental quality. Presents opportunities for nature connectivity. (GWT).
- National Highways supports policy as it links with both NPPF and DfT Circular 01/2022.. Active travel considered at the spatial planning stage may offer greater benefits. (National Highways).
- Effective implementation of policy would help tackle climate change. Many of the allocations in the LP have potential to incorporate active travel and green connected places. (Natural England).
- Under this policy developments should consider the impact and risk of routes over the railway particularly in relation to level crossings. Assessment of these routes should be included with a submitted transport assessment and mitigation proposed where necessary. (Network Rail).
- Agree in principle, but needs recognition of disabled persons special needs.

Object:

- Plan lacks definition on a travel policy for Sedbury and Tutshill.

Observations:

- Transport proposals are vague. New infrastructure is required. Public transport is inadequate. (Woolaston PC).
- Concern re. volume of traffic using Beachley Road/delays getting onto A48.
- Transport requires significant investment.
- Policies should clarify what additional weight be afforded to development which supports active travel or provides additional cycle routes or connectivity.
- Include 'wheeling' as per emerging Active Travel Strategy. Wheeling includes wheelchairs and other wheeled mobility aids. (Regeneration, FODDC).

- Gloucestershire's Pupil and Wellbeing Survey 2022, 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.(GCC).
- FODDC's Local Plan should look to set out purposeful policies based around sustainability that should contribute to improving the air we breathe. (GCC).

Draft Officer Response

All comments of support and general observation are noted.

Support for integrating active travel routes with GI are noted and the Local Plan seeks to promote this, an Ecological Assessment will be required for all applications which may result on the removal of vegetation and buildings for travel infrastructure projects to ensure that any adverse impacts on protected and notable species will be mitigated and compensated for and that GI can be included to create wildlife corridors.

Recognition of how to include special needs of disabled persons will be considered.

Concerns regarding lack of definition on travel policy are noted and will be reviewed as appropriate.

Concerns in relation to lack of infrastructure, traffic and inadequate public transport are noted. The Council engages regularly with GCC Highways and issues such as public transport hubs, highway networks, infrastructure, parking provision and traffic management measures are discussed with and the remit of GCC Highways. References to the emerging FoDDC led, district-wide Active Travel Strategy will be made where appropriate.

GCC Highways comment on allocations and on individual applications and request necessary highway works/mitigation and contributions. Walking and cycling paths are encouraged through Policies LP.24 and LP.25. It is recognised that better bus services are required and this continues to be an aspect for further work. Bus companies are consulted on the draft plan and their input is taken into account. Bus services are generally run by private companies.

All suggestions for amendments to policy wording and supporting text will be taken into consideration and revised where appropriate.

Policy LP.25 Cycle Routes and Supporting Text.

Number of Representations: 23

Support: 16

Object: 1

Observation: 6

Support:

- There is a good case for planning in a cycle route between the Severn and the Wye (visitor attraction). Adjacent/linked footpaths and PROWs need to be added. (Coleford TC).
- Welcomes opportunity for extension of the Wye Valley Greenway. DIO keen to engage with Council and GCC to enhance cycling links to and within Beachley peninsula. Local Plan and SI06

tools should also ensure other developments near route should also assist in delivery such linkages. (DIO).

- Support for expansion of Wye Valley Greenway and connection to Beachley (MCC).
- Support, particularly the 17km Newent to Gloucester Route (WCC).
- Herefordshire & Gloucestershire Can could support a traffic free route from Newent to Gloucester with towpath development for cyclists and walkers (H&G Canal Trust).
- Additional cycle route ought to be included to link Coleford to a number of important places (e.g. Perrygrove Railway Adventure, Puzzlewood, Clearwell caves and Ellwood).
- Support safeguarding of land for the proposed cycle route from Newent to Gloucester. Important the LP takes into account the recommendations of the LCWIP for Newent. Further routes and a network approach is recommended for Newent, e.g using disused railway line from Dymock to Newent as cycle/walking route. (Newent TC).
- More charging points along cycle routes (electric bikes) (Sport England).
- Link of Greenway to Beachley is positive for leisure, but will make no difference to traffic congestion.
- Support but needs recognition of special needs of disabled persons.
- Forestry England supports and agrees for cycle trail to cross its land holding (Forestry England).
- Change text – 7.11, 3rd line, add semicolon – ‘...;green infrastructure; however were not.’
- Change text – 7.12 in the last full line, add semicolon to read ‘;green infrastructure; however were not.’
- Change text – 7.14 in the lozenge, alter the 2nd line text to ‘;...support for this, further more specific....’

Object:

- How would you increase the cycle route which starts in Sedbury Lane. Sedbury Lane has inadequate lighting to support expansion of the route usage in Winter. The tunnel (which is major part of route) is closed for months whilst bats are in hibernation. The lane is inadequately maintained and floods badly in winter.

Observations:

- Cycle routes are not adequate for commuter transport – it is not realistic.(Woolaston PC).
- Cycle routes present an opportunity for tree planting (shade, habitat, biodiversity and aesthetically pleasing) (Forestry Commission)
- Could further encourage cycling with secure cycle parking, battery recharging points, toilets, rain shelters, refreshment outlets, minor repair facilities. Need to provide suitable ‘human’ infrastructure, not just bare transport service. (EA)
- Provides opportunity for high quality placemaking. NE are committed to involving community in their work and are keen to see this principle adopted as part of the design statement formulation process. (NE)

- GCC's Countrywide Cycling Infrastructure Plan (CCIP) and Local Cycling and Walking Infrastructure Plans (LCWIPs) will be the key documents to inform cycle corridors, as well as the FoDDC Active Travel Strategy. (GCC)
- Wye Valley Greenway extension should be subject to sufficient and suitable free parking at additional access points. Also provision of extra dog waste bins (the greenway is littered with dog waste).

Draft Officer Response

All comments of support and general observation are noted.

Footpaths and PROW connections will be taken into account when considering future cycle route links, and these already show on existing maps.

All suggestions for amendments to policy wording and supporting text will be taken into consideration and revised where appropriate.

Any proposed additional cycle route links will be considered.

More charging points, cycle parking, litter/dog waste bins, shelters, etc. along cycle routes for bikes may be provided through developer contributions (S106) as requested by GCC Highways on any future planning application which includes the provision of the cycle route, or alternatively through the district/town/parish councils wishing to provide these facilities. Equally, car parking to gain access onto the cycle ways will form part of the consideration of a future planning application for such. However, it is also noted that land may need to be allocated for this purpose. The policy will be reviewed to consider whether additional facilities could be promoted/encouraged through stronger wording.

Concerns highlighting that the link of Greenway to Beachley will make no difference to traffic congestion is noted, however, active travel routes such as cycle ways provide an alternative if it is appropriate for the individual. Noted that they may be used frequently for leisure.

Recognition of how to include special needs of disabled persons will also be considered.

Concerns regarding cycle lane from Sedbury Lane (lighting, tunnel closure, flooding, etc.) are noted. Any extension to this cycle track would need to take these issues into account. Recognised that the use of the full route is not viable during the winter when the tunnel section of the route is closed.

Support for additional tree planting is noted and would be considered during any future planning application.

References to the emerging FoDDC led, district-wide Active Travel Strategy will be made where appropriate.

Policy LP.26 Town Centres and Supporting Text.

Number of Representations: 10

Support: 5

Object: 0

Observations: 5

Support:

- This is a vital policy to conserve and enhance service provision in small market towns. Developments outside of town centres have detrimental impact on town centres. Local residents identity with local shopkeepers, local familial independent shops make a refreshing difference from chain stores. (CTC).
- Change to text to make policy stronger (could be added to strategical allocations policies for town centres) - 'Environmental improvements will be supported in town centres especially those which improve pedestrian circulation and access and those that provide additional greenspace and/or green infrastructure' (GWT).
- Change text – 'A proposal for a main town centre use, as defined in the 'Glossary', will be supported where it is appropriately located in accordance with the sequential approach as set out in the National Planning Policy Framework.' The explanatory text should outline benefits of a range of main town centre uses.
- WDPC would like retention of ground floor shops within he towns and villages (WDPC).
- Protects town centre ground floor frontages (NTC).

Observations:

- Refer to emerging Market Towns Regeneration Framework?
- LP to support reduction of vacant units, retain active frontages, seek sensitive refurbishment of open space, LBs and heritage.
- Policies should include innovative and well-designed water management - retrofitted SuDs. Eg. use of roof run off. Current project (partnered with EA) to promote rain gardens in response to surface water flooding in town and water quantity/quality in the watercourses. This should be a requirement in development proposals. (EA).
- Opportunities for heritage assets to enable economic regeneration in a sustainable manner. (CTC).

Draft Officer Response

All comments of support and general observation are noted.

All suggestions for amendments to policy wording and supporting text will be taken into consideration and revised where appropriate.

The policy wording/supporting text can be amended to reflect the Market Towns Regeneration Framework.

Comments regarding SUDs are noted. Other policies in the Local Plan, such as LP.21 deal with water management. Any future planning application would be assessed with the expert advice of drainage officers and SUDs would be expected in accordance with LP.21.

Good point raised that heritage assets can enable economic regeneration. The policy wording/ supporting text will be reviewed to strengthen reflection of heritage within town centres.

Any proposed cycle paths which may require the removal of vegetation or buildings will be subject to an Ecological Impact Assessment to ensure that any adverse impacts to notable and protected species and habitats can be mitigated and compensated for. The implementation of green infrastructure will be supported to create wildlife corridors into the wider area and all applications must consider the LNRS and the linking of NRNs (when published).

Chapter 8 Delivering the Strategy and Supporting Text.

Number of Representations: 31

Support: 0

Object: 13

Observations: 18

Object:

- Draft plan needs additional work – current housing targets under LP.29 are 80% lower than proposed changes to Standard Method. Will need additional allocation sites. Require radical replan.
- Propose land to west side of Church Road, Longhope.
- Authority should be planning for more development.
- In principle this strategy is supported as there is a greater focus on those settlements that have the capacity to accommodate future development in a sustainable manner, but with one exception the proposed development at MOD land at Beachley.
- An objection is made to the housing requirement which does no more than reflect the standard method that is the minimum housing need, which does not generate a housing requirement. It simply rolls forward the figure from the adopted Core Strategy and does not reflect any aspirations for growth to significantly boost the housing supply in accordance with paragraph 60 of the NPPF (December 2023).
- No justification for the assumptions on small sites and large windfalls.
- Whilst the figure of 40 dwellings per annum may seem conservative given past delivery, nevertheless contributions from small sites are in the Council's words "quite variable" and furthermore cannot be relied upon on a regular basis.
- The figures in the Reg 18 Plan differ from those in the Housing Delivery Note.
- For large windfall sites the Plan assumes 16, 32 then 40 pa starting 2027/2028, again there is little evidence or justification for these assumptions and what years the various figures relate to.
- In the table: New allocations in the plan total 2,347 dwellings, but in the Table below paragraph 8.14 new allocations total 2,229 dwellings.
- Old plan sites and permissions carried over allocation and current sites in the Plan total 2066 whereas in the Delivery Note the total is 2075.
- Total completions for 2021/22 to 2023/24 in the Plan is 1,404 dwellings whereas the Delivery Note has a figure of 1,440 dwellings.
- Small sites contribution in the Plan - 680 dwellings whereas in the Delivery Note 640.
- Large windfall in the Plan 528 dwellings - this figure is the same in the Delivery Note.
- Total dwellings in the Plan is 7,025 whereas the Delivery Note the total number of dwellings 7,030.
- The Plan lacks the evidence to justify the figures set out in the table below paragraph 8.3.
- If there is potential for 7,025 dwellings, then this shows that there is capacity to exceed the housing need figure of 6,600 dwellings.
- Key criticism of the proposed housing delivery strategy is that it is heavily reliant upon a small number of sites.
- Whilst the Council is right to pursue a mix of strategic and non-strategic allocations, delivery of the former - particularly large strategic sites - can often be more complex in terms of both obtaining planning permission(s) and build-out owing to considerations such as infrastructure delivery, complex legal agreements or multi-party commercial arrangements.

- It is critically important that the smaller strategic and non-strategic sites - which are often able to deliver early in the plan period - are supported to do so. Land at The Firs (W.O.S) is one such important site which is available now, with preparations for a planning permission being pursued by a housebuilder.
- In an authority like the Forest of Dean which is inherently rural, we consider that there is considerable opportunity to direct more housing towards the larger villages or villages close to higher order settlements where there is still access to transport and/or services and where increased housing numbers are likely to support the viability of community facilities e.g. a village shop. Littledean is one such village. As such, in order to facilitate the delivery of housing at Land north of Oak Way, it would be necessary to amend the settlement boundary and secure its allocation.

Observations:

- Inconsistent in plan as to whether Beachley site is major or not.
- Changes by Gvt to housing numbers (rising from 330pa to 597 pa).
- To meet Gvt increase in housing targets - maximise density on draft allocations and additional allocations should be explored.
- Essential resources in Forest are designated areas, Statutory Forest, 2 AONBs, SACs, SSSIs, etc – must be protected.
- Where is there more available land for development?
- Land banking is an issue -what will Gvt put in place to release those sites?
- Development first on brownfield sites is not new – it will not make any difference where there is no grey belt land available (like in the Forest)
- There is a need for housing which will also boost economy – but must happen in right place in right way with improved infrastructure.
- Strategy will need to be reviewed.
- Constraints around Coleford still apply (only town with made NDP).
- Noted that 10% (680) of 7025 houses are allocated to small sites. Acknowledge need for some growth in villages, but they are unsustainable in terms of location (need for car and limited employment). Figure of housing in small villages is too high to meet sustainability ambition of plan – open to challenge. Advocate a larger target allocation in the principle settlements or removal of 15% uplift. (CPRE).
- Agree that there are no exceptional circumstances which justify an alternative approach to assessing housing need.
- Unclear how the windfall allowance has been calculated, in the absence of a proportionate evidence base. Reliance on such a contribution is unreliable and would be unsound.
- The inclusion of a large number of completions over the previous 3 years (amounting to 468 dpa) to align with the retrospective years in the plan period (from 2021) is not appropriate and will challenge the ability to identify sufficient supply over a five and then eleven to fifteen year period, as set out at NPPF 69. Such an assessment should be conducted from the adoption of the Local Plan.
- The Local Plan is unlikely to be in a position for adoption until at least 2026, based on the current 'Local Development Scheme' timeframes, irrespective of national policy amendments likely in the meantime.

- Even when assessed against the current Standard Methodology, the draft Local Plan does not include sufficient housing to be able to maintain a supply over the Plan Period and further allocations should be included.
- The key spatial principles of the plan are disjointed and do not read coherently or intuitively.
- Plainly evident from previous local plans that such a spatial strategy is incapable of delivering the necessary housing delivery trajectory to maintain a 5 year housing land supply, and thus the spatial strategy as proposed raises very grave soundness issues.
- Deeply concerned about the capacity of existing settlements to continue to sustainably meet housing needs over the plan period and beyond.
- Alarming that the Draft Plan appears blind to the evidence that plainly points to the need for a spatial strategy that delivers a step change by positively planning for at least one new settlement, to help deliver the long term growth requirement for both economic/employment development and housing.
- Revisit designation of new settlement
- Only a strategically located new settlement/s, which can be designed from the outset to deliver a balanced community in respect of land uses thus promoting more sustainable living patterns, can fulfil such longer term needs (including being capable of spanning successive local plan periods to main plan led development).
- The SA summarises the findings of previous SA iterations of the Local Plan, and a consistent pattern emerges in favour of a new settlement option.
- Paragraph 5.18 of the SA summarises the conclusions of the 2022 Second Preferred Option SA. It states that "the main difference [from the 2020 Preferred Option] is that the New Settlement(s) has been excluded from the proposed strategy at this stage". However, no evidence is presented to support this very significant change in approach.
- The rejection of a new settlement option in principle was spurious, was not based upon evidence and seriously undermines the soundness of the plan-making process. This is clearly evidenced by the 2022 SA for Potential Large Development Sites¹ which finds that a new settlement option performs most strongly in relation to the SA objectives, and yet fails to feed this into the wider SA of the plan as a whole.
- There is no evidence-based explanation in the current iteration of the SA as to why a new settlement option is not tested as a reasonable alternative to the draft plan. Even more seriously, the SA of the draft plan fails to undertake any relative merits assessment of the draft plan and reasonable alternatives to it - this is in direct conflict with Regulation 12(2)(b) of the SEA Regulations² and goes to the heart of soundness. In the absence of an assessment of the draft plan and reasonable alternatives to it, the draft plan cannot be found to be legally compliant and will fail the test of soundness. The Council must address this as a matter of urgency, either by publishing a full assessment of reasonable alternatives as soon as possible, or by pausing preparation of the plan to enable such an assessment to be completed.
- Settlement Key Note underscores the limitations of existing settlements to continue to meet housing needs, and reinforces the messaging from the earlier iterations of the SA that constrained capacity of the larger settlements directs toward a need for step change in housing delivery via a new settlement.
- The previous iteration of the plan only ever considered a single location (in the vicinity of where the A40 and A48 meet (Churcham)), without any proper consideration or testing of alternative

locations for a new settlement. This glaring omission to test alternatives undermines the Council's whole approach to the spatial strategy, thus underscoring that the preparation of the Draft Plan is unsound.

- The preferred strategy is heavily reliant on Beachley Camp barracks being released for development by the MOD/DIO. This is significant risk in terms of deliverability (disposal of the site has already slipped to 2029 and risk the timetable slips further, or that the MOD pauses or even reverses its decision to vacate the site).
- If Beachley isn't available, it is unlikely that the preferred option would yield 600 dwellings elsewhere in the plan area given the pressure on supply at the main settlements - considerable threat to the soundness of the strategy and the plan as a whole.
- Given the uncertainties over the availability of MOD Beachley it is considered that this site should not feature as a site allocation at this time. Given the expectation for plans to be reviewed every 5 years, this site should instead be deferred until the review of the plan when the availability and deliverability of the site may be more clear.
- Local Plan reallocates several sites which have failed to come forward for development since being first allocated in the adopted Core Strategy in 2012 or the adopted Allocations Plan in 2018 - long term allocations which consistently fail to come forward for development or attract market interest cannot be assumed to be a source of supply indefinitely into the future.
- It is considered that the Council needs to present clear deliverability evidence should it wish to carry over these allocations.
- A new settlement would enable delivery of a balanced community, whereby jobs/employment is delivered alongside homes and supporting community infrastructure, thus promoting much more sustainable living patterns. Importantly, a new settlement/s would also enable long term masterplanning, ensure a robust supply of housing over the plan period, and capability to span seamlessly into a future plan review, thus maintaining local plan-led decision making on development in the District.
- Would support the Council wholeheartedly if it now chooses, in light of the proposed changes to the standard method, to pause plan preparation.
- We are committed to the promotion of Glynchbrook as a highly sustainable and deliverable new settlement in Forest of Dean District. (Black Box, 313).
- Freeman Homes' additional land at Newnham would be an obvious candidate site where growth has already been allocated to help meet additional housing needs, whilst land at Loop Road (Beachley) and Warfield Farm (Ruardean) present new sites that should be considered for allocation.
- Suggested that the Council will need to start the process again and take a revised preferred strategy back to Council for approval and then carry out another Regulation 18 consultation on a draft plan that has been prepared under the new NPPF (when published) and can fully meet the increased housing need for the District.
- Draft plan includes a combined windfall contribution of 1,208 dwellings from small sites and large windfall. It is unclear whether this is realistic and achievable.
- It is noted that all 170 additional units proposed at Lydney through modifying existing allocations fall on sites controlled by Vantage Ventures, i.e. land at Augustus Way/Court Road and, separately, land at Holms Farm. Holms farm has capacity to work much harder in its contributions.

- Land at the JD Norman Foundry has capacity to make a much needed contribution to meeting housing needs in Lydney and the district more widely.
- Land at the Scovill site has capacity to make a greater contribution to meeting housing needs in the district, though it is recognised that the proposed 66-dwelling allocation reflects the live planning application.
- As a sustainably located site in a Tier 2 settlement, the site at Lydney Road, Yorkley should be considered for allocation through the submission draft of the plan.
- Pleased to see that the Council has accommodated a degree of contingency in its plan; with projected potential housing delivery of 7,025 dwellings against its stated need of 6,600 dwellings. However, there is a distinct lack of clarity about how any contingency has been arrived at, and how it should be delivered.
- The Council is required to plan for all of its identified need within the plan period from the outset, regardless of whether that involves projects which span a longer delivery period or whether any subsequent Local Plan Review amends the relevant housing need and/or trajectory.
- Being located at the District's largest service centre, the Land West of Lydney is suitably located to contribute towards this identified housing need.
- We note the DLP does not have a housing shortfall and there is no need for additional homes to be delivered elsewhere. We support the preferred approach that will ensure that the identified housing needs can be met without requiring further development opportunities in neighbouring local authority areas. (Worcestershire CC)
- Where are the details of the additional services and amenities that will be implemented to support the increase in residents?
- In the core Forest of Dean area we now only have 2 leisure centres, when we used to have 3. Five Acres site not coming forward owing to costs.
- Earlier in the year the SLP underwent a Regulation 18 consultation which looked at spatial options. We are currently processing all the responses received and will issue response reports in due course. No decision has been taken at this time on a preferred option for the SLP. We note from your response that FoDDC and the FoDDC LP do not support the inclusion of a new strategic settlement across our joint boundary. However, if given the increased figures, this position is to be reconsidered, the SLP authorities would be willing to explore cross boundary options further through our Duty to Cooperate process.
- Beachley as a 'major' site for development without prior guaranteed commitment to infrastructure improvements is bonkers. Active travel ideas are lovely but wholly impractical for many residents.
- Access to and from the A48 from Beachley and Sedbury is via one road, already plagued by heavy congestion and grid locked.

Draft Officer Response

A strategy focused on dispersal of development around the existing and established settlements was agreed by Council in October 2023 to deliver 330 new dwellings per annum for the duration of the Local Plan period (2021– 2041). The Plan represents the FODDC's considerations at the time of preparation early 2024. The majority of the representations in this section mention the changes to the NPPF (December 2024) and the new standard methodology for housing requirements. It is acknowledged that these command a significant uplift in the housing requirement to 600 new dwellings per annum at present. In consideration of these changes the Council will now have to consider whether the agreed strategy will be capable of delivering the new increased number (amounting to an increase

of approximately 82% on top of the delivery currently planned for) and a decision made regarding the need to review the strategy and all potential options for delivery. The recent reforms to the NPPF in December 2024 will be taken into account, any subsequent changes to the agreed strategy and potential options will be subject to further consultation.

Comments regarding the layout of the plan will be taken into account.

It is acknowledged that nationally and local designated areas should be protected.

Objections to specific policy are considered under the relevant policy section.

Policy LP.27 Strategic Sites: Strategic Location of New Development and Supporting Text.

Number of Representations: 42

Support: 9

Object: 11

Observation:22

Support:

- NE welcome the emphasis in section 8.6 which states sustainability will remain a focus despite it not being as sustainable as the New Settlement option, while providing 1160 homes to Lydney. (Natural England).
- NE are aware that Lydney, Newent, and Sedbury and Tutshill are in the core sustenance zones of hibernation roosts for greater horseshoe bats. (Natural England).
- NE are aware that Beachley Barracks is in close proximity to the Severn Estuary SAC/SPA/ RAMSAR. (Natural England).
- The strategic sites should be developed in a way that ensures their protection; this would be in accordance with LP.8. (Natural England).
- It is absolutely critical that measures are put in place / conditioned with any new permissions to effectively mitigate against flooding downstream towards Newland and Redbrook from increased sewage and surface water run-off. River Wye is already highly polluted. (Newland Parish Council).
- Need to ensure that the occupiers of new residential, will generate demand for sporting provision. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. (Sport England).
- New developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site (informed by a robust evidence base). (Sport England).
- Strategic Land Estates have been actively promoting a mixed-use development at Newent and is fully supportive of the proposed allocation for a primarily residential, but mixed used development for about 600 dwellings, associated employment generating uses, infrastructure and greenspace, adjoining the southeast of the town to be developed in step with supporting infrastructure including transport. Strategic Land Estates have additional land under their control, which if required to meet the housing requirements of the proposed Standard Method could provide approximately 825 dwellings. This combined with the neighbouring land being promoted by Hitchens could provide 1,200 dwellings on Land to the South East of Newent.

- Needs to be spelt out in the accompanying text that the development proposed will only be possible subject to appropriate infrastructure provision.
- We note and wholly support the Council's decision not to allocate the land at Glynchbrook for a mixed-use strategic site. This would result in a significant encroachment into the open countryside in an entirely unsustainable location remote from existing public transport facilities and other existing infrastructure and services. There are also significant drainage and flooding issues and a strategic allocation in this area would have an adverse impact on the setting of nearby heritage assets.
- Need a concrete guarantee for transport enhancement in Beachley.

Beachley Barracks:

- The DIO continues to support the allocation of Beachley Barracks within the Local Plan for mixed use development. (DIO)
- DIO has concerns with elements of the identified requirements (including quantum of housing and employment) for the site (DIO).
- DIO's concerns re. wording of policy - at present is prescriptive and detailed in relation to the Beachley Barracks site in comparison to the other identified strategic sites within the same policy wording. Suggest that a simple paragraph summarising that the site offers a significant mixed-use redevelopment opportunity, rather than relying on detailed criteria and supporting text, which would be at odds with the other identified strategic sites (could then cross reference to LP.78). Suggested changes to the policy LP.27 wording (as below): "Beachley Barracks offers a significant mixed-use redevelopment opportunity on one of the largest available brownfield sites in the district which could accommodate up to 800 dwellings and supporting mixed commercial uses, infrastructure and greenspace in line with Policy LP. 78." (DIO).
- The project team working on Beachley Barracks are already working on the movement strategy for the site and have entered into the pre application process with Gloucestershire Highways with regards to off site infrastructure matters. Recommend that once this has concluded, the findings of the process can be incorporated within future Plan policy drafting.
- Question the terminology of the site description being "A new mixed use development centred on MOD land at Beachley to accommodate".. (our emphasis). This is potentially misleading on the basis that it may imply land beyond the MOD boundary. Therefore, we would recommend that both points could be referenced within the site title which could read "Redevelopment of Beachley Barracks".(DIO).

Object:

- The timing of publication of the Regulation 18 Local Plan the consultation period coincided with the draft NPPF & the proposed changes to the standard methodology to the assessment of local housing need which forms the basis of strategic policies:
- "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance." (NPPF paragraph 61 / consultation draft paragraph 62)
- The proposed changes to the standard methodology result in an 80% increase in the local housing need figure for Forest of Dean, such that its housing requirement over the 20-year Local Plan period will increase from 6,600 to 11,940 homes.

- Under the transitional arrangements that are set out in the draft NPPF, any local plan that has reached Regulation 18 stage will need to be reworked in order to progress under the new NPPF.
- The magnitude of the changes are such that the draft plan should be completely revised in order to take account of the new approach. The Regulation 18 consultation should be repeated.
- The LP has identified an annual housing requirement of 330 dwellings per annum ('dpa') (Policy LP. 29). This figure reflects the current standard methodology.
- The plan includes a number of allocations including major strategic allocations for mixed use development at sustainable locations, sites identified for development at a number of large settlements, together with "a more proportionate" level of development in smaller settlements. All are broadly in accordance with the settlement hierarchy which is set out in Policy LP. 4.
- The plan also carries forward a number of sites that have been identified for development in the previous local plan. Paragraph 8.3 proposed new allocations. There is an allowance for the contribution of small sites (under five net capacity) and for unidentified sites that are larger but not allocated"
- Paragraph 8.3 of the draft Local Plan. The total expected delivery over the plan period - 7,025 dwellings - is 6.5% above the identified need (based on the current standard methodology) of 6,600 dwellings. We welcome the inclusion of a flexibility margin. Is an important planning tool that will ensure that the housing requirement can be met in the event that some sites do not come forward at the expected rate. This approach is widely used elsewhere in England. Would question whether 6.5% represents a sufficient margin to take account of uncertainties regarding the future delivery of sites in the FOD. Consider that a 10% margin would be more appropriate.
- No evidence has been provided in respect of the basis for the small site & large windfall sources of supply so the proposed level of supply from this source cannot be verified.
- Much greater concern the housing strategy has now been rendered very substantially inadequate as a result of the proposed changes to the standard methodology.
- The Government has set out specific changes to the NPPF to make following consultation, including a number of pro-supply measures to ensure that a pipeline of deliverable sites is maintained at all times. Specifically, to Implement a new standard method and calculation to ensure local plans are ambitious enough to support its manifesto commitment of 1.5 million new homes. Making the standard method for assessing housing needs mandatory, requiring local authorities to plan for the resulting housing need figure.
- Paragraphs 226 to 233 of the draft NPPF, any plan that has reached Regulation 18 stage will progress under the provisions of the new NPPF including the revised standard methodology.
- It is not known whether the proposed changes to the standard methodology will be implemented in their current form, the new Government is keen to revise & update the current approach to the standard methodology.
- The implication of these factors is that the standard methodology figure will rise in a very large number of authorities, including the Forest of Dean.
- Draft Forest of Dean Regulation 18 Plan in light of the Government's recent reforms of the planning system, namely the revised NPPF (July 2024).
- It has adopted a necessarily high-level approach given the magnitude of the changes that are required to the draft Forest of Dean Local Plan to take account of the proposed changes to the standard methodology.
- There are extensive concerns with the draft Plan as it currently stands.

- The introduction of a revised standard method will see an 80% increase in the housing need figure for Forest of Dean District Council, resulting in a requirement of 11,940 dwellings over the 20-year plan period.
- The Regulation 18 Plan does not reflect the revised standard methodology figure and will fail to deliver the required quantum of housing.
- It could not be found sound in its current form and the only way to address the challenge would be to fundamentally review the proposed strategy and repeat the Regulation 18 consultation.
- Welcome the opportunity to comment on the Draft Forest of Dean Regulation 18 Plan.
- Key criticism of the proposed housing delivery strategy is that it is heavily reliant upon a small number of sites.
- The Council is right to pursue a mix of strategic and non-strategic allocations, delivery of the former - particularly large strategic sites - can often be more complex in terms of both obtaining planning permission(s) and build-out owing to considerations such as infrastructure delivery, complex legal agreements or multi-party commercial arrangements.
- Beachley Camp specifically is encumbered by the fact that it remains in use by the MoD until 2029 which may well delay even initial pre-application discussions until such time, assuming that the land does indeed become available at that time as anticipated.
- Remove Beachley section as a strategic site and allocation.
- It is critically important that the smaller strategic and non-strategic sites - which are often able to deliver early in the plan period - are supported to do so. Land at The Firs is one such important site which is available now, with preparations for a planning permission being pursued by a housebuilder.
- The policy text includes reference to allocations elsewhere in the plan area amounting to around 1,070 dwellings, although we note that none of these 1,070 dwellings will come forward at strategic sites, so it is incongruous to include in the strategic sites policy. In our view this section should be moved to Policy LP.28 or LP.29.
- There are flaws in the SA scoring and selection process as well as the sustainability and deliverability of specific draft allocations.
- Taking into account that the Council is only planning for a 6% surplus in housing provision; the government's commitment to reinstate mandatory housing targets and a potential uplift in the housing need figure through the revised standard methodology it is recommended that FODDC will need to find additional sites for housing and the Site is available to meet this need.
- Suggest Policy LP.27 includes reference towards a sustainable extension to the west of Lydney.
- In light of the relevant constraints and the lack of certainty whether it will come forward, the Beachley Barracks allocation fails the tests of soundness. This allocation should be removed from the policy unless evidence comes forward to prove that it is available and deliverable at the scale identified.

“Policy LP. 27 Strategic Sites

- Major strategic sites are identified in order to meet the needs of the district while making a sustainable contribution to the area's economy, community and environment. They are proposed where transport linkages can be created, enhanced or used which promote the use of public transport, reduce the need to travel overall and allow and encourage cycling and walking. In all cases the form of the development will be expected to include greenspace as an integral part. The locations identified are as below:

Mixed development at Lydney

Land for housing to accommodate about 1,610 dwellings between 2023/24 and 2041, associated open space, employment, services, and associated greenspace is allocated at Lydney, to the east and west of the town. This will include the development of Land to the West of Lydney (up to 450 homes); areas previously allocated and/ or under construction and development is likely to occur throughout the plan period.

Mixed development at Newent

- Land for mixed uses to accommodate about 600 dwellings, associated employment generating uses, infrastructure and greenspace, adjoining the southeast of the town to be developed in step with supporting infrastructure including transport.
- Mixed development at Coleford Land for about 450 new dwellings and supporting development including employment will be allocated. This includes providing for about 400 dwellings on existing sites with the remainder on newly identified land. Additional policies in respect of the above are contained in the relevant settlement chapters of the LP.

Mixed development at Cinderford

- Land for about 400 dwellings, including sites presently allocated and with permission, xha employment and mixed uses will be identified at Cinderford in support of the town's continued regeneration

Elsewhere in the plan area

- Land will be allocated elsewhere in the LP area to provide about 1070 dwellings and mixed development principally at the major villages including Tutshill, Mitcheldean Newnham, Whitecroft, Lydbrook and Drybrook which together will account for about 800 or 75% of the "village" allocations.”
- Accessibility to sub-regional locations via rail is significantly constrained. To access their nearest railway station, local residents would have to travel to Lydney, Gloucester, Chepstow or Hereford.
- Proposed site to the West of Lydney is located approximately 2.1km from Lydney Railway Station, comprising a 26 minute walk or a nine-minute cycle.
- Object to the inclusion of the MOD land at Beachley Barracks, this is the only major site to be brought forward in the later part of the plan period and is located in an unsustainable location. The disposal of the site is entirely out of the Council's control, yet it is relying on the site to come forward to deliver a significant part of the housing requirement the plan period. The Plan fails to

address the long term strategy for the district and the inclusion of land at Beachley Barracks to come forward in the latter part of the plan period is a high risk strategy

- A new settlement in a highly sustainable location would complement the strategy which focuses on the Forest towns.
- The overreliance upon a relatively small area of the FoDDC (cantered around Lydney and Beachley) to deliver housing growth will not deliver wider economic benefits so badly needed with the district.
- Housing at Lydney and Beachley will tend to deliver housing serving the southern forest providing housing for people dispersed from Bristol and surrounding areas. The proposed new allocations will not deliver economic benefits to towns within the FoDDC such as Cinderford or Coleford.
- Land at Sneyd Wood Road Cinderford - The site as a whole comprises a site with excellent pedestrian vehicular access, sustainably located and suitable for a wide range of uses (mix of). It is the landowners' intent to work with the local community, developing the site to meet local needs and aspirations, using local labour and locally sourced materials.
- Need an active traffic report for the proposed development at Beachley – development will cause more commuting.
- Houses onto the Tutshill side of the area pulling straight out onto the A48, (50 MPH limit) is flawed as is additional housing on the site by Wyedean. Highway concerns - Volume of traffic, poor lighting , no mains drains and hedges too high during certain times of the year.
- Traffic implications at High Beech roundabout and through Chepstow
- Suggested sites that are well related to the existing built development have good access to the highway network and would provide a sustainable location (in whole or in part) for new development:

1. Land adjacent Forest of Dean Golf Club Coleford (see below)

2. Land at Angel Field and Newland Street

3. Maze Walk Berry Hill Coleford

- The allocation of only 50 new dwellings in Coleford (over and above existing allocations) is inadequate to sustain sufficient growth to maintain the economic prosperity of the Town.
- Plan lacks details on protecting SSI in Beachley area.
- Lacks definition on what employment is expected in Beachley with the poor Transport routes.
- Delete paragraph as it repeats/contradicts other policy wording and supporting text covering Beachley Barracks. The paragraph also references "Chapter Beachley Barracks of the LP..." which we assume this paragraph is a drafting error. (DIO).
- The paragraph also introduces elements not tested or evidenced including reference to employment generating uses on the site which may include "facilities servicing a wider community, as well as the more traditional manufacturing and service activities". DIO acknowledges that the site may support employment opportunities within community and service activities, the proposals will not include traditional manufacturing space. (DIO).
- This is not a suitable location given potential HGV movements, site specific environmental constraints, and such uses simply not being compatible as part of a residential-led development. The Council has not produced any evidence to suggest why such uses should be located here, the DIO Project team previously provided evidence to the emerging Local Plan on this matter and is

currently undertaking an employment market assessment report which will update and enhance that evidence based on potential employment uses that may be included within the masterplan proposals (that we will share in due course). Initial market analysis suggests that the site is unlikely to support a business park use / substantial employment development and any such offer is likely to be ancillary to the proposed residential development. (DIO).

Newent (mixed development):

- This is grade one agricultural land, a rare national asset, and development would cause permanent loss.
- Will increase flooding of the B4215 at Malswick Mill.
- The B4215 is a busy, vitally important transport route to Gloucester and beyond.
- This policy contradicts your statement in paragraph 2.14 about areas at risk of flooding being unsuitable.
- Development of this scale at this location will increase the daily traffic flow to and from Gloucester.
- Must promote allocations that offer transport choices including public transport and policies that reduce the need to travel (including by the encouragement of better digital connectivity).

Observation:

- The balance between development with improved infrastructure and the maintenance/enhancement of service provision is recognised (Coleford TC).
- The relative priority given to Lydney in terms of greater numbers is noted, and understandable, given the position of the town and lesser constraints, however development in Coleford will continue and will support its growing status as the Forest event and tourist centre (the seasonal festivals are very popular). (Coleford TC).
- In light of various major events, and the threats from Climate Change, what processes have you followed to ensure the selected growth locations are as broadly "resilient" as possible, not just to flood risks but any other potential hazards? E.g. communities that can cope more effectively with temporary isolation and no access to key services for a minimum period? Are there any metrics that can help assess this? Which specific Communities are relatively more or less exposed to these various hazards and can any development areas be designed and adapted to increase resilience? Eg. include more community shelters where people can escape extreme heat and cold. (EA)
- The plan could be more responsive to short- and medium-term demand to allow for new employment growth. (GCC).
- Whilst there is a focus on Lydney, it is important to have the choice of employment sites and opportunities for local settlements/market towns - Newent, Coleford, Mitcheldean and Tutshill, to provide job opportunities for local residents and younger people to encourage them to stay in the area/county. (GCC,)
- Market Towns - the recent marketing/communications work completed can help the planners to provide the policy context framework about the future role and identity of the four key market towns as places for the future with the opportunities they could create. (GCC).
- In terms of the Gloucestershire Economic Needs Assessment 2020 and other evidence referenced in the plan it would be useful to demonstrate/identify how those existing employment land

allocations can be started and what work needs to be done to remove any barriers to allow this to come forward. (GCC).

- HBF supports higher housing numbers for a variety of reasons including addressing the current housing crisis, meeting housing need, providing affordable housing and supporting employment growth. (Home Builders Federation).
- HBF note the proposed revision to the standard method in the current consultation. It is HBF's understanding that the standard method will still be a minimum housing numbers and Council's with ambitions for growth could plan for additional housing. (Home Builders Federation).
- Important to demonstrate the housing land supply in plan, from all sources, is deliverable. (Home Builders Federation).
- The NPPF requires Local Plans to identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare, unless there are strong reasons why this cannot be achieved. HBF would advocate that a higher percentage of small sites are allocated if possible (Home Builders Federation)
- Up until the 1980s, small developers accounted for the construction of half of all homes built in this country resulting in greater variety of product, more competition, and faster build-out rates. Since then, the number of small companies has fallen by 80%. (Home Builders Federation).
- SMEs also deliver on other types of non-strategic sites (for example up to 100 units). (Home Builders Federation).
- The policy text also includes reference to allocations elsewhere in the plan area amounting to around 1,070 dwellings, although we note that none of these 1,070 dwellings will come forward at strategic sites so it is incongruous to include in the strategic sites policy. In our view this section should be moved to Policy LP.28.
- The impact of new housing on our sewerage and water networks will be dependent on the spatial distribution of this proposed growth, and the impact of development on our Wastewater Treatment Works (WwTW) will be dependent on the amount of growth within their catchment areas. Where the total growth identified exceeds the theoretical design capacity of our WwTWs then improvements to provide further capacity will be required during the Local Plan period. (Welsh Water).
- Some development sites will require hydraulic modelling assessments (HMAs) of the clean water and/or sewerage networks to be undertaken to understand whether any reinforcement work will be required to our infrastructure, and to identify potential connection points. We have provided comments in appendix I of this representation on the proposed allocated sites located within our operational area. (Welsh Water).
- The scale and location of the mixed-use site in Newent is unlikely to impact on the safe and efficient operation of WCC roads. However, it is challenging for WCC to determine any likely transport implications on Worcestershire's highway network in the absence of a transport assessment and proposed transport strategy/mitigation measures. (Worcestershire CC).
- Support the need to improve public transport links to Gloucester (Worcestershire CC).
- Understanding the journeys made by residents is needed to see how inappropriate active and/or public travel are for many people.
- Industrial facilities need much improved highways.

- Concerns re. accessibility, topography, infrastructure and services (education, health), swimming pools, well maintained roads, drainage, etc.
- You state intention of Lydney being largest settlement yet facilities have moved away (hospital gone).

Draft Officer Response

A strategy focused on dispersal of development around the existing and established settlements was agreed by Council in October 2023 to deliver 330 new dwellings per annum for the duration of the Local Plan period (2021– 2041). The changes to the NPPF December 2024 included a new standard methodology for housing requirements. These command a significant uplift in the housing requirement to 600 new dwellings per annum. In consideration of these changes the Council will now have to consider whether the agreed strategy will be capable of delivering the new increased number (amounting to an increase of approximately 82% on top of the delivery currently planned for) and a decision made regarding the need to review the strategy and all potential options for delivery.

Policy LP.27 sets out the agreed strategy and represents the FoDDC's considerations at the time of preparation in early 2024. The policy sets out the main elements of the spatial strategy for new development and lists the largest broad locations. The spatial strategy and the allocations themselves are made to deliver growth as required in the FoDD in the most sustainable manner.

The Strategy proposes the continued development of Lydney in order to enhance its role in the FODD as the largest single settlement and to benefit other areas from its increased importance. New development at other centres will complement this in particular the proposed re use of Beachley Camp and the development of Newent in a manner that enables issues that have arisen from the past incremental approach to be addressed. Delivery in accord with the LP will ensure their implementation meets the climate change requirements of the plan. It is agreed that at present some allocations are in agricultural use, but the need for additional land is such that some new greenfield allocations are needed.

This approach has been arrived at following a period during which the option of a major New Settlement in a suitable location was considered. This was the subject of a consultation following which a revised strategy was prepared. Although it does not bring some of the sustainability advantages of the new settlement option, the strategy proposed must still be as sustainable as possible.

The strategy should enable a more sustainable future but depends on the capacity of existing settlements. Planned comprehensive development in a relatively concentrated location can be the best way to support improved services including transport and for that reason there are a number of villages identified which will need to accommodate change. They occupy areas of the FoDD that are less constrained, enjoy better access to major centres and are better open to the use of public transport as well as active travel.

Reforms to the NPPF in December 2024 will need to be taken into account. The plan strategy and policy will be reviewed in the light of these changes. Any subsequent changes to the agreed strategy will be subject to further consultation.

It will be a requirement of any development that it is able to provide for its infrastructure needs. With reference to recreation Policy LP.19 ensures that there is adequate recreation provision made for new development. Implementation will be through development management and monitoring by audit of facilities.

Policy LP.28 Other Housing Sites: Supporting Allocations.

Number of Representations: 27

Support: 2

Object: 11

Observation: 14

Support:

- Suggested that in listing the draft allocations under paragraph 8.14 the number of dwellings listed in the third column should clarify that the figure provided is indicative and can be exceeded.
- Support the additional identified housing sites at Bream, Drybrook, Lydbrook, Mitcheldean, Newnham, Sedbury/ Tutshill, Whitecroft, and at Aylburton, Hartpury, Littledean, Sling, and Woolaston. Taken together with the proposed strategic allocations under policy LP 27, consider that this represents a robust housing supply within the identified plan period. Additionally, this removes the need for any further strategic sites or speculative planning applications coming forward within the plan period.

Object:

- Grade one agricultural land (Newent), a rare national asset, and development would cause permanent loss.
- Newent development will increase flooding of the B4215 at Malswick Mill. Development of this scale will increase the daily traffic flow to and from Gloucester, and contradicts paragraph 2.12.
- Whilst it is appropriate to include in the plan a range a choice of sites (paragraph 70 of the NPPF December 2023), it is considered that the distribution of development proposed will not achieve the Council's Plan, in terms of addressing the objectives associated with sustainable development e.g. sustainable modes of travel, climate change etc.
- Welcome the principle of allocating smaller sites within the Emerging plan to help meet the district's housing target over the plan period noting that these can often be developed quickly and within the early years of the plan period. However, the delivery of 680 new homes in rural villages should not be seen as a limit. Propose Land to the West Side Of Church Road Longhope .
- Traffic implications at High Beech roundabout, Chepstow and through Chepstow.
- Aylburton: Access issues (congestion), flooding and flood risk, no facilities, oversubscribed school, suggest development of 'barn in the centre of the village (empty) and the industrial units at the end of the village.
- A Housing Survey conducted by FoD Council and Aylburton PC in 2017 concluded there was little or no need for additional housing in Aylburton village and no land available.
- Broad St, Hartpury – already large increase in properties in the village. No shop, the doctor's surgery in Staunton & Corse is struggling to see the patients they already have, the bus service to Gloucester or Tewkesbury is not frequent and the local primary school is full. Major issue with the sewerage system in the village, A417 in Maisemore floods regularly causing long detours. Poor road conditions, narrow lanes.
- Inclusion of any new housing within the Hartpury boundary is at odds with nearly all facets of your sustainability policy.
- No accountability from Highways or Severn Trent for their disregard as to the impact on climate and mental health of existing inhabitants.

- Scale of building around Lydney, Beachley, Sedbury and Tutshill is currently inappropriate without details on infrastructure and facilities.
- The timing of publication of the Regulation 18 Local Plan the consultation period coincided with the draft NPPF & the proposed changes to the standard methodology to the assessment of local housing need which forms the basis of strategic policies:
- "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance." (NPPF paragraph 61 / consultation draft paragraph 62)
- The proposed changes to the standard methodology result in an 80% increase in the local housing need figure for Forest of Dean, such that its housing requirement over the 20-year Local Plan period will increase from 6,600 to 11,940 homes.
- Under the transitional arrangements that are set out in the draft NPPF, any local plan that has reached Regulation 18 stage will need to be reworked in order to progress under the new NPPF.
- The magnitude of the changes are such that the draft plan should be completely revised in order to take account of the new approach. The Regulation 18 consultation should be repeated.
- The LP has identified an annual housing requirement of 330 dwellings per annum ('dpa') (Policy LP. 29). This figure reflects the current standard methodology.
- The plan includes a number of allocations including major strategic allocations for mixed use development at sustainable locations, sites identified for development at a number of large settlements, together with "a more proportionate" level of development in smaller settlements. All are broadly in accordance with the settlement hierarchy which is set out in Policy LP. 4.
- The plan also carries forward a number of sites that have been identified for development in the previous local plan. Paragraph 8.3 proposed new allocations. There is an allowance for the contribution of small sites (under five net capacity) and for unidentified sites that are larger but not allocated"
- Paragraph 8.3 of the draft Local Plan. The total expected delivery over the plan period - 7,025 dwellings - is 6.5% above the identified need (based on the current standard methodology) of 6,600 dwellings. We welcome the inclusion of a flexibility margin. Is an important planning tool that will ensure that the housing requirement can be met in the event that some sites do not come forward at the expected rate. This approach is widely used elsewhere in England. Would question whether 6.5% represents a sufficient margin to take account of uncertainties regarding the future delivery of sites in the FOD. Consider that a 10% margin would be more appropriate.
- No evidence has been provided in respect of the basis for the small site & large windfall sources of supply so the proposed level of supply from this source cannot be verified.
- Much greater concern the housing strategy has now been rendered very substantially inadequate as a result of the proposed changes to the standard methodology.
- The Government has set out specific changes to the NPPF to make following consultation, including a number of pro-supply measures to ensure that a pipeline of deliverable sites is maintained at all times. Specifically, to Implement a new standard method and calculation to ensure local plans are ambitious enough to support its manifesto commitment of 1.5 million new homes. Making the standard method for assessing housing needs mandatory, requiring local authorities to plan for the resulting housing need figure.
- Paragraphs 226 to 233 of the draft NPPF, any plan that has reached Regulation 18 stage will progress under the provisions of the new NPPF including the revised standard methodology.

- It is not known whether the proposed changes to the standard methodology will be implemented in their current form, the new Government is keen to revise & update the current approach to the standard methodology.
- The implication of these factors is that the standard methodology figure will rise in a very large number of authorities, including the Forest of Dean.
- Draft Forest of Dean Regulation 18 Plan in light of the Government's recent reforms of the planning system, namely the revised NPPF (July 2024).
- It has adopted a necessarily high-level approach given the magnitude of the changes that are required to the draft Forest of Dean Local Plan to take account of the proposed changes to the standard methodology.
- There are extensive concerns with the draft Plan as it currently stands.
- The introduction of a revised standard method will see an 80% increase in the housing need figure for Forest of Dean District Council, resulting in a requirement of 11,940 dwellings over the 20-year plan period.
- The Regulation 18 Plan does not reflect the revised standard methodology figure and will fail to deliver the required quantum of housing.
- It could not be found sound in its current form and the only way to address the challenge would be to fundamentally review the proposed strategy and repeat the Regulation 18 consultation.
- Welcome the opportunity to comment on the Draft Forest of Dean Regulation 18 Plan.
- Little scope for additions of larger sites in Coleford. Some sites still in consideration are not mentioned and need to be investigated/included: St John's Church and Tufthorn Ave Phase 2. The nibbling away at the Green Ring CNE2 of NDP is a threat which must be resisted, and only be accepted if further enhancement can also be gained. (Coleford TC).
- LP.28 does not have a clear purpose - unclear why the LP.28 supporting text includes a full list of housing allocations for both strategic and non-strategic sites, given that the policy itself ostensibly relates only to non-strategic sites. The table should be moved to the supporting text of LP.29, and LP.28 should be deleted or given a clear purpose.
- Robust evidence needs to be provided by the Council to demonstrate that sites, which have not come forward as yet, are deliverable.
- The impact of new housing on our sewerage and water networks will be dependent on the spatial distribution of this proposed growth, and the impact of development on our Wastewater Treatment Works (WwTW) will be dependent on the amount of growth within their catchment areas. Where the total growth identified exceeds the theoretical design capacity of our WwTWs then improvements to provide further capacity will be required during the Local Plan period. (Welsh Water).
- Some development sites will require hydraulic modelling assessments (HMAs) of the clean water and/or sewerage networks to be undertaken to understand whether any reinforcement work will be required to our infrastructure, and to identify potential connection points.
- Need consistency for what is referred to as a major development in the document. Placing Beachley along with the major towns here feels disingenuous.

Observation:

- Little scope for additions of larger sites in Coleford. Some sites still in consideration are not mentioned and need to be investigated/included: St John's Church and Tufthorn Ave Phase 2. The

nibbling away at the Green Ring CNE2 of NDP is a threat which must be resisted, and only be accepted if further enhancement can also be gained. (Coleford TC, 253)

- LP.28 does not have a clear purpose - unclear why the LP.28 supporting text includes a full list of housing allocations for both strategic and non-strategic sites, given that the policy itself ostensibly relates only to non-strategic sites. The table should be moved to the supporting text of LP.29, and LP.28 should be deleted or given a clear purpose. (Black Box, (Freeman Homes) 356)
- Robust evidence needs to be provided by the Council to demonstrate that sites, which have not come forward as yet, are deliverable.
- The impact of new housing on our sewerage and water networks will be dependent on the spatial distribution of this proposed growth, and the impact of development on our Wastewater Treatment Works (WwTW) will be dependent on the amount of growth within their catchment areas. Where the total growth identified exceeds the theoretical design capacity of our WwTWs then improvements to provide further capacity will be required during the Local Plan period. (Welsh Water, 275)
- Some development sites will require hydraulic modelling assessments (HMAs) of the clean water and/or sewerage networks to be undertaken to understand whether any reinforcement work will be required to our infrastructure, and to identify potential connection points. (Welsh Water, 275)
- Need consistency for what is referred to as a major development in the document.
- Placing Beachley along with the major towns here feels disingenuous.

Draft Officer Response

Policy LP.28 refers to land allocated at locations other than the Major strategic allocations at the four towns and Beachley mentioned in the previous policy. The possibility of amending the table in paragraph 8.14 will be considered to differentiate between strategic sites and other housing sites and give clarity on the data. Comments on specific sites are included at relevant policy. It is agreed that at present some allocations are in agricultural use, but the need for additional land is such that some new greenfield allocations are needed. It will be a requirement of any development that it is able to provide for its infrastructure needs.

A number of the representation mention the NPPF 2024. The Plan represents the FODDC's considerations at the time of preparation early 2024. Recent reforms to the NPPF will be taken into account and a review of the strategy may be required. Subsequent changes to the agreed strategy will be subject to further consultation.

Chapter 9 Housing Policies

Number of Representations: 6

Support: 1

Object: 1

Observations: 4

Support:

- Social housing needs to be increased as well as affordable housing. Incredibly important that the council will repurpose housing that is no longer occupied, we have quite a lot of housing that is not being used at the moment in the FOD. Problems with housing associations finding it hard to find social housing that would be able to be adapted – could newly built housing have space for adaptation?

Object:

- Lack of sheltered accommodation in the Forest of Dean. Need for retirement bungalows with a central meeting place to support people and to feel part of a caring community. Not all senior citizens need nursing homes but they do need accommodation that meets their needs. Inappropriate housing can lead to greater pressures on the NHS and local services.

Observations:

- The draft Local Plan highlights proposals which have varying implications on the existing infrastructure and future infrastructure requirements. These proposals should always include the impact on education infrastructure. The settlements selected (for development) do have some education infrastructure however incremental growth puts pressure on facilities and networks not designed for increased use. In the very broadest of terms 4200 new houses equates approximately to: 295 pre-school places at early years provision; 1260 primary school places; 620 secondary places; 210 post 16 and sixth-form places. Existing schools built in areas of constraint may need to be expanded to accommodate increases in the pupil population arising from housing proposals. This may require additional buildings, land and modifications to existing facilities. The County Council will look for support to the District Council to facilitate these actions. (GCC).
- Needs to be a precise definition of Grey Belt. Simply saying 'not green fields' is not definite enough.
- WDPC supports the need for social and affordable housing provision within the towns and villages and would recommend the levels as being those identified with the parish housing needs survey, but what is truly affordable and how can these properties be targeted towards young people and existing residents wishing to stay within the district needs to be outlined. Whether this is by using emerging powers being given by national government or by controlling the loss of homes to holiday lets (40% of housing stock in central Parkend for example is anecdotally being reported as holiday lets) through local taxation could be considered. Either way they remain unoccupied for a significant proportion of the year. This is a situation we are already familiar with in Cornwall. It's widely reported that entire fishing villages are now largely owned by non-residents or absentee landlords, and a great many properties remain empty for all but a few weeks of the year. There are other areas, such as Pembrokeshire, where when Right to Buy properties are placed on the market for sale the Local Authority either has the opportunity to repurchase as social housing or priority is given to local residents, we feel that a similar scheme could be implemented through legislation

to protect the availability of housing for residents of the district, which would enable them to live and work in the area they grew up. We feel the lack of any comment in the Local Plan on the impact on the impact cottages/Air BnB represents something of a black hole at its core. (West Dean PC).

Draft Officer Response

Comments noted regarding education provision FODDC will liaise with GCC. There are no greenbelt or grey belt designations within the District.

The Council intends to commission further evidence to demonstrate the viability of Policy LP.36 and other relevant policies proposed in the plan. This will include taking into consideration the comments made, and the policy will be reviewed accordingly in light of the outcome of the additional viability evidence.

Policy LP. 34 Accessible and Adaptable Homes and the policy requirement of 10% affordable housing on major developments provided to M4(3) standard provides certainty that the council has a clear process for how it intends to meet such demand for people requiring accessible accommodation.

Understand the concerns about the impact that tourism (Air BnB) can have on the long-term residential use of dwellings within the District. However, it is also recognised that the tourism economy is vital within the Forest of Dean and a balance must be struck. The Council will review the subject of holiday lets/Airbnb's and consider whether a policy is required regarding holiday lets/Airbnb's. With regards to the Council buying back Right to Buy properties, this is outside of the remit of the Local Plan. It would be a Council decision and will of course be a financial commitment, and given that the Council no longer runs as a housing association, it would be under the remit of Two Rivers to purchase the housing and rent it back out.

Policy LP.29 Housing Delivery and Supporting Text.

Number of Representations: 42

Support: 10

Object: 12

Observations: 20

Support:

- Para. 9.5 has grammatical errors – needs editing.
- Responding to Climate Change should be added to list of most important national requirements .
- 9.1. In the 5th line, to make the meaning of the text clearer, add coma to read ".. level of delivery, land with a greater.." .
- New standard method – increased housing numbers need to be reflected in LP. Necessary to allocate large strategic sites to include urban extensions and possibly a new settlement/ town. Also necessary to deliver smaller housing sites which could come forward in the shorter term without the need for more significant infrastructure and land assembly for example. Suggest site at Foley Rise in Hartpury as there are no legal, technical or other impediments to this site coming forward for housing development over the next few years, subject to planning permission.

- EA welcomes all housing sites are required to achieve a density that is appropriate to their surroundings making efficient use of available land. Would expect this to include generous riparian zones that respect the existing or natural topography. The overall design scheme should provide open space as an integral part and show how green spaces assist with the mitigation` add prevention `of climate change. (EA).
- Welcome policy but object to density (higher than average for the area) and would recommend 24 per hectare. On what basis is the defined housing need assessed? How will this be done? Should be priced so as not to have an adverse impact on local needs. Welcome the provision of flats as long as there is adequate storage space, national space standards should be considered as well as Rural Design Guides and the best practice from the Forest Edge South NP. (WDPC).
- Consider that the proposed housing delivery policy LP 29 provides robust protection and safeguards against speculative housing applications.
- As part of the likely review of the New Local Plan, we consider it necessary for the spatial strategy to be substantially revised in order that deliverable Sites at settlements such as Ruardean Woodside can come forward and make a valuable contribution to the supply of housing within the district.
- DIO supports the ambition of this policy that unallocated greenfield sites will not be released unless it is proven that suitable land from other sources is not available. Urge the FoDDC to work with the DIO to consider the maximum dwelling capacity that the site can accommodate as the site will deliver more sustainability benefits than a number of the greenfield allocations proposed within more remote locations within the District.
- We support the preferred approach that will ensure that the identified housing needs can be met without requiring further development opportunities in neighbouring local authority areas. (Worcestershire CC).

Object:

- The title, format, layout and content of this policy is confusing, and need to be reconsidered. No need for a policy to require development to comply with other policies in the plan, as the plan should be read as a whole. (HBF).
- The New Local Plan will need to be revised to account for the increased amount of housing need, with significant emphasis on broadening the availability of housing land. As part of the likely review of the New Local Plan, we consider it necessary for the spatial strategy to be substantially revised in order that deliverable Sites such as Roebuck Meadows can come forward and make a valuable contribution to the supply of housing within the district.
- Duplication with other policies (LP.1 and LP.4) and the absence of setting out clearly the housing and economic needs of the area does not assist the users of the Plan. Policies would benefit from redrafting to clearly articulate the strategy for delivering the overall housing requirement.
- Based on the consultation NPPF, and proposed changes to the Standard Method, it is likely that the housing requirement will need to be significantly updated and that additional sites for housing such as Land to the West Side Of Church Road, Longhope will need to be identified. It has previously been demonstrated within Section 2 of this response how Land to the West Side of Church Road, Longhope is both deliverable and developable.
- Object to the identified growth figure within the Local Plan. Council needs to go back and adjust their annual growth figure to 597 dwellings per annum. There are no exceptional circumstances

for which the Council can use in order to reduce the number and therefore we consider that the Local Plan needs to allocate additional land before moving forward with the Regulation 19 Plan.

- Also note that counting sites which are already approved and developed is not permitted.
- Consider a lower density for rural locations would be more acceptable.
- Do not believe it is appropriate for the Council to be referencing the Wales One Planet development. Also do not believe the Council should encourage this type of development as it does not contribute to the permanent supply of housing. There is a risk the Council produces a policy which will simply not be taken up by any developers or landowners.
- The reason more houses are planned is NOT due to local demand – it is due to Central Government following the orders of the World Economic Forum. They are not responding to the electorate.
- The destruction of agricultural land in Gloucestershire - with new build houses and industrial scale solar power plants - will irreparably damage this District's ability to feed itself, the county and country's farming produce needs.
- No to 15 minute District SMART housing.
- Utilise existing empty housing first. Is there actually a 'housing shortage'?
- We consider the changes that are required to be so substantial as to necessitate a repeat of the Regulation 18 consultation.
- In order to assist the Council in identifying the additional sites that are now necessary, recommend a further 'call for sites' consultation.
- The Council should consider its economic strategy and employment policies in the light of the increased level of housing need and the need to identify additional sites.
- With fibre to the home in place in many forest areas, home food deliveries commonplace, and the AI revolution we need to rethink control of development outside the settlement boundaries and allow some flexibility and be more innovative about repurposing and (where appropriate) replacing existing redundant agricultural buildings.
- The Plan as proposed does not set out a long-term strategy. The Local Plan and the SA acknowledge that there are constraints to many of the settlements in which case it is appropriate to consider allocations which transcend the plan period and provide for the longer term. Land West of Severn is not only a deliverable alternative to the proposed allocation at Beachley Barracks (which is unsustainable for all the reason we outline in response to Policy LP.78) but also provides a long-term strategy. Given the proposed increase in the Standard Method housing figures it is considered imperative that those options that were considered earlier in the preparation of the Local Plan i.e. a new settlement at land West of Severn, are now revisited and included in the next iteration of the Local Plan.
- The Viability evidence and the LHNA will need to be updated.
- The timing of publication of the Regulation 18 Local Plan the consultation period coincided with the draft NPPF & the proposed changes to the standard methodology to the assessment of local housing need which forms the basis of strategic policies:
- "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance." (NPPF paragraph 61 / consultation draft paragraph 62)

- The proposed changes to the standard methodology result in an 80% increase in the local housing need figure for Forest of Dean, such that its housing requirement over the 20-year Local Plan period will increase from 6,600 to 11,940 homes.
- Under the transitional arrangements that are set out in the draft NPPF, any local plan that has reached Regulation 18 stage will need to be reworked in order to progress under the new NPPF.
- The magnitude of the changes are such that the draft plan should be completely revised in order to take account of the new approach. The Regulation 18 consultation should be repeated.
- The LP has identified an annual housing requirement of 330 dwellings per annum ('dpa') (Policy LP. 29). This figure reflects the current standard methodology.
- The plan includes a number of allocations including major strategic allocations for mixed use development at sustainable locations, sites identified for development at a number of large settlements, together with "a more proportionate" level of development in smaller settlements. All are broadly in accordance with the settlement hierarchy which is set out in Policy LP. 4.
- The plan also carries forward a number of sites that have been identified for development in the previous local plan. Paragraph 8.3 proposed new allocations. There is an allowance for the contribution of small sites (under five net capacity) and for unidentified sites that are larger but not allocated"
- Paragraph 8.3 of the draft Local Plan. The total expected delivery over the plan period - 7,025 dwellings - is 6.5% above the identified need (based on the current standard methodology) of 6,600 dwellings. We welcome the inclusion of a flexibility margin. Is an important planning tool that will ensure that the housing requirement can be met in the event that some sites do not come forward at the expected rate. This approach is widely used elsewhere in England. Would question whether 6.5% represents a sufficient margin to take account of uncertainties regarding the future delivery of sites in the FOD. Consider that a 10% margin would be more appropriate.
- No evidence has been provided in respect of the basis for the small site & large windfall sources of supply so the proposed level of supply from this source cannot be verified.
- Much greater concern the housing strategy has now been rendered very substantially inadequate as a result of the proposed changes to the standard methodology.
- The Government has set out specific changes to the NPPF to make following consultation, including a number of pro-supply measures to ensure that a pipeline of deliverable sites is maintained at all times. Specifically, to Implement a new standard method and calculation to ensure local plans are ambitious enough to support its manifesto commitment of 1.5 million new homes. Making the standard method for assessing housing needs mandatory, requiring local authorities to plan for the resulting housing need figure.
- Paragraphs 226 to 233 of the draft NPPF, any plan that has reached Regulation 18 stage will progress under the provisions of the new NPPF including the revised standard methodology.
- It is not known whether the proposed changes to the standard methodology will be implemented in their current form, the new Government is keen to revise & update the current approach to the standard methodology.
- The implication of these factors is that the standard methodology figure will rise in a very large number of authorities, including the Forest of Dean.
- Draft Forest of Dean Regulation 18 Plan in light of the Government's recent reforms of the planning system, namely the revised NPPF (July 2024).

- It has adopted a necessarily high-level approach given the magnitude of the changes that are required to the draft Forest of Dean Local Plan to take account of the proposed changes to the standard methodology.
- There are extensive concerns with the draft Plan as it currently stands.
- The introduction of a revised standard method will see an 80% increase in the housing need figure for Forest of Dean District Council, resulting in a requirement of 11,940 dwellings over the 20-year plan period.
- The Regulation 18 Plan does not reflect the revised standard methodology figure and will fail to deliver the required quantum of housing.
- It could not be found sound in its current form and the only way to address the challenge would be to fundamentally review the proposed strategy and repeat the Regulation 18 consultation.
- Welcome the opportunity to comment on the Draft Forest of Dean Regulation 18 Plan.

Observations:

- Given that the yearly requirement by Government could be in the order of double that stated here, FoDDC would need to review the resources available again and challenge those new figures. The constraints from designations etc will not allow for such an increase in allocation. (CTC).
- Request that one housing need figure is used throughout the document for consistency and to avoid any unnecessary numerical confusion. (SWHAPC).
- New NPPF - new standard method for calculating housing need (597 dwellings will be required per annum - increase of 81%). New Local Plan will need to be revised to account for the increased amount of housing need.
- CTC welcome the existing sites already earmarked for development to be used & request continued work with owners of brownfield sites come forward (rather than 'banked'). (Cinderford Town Council).
- CTC strongly oppose any reduction in the requirement for 40% affordable housing in new developments and rate should not be lower for Cinderford. (Cinderford Town Council).
- CTC wish reinstatement of the G&H site into the Local Plan and also look at the former GIS (former mobility aid site) at Valley Road. (Cinderford Town Council).
- The criteria proposed is sound & the need for affordable housing - both for rent and shared equity - is clear. Larger sites, mainly in the towns will be the source for most of these. (Coleford Town Council)
- DfE have published guidance on securing developer contributions for education, and estimating pupil yield from housing development, at <https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth>. Be aware of the corresponding Planning Practice Guidance on planning obligations, viability and safe and healthy communities. <https://www.gov.uk/government/collections/planning-practice-guidance>. FoDDC should have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on Planning for Schools Development (<https://www.gov.uk/government/publications/national-planning-policy-framework--2>) (2011). (DfE).
- The department notes that some growth in housing stock is expected - this will place additional pressure on social infrastructure such as education facilities. The Local Plan will need to be 'positively prepared' to meet the objectively assessed development needs and infrastructure requirements. (DfE).

- DfE supports the principle of safeguarding land for the provision of new schools (per paragraph 99 of the NPPF). When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary, in accordance with Planning Practice Guidance and DfE guidance. (DfE).
- Site allocations/policies should clarify requirements for the delivery of new education infrastructure, including when it should be delivered to support housing growth, the minimum site area required, any preferred site characteristics, and any requirements for safeguarding additional land for future expansion where need and demand indicates this might be necessary. (DfE).
- Local Plan Viability Assessment should inform options analysis and site selection, with site typologies reflecting the type and size of developments that are envisaged in the district. (DfE).
- As per PPG, there should be an initial assumption that applicable developments will provide both land and funding for the construction of new schools. The total cumulative cost of complying with all relevant policies should not undermine deliverability of the plan, so it is important that anticipated education needs and costs of provision are incorporated at the outset, to inform local decisions about site selection and infrastructure priorities. (DfE).
- Highlight in the next version of the Local Plan that:- specific requirements for developer contributions to increase the capacity of education infrastructure through expansion or new facilities will be confirmed at application stage to ensure the latest data on identified need informs delivery; and that- requirements to deliver schools or nurseries on some sites could change in future if it were demonstrated and agreed that the site had become surplus to requirements, and is therefore no longer required for educational use.
- The DfE submitted comments (see attached letter 16.11.2020) on the Forest of Dean's Local Plan Viability Assessment (2020) in which we raised concerns regarding the approach used to calculate the cost of providing additional school places. The approach set out within the viability assessment significantly underestimates the cost of providing additional school places. We understand from recent discussions that you are planning to update the viability assessment. (DfE),).
- DfE supports use of planning obligations to secure developer contributions for education wherever there is a need to mitigate the direct impacts of development. (DfE).
- Request a reference within the Local Plan's policies or supporting text to explain that developer contributions may be secured retrospectively, when it has been necessary to forward fund infrastructure projects in advance of anticipated housing growth. (DfE).
- Review policy to reflect paragraph 16 of the NPPF - to provide clear and unambiguous direction and does not replicate requirements set out elsewhere in the Draft Plan or other documents. Policy LP.29 should require housing delivery to comply with other relevant policies within the Draft Plan rather than partially replicating requirements set out in greater detail elsewhere – to avoid overlapping requirements.
- Paragraph 9.1 states need for 329dpa but all other sections of the Draft Plan use the 330dpa figure. Use a single consistent figure throughout.
- Gladman agrees that the starting point for calculating its housing requirement should be the standard method – however, it is only a starting point. Note NPPF and new standard method.
- Gladman supports the over-provision of dwellings above the housing requirement for the plan period. Gladman considers a housing land supply buffer of 20% in line with the House Builders Federation's recommendation to be the most suitable. The housing land supply buffer should be flexible.

- The emerging Local Plan has a large reliance on windfall development. Such a significant reliance on unknown windfall development does not constitute a positively prepared local plan. Recommend allocating further medium- and large-scale sites in both Major and Large Villages.
- Para. 5 regarding Health Impact Assessments should look to ensure future occupiers are not exposed to poor air quality. Development where non-openable windows and mechanical ventilation is proposed to prevent poor air quality exposure is not favoured. Would advocate use of HIAs as a key tool to identify and optimise the health and wellbeing impacts of planning. Prudent to consider a definition of "major development" in relation to HIA use. (GCC).
- Not fully in accordance with the NPPF regarding rural housing exceptions. These policies need to be more inclusive and reflective of rural housing exceptions and re-worded to ensure the policies are reflective of the NPPF. Places too much reliance on the allocations and settlement boundaries. Sustainable growth through windfall sites in and around the towns and villages within the settlement hierarchy would offer a wider range of housing types and tenure to be built, along with improving affordability of the areas & aid in the retention of the local facilities and services in the village. Paramount that appropriately scaled residential development is considered adjacent to settlement boundaries as well as within them. (NHS Trust).
- Request that policy reflects the need to prioritise sustainable modes to ensure that users of the site have a genuine mode choice and are not obligated to use the SRN. Important for National Highways to understand the cumulative impacts of these site options and the wider Local Plan on the SRN (A40, M50 and M48) and at SRN junctions (including M48 Junction 2). We are aware of existing congestion-related queueing on the A40 at Highnam. The Plan's evidence base should identify the traffic movements generated by the proposed site allocations using SRN infrastructure and, if necessary, any mitigation required. At this time, we would not envisage any need for detailed junction modelling of any SRN impacts, but we would expect to see evidence clarifying that such modelling is not required. (National Highways).
- Consider the need for affordable housing for NHS staff and those employed by other health and care providers in the local authority area. As the population grows in areas of new housing development, additional health services are required, meaning the NHS must grow its workforce to adequately serve population growth. Ensuring that NHS staff have access to suitable housing at an affordable price within reasonable commuting distance of the communities they serve is an important factor in supporting the delivery of high-quality local healthcare services. Recommend engagement with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other relevant Integrated Care System (ICS) partners. Ensure that the local need for affordable housing for NHS staff is factored into housing needs assessments, and any other relevant evidence base studies. (NHS Property).
- The SWHAPC strongly recommends that the Council words its housing delivery target as a minimum requirement to ensure that additional housing delivery can be facilitated where necessary in the FoD. (SWHAPC).
- Health Impact Assessment should be required only when there is a departure from the Local Plan and for housing mix needs should not be overly prescriptive so as to delay delivery of sites. The requirement for HIA for developments of 50 or more dwellings without any specific evidence that an individual scheme is likely to have a significant impact upon the health and wellbeing of the local population is not justified by reference to the PPG.

- In the light of NPPF standard method - suggest Site at Broad Lane, Hartpury, which, as the accompanying analysis demonstrates, is capable of accommodation an increase quantum of development subject to the revision of identified site boundaries.
- The impact of new housing on our sewerage and water networks will be dependent on the spatial distribution of this proposed growth, and the impact of development on our Wastewater Treatment Works (WwTW) will be dependent on the amount of growth within their catchment areas. Where the total growth identified exceeds the theoretical design capacity of our WwTWs then improvements to provide further capacity will be required during the Local Plan period. Some development sites will require hydraulic modelling assessments (HMAs) of the clean water and/or sewerage networks to be undertaken to understand whether any reinforcement work will be required to our infrastructure, and to identify potential connection points. (Welsh Water).
- A lot of youngsters starting out on the housing ladder don't want social housing they want 2 bedroom starter homes on small estates not 4/5 executive homes costing £500, 000+. People who own land would be willing to release it for a reasonable price to give youngsters a start but not for social housing. Few occupants are forest born. Villages die without young people the school keeps going, the local pub stays open and the community spirit stays alive. This does not happen when large executive houses are built mostly for commuters.
- (West Dean PC) As the overarching aim of the Plan is clearly for 'carbon neutral by 2030' to be first and foremost, with everything else subservient to that aim, then it's contradictory to ignore a situation that has a fundamental impact on the whole subject.
- Actively encouraging tourism means an inevitable net increase the amount of vehicles movements in the area, it cannot be avoided. But it also requires additional accommodation. That actively encourages the use of existing local houses as Air BnB's and holiday cottages, which takes them off the residential roster and cannot help but require increased house building . Clearly this is the opposite of a sustainable, 'green' scenario in every way. It has affected the biodiversity of the county, increased its traffic, road building, power usage and housing construction requirements. At the same time, it is adversely affecting existing communities and disenfranchising the next generation who have little hope of ever affording to live in the places where they and their families were born. We are acutely aware of this issue as it spreads into the Forest as property values have rocketed in Cornwall and other 'attractive' areas like the Cotswolds, the trickledown effect is increased concentration on/migration to less costly areas and that means here. But it is impossible to justify extensive new housing developments in the Forest while still permitting existing homes to fall out of full-time use at the current rate or to see them bought up by people who commute to a more distant place of employment than they previously did. We already see the adverse effects of this aspect in the daily gridlock through Chepstow from the numerous new developments already built on this side the border - with more now planned and the daily difficulties of commuting to Gloucester, Cheltenham and beyond using the A40 and A48.
- We also have an issue locally with long-term empty or derelict properties. Mrs Sheward's Shop, Folly Cottage and at least one house in Woodland Road (ex-council) are prime examples in and around Parkend. They have remained empty for many years or even many decades. There are dozens, probably hundreds of such properties in the Forest at present. This does not appear to be mentioned in the Plan.
- It seems that the Plan should really seek to actively encourage full time occupancy of what already exists in the area before supporting extensive new "needed" developments, which in fact may not all be "needed".

- No matter how it's built or designed NO new property constructed on a greenfield site can be 'greener' than one that has already existed for decades or even centuries . No amount of off-setting can ever compensate for the energy and material use, the loss of established habitats and the permanent, unrecoverable loss to local cultural heritage. We simply cannot realistically claim to be gaining something while actively losing it.
- This issue of properties that are either permanently empty or stand empty for a substantial portion of the year as profit-generators rather than homes is central to this. we feel the Local Plan does not approach this issue. As such it is sabotaging its own declared aims . If this is a plan for the next ten or twenty years then it must address an issue that will only get vastly worse in that timeframe if ignored. (West Dean PC).

Draft Officer Response

Policy LP.29 is the 'root' policy for housing delivery, setting out the type, number and general location of new housing expected.

A strategy focused on dispersal of development around the existing and established settlements was agreed by Council in October 2023 to deliver 330 new dwellings per annum for the duration of the Local Plan period (2021– 2041). The Plan represents the FoDDC's considerations at the time of preparation early 2024. The representations to this policy mention the changes to the NPPF (December 2024) and the new standard methodology for housing requirements. It is acknowledged that these command a significant uplift in the housing requirement to 600 new dwellings per annum at present. In consideration of these changes the Council will now have to consider whether the agreed strategy will be capable of delivering the new increased number (amounting to an increase of approximately 82% on top of the delivery currently planned for) and a decision made regarding the need to review the strategy and all potential options for delivery. The recent reforms to the NPPF in December 2024 will be taken into account, any subsequent changes to the agreed strategy and potential options will be subject to further consultation.

Transport evidence, Viability evidence and the LHNA will be updated to inform the development of the Local Plan. The housing needs assessment will NHs workers within the context of people who are unable to afford housing and require affordable housing rather than as a specific cohort. The SHELAA call for sites consultation is undertaken yearly. The policy and supporting text will be reviewed to address any comments made and amended as appropriate. There are a few comments regarding duplication within policies this will also be considered and amended as appropriate.

The Council will review the subject of holiday lets/Airbnb's and consider whether a policy is required regarding holiday lets/Airbnb's. Furthermore, vacant homes are also identified by the Strategic Housing Officer.

Policy LP.30 Sites for Gypsies Travellers and Travelling Showpeople and supporting text

Number of Representations: 2

Support: 0

Object: 1

Observations: 1

Object:

Have you put any showman's sites in your plans or are we left out again?

Observations:

The policy confirms an intention to bring forward proposed site allocations at Regulation 19 Consultation stage.

Draft Officer Response

The Council has undertaken a call for sites for appropriate land to come forward for Gypsy & Travellers site as well as sites for show people. The Council are also working with other partners to try and identify any suitable public land that may be available to come forward as sites to meet the needs for Gypsy & Travellers and/or Travelling Show People as appropriate. Should suitable sites be identified they will be included in future stages of the plan.

Policy LP.31 Affordable Housing Delivery including supporting text

Number of Representations: 27

Support: 9

Object: 2

Observations: 16

Support:

- Important that the scale of the provision required by policy reflects what can be delivered having regard to commercial realities. FODDC need to ensure that what is required by policy for development sites is deliverable and realistic, having particular regard to the infrastructure requirements/costs and how they are to be funded.
- In (e) the wording needs to be altered to change it from " ;the developments as to avoid ;" to "the developments so as to avoid;"
- Draft NPPF 2024 now requires 50% - subject to transparent viability testing we support this target, but expect in low value areas it will be difficult to achieve.
- Paragraph 9.13. Revise the paragraph's 2nd sentence to read "To ensure that developments are viable while delivering affordable housing that contributes to meeting housing need, the tenure mix between rented accommodation and intermediate housing that will be sought may be used to balance the housing need against the viability of development."

- Welcome the increased level of detail provided in the policy (compared with CSP.5) which makes clear to developers what the expectations are in terms of the affordable housing quantum and mix, and what the assessment process will be if a viability case is to be presented.
- Pleased that paragraph 9.9 makes reference to the latest Local Housing Need Assessment (LHNA) and sets out an overall need for affordable housing of 2,195 dwellings over the period 2021-2041, equivalent to 110 dwellings per annum. (SWHAPC).

Object:

- Para (b) - we would wish to see 60% (rather than 40%) affordable housing on sites in rural areas on sites of area 0.16ha or greater. (Newland Parish Council).
- Concerns about the delivery of affordable housing and what is truly affordable in real terms. There are no details within the Local Plan for social housing, and this needs to be included but these should be prioritised for local people before anyone else. There also needs to be some thought given to the onward sale of social housing and ex-social housing with the Council being given the option to buy these back in the first instance. (WDPC).

Observations:

- CTC welcome the existing sites already earmarked for development to be used. Request that FODDC continue to work with landowners who are current brownfield site owners to ensure that these sites are sold and developed rather than being "banked" for future use. CTC strongly opposes any reduction in the requirement for 40% affordable housing - the rate should not be lower for Cinderford than for the rest of the Forest. CTC wish FODDC to reinstate the G&H site into the Local Plan and also look at the former GIS (former mobility aid site) at Valley Road. (Cinderford Town Council).
- The current figure of 40% affordable housing in large sites has been challenged by Developers in terms of viability, and does not meet the need. However, there should still be a stated proportion in the LP as the drive to meet the affordable housing need requires positive action: this is maintained in LP31, Affordable housing which is supported. Developers on larger sites will have to complete viability appraisals if they consider there is an issue and prove their case. (Coleford TC).
- No sufficient evidence has been produced to demonstrate that 40% on-site affordable housing would not prejudice the delivery of growth and development within the district. Such evidence must take into consideration the additional abnormal costs borne from the development of brownfield sites, as well as the significant level of infrastructure that strategic sites are required to deliver. The DIO has significant concerns that 40% affordable housing requirements on a previously developed site within this locality will not be viable.
- The requirement to provide 40% affordable housing on-site is not justified, effective nor sound. The Economic Viability Assessment that informs the emerging Local Plan recommends that 35% affordable housing should be sought on sites. The Economic Viability Assessment states that the Council "does not always achieve the current 40% affordable housing target, suggesting that it may be too high". Therefore, the evidence base underpinning the emerging Local Plan does not support the current level of affordable housing provision required by the policy. The progression of an affordable housing level that is too high could impact on housing delivery and may result in delays to housing sites being delivered due to viability assessments being undertaken.

- Welcome the target of a 70 by 30 per cent split across rent and shared ownership of affordable housing for outlined in, but would like clarification of how the 70 per cent affordable housing will be split across social rented properties and affordable rented properties, urging the Forest of Dean District Council to aspire to a higher ratio of social rented properties within Policy LP. 31. (GCC).
- Policy should include flexibility and should include the opportunity for negotiation around policy requirements for site specific reasons. Unable to locate an up to date Viability Assessment in support of this consultation version of the Local Plan. (HBF).
- The 40% affordable housing requirement for older people's housing is contrary to PPG, given that all of the scenarios for older people's housing considered within the council's own Viability Assessment at the plan making stage have been found to be unviable. The policy should therefore be amended to make it clear that older person's housing is exempt from all types of affordable housing, in line with the Viability Study, to ensure the plan is deliverable, justified and consistent with national policy.
- Add the following text to Policy LP.31 - 'Specialist housing for older people is exempt from providing affordable housing'.
- The Viability Assessment should be re-run for sheltered and extra-care housing - direct the Council towards the Retirement Housing Consortium paper entitled 'A briefing note on viability' prepared for Retirement Housing Group by Three Dragons, May 2013 (updated February 2016 ('RHG Briefing Note')).
- A typical sheltered housing / retirement living scheme would consist of 45 dwellings on a gross site area of 0.45 hectares creating a density of 100 units per hectare. Extra care housing tends to have a lower density and a typical scheme would consist of 60 units on a 0.75 hectare site at a lower density of 80 units per hectare. Therefore, a scheme of 50 units should be modelled for sheltered housing and a scheme of 40 units should be modelled for extra care, both on a site of 0.5 hectares.
- Viability Study should amend the 1 bedroom apartment sizes as follows. 1 bed sheltered 55 sq. m, 1 bed extra care 60 sq. m
- A typical scheme provides 1 and 2 bedroomed apartments using a mix of 60% 1 bed and 40 % 2 bed units on a development. This is the case for both sheltered (retirement) and extra care (retirement living plus) schemes.
- Older persons' housing has a larger communal and non-saleable areas such as residents lounge, laundries, guest rooms, managers office and wellness rooms. Extra care housing also includes additional facilities such as a restaurant area. For sheltered schemes the non-chargeable space used should be 25% and for extra care schemes this should be 35% of GIA. Note that the Viability Assessment has used 20% and 30% respectively.
- Recommend that a 10% of build cost figure is used for brownfield sites for professional fees rather than 8%.
- Sales and marketing costs for older persons housing schemes are typically 6% of GDV and this should be used within the older persons modelling rather than the 3.5% level for general housing.
- Sales periods of older persons' housing schemes are typically longer for retirement and extra care housing than general needs housing. There is a typical 18 month build period before sales can commence. These longer sales periods should therefore be incorporated into the Viability Study rather than the 3 months used within the study.
- Recommended that a standard allowance of £5,000 per unit is assumed as a typical average empty property cost - to cover Council Tax liability on unsold units and service charges (which will be

applicable to the whole building from day first resident moves in). This increases to £10,000 for extra care accommodation to reflect higher costs particularly in maintaining care, communal and catering facilities, staff and services and reflecting a slower sales rate than Retirement Living.

- Build costs tend to range from 8% to 15% of base build costs on flatted schemes within urban areas and we therefore feel that an allowance is 10% of base build cost should be used for external build costs for brownfield sites rather than the 5% used in the Viability Assessment.
- For specialist housing for older people there is a clear precedent for a return of not less than 20% of gross development value primarily because of the risks associated with such developments. 20% profit should therefore be assumed for specialist housing for older people rather than the 17.5% used within the study.
- Older Persons housing schemes are ideally located on small windfall sites close to local facilities and it will most likely be that BNG requirements will need to be met largely or entirely off site by contribution.
- Newent NP is being prepared with the support from AECOM to provide a Housing Needs Assessment for the Parish. This will provide recommendations on housing tenure mix to meet the needs of Newent and also housing types and sizes to contribute to the Newent NP strategy. (Newent TC).
- We support the Council's decision to seek 40% affordable housing on residential sites in Designated Rural Areas that provide a net increase of 5 - 9 dwellings or have a site area of 0.16 hectares or larger. SWHAPC seeks further clarification on the 67% affordable housing for rent aspect and how this applies to both affordable rented and social rented housing. Additional clarification is also required on the 33% affordable housing for home ownership aspect and whether this refers to shared ownership affordable housing, or First Homes. The SWHAPC accepts that First Homes will assist some first time buyers in entering the property market, but it will likely not help as many households as shared ownership currently does. (SWHAPC).
- It is important that policy includes provision to set out that that specific tenure split will be reviewed on a site by site basis to reflect the nature of development and local needs.
- A lot of youngsters starting out on the housing ladder don't want social housing, they want 2 bedroom starter homes on small estates not 4/5 executive homes. People who own land would be willing to release it for a reasonable price to give youngsters a start but not for social housing. The occupants are shipped in from everywhere very few are forest born and those that are resent the fact that preference seems to be given to outsiders.
- With the phase out of the petrol/diesel vehicles to be replaced by electrically driven vehicles which will be unaffordable to many, (affordable) houses will need to be near places of employment or served by public transport links.
- To avoid later arguments over viability, developers should take into account the requirement for affordable housing and infrastructure provision before land purchase.
- Consider that the Council has set its threshold for affordable housing delivery on small sites far too low. There is no way that a site for 4 dwellings can deliver 40% affordable housing and remain viable. The Council should look to Monmouthshire County Council's policy for Main Village sites whereby it takes the approach of applying a policy on sites for less than 9 for making a financial contribution towards affordable housing. Support the proposal for 100% affordable schemes and think that there is demand for this, but we do not believe that the policy should be restricted

to only affordable providers being able to apply under it. Do not preclude landowners or their consultants from being able to apply for 100% affordable schemes.

- The provision of affordable housing will necessarily vary on a site by site basis taking into account evidence of local need, mix proposed, and where appropriate, the viability of the development and where this would not lead to unsustainable development. In a similar vein, it is important that policy includes provision to set out that that specific tenure split will be reviewed on a site by site basis to reflect the nature of development and local needs

Draft Officer Response

The draft plan identifies both existing sites already earmarked for development and new proposed sites which it anticipates will come forward for development over the life of the plan. The Council will work with all landowners who proactively seek to bring forward suitable sites.

Any level of affordable housing sought through Policy LP.31 Affordable Housing needs to be supported by evidence demonstrating that the level of affordable housing being sought can generally be provided without adversely affecting the viability of the development to come forward. Whilst it recognised that it would be desirable to have same level of affordable housing from all developments regardless of where the site is located in the district it is recognised that not all housing markets are the same which may lead to varying levels of affordable housing being sought in some housing market areas. The Council intends to commission further evidence to demonstrate the viability of Policy LP.31.

40% figure -The Council intends to commission further evidence to demonstrate the viability of Policy LP.31 and other relevant policies proposed in the plan and also the level of affordable housing which can be provided. This will also consider the levels of social rented and affordable rented housing that can be provided balanced against maximising the delivery of affordable housing for rent. Comments made will be taken into account, and the policy will be reviewed accordingly in light of the outcome of the additional viability evidence.

Regarding the 33% affordable housing for home ownership aspect and whether this refers to shared ownership affordable housing, or First Homes the policy has been written to provide flexibility and to accommodate future homeownership products that may come forward. However, additional wording will be considered to indicate that the Council preference is for Shared Ownership accommodation.

60% figure - Comment noted and desire welcomed, however the viability evidence commissioned to demonstrate the viability of Policy LP.31 does not support such levels of affordable housing provision whilst allowing the proposed development to remain viable.

The 50% affordable housing requirement identified in the NPFF relates specifically to major development involving the provision of housing proposed on land in the Green Belt, not overall development. The Council does not have any designated Green Belt land. The Council intends to commission further evidence to demonstrate the viability of Policy LP.31 and other relevant policies proposed in the plan and the level of affordable housing which can be provided.

Assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable. Plan makers can use site typologies to determine viability at the plan making stage. The Council intends to commission further evidence to demonstrate the viability of Policy LP.31.

It is considered that flexibility mentioned is provided. Policy LP. 31 AFFORDABLE HOUSING and its supporting text which should be read as whole states exceptionally where site conditions would render a scheme unviable if the policy requirements were to be met in full, the Council will expect the applicant to provide an open book financial appraisal, which should demonstrate the level of affordable housing and other S106 contributions which can be provided whilst allowing the scheme to remain viable.

Whilst the findings of the Newent housing needs assessment will be noted and considered Policy LP.31 Affordable Housing indicates thresholds for affordable housing provision on development sites, the proportion of affordable housing requirement and the split of affordable housing tenures is a district wide policy, which will primarily be based on the district-wide Local Housing Needs Assessment in accordance with the NPPF.

Comment noted and the many support in principle comments for the policy welcomed. The policy provides clarity that all developments will be expected to provide affordable housing in accordance with the tenure split sought by the policy, unless viability constraints demonstrates that the required tenure split cannot be provided. It is considered that the proposal that the tenure split will be negotiated on a site by site basis provides no clarity as to what will be required and potentially protracts the planning process.

Policy LP.31 Affordable Housing seeks to provide a range of affordable housing to address housing need including affordable homeownership.

Proposed amendment - 'Within mixed-tenure developments, the appearance of the affordable dwellings shall be indistinguishable from the open market dwellings and the affordable housing shall be evenly distributed across the developments so as to avoid the over-concentration of affordable housing within the development site.'

Regarding the allocation of affordable housing for rent this is set out in the Homeseeker Plus policy which is the allocation scheme of affordable housing for rent in the district.

The purchasing of ex-social housing is outside the scope of the Local Plan and the consultation.

Whilst the FODDC Local Plan Economic Viability Assessment indicates that greenfield sites providing less than 5 dwellings would be viable to provide affordable housing, the site threshold of 0.16 ha in designated rural areas will be reviewed. Whilst the suggestion that the council should consider taking financial contribution in lieu of an onsite affordable housing provision in designated rural areas is noted the council considers that such provision fails to address the affordable housing needs of rural areas with actual provision.

Support for 100% affordable housing schemes noted and welcomed. In relation to the comment that the policy should not just be restricted to only affordable providers being able to bring schemes forward under it, the policy will be considered however the Council will still want to see such sites developed and managed by a Housing Association.

Paragraph 9.13 - comment noted however it is considered that the sentence provides clarity over the tenure mix that will be sought as part of the affordable housing provision albeit that the 70:30 split will need to be amended to 67:33.

Policy LP.32 Affordable Housing on Rural Exception sites and supporting text

Number of Representations: 10

Support: 3

Object: 0

Observations: 7

Support:

- The same principle (as para. 9.20) should extend to self and custom build (SCB) housing, which is a tenure of housing for which there is already clear evidence of local need across the district, and which can make an important contribution to meeting housing needs more widely. Policy LP.35 seeks to contribute to SCB supply by requiring 4% of plots on large sites of 50+ dwellings to be provided for SCB development. However, in practice large sites are often not suitable for SCB plots for a range of reasons, and the SCB market tends to be naturally stronger in smaller settlements than the larger urban centres where large sites tend to come forward. LP.37 provides a potential template for this, as it establishes support in principle for self-build "land based residences" in locations where this would not normally be the case, subject to several criteria. In principle, there is no reason why the same support, with appropriate caveats, should not be extended to conventional SCB housing as well.
- The principle of Part C with regard to rural exception sites is appropriate and supported by the SWHAPC as it helps to secure land for delivery of affordable housing in rural areas where housing delivery would otherwise not be supported. (SWHAPC).
- The application of this policy with some reasonable flexibility is supported to deliver rural AH.

Observations:

- The criteria proposed for approval of permissions are sound and well stated. The need for affordable housing - both for rent and shared equity- is clear, and larger sites, mainly in the towns will be the source for most of these. (Coleford Town Council3).
- There are some common themes which run through this group of policies – thus potential to find efficiencies where their scope and content overlap, and to address inconsistencies where they arise. Fully supportive of principle of Paragraph 9.20.

Draft Officer Response

Support in Principle for Rural Exception Sites is noted and welcomed.

Policy LP.35 Self And Custom Build provides support for smaller custom and self-build developments, stating that proposals for self and custom build housing, to be occupied as homes by those individuals, will be supported by the Council where they are in conformity with all other relevant local and national policies.

The NPPF requires local authorities to identify the demand from people wishing to commission or build their own homes and to develop policies to address this demand. Policy LP.35 Self And Custom Build and the 4% requirement provides certainty that the council has a clear process for how it intends to meet such demand of self-build plots. The policy also provides clarity to landowners/ developers of what types of development will be expected to provide self and custom build housing.

Policy LP.35 Self And Custom Build and the 4% requirement provides certainty that the council has a clear process for how it intends to meet such demand of self-build plots. Many local authorities have introduced similar % requirement policies, and the Council cannot see why such requirements cannot work in the Forest of Dean.

The Council appreciates that several of the policies identified are similar in nature and that there are some common themes which run through these group of policies. The Council will consider whether common themes and policies could be grouped together, whilst making sure the requirements of each policy is not lost.

Policy LP.33 Development proposals for first Home Exception sites and supporting text

Number of Representations: 9

Support: 2

Object: 1

Observations: 6

Support:

- The SWHAPC requests that First Homes Exception Schemes are included where First Homes is either included as a possible affordable home ownership option or excluded on the basis of not meeting needs. The strengthening of First Homes within national policy is also yet to be seen. It would be prudent for the Local Plan policies to be drafted with suitable flexibility should the tenure fall away completely over the plan period. (SWHAPC).
- Paragraph 9.20 of the supporting text states that "Rural Exception Sites can therefore provide a means for people who would ordinarily not be able to afford to remain within their local community". We are firmly supportive of this principle. It is also considered this same principle should also extend to self and custom build (SCB) housing. Policy LP.35 seeks to contribute to SCB supply by requiring 4% of plots on large sites of 50+ dwellings to be provided for SCB development. However, in practice large sites are often not suitable for SCB plots for a range of reasons, and the SCB market tends to be naturally stronger in smaller settlements than the larger urban centres where large sites tend to come forward.

Object:

- RPC strongly disagrees with the approach to settlement boundaries set out in Policy LP.33 Development proposals for First Homes Exception Schemes. This approach has been successfully utilised by developers seeking planning permission in Redmarley and has resulted in the village settlement boundary being extended three times in the last six years. With this policy, one has to ask, "what is the point of having a settlement boundary?" RPC requests that this Plan clause is removed. (Redmarley PC).

Observations:

- There are some common themes which run through this group of policies - as such there is potential to find efficiencies where their scope and content overlap, and to address inconsistencies where they arise.

- Would point out that within Newland parish there are large areas of Crown Estates land which has the potential for use for development. (Newland Parish Council).
- Suggest Capitalisation of 'Designated Rural Area' definition within the policy.
- Under Part 6 of Policy LP31 it makes reference to "a small proportion of affordable homes" - we consider the Council needs to be more specific when referring to "small proportion", as this is not defined and will cause confusion amongst developers.
- Are we proofing and including One Planet and Low Impact developments?

Draft Officer Response

Support in Principle for Rural Exception Sites noted and welcomed.

Policy LP. 35 SELF AND CUSTOM BUILD provides support for smaller custom and self-build developments, stating that proposals for self and custom build housing, to be occupied as homes by those individuals, will be supported by the Council where they are in conformity with all other relevant local and national policies.

The approach regarding First Homes Exception Schemes reflects National Planning Practice Guidance. The NPPF requires local authorities to identify the demand from people wishing to commission or build their own homes and to develop policies to address this demand. Policy LP. 35 SELF AND CUSTOM BUILD and the 4% requirement provides certainty that the council has a clear process for how it intends to meet such demand of self-build plots. The policy also provides clarity to landowners/ developers of what types of development will be expected to provide self and custom build housing. Many local authorities have introduced similar % requirement policies, and the Council cannot see why such requirements cannot work in the Forest of Dean.

First Homes Exception Schemes are schemes comprising wholly of first homes (unless viability constraints require a small element of market housing) it would not be appropriate on mixed residential schemes where First homes is included as part of the housing provision to define the site as a First Homes Exception Scheme.

It is recognised that affordable homeownership tenures can alter or stop over time so will review the policy to ensure that there is suitable flexibility should the tenure fall away completely over the plan period.

Regarding allowing a small element of affordable housing this will be considered against each site proposal recognising that scheme sizes may vary etc. and the amount small may differ.

The Council appreciates that several of the policies identified are similar in nature and that there are some common themes which run through these group of policies. The Council will consider whether common themes and policies could be grouped together, whilst making sure the requirements of each policy is not lost.

There is a drafting error the definition will be amended to have capitalised letters at the start of each word

Comments regarding One Planet and Low Impact developments are noted, and policy LP.9 (point 11) and Para. 9.42 supports single or small groups of dwellings on exceptional land based basis (similar to Wales' One Planet Development Practice Guidance).

Policy LP.34 Accessible And Adaptable Homes and Supporting Text.

Number of Representations: 9

Support: 7

Object: 0

Observations: 2

Support:

- Support the Council's objective to ensure that new homes are futureproofed for an aging and changing population. The requirement for 90% to be built to M4(2) standards is reasonable (where site levels etc. allow). M4(2) homes are broadly suitable for a range of able-bodied and disabled persons and therefore can be effectively sold to the private market. However, we consider that the requirement for 10% of affordable homes to be built to M4(3) standards requires further caveating. Whilst we accept that the findings of the Gloucestershire Local Housing Needs Assessment suggest that a further 170 M4(3) dwellings will be required over the plan period, such homes are of a specialist design which is likely to primarily be suitable only for wheelchair users due to sizing and fixtures. As such, the reference in the proposed supporting text to the flexible application of this policy should be expanded to put the onus on the LPA to demonstrate need (e.g. through their Housing Register) and included within the policy proper.
- Secures greater provision of lifetime/adaptable homes which would meet the needs of the population in the area. (NTC).
- 9.27. Suggest an addition to the 3rd sentence to read ";than the overall population predicted growth of 8,823."
- Accept that there is a growing need for properties which comply with current Building Regulations and so we support this policy direction, although we would like to remind the Council that the increased delivery of such properties may affect viability and overall affordable housing delivery in the FoD. There is some concern that a 10% provision of M4(3) may be a significant over-provision. Therefore, we suggest this requirement is based on actual need rather than a blanket 10% requirement taking into account viability and feasibility considerations. We are also aware that M4(3) requirements are challenging to achieve in terms of level access on sites where there are topography issues, so planning policy should acknowledge this as it will not always be possible to achieve this on sites. There may also be viability considerations around the provision of lifts which may also make the provision of level access challenging to achieve and this should be considered when setting requirements. (SWHAPC).

Observations:

- With the increasing proportion of the Forest population in the older age categories, and the established benefits of independent living for all, this is an important policy. (Coleford TC).
- Should the Building Regulations be reviewed in the future, we would urge the Forest of Dean Council to go further and commitment to a target of 100 per cent, except for those designed to be wheelchair accessible.
- GCC officers fully support the Forest of Dean District Council to commit to a 10 per cent target of affordable housing on major developments being wheelchair dwellings in accordance with the Building Regulations M4(3) standard: Category 3 or any subsequent national equivalent standard, should the Building Regulations be reviewed in the future.

- GCC welcome paragraph 9.28, that developing more accessible and adaptable homes will support the increasing numbers of older people to be supported in their own homes for longer, in accordance with key public health and social care strategies.
- Protecting older adults during cold and hot weather periods, including considering the social determinants of vulnerability, is a key lever for minimising health risks. Responding to an ageing demographic is a key issue in Gloucestershire. (GCC)
- The requirements to meet Part M4(2) will be superseded by changes to residential Building Regulations. (HBF)
- A distinction needs to be made between M4(3)a wheelchair adaptable housing and M4(3)b wheelchair accessible housing. (HBF)
- The whole plan viability assessment should also be explicit in whether it was applying M4(3)a or M4(3)b as the latter can only be sought on affordable housing where the Council has nominations and is considerably more expensive than the former. (HBF).

Draft Officer Response

Support that new homes are futureproofed for an aging and changing population is noted.

The NPPF requires local authority's via a local housing needs assessment to establish the needs for different groups in the community including people with disabilities (which includes wheelchair users) and then develop policy's to meet those needs. For wheelchair users such policy would be implemented through the introduction of the optional technical housing standards and the requirement for M4 (3) dwellings, within their Local Plan. In accordance with the NPPF and PPG, the Council has identified the calculated need via the Gloucestershire Local Housing Needs Assessment for 621 M4(3) dwellings over the plan period and has set out policy requirement of 10% of affordable housing on major developments should be wheelchair dwellings in accordance with the Building Regulations M4(3) standard. When the policy requirement of 10% affordable housing on major developments provided to M4(3) standard is compared to identified need it is not considered that such provision will outstrip the identified need.

Policy LP. 34 Accessible and Adaptable Homes and the policy requirement of 10% affordable housing on major developments provided to M4(3) standard provides certainty that the council has a clear process for how it intends to meet such demand for people requiring wheelchair accommodation. Is not considered correct that the Council should on the submission of each relevant application further demonstrate need, using various sources such as the housing register (which it is recognised has constraints). Such an approach would proact the planning application process potentially leading to disputes between the council and applicants on need as well as provide uncertainty to developers/ Landowners of being fully able to take into account, such policy requirements when procuring land and bringing forward sites.

Point 3 of the policy already acknowledges that in certain circumstances (subject to appropriate justification) such provision may not be possible to achieve on site.

It is recognised that the previous government consulted on the raising accessibility standards for new homes in 2020 and proposed as part of its consultation response in 2022 to mandate the current M4(2) (Category 2: Accessible and adaptable dwellings) requirement in Building Regulations as a minimum standard for all new homes. However, to date no timetable has been set for the proposed amendments to Building Regulations. Should a timetable prior to submission of examination of the plan be confirmed

for the introduction M4(2) through Building Regulations as a minimum standard for all new homes, the policy requirement for M4(2) will be removed from the plan.

The Council intends to commission further evidence to demonstrate the viability of relevant policies proposed in the plan as well commissioning updated housing needs information to support relevant policy requirements, including what level of M4(3) housing can be provided. The suggestion of increasing the requirement for the provision of M4(2) dwellings from 90% to 100% of dwellings will be considered in light of the outcomes of this additional work.

The Council considers that the proposed policy aligns with the optional technical housing standards and no amendment is proposed.

proposed amendment - The growth in the older population aged 65 and over (9,498) is larger than the overall predicted population growth of 8,823

Policy LP.35 Self And Custom Build and supporting text

Number of Representations: 15

Support: 6

Object: 2

Observations: 7

Support:

- Welcome the provision in part b) of the policy to enable developers to build out self-build plots as ordinary market housing after a period of (unsuccessful) marketing. Within the supporting text it would be helpful to add some guidance as to what such a marketing exercise would be expected to comprise of.
- Given the preference within Newent to promote a wide range of smaller developments to meet housing needs, this policy could express more support for smaller custom and self-build developments. (NTC).
- Support but recommend a higher % to meet likely demand over the plan period.

Object:

- Policy is a very narrow and restrictive, when there has been a consistent government strategy over more than a decade to significantly boost the supply of self-build homes. This does not respond to the changes made in the NPPF in para 70b) which explicitly support the promotion of small sites for self-building. The policy should be revised to become more positive, and especially in relation to small sites for self-building.
- Draft Policy LP35 provides challenges to affordable housing providers when taking forward a scheme as 100% affordable, as they lose grant funding if the self-build / custom-build element is delivered as an open market product. To comply with draft Policy LP35, such plots can only be taken forwards as Shared Ownership and are dependent on the customer being able to get a mortgage. Therefore, we ask that draft Policy LP35 is reconsidered to give a more flexible approach for 100% affordable schemes. (SWHAPC).

Observations:

- "Rural Exception Sites can therefore provide a means for people who would ordinarily not be able to afford to remain within their local community". We are firmly supportive of this principle. It is considered this same principle should also extend to self and custom build (SCB) housing, which is a tenure of housing for which there is already clear evidence of local need across the district, and which can make an important contribution to meeting housing needs more widely. In practice some large sites are not appropriate for SCB plots for a range of reasons, and the SCB market tends to be naturally stronger in smaller settlements than the larger urban centres where large sites tend to come forward. In many instances Registered Providers (RPs) can find small rural exception schemes unsuitable additions to their portfolio because, by their nature, small exception sites can be relatively isolated from the rest of an RP's stock, making management and cost efficiency much more challenging.
- HBF considers that Councils can play a key role in facilitating the provision of land as set in the PPG. This could be done, for example, by using the Councils' own land for such purposes and/or allocating sites specifically for self and custom-build home builders- although this would need to be done through discussion and negotiation with landowners. HBF does not consider that requiring major developments to provide for self-builders is appropriate (co-ordination of builds, multiple contractors, large machinery, health and safety, etc).
- If such a policy were to be introduced it will be important that it is realistic to ensure that where self and custom build plots are provided, they are delivered and do not remain unsold. If demand for plots is not realised, there is a risk of plots remaining permanently vacant effectively removing these undeveloped plots from the Council's Housing Land Supply. The Council should consider the application of a non-implementation rate to its HLS calculations. (HBF)
- HBF suggest any unsold plots should revert back to the developer. The timescale for reversion of these plots to the original housebuilder should be as short as possible from the commencement of development because the consequential delay in developing those plots presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site. (HBF).
- HBF considers that a policy which encourages self and custom-build development and sets out where it will be supported in principle would be more appropriate. HBF considers that the Councils can play a key role in facilitating the provision of land as set in the PPG. This could be done, for example, by using the Councils' own land for such purposes and/or allocating sites specifically for self and custom-build home builders- although this would need to be done through discussion and negotiation with landowners. HBF does not consider that requiring major developments to provide for self-builders is appropriate.
- Not considered appropriate to set a fixed requirement of 4% on all sites over 50 dwellings. Instead, this should be determined on a site-by-basis having regard to the most up to date evidence and demand contained within the self-build register, and to the viability and nature of the development at the time of the planning applications submission..
- Object to the blanket requirement for 4% on sites of 50+ homes to be made available as serviced plots for sale to self and custom builders. Instead, an approach which seeks to encourage self and custom build in appropriate circumstances and / or locations should be considered.
- There are some common themes which run through this group of policies. As such there is potential to find efficiencies where their scope and content overlap, and to address inconsistencies where they arise.

Draft Officer Response

The NPPF requires local authority's to establish the needs for different groups in the community including people seeking to build their own home, and then develop policy's to meet those needs. The Self & Custom Build Act requires local authority's to grant permission to self-build plots to help meet demand on it's self-build register.

Policy LP.35 Self And Custom Build and the 4% requirement provides certainty that the council has a clear process for how it intends to meet such demand of self-build plots, without which the Council could not demonstrate how it would meet demand for such accommodation. Many local authorities have introduced similar % requirement policies, and the Council cannot see why such requirements cannot work in the Forest of Dean. The council considers that this is appropriate % level at which to set a requirement when considered against demand on the self-build register.

The policy does support smaller custom and self-build developments, stating that Proposals for self and custom build housing, to be occupied as homes by those individuals, will be supported by the Council where they are in conformity with all other relevant local and national policies.

In regard to plots not being sold and remaining permanently vacant, the policy sets out that where plots have been marketed for at least 9 months and, where they have not sold, the plot(s) may either remain on the open market as self-build or be built out by the developer as market housing.

The Council appreciates that several of the policies identified are similar in nature and that there are some common themes which run through these group of policies. The Council will consider whether common themes and policies could be grouped together, whilst making sure the requirements of each policy is not lost.

It is not considered correct that the Council should on the submission of each relevant application further demonstrate need. Such an approach, would proact the planning application process potentially leading to disputes between the council and applicants on need as well as provide uncertainty to developers of being fully able to clearly take in policy requirements when procuring land.

Use of council land for self-build - a review of the council land holdings has not identified any suitable sites, whilst allocating sites following discussion and negotiation with landowners would be a protracted process and not provide certainty of delivery of self-build plots.

What a marketing exercise would be expected to comprise of, - each scheme will need to submit a marketing strategy which demonstrates how the developer intends to market the site. The council will consider the additional wording or similar to be included as well as the proposed amendment.

9.36 As of 30 October 2023, 96 households had registered on the FODDC self-build and custom housebuilding register. Self-build and custom build plots can be delivered in a number of ways, ranging from multiple individually serviced plots within larger sites (as through this policy) or single or small sites. The council will require developers of eligible sites (including sites below 50 dwellings proposing to provide self build) to enter into a legal agreement section 106 agreements that secures the serviced plots as well as a marketing strategy for the marketing of any plots.

9.36a The Council will expect the marketing strategy to be submitted to the Council and agreed prior to the commencement of any phase which includes custom-build plots. The strategy should include at least show plots will be marketed to eligible purchasers, the use of plot passports, the

proposed terms and conditions for the sale and include the use of a reputable and experienced estate agent (to potentially market the plots) and that all serviced plots will be offered to people on the FODDC self-build and custom housebuilding register first for a period of 2 weeks before being marketed on the open market.

The policy will be amended to reflect that wholly affordable housing schemes will not required to provide self-build / custom-build plots.

Policy LP.36 Proposals For Purpose Built Or Specialist Accommodation and supporting text

Number of Representations: 6

Support: 3

Object: 0

Observations: 3

Support:

- Welcome the detail in Policy LP. 36, "In addition, the policy references adherence to the required building standards as outlined in Policy LP. 34, which is vital in terms of the long-term suitability for any future developments of specialist housing. In agreement with paragraph 9.38, ASC are committed to working positively and collaboratively to secure a broad range of housing choices for older and/or vulnerable people in the Forest of Dean that supports self-reliance and independent living and helps reduce the need for expensive care services and unnecessary admissions to hospital or residential care, approaches supported by Gloucestershire's County Councils Housing with Care Strategy (GCC).
- Policy does not distinguish between C2 care homes and C3 residential development. There is no requirement for affordable components for example through referrals for C2 accommodation. The words on meeting local needs are not very strong. According to the age-profile of the area, there are clear requirements for specialist accommodation for the elderly to meet local needs in Newent. A flexible approach to proposals for such accommodation is understood but, in forward planning, this should be part of a broader approach to mixed-uses on allocation sites in Newent and not at the expense of much needed employment land. (Newent TC).
- Suggest an amendment of the 5th line to "...dwellings be constructed to Category M4(3) standard."

Observations:

- Agreed that this development should not be restricted to sites within settlement boundaries as this may only act to stifle opportunities to provide new specialist housing. However, the policy wording is still restrictive that specialist accommodation and development would more likely be permitted outside of settlements should it involve the re-use of a building. Brownfield land and sustainable locations outside of the settlement boundaries should also be considered appropriate if it can be demonstrated that they are well located and have a good access to services and facilities. Uses such as care homes and nursing homes need not be located closer to other services and facilities given their use. Noted access for staff and visitors would need to be a consideration. Suggest amendments are carried out to note that "proposals for specialist housing for older persons

outside of settlement boundaries will be permitted where it would facilitate the re-use of existing buildings or previously developed land or sustainable locations which can demonstrate access to a good range of services and facilities." (NHS Trust)

- The requirements to meet Part M4(2) will be superseded by changes to residential Building Regulations. A distinction also needs to be made between M4(3)a wheelchair adaptable housing and M4(3)b wheelchair accessible housing. The whole plan viability assessment should also be explicit in whether it was applying M4(3)a or M4(3)b as the latter can only be sought on affordable housing where the Council has nominations and is considerably more expensive than the former. (HBF)
- Pleased that the draft Local Plan recognizes, albeit partially, that housing for older people has its own requirements and should be considered separately to mainstream housing. However, consider that the proposed wording of Policy LP.36 will not deliver the broad range of housing choices for older people that it states in the supporting paragraphs that it is seeking to achieve. Policy fails to make wider reference to the different typologies of specialist housing for older people identified in the Local Housing Needs Assessment paper or in Paragraph: 010 Reference ID: 63-010-20190626 of the Planning Policy Guidance note 'Housing for older and disabled people.
- Rather than addressing the range of typologies appropriate to meet the recognised needs of older people the policy is primarily focused on the provision of extra care housing in association with relevant statutory agencies.
- Whilst we can appreciate that commissioning priorities and the capacity of public services are relevant for some forms of specialist housing, they are not relevant for much needed specialist forms of older persons housing in the private sector and would therefore create an overly onerous policy requirement and the policy should be amended.
- Note that policy asks for 25% of all new residential proposals for older people to be built to Category M4(3) standards, rather than the 10% set out in the supporting text to Policy LP.34 'Accessible and Adaptable Homes'. This will have a significant financial impact upon the viability of older persons housing development.
- Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan"(Paragraph: 002 Reference ID: 10-002-20190509). M4(2) and (3) Housing has a cost implication and may serve to reduce the number of dwellings and further reduce viability.
- The 25% M4(3) requirement for older persons housing should therefore be deleted to make the plan deliverable, and consistent with national policy.
- Revise the text of Policy LP.36 as follows:

Policy LP. 36 Proposals For Purpose Built Or Specialist Accommodation

Proposals for purpose built or specialist accommodation for vulnerable people and/or older people will be supported provided the following criteria are met:

- a) The accommodation is well located having particular regard to its intended purpose, normally within a defined settlement but exceptionally making use of an existing building elsewhere which has access to a good range of services and facilities, such as healthcare or day care which may be needed by the anticipated residents.
- b) That any specialist and supported housing schemes proposed provide the necessary care and support packages.

Accommodation in various forms of tenure, e.g. shared ownership, outright purchase, leasehold possibilities, affordable housing for rent will be sought.

In addition, proposals specifically for specialist accommodation for vulnerable people should meet the following criteria:

c) the proposals meet or comply with local commissioning priorities, and address a demonstrable local community need.

d) It can be demonstrated that the development can be accommodated within the capacity of public services, and has the support of the relevant statutory agencies including health and social care.

Draft Officer Response

The comments and support for the policy re noted and welcomed. Several comments have been received in relation to this policy and the wording of the policy will be considered accordingly with the suggestions taken into consideration

It is recognised that the previous government consulted on the raising accessibility standards for new homes in 2020 and proposed as part of its consultation response in 2022 to mandate the current M4(2) (Category 2: Accessible and adaptable dwellings) requirement in Building Regulations as a minimum standard for all new homes. However, to date no timetable has been set for the proposed amendments to Building Regulations. Should a timetable prior to submission of examination of the plan be confirmed for the introduction M4(2) through Building Regulations as a minimum standard for all new homes, the policy requirement for M4(2) will be removed from the plan.

The Council intends to commission further evidence to demonstrate the viability of Policy LP.36 and other relevant policies proposed in the plan, including what level of M4(3) housing can be provided. This will include taking into consideration the comments made, and the policy will be reviewed accordingly in light of the outcome of the additional viability evidence.

Policy LP.37 New Land Based Low Impact Housing

Number of Representations: 10

Support: 4

Object: 1

Observations: 5

Support:

- Newent Town Council welcomes the flexibility provided by the policy. (Newent Town Council).

Object:

- On attending a recent local plan meeting, it was suggested to us that we were a perfect fit for Policy LP.37 and that the Council would be likely to support what we wished to do (subject of course to pre-planning advice). But on reading the detail, it is an impossible ask. We have also looked in detail at the Welsh One Planet Scheme. We are a working farm - not the type of project

which LP.37 seeks to support. We would be grateful if the Council would consider situations like ours. We are happy to remain off grid. We are supportive of green energy and net zero targets. We would be happy in a log cabin or to convert one of our (small!) barns, maintaining the exterior agricultural appearance. We are happy to be self sufficient in terms of sewerage discharge etc. (albeit the main sewer runs at the bottom of our land). We are happy to work with the Council in all aspects to achieve a solution that is appropriate for all. It is strongly our view that LP.37 needs to be rethought - and put forward in a way that is less restrictive, but is supportive of small, local, ethical businesses like ours. Either that, or an additional policy added to deal with people like us that "fall through the gaps". Restrictions should, of course, remain in place to avoid the "let's buy a piece of land, put some animals on it, and apply for planning permission" mentality - we totally agree with that!

Observations:

- One of the gaps in this LP delivery is that to address the growing number of holiday lets/AirBnBs which may not concur with regulation. This needs further consideration, given that the Forest is a major short stay tourist area. (Coleford TC).
- LP.37 provides a potential template for affordable housing, as it establishes support in principle for self-build land based residences in "locations where this would not normally be the case", subject to several criteria. In principle, there is no reason why the same support, with appropriate caveats, should not be extended to conventional SCB housing as well.
- LP37 new land based low impact housing is an interesting policy for a mainly rural area. It reflects climate change and the balanced approach between environment and development. One of the gaps in this LP delivery is that to address the growing number of holiday lets/AirBnBs which may not concur with regulation. This needs further consideration, given that the Forest is a major short stay tourist area.

Draft Officer Response

The Council appreciates that several of the policies identified are similar in nature and that there are some common themes which run through these group of policies. The Council will consider whether common themes and policies could be grouped together, whilst making sure the requirements of each policy is not lost.

Policy LP. 35 Self And Custom Build and the 4% requirement provides certainty that the council has a clear process for how it intends to meet such demand of self-build plots, without which the Council could not demonstrate how it would meet demand for such accommodation.

Many local authorities have introduced similar % requirement policies, and the Council cannot see why such requirements cannot work in the Forest of Dean. Policy LP. 35 Self And Custom Build supports smaller custom and self-build developments, stating that Proposals for self and custom build housing, to be occupied as homes by those individuals, will be supported by the Council where they are in conformity with all other relevant local and national policies.

The Council will review the subject of holiday lets/Airbnb's and consider whether a policy is required regarding holiday lets/Airbnb's.

Policy LP.38 Nationally Described Space Standards and Supporting Text.

Number of Representations: 8

Support: 6

Object: 0

Observations: 2

Support:

- The decision to enshrine the Government's Technical Housing Standards on minimum housing sizes is supported.
- 9.45. Last full line change to "∴ is provided including an assessment;"

Observations:

- HBF does not support the introduction of the optional Nationally Described Space Standard though policies in individual Local Plans. If the Councils wish to apply the optional NDSS to all dwellings, then this should only be done in accordance with the NPPF (paragraph 130f & Footnote 49) which states that "policies may also make use of the NDSS where the need for an internal space standard can be justified".
- The Council will need robust justifiable evidence to introduce the NDSS.
- The HBF considers that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional.
- There is a direct relationship between unit size, cost per square metre (sqm), selling price per sqm and affordability. The policy approach should recognise that customers have different budgets and aspirations. An inflexible policy approach to NDSS for all new dwellings will impact on affordability and effect customer choice. Well-designed dwellings below NDSS can provide a good, functional home. Smaller dwellings play a valuable role in meeting specific needs for both open market and affordable home ownership housing. (HBF).
- The NDSS is not a building regulation and remains solely within the planning system as a form of technical planning standard. It is not essential for all dwellings to achieve these standards in order to provide good quality living. We have not been able to locate an emerging Local Plan evidence base in relation to NDSS for draft Policy LP38. As such, in its current form and considering the evidence available, draft Policy LP38 does not clearly justify the need to apply NDSS across all residential development in the authority. The PPG is clear that the Council needs to fully evidence need, viability and timing of applying NDSS. (SWHAPC).

Draft Officer Response

Support for the policy is noted. As the local plan progresses the Council will publish a topic paper providing support for the introduction Nationally Described Space Standard. The introduction of the Nationally Described Space Standard for new dwellings will help ensure that properties are provided to a size that will help meet the needs of future occupiers. The provision of sufficient space in dwellings is an important element of good design, and the RIBA 2011 report 'The Case for Space: the size of England's new homes' highlights how substandard space in homes can have adverse social impacts.

The Council intends to commission further evidence to demonstrate the viability of the introduction of the NDSS and other relevant policies proposed in the plan.

Paragraph 9.45 - Proposed that the last line of the paragraph is removed as not necessary.

Chapter 10 Economy

Number of Representations: 4

Observations: 4

Object: 0

Support: 0

4 Observations:

- Gloucestershire Economic Strategy 2024-34 adopted to achieve greener & inclusive economic growth in Glos that delivers a stronger more sustainable economy. A core aim of GES is for the county to achieve carbon net zero by 2045, this corresponds to the draft LP's vision (paragraph 2.16) & Policy LP.2 concerning Net-Zero development. (GCC)
- The draft plan should consider employment opportunities in areas where housing sites are allocated. Employment land allocated at Beachley seems small (4 ha), considering a housing target of 600 dwellings. Useful to include reference to where projected future job opportunities & growth might develop, e.g. the tourism offer & assets thinking proactively about emerging industry such as ecology/biosphere/area designation if successful. Other potential sectors might include lifestyle/activity type holidays which link to other work currently being developed for the district. (GCC)
- Proposals for Employment opportunities are vague - lack of clarity in relation to job opportunities. How will employment be kept locally? There is no longer a big employer in Lydney. Local employment proposals are not realistic. It is not specific about what is currently available or what is being introduced. It is not considered there will be sufficient work to accommodate the increased number of additional adults who will fill the proposed 6,600 dwellings Residents will need to work further afield Woolaston will become a dormitory commuter area. (Woolaston Parish Council).
- Worcestershire County Council note employment/industrial development needs can be met without requiring further development opportunities in neighbouring local authority areas. Understand that 8 hectares of land at Newent has been identified for Employment Generating Uses as well as intensification of 3.4 hectares at Staunton Court. These sites are closest to the WCC transport network. The scale and location of these sites are unlikely to impact on the safe and efficient operation of WCC roads. It is challenging for WCC to determine any likely transport implications on Worcestershire's highway network without more detail on the potential uses, likely impacts & proposed mitigation measures. (WCC).
- As an accompaniment to the maps in Chapter 10 it would be useful to have a table explaining what the various coloured annotations mean rather than a key to the maps included at the end of the document.

Draft Officer Response

An up to date Local Economic needs assessment will be undertaken to inform the preparation of the Local Plan. A key to the maps is available on the online Policies Map, within the appendices and a separate pdf on the FODDC local plan webpage.

Policy LP.39 Economic Development and Supporting Text.

Number of Representations: 15

Observations: 8

Support: 7

Observations:

- The policy has good planning argument is supported, there is a lack of clear definition in some of the terms difficult to justify in development control. The comments re underuse, unsuitable, when change of use is being debated.
- CNDP and current LP state definitions against which actions can be measured, e.g. marketing a property for a period of time. (Coleford TC).
- The requirement for new development to meet sustainability targets in Policy LP. 2 LP. 3 no reference to biodiversity or the natural environment which makes a material contribution to the quality of the working environment & biodiversity.
- Stated that opportunities for renewable generation and storage on site will generally be supported, e.g. provision of PV on roofs. Strongly advocate stronger wording which goes beyond support. e.g. economic developments have a larger roof space in own ownership inherently suited to e.g. p.v. panels. (Environment Agency,).
- Is silent on homeworking & home-based business use. Post pandemic people continue to work from home agile/hybrid working is something that continue to be offered by local employers. (Regeneration FODDC).
- In considering role of businesses in communities health, encourage plan-makers to consider the 2021 Director of Public Health annual report.
- Anchor institutions organisations unlikely to relocate have a significant stake in their local area, are well positioned to use their assets & resources to benefit the communities around them to improve health & reduce health inequalities.
- In addition to NPPF, welcome reference to guidance in the LP & related policies that support green and healthy places. Air pollution & children's health & European Environment Agency (europa.eu) Active Design | Sport England. National design guide - UK (www.gov.uk) & National Model Design Code and Guidance Notes for Design Codes (GCC)
- Falls short when it comes to promoting restaurant and sale of food uses people change their spending habits & the way they spend their time, looking for more leisure & dining experiences spending less in retail premises.
- Close availability of convenient food uses makes adjacent employment areas more attractive to potential occupiers without the need for mobile food kiosks tend to proliferate around employment areas if no obvious convenient food options exist within walking distance.
- It may also reduce employees driving to places to buy lunch.
- General policies promoting commercial uses should include support for restaurants & other sale of food uses, recognise the value of food establishments in creating jobs, bringing vacant land into use & offering greater choice for residents & employees at larger employment sites. LP. 39 may be a suitable place to include this.
- LP.39 & LP.43 note that the LP contains new allocations for employment use, aim to support sustainable economic development where possible.

- Potential developers should be aware that the obligations of a water and sewerage undertaker extends to 'domestic' supplies only, the capability of our infrastructure to service future employment allocations will be assessed when the potential demand on our infrastructure is known.
- We have provided comments on the proposed employment allocations located within our operational area. (Welsh Water).
- Paragraph 10.3 is the only reference to a Circular Economy model in the document. The phrase "Overall the Council seeks to promote.." is not particularly robust, "overall", and "seeks" not being very strong. A Circular Economy can help reduce carbon emissions by avoiding waste "disposal" activities.
- The paragraph does not reference the Waste Hierarchy which should be applied as far as possible, elimination & minimisation are separate stages in the Waste Hierarchy, it is not clear why one term is in brackets?
- "Regeneration" is also a term more usually used in the context of urban renewal, or in the specific regeneration of chemicals? In waste terms such as recycling and recovery are used.
- The solitary reference in the consultation does not really suggest that the issue has been fully understood?
- Effectively a Circular Economy means minimal reliance on landfill, waste to energy with the associated carbon emissions & the retention/conversion of waste streams back into new materials and products.
- Single-use, short lifespan materials that cannot be "recycled" should be avoided as far as possible.
- Following subsequent announcements by the new Government, how will the Plan implementation be able to accommodate/adapt to any regulatory or policy changes, around Decarbonising, Climate Adaptation, Mitigation and transition to a minimal-waste Circular Economy, including expansion of "Green Jobs"?
- Linear & Circular Economy models are incompatible, in the former, resources are converted to emissions that are released into the environment, in a Circular model, emissions are minimised, resources are conserved and kept in use indefinitely. A transition is likely to be a complicated process, with traditional "waste management" facilities being converted into resource recovery and remanufacturing activities.
- Your Council may wish to inventory material flows in FOD to see where there are any opportunities to intercept & recover useful materials in the streams of household, commercial & industrial wastes, to help develop interventions, assess how far the industrial/manufacturing base could create more demand for recycled materials. E.g. food & green waste streams to create compost, recovered aggregates in construction, end-of life forestry, agricultural or any waste marine equipment produced at Lydney Harbour, how the BASF catalytic converter recovery facility in Cinderford could adapt to the move to Electric vehicles.
- The Councils procurement activities could help by increasingly specifying materials made from locally sourced & recycled materials rather than made from "New" and imported raw materials.
- How far could a "Community green waste composting" scheme be implemented so residents can avoid taking green waste to the HWRC & useful organic matter can be reprocessed within the community? Surplus compost could be donated to schools, parks or charities. Can small-scale modern "local" HWRCs and Reuse Centres be specified? could reduce litter, fly tipping, encourage diversion & reuse of still useful materials & avoid pressure on existing facilities.

- Para 10.3, how will performance towards Circularity be measured & assessed, what do "Good", "Average" & "Bad" waste generation levels look like? ("If you don't measure it, you cannot control it").
- How "Circular" can developments be, creating demand for more waste-derived construction materials (bricks blocks, tiles, joists, insulation, UPVC, flooring, etc.). Substitution of traditional "linear economy" raw materials with locally waste-derived products can reduce import costs and be more sustainable.
- Whilst 100% recycled content may not be practical, what are the currently achievable or ambitious levels of recycled percentages that could be aimed for? (Environment Agency).
- NPPF paragraph 81 places significant weight on supporting economic growth, taking into account both local business needs & wider opportunities for development.
- Paragraph 88 states policies should enable the sustainable growth and expansion of all types of business in rural area, both through conversion of existing buildings and well-designed, beautiful new buildings.
- The policies support both the retention of existing employment sites and new opportunities.
- The policy is slightly restrictive upon rural employment sites and could provide for more lenience in accordance with the Framework to ensure rural employment is supported where it would address local business and community needs.
- The NPPF states that policies and decisions should recognise that sites to meet these needs in rural areas may be found adjacent to or beyond existing settlements, in locations which are not well served by public transport.

Support:

- The comment in 10.5 is moot particularly to town centres. (Coleford Town Council).
- Agree in principle with this policy and note the cross reference to policy LP.5.
- In 5th line change to "& the location being suitable to be considered for redevelopment &."
- The policy is very general and could do with some improvement to the text the policy lacks clarity and could be improved. (Newent Town Council)
- No reference to the Economic Needs Assessment & the final employment allocation is also not identified, request that further detail is provided.
- When considering the cumulative impact of the Plan, it is important to understand the overall housing and employment needs in relation to the proposed allocated sites.
- Careful consideration of allocations may enable sustainable development and reduce demand on the SRN. (National Highways).
- Strengthen by the addition in the first paragraph, after the sentence ending 'by appropriate infrastructure' the following sentence: 'The quality of employment opportunities will be considered, including the pay, security and wellbeing of proposed employment.'
- Good local employment is at the heart of thriving communities.
- Previous Local Plans have allocated land for employment, this has not, to any great extent, been taken up. E.g. land around Lydney has been re-allocated to housing when no businesses took up the allocations.
- (CPRE) support paragraph 10.6 in allocating land for employment in line with the settlement hierarchy, the draft Local Plan still focuses too much on allocating housing and too little on how the Plan can support employment creation.

- Experience has shown that building houses will not drive employment.
- Without more creative policies to encourage businesses to operate within the Forest, settlements will continue to be commuter towns.
- Given the high-quality natural environment FOD is well placed to host SME businesses which do not require access to the national transport highways.
- The Local Plan could consider supporting work/home developments under LP6 (Mixed Use developments) to allow for office/studio/small workspace alongside new housing.
- Expecting large employers to take up significant sites when the Forest of Dean is not well connected to national transport infrastructure have been shown not to work.
- The mixed-use development proposed in LP27 for strategic sites allocates separate blocks of land for each use. We question whether this will achieve more employment than the previous plan.
- Without changing the focus of development from housing to employment, the Council's ambitions to achieve carbon neutrality will inevitably be thwarted.
- Would encourage FODDC to look again at how the plan can be used to encourage new and diverse forms of employment. Without addressing this, the plan will inevitably not be sustainable as residents leave the Forest for work. This will leave the Plan open to challenge. (CPRE).
- general policies promoting commercial uses should be sure to include support for restaurants and other sale of food uses and recognise the value of food establishments in creating jobs, bringing vacant land into use and offering greater choice for residents and employees at larger employment sites. LP. 39 concerning economic development may be a suitable place to include this.

Draft Officer Response

Policy LP39 sets out the aims of new employment provision. The policy seeks to make the best use of available land by steering development to existing sites where new proposals will need to be justified in respect of the settlement hierarchy or a need to be located away from settlements. The policy encourages a wide range of employment uses and in general does not refer to a specific employment sector. Any proposal must have regard to other relevant policies within the Local Plan.

Comments regarding the circular economy will be taken into consideration and revised where appropriate

An up to date Local Economic needs assessment will be undertaken to inform the preparation of the Local Plan. The Council will continue to work with the County Council and Parish /town Council to bring forward sites for employment uses. The council welcomes updates on discussions between CTC and the emergency services.

All suggestions for amendments to policy wording, supporting text and definitions will be taken into consideration and revised where appropriate.

Policy LP.40 Employment Generating Uses - Identified Sites and Supporting Text.

Number of Representations: 12

Support: 5

Observations: 6

Object: 1

Support:

- (GCC) looked through the sites included within the Regulation 18 consultation for Mineral Safeguarding & the location of waste infrastructure (see Table 1) should help in identifying where to carry out a Minerals Resource Assessment.
- Development on or within proximity to minerals & waste sites would need to ensure they meet the requirements of 'Policy MS01/non-mineral developments' within Minerals Safeguarded Areas (MSAs) - Minerals Local Plan 2020 & Core Policy WCS11 - Safeguarding Sites for Waste Management of the adopted Waste Core Strategy 2012.
- Paragraph 10.10: with two-tier administrations, there will be separate Local Plans for Minerals & Waste prepared by the Upper Tier, as well as Lower-Tier Local Plans covering other developments.
- Supportive of the general approach of allocating employment generating uses in or adjacent to the district's principal settlements & the other sites identified under this policy and policy LP 43.
- This policy & LP 43 are not supportive of speculative or unallocated large scale employment generating uses in the countryside. Such proposals should be refused & only the settlements & sites identified under this policy are appropriate. Any other alternative would be unsustainable & potentially harmful to the open countryside.
- Policy LP. 40 agree in principle with this policy, note that for some locations the available land area (ha) has not yet been quoted.
- Other than identified locations, no major additional sites for employment are identified for Lydney. Lydney is identified to be the largest residential settlement for growth in the FoDD that seems strange.
- Unless the FoDDC sees the future of Lydney to be little more than a largely out-commuter town.
- The policy allocates employment sites within or adjoining settlements including 8ha at Newent.
- Employment Sites outside settlements are also allocated, but none within Newent Parish.
- (Newent Town Council) would support a flexible approach to delivery of employment development within the parish based on a greater focus on mixed use development on allocation sites with high quality employment spaces that are attractive to potential occupiers.
- The current & previous strategy toward employment land of 'allocate it and they will come' has not worked and some allocated employment land has been proposed for alternative housing development as a result.
- Something new is required and allocation of sites within the local plan is only one part.
- A focused strategy is needed understanding the needs of businesses, promoting sites which meet their needs & understanding & playing to the key strengths of the local economy.
- This is likely to involve joint approaches involving the Town council District & County councils.

Observations:

- How is the interface with the GCC Waste & Minerals Plan (and any other relevant Plans such as Climate Emergency,) managed to prevent conflicting developments, such as new housing near to existing waste sites?
- The Consultation document does not provide a link to the Gloucestershire Minerals and Waste Plan or list of identified waste/minerals sites. (EA)
- Several large sites identified within the Policy.
- Several other smaller sites not directly linked to settlements are identified for additional employment generating uses.
- To ascertain if these proposed allocations would have a severe impact on the SRN, it is important to understand the proposed uses within these sites, when they are expected to come forward & any cumulative transport infrastructure requirements to facilitate delivery.
- Any mitigation detailed within the transport evidence base should be linked to an appropriate Local Plan site allocation or general infrastructure policy and included in the IDP. (National Highways)
- Can the regeneration of the wider Lydney Harbour Corridor be mentioned in blue boxes at 10.5 and 10.18? At present the former Pine End Works site is referenced and this is fully supported.
- The LP needs to help facilitate further employment & tourism related development along the Harbour Corridor to include a long term ambition to support the heritage railway, regenerate the canal serving the harbour inner/outer basins.
- Aim to bring this stretch of blue infrastructure back into productive use to increase potential for mooring points and bringing more visitors arriving by boat into Lydney. (Regeneration, FODDC).
- Greater flexibility for small rural business starter units outside the settlement boundaries is encouraged will reduce commuting to & from Gloucester with beneficial effect.
- With 600 new homes proposed, Newent needs more than 8ha of additional business space.
- Newent will have a disproportionately large allocation of proposed new houses compared to the rest of the Forest towns, there are no corresponding proposals for business.
- By comparison, Lydney has 101ha identified for business.
- Without jobs to go with the housing, this lack of opportunity for Newent directly conflicts with the Council aims and policies for sustainable living.
- The already overloaded B4215 to Gloucester will become even busier as a greater proportion of the inhabitants travel elsewhere to work.
- A case for recategorizing as an additional strategic site, the allocated site for employment on the west of Arthur Cooper Way, east of Tufthorn Ave by Tufthorn Lights. For a multi-hub use for emergency services. Coleford Town Council has made a case for this to Gloucestershire Fire Service in their consultation, has raised with the Ambulance Service an enquiry about their strategic consultation. This would make Coleford the central location for emergency services in the Forest, also reflects better Wye Valley access for specialist services, given the increased risk & frequency of service requirements in that sport/leisure location. It allows flexibility of different route to base for retained firefighters and for specialist teams to react quickly in less obvious vehicles.

- Would also potentially open up additional contiguous land for employment/ service provision in a Town Centre location adjoining the proposed site south of Railway Drive LP58, see later. (Coleford Town Council).
- Note that employment/industrial development needs can be met without requiring further development opportunities in neighbouring local authority areas. Understand that 8 hectares of land at Newent has been identified for Employment Generating Uses as well as intensification of 3.4 hectares at Staunton Court. These sites are closest to the WCC transport network. At this stage it is challenging for WCC to determine any likely transport implications on Worcestershire's highway network without more detail on the potential uses, likely impacts and proposed mitigation measures. (Worcestershire CC).

Object:

- The DIO objects to the proposed 4 ha of "employment generating uses" as part of the redevelopment of the Beachley Barracks site within this policy.
- There is no evidence provided within, or supporting the Plan to demonstrate how the Council has justified this level of provision, no commentary is provided as to the potential uses that this may include (with the exception of paragraph 8.9 which adds to the potential confusion on this matter).
- The 4 ha figure is also potentially at odds with the 5 ha referenced within policy LP.27 which states "about 5ha mixed commercial and employment generating uses" & policy LP.78 (para. 11.78) references "10ha for other uses" .
- We provide further clarification on the DIO position with regards to employment uses within our response to the site-specific policy LP.78.

Draft Officer Response

Policy LP40 is an important part of the Local Plan strategy, much of the new planned employment development is expected to take place in conjunction with the main strategic allocations to support the development itself and their wider areas. Land is identified for employment generating uses at the 4 towns and also the Beachley allocation as part of the redevelopment of the site. Land is also allocated at Mitcheldean for intensification for continued employment use at Whitecroft and at Aylburton on. It is acknowledged that the policy does not quote site area for employment sites away from settlements there is a specific policy that includes this information. It is considered that Lydney allocations amount to 101ha, this will be reviewed along with the strategy as a result of changes to the NPPF December 2024.

Policy LP.5 development in the countryside references employment uses outside of the LP allocations or settlement boundaries.

Policy LP40 is not intended to refer to specific sites and LP43 refers to employment sites away from settlement boundaries. Lydney Harbour Area Regeneration has a specific allocation Policy LP62 within the LP.

Minerals and Waste Local Planning is the responsibility of GCC. GCC and FODDC engage with regard to the development of the respective Local Plans, a hyperlink to the Minerals and Waste Local plans will be added to the text for reference.

Advice regarding the transport evidence base and IDP are noted.

The Council will continue to work with the County Council and Parish /town Council to bring forward sites for employment uses. The council welcomes updates on discussions between CTC and the emergency services.

Policy LP.4I The Reinstatement Of The Herefordshire And Gloucestershire Canal and Supporting Text.

Number of Representations: 9

Support: 7

Observations: 2

Object: 0

Support:

- Fully support and would help with improvements to travel, tourists and health of the people of FODDC. (Herefordshire & Glos Canal Trust).
- (Newent Town Council) welcomes the safeguarding of land for the reinstatement of the Herefordshire and Gloucestershire Canal.
- (The Canal & River Trust) support the retention of a canal safeguarding policy, covering both the existing route & any new diversions as necessary.
- A fully restored canal can bring social, economic & environmental benefits to the area.
- A restored canal can provide an active travel route, biodiversity enhancement, increase tourism, improve health & wellbeing, a host of other, multi-functional benefits.
- The Canal & River Trust do not own or maintain the Herefordshire & Gloucestershire Canal as it runs through the district one of our charitable objects is to support the restoration of all inland waterways.
- Support plans for the canal restoration being led by the Herefordshire & Gloucestershire Canal Trust as the Canal & River Trust believe life is better by water.
- Agree in principle in full paragraph 3, the wording is alter to read "&. will need to be considered and may apply whether or not planning permission is required."
- Should also improve the tourists to the area (Herefordshire & Glos Canal Trust).

Observations:

- Although 10.12 makes reference to regulation & technical approvals outside the planning system as required by the EA or other authorities the Council's recognition in 10.13 the ecological benefits of the canal should be balanced by a more explicit reference to the need to balance ecological and water resources which often present a unique set of challenges for canal restoration. (EA).
- The consented route we are currently constructing differs from the safeguarded route which was positioned over the old railway embankment.
- The new canal route and the alignment through the football club needs to be amended and we have been discussing this the planning officer. (Route realignment plan attached). (Herefordshire & Glos Canal Trust).

Draft Officer Response

Support for policy noted. All suggestions for amendments to policy wording and supporting text will be taken into consideration and revised where appropriate. The policies map will be amended where appropriate.

Policy LP.42 Dean Forest Railway

Number of Representations: 1

Support: 1

Observation: 0

Object: 0

Support:

- Access enhancements in conjunction with Policy LP.71, are well supported. A more joined up approach to improve facilities at both the heritage and mainline stations is needed. Sharing facilities such as a ticket office and cafe/toilets would help to provide a more welcoming arrival/departure experience for travellers which is currently lacking, particularly in the evening. This would not be a strategic priority for us and would need a business case to support. (GCC).

Draft Officer Response

Support and comments noted.

Policy LP.43 Employment Sites Away From Settlement Boundaries and Supporting Text.

Number of Representations: 14

Observations: 8

Support: 4

Object: 2

Observations:

- Former National Diving Centre Tutshill- this is now owned by DEEP.
- Taurus Crafts Lydney - redevelopment and expansion will impact on the services provided in Lydney (Woolaston Parish Council).
- Using the term " recreational use" for Taurus Crafts when it has a small playground and a mini golf course is perhaps stretching the meaning.
- The Former Dive Centre is now a research centre for underwater human habitats.
- Can the regeneration of the wider Lydney Harbour Corridor be mentioned in blue boxes at 10.5 and 10.18? At present the former Pine End Works site is referenced and this is fully supported.
- The LP needs to help facilitate further employment & tourism related development along the Harbour Corridor to include a long term ambition to support the heritage railway, regenerate the canal serving the harbour inner/outer basins.

- Aim to bring this stretch of blue infrastructure back into productive use to increase potential for mooring points & bringing more visitors arriving by boat into Lydney. (Regeneration, FODDC).
- Allocates Employment Sites located away from settlement boundaries. None are identified in Newent Parish. (Newent Town Council).
- The scope of employment uses supported is broad & includes a number of tourist and leisure schemes. There is some duplication here with Policy LP.5 insofar as it relates to employment outside the settlement boundaries.
- We are supportive in principle of a policy position which enables the delivery of employment at locations outside the defined settlement boundaries.
- Contains new allocations for employment use we aim to support sustainable economic development where possible.
- Potential developers should be aware that the obligations of a water and sewerage undertaker extends to 'domestic' supplies only, the capability of our infrastructure to service future employment allocations will be assessed when the potential demand on our infrastructure is known.
- We have provided comments in appendix 2 of this representation on the proposed employment allocations located within our operational area. (Welsh Water).
- The retail element on the site has the potential to compete with Lydney town centre" requires explanation.
- Lydney Town Centre has a variety of shops that are not likely to be replicated at Taurus. Taurus will not provide a weekly shop for a large family, nor the other retail variety available in Lydney.
- Needs updating to reflect new site owners and recent investment as a marine engineering research & development facility. (FODDC Wendy Jackson).

Support:

- Supportive of the general approach this policy & policy LP 43.
- Clearly this policy & LP 43 are not supportive of speculative or unallocated large scale employment generating uses in the countryside. Such proposals should be refused and only the settlements and sites identified under this policy are appropriate.
- Stone End Farm at Churcham, mention should be made that considerations for the site's use include the impact on local listed buildings their curtilages & nearby Wildlife sites; a priority consideration needing to be taken that the site is inside the Natural England Walmore Common SPA/Ramsar/European Natura 2000 registered/SSSI Impact Risk Zone.
- Re Cannop Depot and Cycle Centre, for clarification the 1st sentence needs to be revised..
- Former National Diving Centre Tutshill do not object in principle & the objection can be overcome through purchasing adjacent arable land, reducing the size of the development or operational hours, changes to the layout and design of the site so that most of the development is to the east rather than the west which should be integrated into this plan policy. (Natural England)
- Dive Centre - The site must be compatible with the continued use of the adjoining former railway as a recreational route. take full account & provide for the ecology of the site, the site's role in supporting wildlife especially any associated with nearby designated sites and other protected species.'
- The following wording is recommended: 'A site of about 21.7ha is identified for further development and intensification of a marine related Employment uses to create a research

and development facility centred around the water. The proposed Campus will embrace research, engineering, training, workshops, accommodation in a master planned environment which celebrates biodiversity, high quality buildings and reflecting sustainable development principles. A masterplan will be produced to reflect these key Employment focused uses and the required approach to various effects such as access, ecology, noise and visual.' will strengthen the allocation of the Site in order to fully support its delivery and associated job creation, economic benefits and regeneration.

- The opportunity & associated employment & economic benefits currently being determined under planning application P1712/23/OUT are significant.
- The provision of a high-quality research campus will enhance the existing facilities and services on the Site & will further develop & intensify uses on Site for diving related activities.
- The retained, when necessary strengthened allocation of the Site, will contribute to its imminent delivery & the resultant economic benefits.
- For FODDC to apply the recommended amendments to maximise the potential of this under-utilised Site.

Object:

- Object to the omission of Puzzlewood & Perrygrove Railway Adventure
- The large areas of land occupied by these sites, their prominent location on the edge of the principal Settlement of Coleford, their importance to the tourism & recreation facilities in the FOD mean they are of equal importance to Taurus Crafts. It makes little sense to include Taurus Crafts as a specific site & not Puzzlewood & Perrygrove Railway Adventure.

Draft Officer Response

Former National Diving Centre Tidenham - The policy will be revised to reflect the current permissions/activities and suitable uses on an existing site. Horseshoe bats, dormice and great crested newts are all present within the wider site and all forthcoming applications must make sure that all protected and notable species and habitats are adequately mitigated for. There must be no adverse impacts to the Wye Valley and Forest of Dean Bat SAC and this must be a key consideration. Lighting must be designed sensitively across the site.

Policy LP40 is not intended to refer to specific sites and LP43 refers to employment sites away from settlement boundaries. Lydney Harbour Area Regeneration has a specific allocation Policy LP62 within the LP.

Stone End Farm Churcham - The Ecology and Listed buildings on site will be considered. The policy will be amended as appropriate

FODDC recognise the importance of Puzzlewood and Perrygrove railway to the tourism and recreation facilities in the Forest of Dean District. Taurus Craft differs in that it provides a variety of employment uses on a single identified site. The inclusion in this policy is to permit the evolution of the site within the defined area only. the reference to the retail element on the site refers to the need to protect the town centre.

Policy LP.44 Land at Stowfield Lydbrook and Supporting Text.

Number of Representations: 8

Object: 5

Observations: 2

Support: 1

Object:

- Object to the proposal to build on the Chronos Technology site and further development on the factory site the Cable Works.
- Site may be partially in flood zone 3b and 3a, development need to be developed sequentially in relation to layout and uses.
- A culverted ordinary watercourse runs beneath the site.
- Site may be similarly constrained as LP.92 Wye Garages. (EA).
- Ground contamination, site previously used by Temco, they plated steel wire with silver, nickel etc., and cyanide was used.
- Unsuitable for domestic use. Danger to residents in the new housing and other local residents in the area.
- Would disturb wildlife.
- Sewage pipes run through site in order to connect to the main sewer adjacent to Upper Stowfield Rd. will cause problems to sewage waste.
- Above the proposed development are two high voltage electric power lines, effect of electric and magnetic fields, prolonged exposure has been linked to certain health issues.
- Noise pollution of buzzing and humming sounds from high voltage lines.
- National Grid recommends people should not live closer than 50 m from High voltage lines.
- Increase in traffic to access local facilities.
- Site is unsustainable.
- Businesses on this site have 24 hour access, huge heavy good vehicles make deliveries throughout the night, which cause excessive noise.
- We are keeping a diary and making a complaint to the council.
- If developed further noise will obviously increase.
- Restriction should be put in place to make it workable for residents and businesses.
- Upper Stowfield Road is very hazardous with speeding cars and heavy vehicles.
- Large lorries take the wrong turn go up this road and can't turn around.
- The layby is used by buses and lorries for overnight parking.
- Thought the area is a AONB, as it is part of Wye Valley Walk.
- No easy pedestrian access to local amenities.
- Site would directly overlook my property, affecting privacy, cause noise & light pollution.
- Traffic would increase particulate pollution, noise and increased traffic flows.
- Outside the curtilage of Lydbrook development zone.

Observations:

- Support retention of former Stowfield Works site for employment purposes. (Regeneration, FODDC).

Support:

- Paragraph 10.29 alter last sentence to “ except to indicate that a range of employment uses..” .

Draft Officer Response

Land at Stowfield (to the north and south of the main road) is previously development land (brownfield) which national planning policy seeks to promote for re-use as a priority.

Points raising support for the policy are noted.

According to the most up to date flood mapping, parts of the site to the north of the main road are within flood zones 2 and 3 and as such any future development would need to take this into account and avoid that portion of the land for inappropriate uses (employment/residential built structure), but could be used for other purposes, such as landscaping/GI. The policy already includes the requirement of any development not being subject to unacceptable flood risk.

The watercourse running beneath the site is taken into account and any permission granted would take into account this constraint and ensure that appropriate mitigation measures are included taking on board the expert advice of the LLFA and EA if necessary.

Ground contamination will also form part of any future planning application assessment and necessary mitigation measures included. The policy already mentions the need to address legacy from past uses, including contamination.

Any future permission would have to take into account any relevant habitat assessment and comply with any requirements set out in LP8 Nature conservation - protected sites, LP9 Habitat and Species protection and LP10 Green and blue infrastructure.

Similarly, any future permission would need to ensure that sewage is dealt with in an appropriate manner. The water/sewage companies are made aware of the FoDDC emerging local plan allocation sites, so they can prepare for the future required development in the area.

Any issues which may cause harm to the living conditions on the site would be assessed as part of any future planning application, this includes noise pollution and health and safety from high voltage lines as well as overlooking/loss of privacy and light pollution over and above what is already lawful on the site. Mitigation measures can be conditioned if required.

Design, layout, landscape and impacts on the character of the area (including the AONB) would be assessed during a future planning application for the site to ensure that no undue harm is caused.

Issues with regards to traffic and highway safety would be assessed by Gloucestershire County Council Highways at any future planning application stage.

It is noted that the site is not located in the Lydbrook settlement boundary or where pedestrian access or even public transport is readily available to access local amenities. However, the site is brownfield and accords with the national planning policy with regards to re-use. Active travel measures, such as footpaths/cycling can be implemented as part of a wider scheme.

Chapter 11 Strategic Sites and Settlements

Number of Representations: 3

Support: 1

Observations: 2

Object: 0

Observations:

- Support Lydney, Newent, Cinderford & Coleford to be developed as strategic sites. (Regeneration, FODDC).
- The consultation document does not appear to fully set out the environmental or ecological issues and opportunities associated with the future developments. The proposed locations are within the vicinity of sensitive designated sites, designated for a variety of reasons. Natural England would welcome a future conversation. (NE)
- Would prefer a table explaining what the coloured annotations mean presented as an accompaniment to chapter 11.

Support:

- Support Lydney, Newent, Cinderford & Coleford to be developed as strategic sites. (Regeneration, FODDC).

Draft Officer Response

Support noted, the Council will engage with Natural England to discuss allocation in the Local Plan.

A key to the maps is included in the appendix to the plan, online, and within the online policies map.

Cinderford and Supporting Text.

Number of Representations: 14

Observations: 12

Support : 2

Object: 0

Observations:

- Cinderford Town Council (CTC) Welcome existing sites earmarked for development to be used.
- Request FODDC continues to work with landowners/current brownfield sites ensuring these sites are sold and developed rather than being banked for future use.
- Would strongly oppose any reduction in 40 % affordable housing requirement rate for Cinderford. (CTC). Should not be lower than the rest of the Forest.
- Reinstate the G & H site and look at the former GIS (mobility aid site) at Valley Road. (CTC).
- EA - Development areas Cinderford are located on a Principal Aquifer largely within groundwater Source Protection Zone designated for the protection of public drinking water supply.
- Some historic landfills are also designated within the areas proposed for development, which could represent sources of potential contamination could be mobilised during redevelopment to pollute

ground water. The area is already densely populated and therefore further development should ensure that all appropriate measures are taken to ensure that the underlying aquifers are protected by appropriate planning policies/objectives. (EA).

- The NHS Trust have an interest in redeveloping the Dilke Hospital to deliver a social benefit to the local community.
- (GWT) Cinderford is mostly surrounded by core part of NRN, several LWs and two GWT nature reserves. The impact of development and pressures on the Severn Estuary SAC/SPA/Ramsar would need to be considered and a HRA carried out on any development proposals.
- Any potential development should take this into account by committing to the delivery of high quality GI well connected to surrounding habitats. (GWT).
- Unlike other towns no overall strategy is presented for Cinderford.
- Cinderford Forms part of primary Planning Area D6. Approx 400 houses outstanding. Equates to 120 primary places. More local primary places are required to accommodate current commitments to alleviate escalating travel costs. Secondary places could be accommodated with the existing provision in the Cinderford area and Forest Central. Cumulatively further places may need to be added. Additional sixth form places are also required. (GCC).
- Include reference to Gloucestershire Engineering Training centre in Cinderford as well as Accxel - so both engineering & construction vocational training facilities in this location to complement Gloucestershire College's further education provision.
- Can the Levelling up funded investment be mentioned, 3 vacant/underused buildings in the town centre brought back to productive use. (Regeneration, FODDC).
- 24 beds in hospital insufficient and inadequate to support the proposed healthcare provision. The infrastructure on healthcare is too vague. (Woolaston Parish Council).
- 11.3 The new hospital is now open, future of Dilke Hospital site not clarified
- 11.4 factually correct, paragraph contains typographical and related linguistic errors.
- Mention pedestrians and wheelchair users. (Regeneration, FODDC).
- 11.5 paragraph in reference to Norther Quarter p.g. 102 unclear what a 'complementary manner' means.
- Could exact clarification be given as to whether the AAP is still valid.

Support:

- Paragraph 11.3 For clarity re-arrange 1st sentence to read "for a number of years the town has been the subject of policy interventions to support the local economy, the fabric of the town and the educational offer" the 6th sentence revised to read "Later a decision was taken to re focus more on the assets (principally an available workforce and an attractive environment) followed along with the opportunity to reuse some derelict land using government financed support. " 9th sentence amended "...mixed development including housing." And delete rest of sentence. Amend last sentence "Another important change is the development of a 2024 opened new community hospital which is intended to replace...."
- Paragraph 11.5 in table – Built form – amend LP actions - By implementation of the LP policies "to establish and maintain a high standard of development, work with partners, designers and local bodies, to support and promote the use of under used or derelict sites and premises for appropriate uses." Add "Support moves towards net zero carbon." Also applies to development at FODD towns Coleford, Lydney, Newent and Beachley Barracks.

Draft Officer Response

All suggestions for amendments to policy wording and supporting text will be taken into consideration and revised where appropriate, including reference to the new hospital and a reference to vocational training facilities at CNQ. The Draft Local Plan will supersede the CNQAAP, this will be noted in the text.

Comment noted, FODDC will continue to engage with land owners/developers/ agents of potential allocations/sites.

The Environment Agency's comments regarding the Principal Aquifer and a groundwater Source Protection Zone are noted. A water cycle study will be carried out to inform the local plan policies with regards to water resources, quality, extraction, nutrients, and pressure on groundwater sources, waste water treatment, etc.

GWT comments regarding the core NRN and local wildlife sites (LWS) and other sites are noted. Comments regarding school places are noted.

The Council will engage with NHS Trust to discuss the future of the Dilke Hospital site.

Policy LP.45 Cinderford Northern Quarter

Number of representations: 6

Observations: 2

Support: 3

Object: 1

Observations:

- Good to see positive references to the College and construction industry training centre.
- Could exact clarification be given as to whether the AAP is still valid?
- Welcome noting of low level land values.
- Transport focus on active travel, there is reference to no further development in some areas of CNQ, can it be assumed there is no plan to complete the spine road.
- The text in the policy statement box is unclear. Does it mean that the land use hasn't been identified yet, when will it be clarified?
- Area A & B include two LWS's and some core NRN, include high priority opportunities for nature recovery. As part of a review of the potential of Area B, would like the need for high quality green infrastructure (GI) and the preservation of core habitat, along with opportunities to improve connectivity and enhance the NRN, taking into account the needs of protected species, such as lesser and greater horseshoe bats. (GWT)
- Welcome acknowledgement that NQ is a very sensitive area in respect of ecology.
- Development has not respected the water environment in an optimum manner with the brook being in close proximity to industrial units and the road with associated land raising and prevention or future enhancements.
- The area contains a complex water environment with a range of sensitive habitats. (EA)

Support:

- Proposed allocation has close proximity to water courses which are valuable in their own right, ultimately connect to Severn Estuary SAC/SPA/Ramsar site. stress the need for a good system of sustainable drainage & water management.
- Site is adjacent to deciduous woodland priority habitat, particular importance for nature conservation included in the England biodiversity List published under Section 412 of the Natural Environment and rural communities Act 2006.
- A list of priority habitats and species can be found on Gov.uk.
- Advise council to check its bat strategy, consider whether the site has potential to link up the functionally linked maternity roosts flight lines to the trees and align these with public access routes.
- Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to open mosaic habitats inventory. (NE)
- Whilst appearing factually correct. The text in the box is wordy, contains a few typographical/ linguistic errors and some of it restates information previously provided in paragraph 11.4. Merit in tidying up and revising the text.
- Include reference to Gloucestershire engineering Training centre as well as Accxel to complement Gloucestershire College's further education provision. (Regeneration, FODDC)

Objection:

- Site is adjacent to substantial areas of Ancient Woodland, 18.5 HA of plantation Ancient woodland habitat SO639231568, 266HA plantation woodland habitat S064051560, on Ancient woodland Inventory. In conflict with Policy LP.9.... "planning permission will be refused for development resulting in the loss, deterioration or fragmentations of irreplaceable habitats, including Ancient woodland, ancient hedgerows and veteran trees, unless there are wholly exceptional reasons and a suitable compensation strategy will be delivered. For e.g. a wholly exceptional circumstance could include national infrastructure projects ... the benefits outweigh the harm."
- Attention drawn to Natural England standing advice on ancient woodland, used in conjunction with the NPPF..... "you should refuse planning permission if development will result in the loss or deterioration of ancient woodland".....
- Refer to the standing advice states.. Its existing condition is not a reason to give permission.
- The condition of plantation Ancient Woodland can be improved with good management. Standing advice referred to. (WT).

Draft Officer Response

Points of support are noted.

The CNQAAP will be superseded by an adopted local plan 2021-2041. Policy LP.45 covers the remaining areas (Area A and Area B) of the former AAP with regards to proposed development and any extant permissions can still be built out. There are no further plans to continue with the AAP or to provide additional works or lighting on the spine road.

There is no further land to be identified to be included in this policy. The text in the policy statement box makes reference to any future revised applications on the site covered by Policy LP.45 (which currently has a live outline permission). If planning permission is sought on that land again (revised plans or reserved matters application), then the environmental constraints would need to be taken into account during the planning application.

The sensitivity of the site with regards to LWS, core NRN, ancient woodland and potential for high quality GI are noted and will be further considered by the Ecology Officer, with the potential to strengthen the policy in this regard. Any future planning application would be assessed by a team of ecologists and Natural England to ensure that the appropriate mitigation measures and enhancements are included in any permission.

Any development proposals must consider Natural England's standard advise and create buffers of at least 15m from ancient woodland where root protection zones would be impacted. A full impact assessment will be required of any applications which may impact ancient woodland in accordance with Natural England's standing advise and forthcoming applications which may cause the loss and deterioration of ancient woodland will be refused unless there are wholly exceptional circumstances.

Any future permission would take into account the water environment and seek to ensure that it is not unduly harmed. Measures such as SUDs would be expected.

It is noted that the ancient woodland is adjacent to the site, and not within it. Therefore, any future permission would not accept development which would result in the loss or deterioration of the adjacent ancient woodland.

The text in the policy and statement boxes will be reviewed and amended as and where necessary.

Reference to Gloucestershire's engineering Training centre and Accxel could be included in the policy text and this will be reviewed.

Policy LP.46 Causeway Road, Cinderford - Football Club and Land Adjoining

Number of Representations: 5

Support: 4

Observation: 1

Object: 0

Support:

- The allocation of additional land for mixed uses at Sneyd Wood Road as part of a public benefit package could facilitate a replacement site for the existing football club (Cinderford FC) or provide additional facilities for the Rugby Club. Part of the site was subject to significant ground works having been undertaken on site to create level drained pitches in readiness for the Rugby Club. (Makes reference to Policy LP.48)
- Provide a secure future for the club and releasing additional land for housing.
- Adjacent to deciduous woodland, see comments in Policy LP.45 for NE advice. (NE).

- Supports the policy believes the wording is too weak, support change the wording to “ In addition, land presently occupied by the football club (a further 1.0 ha, capable of accommodating about the same number of additional units) is allocated for housing subject to the satisfactory re location of the football club and its infrastructure and to an accessible site convenient for users. The new site must be operational and meet league requirements, before any work on the current site is started. The area of the new site must be at least the same footprint as the existing site.” (Sport England).
- See comments in LP.45 for Natural England’s advice.

Observation:

- Site does not include any core NRN or high/medium priority opportunity area. We recommend the integration of high quality GI support connectivity between the north of the town and its rural outskirts and using the building with Nature GI framework. (GWT).

Draft Officer Response

Support for the scheme and also the benefits for the rugby/football club are noted.

Note that the site is adjacent to woodland and any application would be subject to the advice and potential mitigation measures from the Council’s Tree Officer and Ecology Officers. Comments and advice from Natural England as well as potential for GI, will be taken into account during both the policy making and planning application stages.

The proposed amendments to the wording of Policy LP.46 with regards to Sport England’s advice will be taken into account.

Lighting impacts on adjacent woodlands will be a key consideration on any future applications.

Development which supports green infrastructure to create connectivity between the town and the surrounding rural outskirts will be supported.

Policy LP.47 Station Street, Cinderford

Number of Representations: 4

Support: 2

Observations: 2

Object: 0

Support :

- Consider the removal of redundant building at the junction of Station Street/high Street junction, it would make development at Lower station Street more connected to town/schools.

Observations:

- A map of this allocation isn’t included in the Draft plan (incorrect map).
- No issue from an ecological sensitivity point of view.
- Alter 1st sentence to read “..having hosted a variety of uses including...”

Draft Officer Response

Any planning application submitted for this site would be subject to consideration by Gloucestershire County Council Highways, who will provide advice on providing highway safety measures. Highway safety measures (including removal of obstructions) can only involve the land within the curtilage of the site or immediate verge.

It is noted that a map of the allocation is missing, and this will be rectified.

Noted that there are no ecological sensitivity issues.

The proposed alteration to the sentence will be considered.

Policy LP.48 St Whites Farm, Cinderford

Number of Representations: 3

Observation: 1

Support: 2

Object: 0

Observation:

- The site does not include any core NRN or opportunity area, its nearest point is less than 300m from a wye Valley and FOD Bat SAC site.
- Any development must be informed by full ecological appraisals and plans must support local populations of bats.
- As with Causeway Road the site would benefit from some high quality GI to improve connection between areas of core habitat to the west and east.
- Adjacent fields have been shown to be used as flight line/feeding area by Greater horseshoe bats from Littledean Hall (SAC) maternity roost.
- Lighting will need to be carefully controlled.
- Tree planting should be used to provide additional screening from the fields. (NE)
- Is a consented site, forms part of larger development site A, a material start has been made, legally implemented and capable of completion (PI435/09/FUL). The site owner remains keen to bring the site forward.
- It is considered that a more balanced high quality development could be delivered on site if amalgamated into the adjacent land to the east to form a larger development site. Delivering a range of housing, affordable housing and other community benefits.
- The extant scheme is poor, lacking quality design, poor public realm and no references to the local design styles prevalent with the FODDC.
- Extant scheme will fail to deliver upon the wider objectives of the draft local plan, including sustainability, BNG enhancements, self build, affordable housing etc.

Support:

- Proposed housing provides a strong opportunity to contribute to core policies 1 & 3 and achieve low carbon vision.

- Potential to be an exemplar for zero carbon development as a planned new neighbourhood.
- Opportunities include incorporating generous green space provision, retrofit to adjoining housing estate, incorporate solar arrays on existing roofs, include bat roosts and pollinator corridors.
- Welcome the plan which identifies the site as having good potential for BNG. (NE)

Draft Officer Response

Supporting comments are noted.

Any future application for the site will be subject to the requirement of ecological assessment and advice provided from the Ecologist Officers and Natural England with regards to necessary mitigation, GI and BNG. Opportunities to create wildlife corridors to NRN core woodland will be encouraged. Planning conditions restricting lighting can be implemented if considered necessary at the planning application stage. Similarly, tree planting could form part of the landscape requirements for the scheme at planning application stage.

Any additional potential development of adjacent land to this site would need to be subject to further consideration and assessment through the Sustainability Appraisal. Currently, it is considered that the further consolidation of development of this area would harm the wider landscape.

Noted that part of the site has planning permission and concerns regarding the poor quality of extant site are taken on board. However, planning permission has been granted and unless the applicant submits another application, no further amendments can be insisted upon retrospectively by the Local Planning Authority with regards to design quality for that part of the site. However, planning applications for additional parts of the site (without extant permission) can be subject to higher design quality taking into account current planning policies and national/local design guidance. Equally, any new planning applications can seek to provide carbon efficiencies in accord with the planning policies as well as providing BNG.

Policy LP.49 Valley Road Cinderford

Number of Representations: 3

Observations: 2

Object: 1

Support: 0

Observations:

- The site is bordered by two areas of core (woodland) to the north and south and ancient woodland (Hollyhill Wood) to the north, the extension to the allocation takes it much closer to the boundary with ancient woodland, any impacts must be taken into account. (GWT)
- The site includes a culverted watercourse. The policy should make explicit reference to the need opening the culvert and benefits which include natural flood management, GI contributions and pollution prevention and detection . (EA)

Object:

- Site is adjacent to 1.7 HA SO64921440 on Ancient woodland Habitat. In conflict with Policy LP.9.... “planning permission will be refused for development resulting in the loss, deterioration or fragmentations of irreplaceable habitats, including Ancient woodland, ancient hedgerows and veteran trees, unless there are wholly exceptional reasons and a suitable compensation strategy will be delivered. For e.g. a wholly exceptional circumstance could include national infrastructure projects ... the benefits outweigh the harm.”
- Attention drawn to Natural England standing advice on ancient woodland, used in conjunction with the NPPF..... “ you should refuse planning permission if development will result in the loss or deterioration of ancient woodland”.....
- Refer to standing advice Its existing condition is not a reason to give permission.
- The condition of plantation Ancient Woodland can be improved with good management. Standing advice referred to. (WT)

Draft Officer Response

The proximity of the Ancient Woodland is noted and any future planning application for this site will take into account both the tree officer and ecology officer’s advice and necessary mitigation measures to ensure no undue harm is caused to it. Reference to expectations regarding the Ancient Woodland could be included in the policy.

The references to the culverted watercourse and the need to open it up, including GI contributions will be taken into account and the policy could be amended to make specific reference to this matter.

Policy LP.50 Forest Vale Employment Area Cinderford

Number of Representations: 2

Observation: 1

Object: 1

Support: 0

Observation:

- Includes some core NRN (woodland) ancient woodland (Hollyhill wood), is close to Laymore Quag Nature reserve and is bordered by vast swathes of ancient woodland to east and west. Wetland opportunity area as per NRN (helping to address vulnerability of flooding. (GWT)

Objection:

- Contains Holyhill Wood, 3.2 HA ancient woodland habitat and 0.5 HA Ancient Semi Natural woodland habitat, in conflict with policy LP9 Habitat and Species Protection (page 32). Attention drawn to NE standing advice on Ancient woodland, used in conjunction with the NPPF... you should refuse pp if development will result in the loss or deterioration of ancient woodland, ancient tree and veteran trees. Reference made to standing advice. (Woodland Trust)

Draft Officer Response

Any future planning application would taken into account the ancient woodland and habitat protection. Applications which may affect root protection zones must have standard buffer zones in accordance with Natural England's standard advice. Direct and Indirect impacts to the woodland must be assessed within an Ecological Impact Assessment. Any applications which may cause loss and deterioration of ancient woodland will be refused. GI will be encouraged to create networks to core woodland habitat. Advice and potential mitigation measures would be provided by the Ecology Officers and Natural England if appropriate at that time.

Policy LP.5I Cinderford Town Centre

Number of Representations: 4

Observation : 3

Support: 1

Object: 0

Observations:

Would help to address the need for climate resilience and good design.

Promoting rain gardens in response to surface water flooding problems in the town and water quantity and quality of watercourses.

Promoting surface water flooding should be a requirement of development proposals. (EA)

Same comments for all town centres – mention pedestrians and wheelchair users. (Regeneration, FODDC).

No map in para 11.18.

Support:

- Why is Policy LP.17 locally distinctive areas being re-quoted specifically in the context of Cinderford, a simple reference would be sufficient.

Draft Officer Response

Comments of support are noted.

With regards to surface water flooding mitigation, this is taken into account and any future planning application will assess this issue. The policy already specifies 'environmental improvements' within the text, but it could be considered whether specific mention of surface water mitigation measures could be included in the policy itself.

Similarly, specific mention of 'pedestrian and wheelchair users' could be added to the policy text.

It will be assessed whether the Locally Distinctive Policy needs to be re-quoted in full in paragraph 11.18, rather than simply referenced, and whether a map is necessary.

Coleford and supporting text

Number of Representations: 11

Support: 1

Object: 2

Observations: 8

Support:

- Support aims to increase range of employment and tourism enterprises.
- In related table under Built Form – Local Plan Actions – add ‘support moves towards net zero carbon’.
- The LP supports the move to net zero development under policy LP2 and climate adaptation under Policy LP3.

Objections:

- The LP does not recognise the importance Coleford plays in tourism.
- Physical constraints here may be problematic for development.
- Added recreational pressure on nearby protected sites.
- Object to Important Open Area designation for land to the west of Great oaks Hospice – does not have public access and not visible from adjoining highway (lack of justification and evidence base). Remove designation.
- Active travel routes, link to routes already mentioned
- The strategy of the LP is to support the town and to increase it’s range of employment including tourism enterprises and to widen it’s service base. The LP acknowledges limited scope for new land to be developed without adverse impacts on the character of the area. The LP has been drafted to take account of this. Policy LP 8 refers to the protection for protected sites.
- Policy LP24 refers to the promotion of active travel.
- The designation of Important Open areas will be reviewed.

Observations:

- Coleford is key to tourism in Forest and Wye Valley.
- Shop vacancies are lower than average in the Forest and Gloucestershire.
- Coleford is a place for events.
- Football needs improvement.
- Independent businesses are distinctive but struggling.
- Coleford is producing a Community Regeneration Plan using UKSPF funding and should be referenced in the LP.
- Located on Principal Aquifer and predominantly within a groundwater Source Protection Zone (protection of public drinking water) Some historic landfills within areas proposed for development – potential to pollute groundwater. Large groundwater abstractions in vicinity to Lucozade/Ribena manufacturing facilities (EA).
- Coleford is less constrained than Cinderford in terms of biodiversity.
- Would welcome further clarity on the scope of uses permitted as ‘employment generating uses’.
- Cumulatively, further (education) places may need to be added and additional sixth form provision required (GCC Education).

- Risk from mineral workings (coal) with regard to flooding.
- Site is in close proximity to the Wye Valley National Landscape. Development should be sensitively designed (NE).

Draft Officer Response

Coleford is considered a town in the settlement hierarchy see keynote 2023 and policy LP4.

Flood risk is considered in the policy. Any permission would have to take into account flood risk and any relevant habitat assessment.

The LP includes support for the Green Ring in policy LP59 locally valued landscape and will be reviewed as part of the LP process.

The next version of the plan will reflect any relevant planning permission on the Poolway Farm site.

Policy LP29 states 'except where specified in another policy, a figure of 30 net dwellings per hectare will be used as a reference point for assessing schemes'

Support for the policy is noted.

The LP supports the move to net zero development under policy LP2 and climate adaptation under Policy LP3 and therefore there is no requirement to duplicate this text here.

The strategy of the LP is to support the town and to increase its range of employment including tourism enterprises and to widen its service base. The current events as well as the struggle to retain independent businesses and increase footfall are taken into account, as is the Community Regeneration Plan. It is noted that Coleford Town Council is preparing a NDP to reflect their aspirations.

The LP acknowledges limited scope for new land to be developed without adverse impacts on the character of the area. The LP has been drafted to take account of this. Policy LP 8 refers to the protection for protected sites.

Policy LP24 refers to the promotion of active travel.

The designation of Important Open areas will be reviewed.

The Environment Agency's comments regarding the Principal Aquifer and a groundwater Source Protection Zone are noted. A water cycle study will be carried out to inform the local plan policies with regards to water resources, quality, extraction, nutrients, and pressure on groundwater sources, waste water treatment, etc.

GWT comments regarding the core NRN and local wildlife sites (LWS) and other sites are noted. Comments regarding school places are noted.

Employment generating uses can include an array of potential development opportunities. Being more specific about which uses are considered acceptable could have the impact of limiting prospective applications. It is more reasonable to consider the appropriateness of each individual future application on its own merits and weigh it against planning policy at that time.

Groundwater source protection/abstraction, contamination and mining legacy are issues which would be assessed for any future planning application and are covered under Policies LP.21 and LP.22.

Any future permission would assess impacts on the nearby National Landscape and seek for high quality sensitive design through both the draft plan policies (LP.15 and LP.20) as well as the national and local design guidance.

The LPA continues to work alongside GCC Education to supply the required educational places through Section 106 agreements.

Ecology comments:

Any permission would have to take into account any relevant habitat assessment and comply with any requirements set out in LP8 Nature conservation - protected sites, LP9 Habitat and Species protection and LP10 Green and blue infrastructure.

Policy LP.52 Poolway Farm Coleford

Number of Representations: 4

Support: 2

Observations: 2

Object:

Support:

- Support allocation – sustainable site, available and suitable for development
- Site was noted when CNDP was prepared.

Observations:

- Full ecological appraisal required
- Surface water flooding in eastern half of site may impact access (EA)
- Allocation includes upper reaches of valley brook at tributary of Wye (EA)
- Habitat connectivity with the SAC/SSSI is constrained by the long culverted reached. Important that the naturalised flow upstream of the town is maintained or improved in context of wider and biodiverse river corridor (EA)
- Recent application submission are not reflected in Draft Plan
- Allocation and settlement boundary for the town should be amended to reflect the red line for the current application which extends further north
- Entire site could be delivered at a higher density to reach up to 220 units
- Policy LP.20 LVL should be withdrawn
- Coleford is the highest order settlement in hierarchy with access to supermarkets, shops, GPs, schools, nurseries, employment, pubs, restaurants, café's health and fitness, places of worship, golf courses and open spaces.
- This is a most successful location.
- Poolway Farm is less than 1km walking distance into town centre.

- NPPF revised requirement of 597 dpa likely to be imposed, significant uplift should come from towns including Coleford, and development opportunities at the 5 allocations will need to be maximised.
- Importance of Green Ring must be emphasised.
- This side of the 'bowl' has seen recent development and infrastructure has not been improved to balance this or retain the LVL.

Draft Officer Response

Coleford is considered a town in the settlement hierarchy see keynote 2023 and policy LP4.

Flood risk is considered in the policy. Any permission would have to take into account flood risk and any relevant habitat assessment.

The LP includes support for the Green Ring in policy LP59 locally valued landscape and will be reviewed as part of the LP process.

The next version of the plan will reflect any relevant planning permission on the site.

Policy LP.53 North Road, Coleford

Number of Representations: 2

Observations: 2

Observations:

- Full ecological appraisal required.
- Relevant GI should be integrated into development as part of the proposed landscaping, to enhance habitats and support connectivity.
- Already been allocated in CNDP.

Draft Officer Response

Any permission would have to take into account any relevant habitat assessment and comply with any requirements set out in LP10 Green and blue infrastructure.

Policy LP.54 Ellwood Road Milkwall

Number of Representations: 3

Support: 1

Observations: 2

Object:

Support:

- Ellwood Road has been allocated in CNDP.

Observations:

- Ecologically sensitive (SAC and LWS nearby) (NE).
- Full ecological appraisal required.
- Must support local bat populations and other species/ species corridors (NE).
- Should be developed using a GI framework (Building with Nature) and use wetland opportunity.

Draft Officer Response

Support noted. Any permission would have to take into account any relevant habitat assessment and comply with any requirements set out in LP8 Nature conservation - protected sites, LP9 Habitat and Species protection and LP10 Green and blue infrastructure.

Policy LP.55 Kings Meade, Coleford

Number of Representations: 3

Support: 1

Observations:2

Object: 0

Support:

- Kings Meade has been already allocated in CNDP.

Observations:

- Important to retain small headwater of Cannop Brook – to maintain or restore natural or naturalised flows downstream (EA).
- Site includes high priority NRN, which should be incorporated into GI plans.
- Full ecological appraisal required.

Draft Officer Response

Any permission would have to take into account any relevant habitat assessment and comply with any requirements set out in LP8 Nature conservation - protected sites, LP9 Habitat and Species protection and LP10 Green and blue infrastructure.

The site is within very close proximity to the Wye Valley and Forest of Dean Bat SAC and any future applications must make a full assessment of impacts to the Wye Valley and Forest of Dean Bat SAC within an Ecological Impact Assessment. Future applications must mitigate and compensate for any impacts to horseshoe bats. Where a Habitat Regulations Appropriate Assessment cannot rule out adverse impacts any future applications will be refused.

Great crested newts must also be a key consideration for any applications within this area and any impacts must be appropriately compensated and mitigated for.

GI links to core woodland habitat will be encouraged.

Policy LP.56 Poolway Road, Broadwell

Number of Representations: 6

Support: 1

Object: 1

Observations: 4

Support:

- Support and welcome allocation of land to west of football club. Site will be subject to planning application over coming months.

Object:

- Broadwell AFC Sports and Social Club has reservations.
- Site is within the Green Ring.
- Will have a significant impact on Broadwell FC which is flourishing.
- Identity and Locally Valued Landscape must not be lost.
- Nibbles away at Green Ring.
- Would there be value in discussion with the Club to see if substitution of their land for the land next door would enhance recreation and enable edge of Broadwell to remain green?

Observations:

- Some BNG would be possible and GI could be applied.
- Site includes some medium priority areas of NRN (and close to ancient woodland) which could be incorporated into GI plans.
- Full ecological appraisal required.
- Housing should be carefully designed to ensure amenity of new occupiers.
- Para.11.28 – Revise text to read ‘It presently forms part of the gap between Coleford and Broadwell. It is considered able to be developed but only if it contributes to providing a better defined boundary between the two settlements.’
- Sport England is concerned that the new housing development could cause planning blight for development of the Broadwell Amateurs FC. The siting of housing on the western boundary of the club's site should be carefully designed to ensure that the amenity of the new occupiers is not compromised by the existing use as a football club.

Draft Officer Response

Any permission would have to take into account any relevant habitat assessment and comply with any requirements set out in LP8 Nature conservation - protected sites, LP9 Habitat and Species protection and LP10 Green and blue infrastructure.

The LP includes support for the Green Ring in policy LP59 locally valued landscape and will be reviewed as part of the LP process.

Policy LP29 states ‘except where specified in another policy, a figure of 30 net dwellings per hectare will be used as a reference point for assessing schemes’

Any proposal should comply with policy LP15 Design principles to respect amenities of residents and others.

The LPA would be open to being informed of outcomes of discussions between adjacent landowners.

Policy LP.57 Coleford Town Centre

Number of Representations: 6

Support: 2

Objections: 2

Observations: 2

Support:

Welcome clear illustration and protection of the important environmental site (NE).

Agree in principle – however, in 1st sentence clarification by revision of wording is needed

Object:

Object to the omission in this policy of anything which doesn't reflect Objective I of the Coleford NDP. This policy does not do enough to support this. CTC should be consulted to develop alternative wording.

Observations:

- Encouraged by opportunities for environmental improvements.
- The Coleford Community Regeneration Plan will enhance the town centre, its heritage, attract people and keep them staying longer. It means residents will use more/wider range of services. Active Travel routes into centre.
- There are areas of core habitat which needs to be protected, especially to the southwest of the town.
- Mention pedestrians and wheelchair users.

Draft Officer Response

The Local Plan will continue to support the Community Regeneration Plan for Coleford Town centre.

The LPA will continue to work with Coleford TC to realise the ambitions of the Coleford NDP.

Any future applications must protect areas of core habitat and GI will be encouraged.

Policy LP.58 South of Railway Drive (1.0 ha) Coleford

Number of Representations: 3

Observation: 3

Observation:

- There is scope in the enlarged site described earlier for mixed use. The section which is town centre should remain so, and expand the service offer, possibly with an attraction in the Town Centre, to retain visitors in bad weather. This is near to the cinema and car park. It could also be used for youth and community provision to link with the Main Place and give extra weight to local services. (Coleford TC)
- May include a culvert (EA).
- GWT has no significant initial concerns regarding the impact of this allocation on biodiversity and ecological networks. The site does fall into a high priority zone for grassland habitat as per the NRN, should there be an opportunity to improve the GI on the site to support connectivity. (GWT).
- Opportunity to improve the GI on site to support connectivity.
- There is potential to relocate the emergency service to land include in Policy LP61 opening up additional contiguous land for employment/ service provision in a Town Centre location adjoining the proposed site south of Railway Drive LP58,

Draft Officer Response

The policy allows for mixed uses appropriate to a town centre which may include tourism and youth facilities, or community uses among other town centre uses. The Council would welcome updates on discussions between CTC and the emergency services.

Any permission would have to take into account any relevant habitat assessment and comply with any requirements set out in LP8 Nature conservation - protected sites, LP9 Habitat and Species protection and LP10 Green and blue infrastructure.

Opportunities to improve GI onsite and create connectivity will be encouraged. Our ecologist will also visit the site to inform policies.

Policy LP.59 Locally Valued Landscape (LVL) - Coleford

Number of Representations: 9

Support: 4

Object: 3

Observation: 2

Support:

- Locally Valued Landscape LP59 is very much supported, NB CNE2 Green Ring. (Coleford TC).
- 11.33 and 11.34. I suggest these paragraphs would be better be rationalised and placed as part of the introduction to the Coleford section (information is reiterated).

- Wording of 11.33 conflicts with the boundary of the LVL shown on AP and Coleford Maps. Propose boundary is redrawn. .
- Welcome clear illustration and protection of important environmental site (NE).
- support Policy LP.59 if the wording reflects my comments on LP.20

Object:

- Policy and supporting text need to take due cognisance of NPPF requirements of enhancing landscape.
- Object to the proposed designation of 'Locally Valued Landscape' (LVL) capturing land around the northern side of Coleford. We do not consider there is any justifiable evidence on the Council's side to demonstrate why this land should be considered a candidate for an LVL. We consider that this proposed designation puts far too much of a significant constraint on an area which is potentially where the settlement needs to expand in the future given the additional central government housing pressures following the revision of the Standard Method. If the Council applies this designation under the Local Plan without a fully detailed evidence base to justify why they are proposing it, it would be considered inappropriate and lacking justifiable grounds.
- question the necessity of applying another layer of landscape to protection within a framework which already gives statutory protections to designations such as AONBs and the Statutory Forest, and where Local Plan policies (together with the local validation list) already stipulate where rigorous Landscape and Visual Impact Assessment is required. the Neighbourhood Plan already affords protection from coalescence through the designation of a 'Green Ring' and it does not seem justified to reiterate the gist of that policy within the Development Plan again.

Observation:

- Correct and due cognisance needs to be taken of the NPPF (para 182, 183 and Section 245 of LURA 2023) in this document.
- Wording conflicts with boundary of LVL on AP and Coleford Maps – propose boundary is redrawn.
- Paras.11.33 and 11.34 would be better placed as part of the introduction to Coleford.

Draft Officer Response

The LP identifies in detail an area which is important to the setting of Coleford and performs an important function in defining the town. The LP (Policy LP59) and Coleford NDP (policy CNE2) support the designation of the Coleford Green Ring and Locally Valued Landscape. The purpose of the Coleford LVL is to protect the setting of Coleford town and the settlements that form an arc to its north, east and south as well as their setting in the wider landscape. New development must demonstrate that it does not detract from the open setting of the town, its satellite settlements or an appreciation of the local landscape.

The policy also highlights the valued local landscapes to enhance the local distinctiveness of the area. It is complementary to the nationally designated landscapes and the protective policies that apply throughout the area especially to open countryside.

The wording of paragraph 11.34 will be reviewed with regard to any conflict with the boundaries drawn on the policies map.

Policy LP.60 Five Acres Mixed Development

Number of Representations: 6

Support: 1

Object: 2

Observations: 3

Support:

- This site needs to be developed. Although the Phase 1 does not include a swimming pool (Coleford is the only local town not to have one) there is space planned in should funding allow later. There is also scope with the Five Acres High School to develop an athletics track and field which the Forest does not currently have. (Coleford TC)
- Sport England support allocations – the allocated site should be increased to include the area for the new football ground, all the way across to Lakers road, the land south of the boundary to Lakers Road.

Object:

Map shown is wrong – needs to include the playing pitches as well as former college and Leisure Centre site

Adjacent to Ancient Woodland – allocation conflicts with Policy LP.9 (Woodland Trust)

Observations:

- GWT has no significant initial concerns regarding the impact of this allocation on biodiversity and ecological networks. The site does include high priority land as per the NRN, which borders ancient woodland and core NRN. A full ecological appraisal should be undertaken, and measures put in place to support local ecology, including bats.

Draft Officer Response

Support for the policy is noted and welcomed. A planning application was approved for development of this site in 2024, but has not yet been implemented. The text will be updated to reflect the current phase of development and likewise the policies map will be updated to reflect the correct boundary of the site. The District Council is working to support the optimum outcome for the regeneration of the area.

Any permission would have to take into account any relevant habitat assessment and comply with any requirements set out in LP8 Nature conservation - protected sites, LP9 Habitat and Species protection and LP10 Green and blue infrastructure.

There must be a buffer zone on development from ancient woodland if development is likely to impact root protection zones of the ancient woodland for any future applications in accordance with Natural England's standing advice. An Ecological Impact Assessment will be required for any future applications which must assess direct and indirect impacts to the ancient woodland. Any applications which may cause the loss and deterioration of the ancient woodland will be refused and lighting must be a key consideration.

GI corridors to core NRN woodland habitat will be encouraged.

Policy LP.6I Employment Land off B4288 Coleford

Number of Representations: 6

Support: 3

Object: 2

Observations: 1

Support:

- The site remains suitable, available and achievable for a wide range of commercial uses.
- Class E commercial uses creates significant employment opportunities (could further clarify which commercial uses are suitable). The plan could go further in clarifying the different types of commercial use which would be suitable.
- The policy should ensure that the technical constraints such as landscaping and ecology can be considered at the planning application stage.

Object:

- Impact on tourist facility at Perrygrove Railway Adventure and Perrygrove Farm.
- No justification for this additional allocation.
- Change the character of the southern approach to Coleford.
- Contrary to Coleford NDP.
- The draft plan falls short when it comes to promoting restaurant and sale of food uses.
- If my objection is not accepted I support the inclusion of additional words:
After 'The site will require to be landscaped both with regard to its internal and external presentation' INSERT with careful regard being paid to the levels, mass and visibility of any buildings or open uses.
After 'Large areas of open storage are unlikely to be acceptable. The site should contain landscaped features which may also screen or partially screen areas such as may in future be or are already used for servicing and parking. These should retain and reinforce existing planting and hedgerows where possible.' INSERT Landscaping should also address the existing buildings on the main factory site.
If policy proceeds I propose the addition of the following words at the end of Policy LP.6I:
'Proposals will also need to demonstrate no adverse effects on the important tourism site at Perrygrove Railway Adventure opposite.'

Observations:

- Para. 11.39 – Take care to avoid cumulative impact on biodiversity.
- Sensitive location due to close proximity to Wye Valley and FoD Bat SAC – incorporate mitigation and enhancement for bats (NE).
- This site is in an ecologically sensitive area of the town, close to a Wye Valley and FoD SAC site. We agree with the statement in the plan that development proposals will need to demonstrate how they can be accommodated with no adverse impact on these sites and their ecology and measures should be put in place to support local bat populations. We would object to any development at this site that did impact on the SAC. (GWT)

- If remaining in local plan support wording of policy with regard to landscape. Suggested additional wording to policy referring to 'need to demonstrate no adverse effects on the important tourism site at Perrygrove Railway Adventure opposite.'
- Policy wording should avoid being too prescriptive as the character of each of the three sections of land (i.e. the land west of Perrygrove road, our client's site and the land east of Arthur Cooper Way) varies, and there will be different considerations for each.
- There is a case for recategorizing as an additional strategic site, the allocated site for employment on the west of Arthur Cooper Way, east of Tufthorn Ave by Tufthorn Lights would be suitable for a multi-hub use for emergency services. This would make Coleford the central location for emergency services in the Forest, (Coleford Town Council).

Draft Officer Response

As set out within Policy LP 39, Policy Employment Generating Uses must be appropriate for the site on which they are proposed. This may mean simple compatibility with neighbouring uses (whether other employment or residential for example) but also in respect of their wider impacts including traffic and other environmental impacts.

Any development will require to be landscaped both with regard to its internal and external presentation with careful regard being paid to the levels, mass and visibility of any buildings or open uses.

The employment development is expected to take place in conjunction with the main strategic allocations both to support the development itself and their wider areas. Overall the allocations take account of the existing pattern of development and provide for the evolution of certain

Important sites throughout the FODD. The LP's strategy is one of supporting settlements in accordance with their ability to provide facilities taking into account accessibility and infrastructure and in doing so the inter relationships between settlements is also considered. Additional development is allocated according to these principles in a manner that will encourage a range of sites which are sustainable.

Any permission would have to take into account any relevant ecological assessment and comply with any requirements set out in LP8 Nature conservation - protected sites, LP9 Habitat and Species protection and LP10 Green and blue infrastructure.

Due to the sites close proximity of the Wye Valley and Forest of Dean Bat SAC a full Ecological Assessment of impacts to the bat SAC in accordance with the FoDDCs guidance for Zone A sites must be undertaken. A Habitat Regulations Appropriate Assessment is likely required and development will be refused if the Appropriate Assessment identifies that adverse impacts cannot be ruled out.

Habitat linkages to core habitat will be encouraged and lighting will be a key consideration for any future developments.

Lydney and Supporting Text.

Number of Representations: 23

Observations: 16

Support: 4

Object: 3

Observations:

- Lydney born and bred and worked all my life at Xerox.
- Lydney has expanded over time, need improved connections (public transport).
- The rail service is good, people rely on a car to get to the train station.
- Need more multi-national companies (employment, good pay and pension).
- Not immediately impacting the town, growth of Lydney will severely impact Beachley, Sedbury area in relation to A48 congestion.
- Lydney needs no more houses built until the infrastructure to support the recently constructed homes are met.
- School, doctors, dentist, sewage treatment plants, better road conditions for the roads in Lydney.
- If more homes are going to be built there is a higher risk of flooding in Lydney.
- More traffic & the A48 to Chepstow & Gloucester & congestion.
- Traffic coming out of Albert Street is getting busier traffic coming down Highfield Road is too fast even though its 20 miles per hour.
- Fix the roads & infrastructure before any more development.
- Lydney to Whitecroft, temporary traffic lights for months awaiting attention.
- Lydney Albert Street awaiting attention for nearly a year.
- Potholes up & down Primrose Hill & just local to here.
- (NE) note over 25% of new development envisaged will take place in Lydney.
- Level of proposed development it is an important opportunity to establish strong active travel routes & green infrastructure from the town centre outwards; would be reduced reliance on car ownership & more active travel routes.
- It remains critical that public open space provision, cycle routes & footpaths, respects the existing habitats, is not too close to sensitive features such as local water courses & sites used by SPA bird species.
- The development of Lydney must consider the environmental impacts. (Natural England).
- Lydney (land south of Highfield Road SHLAA REF 22033) - the land to the south of Highfield Road should be allocated within the Local Plan, it is in a sustainable location there is significant housing need & pressure to deliver additional housing in the authority area.
- Lydney (land north of Highfield Road SHLAA REF 22066) - there is more than sufficient need for the allocation of land to the north of Highfield Road, Lydney. The Council has made an oversight in not including this area as a proposed development allocation. The site is more than capable of being delivered to provide much needed housing, infrastructure & employment should carefully consider this as a proposed draft allocation.
- Have lived & worked locally for 33.5 years, our children attended local schools & colleges.
- The LP is well-written & does appear to have some level of future-thought.
- Lydney will, in future, be far too small & limited in its facilities, schools (all levels and SEN).

- Doctors, Dentists, even shopping (Tesco/other) will be too small, especially the car parks (though vastly improved with a time limit to 90 mins).
- Needs a properly funded Youth Club. There is nothing (except the great sport-clubs) for teenagers.
- New drop-in 'A&E' having had ours aged & now being built over. I know there's a new facility being built.
- There is no proper parking in Lydney not enough. Nowhere to put a car park especially once the surgeries all go to old co-op area.
- The schools will be very over-crowded until the new one built.
- Difficult to accommodate the nos. at Dean Academy, sad we have no 6th form & evening classes - all promised.
- Dementia needs?
- The plan's apparent inability to meet the housing needs over the plan period & restore a five year housing land supply. significantly compounded by the Government's current proposal to update the standard method, could see the District's housing need increase by 267 homes per year.
- Lantar seeks to promote 'Land West of Allaston Road, Lydney' as an omission site for allocation in the plan. previously submitted to the SHELAA in 2022 & 2023. The site was assessed in 2022 SHELAA Site Reference 22007 & was found to be developable, submitted again in 2023 Site Reference 23016. An outline application for up to 80 dwellings has been submitted for the site (P1619/23/OUT) is currently pending determination.
- The Draft Plan fails to capitalise on Lydney's potential to accommodate sustainable growth.
- Lydney is the largest most accessible settlement in the district.
- A passenger railway station a location on the primary road network, providing relatively good connections to Gloucester, South Wales & the motorway network.
- Is the highest rated settlement for services in the District by a significant margin.
- Set to be enhanced further with plans for a new primary care facility (former Co-op site) provide general medical services for around 15,000 patients & accommodate some of the services from Lydney hospital.
- Subject to a no. of strategic scale employment sites presents further potential for employment growth will help to support the sustainability of new housing growth.
- Is not subject to significant land constraints & presents the greatest opportunities for change.
- The plan's approach is largely based on carrying over the sites allocated in the 2018 Allocations Plan.
- Very little new allocations are proposed - newly allocated sites together with the modest intensification of the previously allocated site at 'Land Off Augustus Way & Court Road' would only produce around 331 additional dwellings over & above those previously allocated/committed.
- Not considered to be commensurate with the town's sustainability credentials & clear potential for further growth.
- Not considered to represent a sustainable distribution of development when considering it alongside the plan's proposals at a no. of other settlements, particularly at Newent.
- Housing Needs Assessment for Lydney (February 2024) AECOM evidence base for the emerging revised Lydney NDP. Appendix B. estimates a need for 29.4 affordable rented homes per annum & 26 affordable home ownership dwellings per annum. Over 20 year plan period would equate to a combined need for an additional 1,100 affordable homes in the town. the draft plan proposes a total of 1,278 homes over the plan period from reallocated & newly allocated sites, policy

requirement for 40% affordable housing would only yield approx 511 new affordable homes, would fall significantly short of 1,100 affordable homes.

- Increase the proposed supply of new housing at the town by allocating further land.
- Omission sites proposing high levels of affordable housing should be given priority in this regard.
- (GWT) has identified constraints as high priorities for any development allocations in Lydney.
- The town is within close proximity of the Wye Valley & Forest of Dean (FoD) Bat SAC sites to the west & Severn Estuary SPA, SAC & Ramsar to the east.
- Several Local Wildlife Sites (LWS) to the South Lydney Town Marsh & Sidings LWS consists of one of the largest reedbeds in the county has a diversity of wetland vegetation. To the West Brockhollands LWS designated for its semi-natural grassland with marsh, bog, swamp, mire & tall fen; Old Park and Old Bargains Woods LWS, designated for its ancient semi-natural broad-leaved woodland; & Priors Pool LWS. The north & northwest areas include high proportions of the woodland core NRN the area between the town & adjoining residential areas & LWS's to the west includes large amounts of core NRN should not be negatively impacted by any development. (Glos wildlife Trust),
- Para 11.43. In the related table under the Built Form- Local Plan Actions add "Support moves towards net zero carbon."
- Para 11.40 Lydney forms part of primary planning area D2. There are 1000 houses outstanding equates to 300 primary places. The primary planning area data shows the PPA is at 95% capacity indicating the town requires more primary places to accommodate current & future commitments. In isolation secondary places could be accommodated with the existing provision in the Lydney area & Forest Central. Cumulatively along with other proposals further places may need to be added. Additional sixth form provision is also required. (GCC)
- Para 11.40- Lydney regeneration is long overdue.
- Huge effort to increase the number of houses now occupy what was valuable farmland has been very little change in the actual town for 60+ years.
- Only 8 miles from Sedbury some villagers access health resources miss the minor injuries unit at Lydney hospital.
- An increase in employment opportunities would also benefit the outlying villages & schools, but transport is a challenge. (Lesley Moore) Para 11.43 - Transport - can this section reference the heritage railway as well as the main line railway line & station? (Regeneration, FODDC).
- Vantage Ventures supports the proposed allocation of land at Allastone Policy LP.65 & Policy LP.66.
- Two site allocations comprise three contiguous parcels of land to the north of Lydney, given their spatial relationship there is merit in considering them collectively, to harmonise access arrangements.
- Both have a distinct planning history.
- Augustus Way the principle of development is well established these two parcels received outline planning permission in November 2017.
- A smaller site area 6.5ha southernmost parcel allocated through the Allocations Plan in 2018 around 120 dwellings, reserved matters approval was granted October 2020 comprised land around 14ha a very low density of 14 dwellings per hectare.
- Notwithstanding the planning history, no development has come forward on the site.

- Very concerned about the amount of housing to be further developed in Lydney, is this because the property developers want to develop more in Lydney? If so this needs to be explained in the local plan.
- There needs to be much more infrastructure put in place if these houses are to be built.
- Climate change should be at the heart of the local plan.
- The people in the FOD need to know that their communities will be enhanced and services improved.
- Climate change and social improvements can go hand in hand, LP needs to explain this.
- It needs to show that sustainable options will help and decrease cost.
- People need to feel that the improvements will benefit them economically, socially and environmentally.
- If the council is serious about reducing carbon emissions it needs to invest in the roads to properly repair the hundreds of potholes & poor surfaces around the region.
- Traffic hotspots need to be addressed, e.g. traffic lights & a right filter at the Tesco junction in Lydney, the Chepstow bypass, reinstate the Lydney river crossing, to avoid traffic queues.
- Redevelop the derelict land on Lydney industrial estates to provide business premises, a decent retail park & entertainment facilities to further reduce travel out of the area (and corresponding traffic problems on the A48).
- Better entertainment facilities for people of all ages will reduce the reliance on alcohol for amusement.
- Provide subsidies or grants for existing houses to upgrade to solar panels & better heat management (cooling as well as heating) rather than focusing solely on new builds.
- Improve the kerbside recycling to match that offered in other areas instead of making unfounded excuses about why that can't be done.
- Subsidise or cap local rents for people who want to open businesses in the area, and incentivise affordable rents by capping business rates.
- Provide better healthcare utilising the Lydney hospital or the Dilke for holistic wellbeing, not just NHS services. Social workers, drug rehabilitation schemes, counselling services, complementary health services, dentists & GPs, minor injuries, dieticians, mobile care workers, citizens advice and probation services.
- Lydney is the largest of the proposals in the plan period the principles referenced should be relevant to many of the other proposals. There is concern that there is limited reference to recreational disturbance on the Severn Estuary relating to other developments and their cumulative impacts. The detailed proposals in the Lydney Harbour Area Recreation Study are welcomed.

Support:

- Welcome inclusion of Natural Environment 11.43 concerned its omission from similar tables in other policies implies not important in other locations? (EA)
- Para 11.41. suggest the last sentence be revised to read "As with all major development proposals not just the impact on the A48 but on the fabric and the quality of life of the residents of the road's wayside villages is of particular concern."
- Broadly in favour of the development in the north of Lydney.

- The volume of traffic on Primrose Hill, weaving between parked cars, causing problems, particularly immediately south of Holy Trinity Church.
- Alternative route along Lancaster Drive already used as a 'rat run' with consequent high speeds, still exits (via Primrose Way) onto Primrose Hill, access needs to be provided via Driffield Rd which needs widening & Centurion Rd.
- The present provision of doctors' surgeries & dentists is scarcely adequate for the existing population.
- Will the proposed new Health Centre on the old Co-op site be able to cope with further increases in population? this provision needs to be built into the plan.
- Land at Driffield Road, Lydney the land is still available for development, and is deliverable within the context of the NPPF.
- We agree with the allocation of this land seeking to 'emphasise Lydney as a focal point throughout the plan period'
- West Dean PC note that Lydney is designated to become the major gateway town for the Forest of Dean, this is understandable as it's the best serviced in terms of transportation links, with land identified and designated for employment use. But due consideration also needs to be given to the core services infrastructure and utility supplies.
- There are already issues with infrastructure and capacity in the Lydney area and we believe that the Local Plan should be strengthened to ensure that any development cannot be approved until the capacity and capabilities of services and utilities are established and confirmed by the utility provider i.e. water companies etc.
- There was an understanding of the need to improve Lydney, but this should not be to the detriment of the other Forest Towns or the rich agricultural land which surrounds Lydney. There are opportunities and benefits that improved facilities in Lydney could bring to Lydney and the surrounding villages with improved transport links, health, leisure, and shopping.
- There is a sad lack of vision and investment in the infrastructure to support these ambitions, these have not been developed, planned, or costed and the current new build programme based on the national algorithm is supporting this concern.
- There are already issues with commuting out of the area to work and the pressure this adds to an already overstretched transport network and the increased atmospheric pollution issues, already being monitored, at the network nodes is a cause for growing concern. The general premise seems to still be one of build the housing and employment opportunities will follow, but this thought process has the potential for Lydney to become a dormitory town for Bristol, Gloucester, Cheltenham and further afield!
- The development at Higher Lydney Park already has connectivity issues with the rest of the town and the links to remove this barrier such as bus lanes, footpaths etc is still lacking meaning this area and its residents are left isolated and remote with the potential for a similar lack of cohesion when the land off Driffield Road is developed for housing. (West Dean Parish council).

Object:

- Allocation of land as "important open area" on my site between Lydney Park and the Recreation Ground.

- The site was given consent as a Managed Nature Garden under Planning Consent Notice DF 4140/U/API does not fit within the criteria of Important Open Area stated in the Plan Document. (attached copy of letter dated 2nd February, 2006, confirming the designation of this area).
- "Important Open Areas - Individually identified undeveloped open areas that contribute positively to a settlement- not all are unfenced and not all have public access but all make contribution to the amenity and or setting of a locality. May be of cultural/ historic importance".
- I find the content of the plan in question for housing in the Lydney area absolutely horrifying.
- Downgraded with every house built the local infrastructure cannot support the houses now, nor can it support any of the hundreds of homes planned here for the future.
- The estates of Oak Dale & Redrow are an absolute eyesore obliterated many of the peaceful greenfield that once surrounded Lydney.
- Plan shows little care or concern for local, lifelong residents.
- Local councils feel happy to turn Lydney into a gigantic commuter town.
- Lost its identity & nobody knows anybody anymore.
- Purpose is to provide cheaper housing for people from Bristol sold their city homes for profit, bought cheaply , unwittingly elevated the prices of homes out of the reach of locals.
- Worked for Monmouthshire for a very long time & have had to commute to Caldicot daily for nearly 20 years.
- Traffic is getting worse year on year doesn't seem to be considered in the plan effectively enough.
- County & district councils don't have answers for the traffic on the A48 considering hundreds of new homes shows a lack of empathy for local people.
- Why, in 2024 are we still building homes in a beautiful place like the FOD when areas like Gloucester & Cheltenham have dozens of huge brownfield sites could be used as housing land instead?
- Only new infrastructure we've had is a Lidl & a B&M no new schools, doctor's surgeries, one less hospital, no good retail outlets, extremely poor road infrastructure.
- New homes in Lydney is a ludicrous idea should be scrapped.
- The government may say we HAVE to have these homes who has the balls to stand up to that view & challenge it.
- Fully expect to see all the fields surrounding Lydney full of housing in the future.
- Locals are always ignored.
- The Land West of Lydney represents a 'Sound' site for residential development. The Site extends to 38.99ha (96.35 acres); southern parcel is located west of adjacent to the defined settlement boundary.
- Land at Holms Farm, (extant outline planning permission for 29 dwellings & associated works (P1889/15/OUT approved June 2021), sandwiched between the Site & settlement boundary.
- Bream Road comprises the Site's northern boundary, provides direct access to Coleford & the heart of the district.
- The A48, a key arterial route through the District situated within 500m from the Site's southern boundary.
- The landowner, Lydney Park Estate, owns a much wider area of land to the south and west of the Site.
- Land north of Bream Road edged blue on the site location plan is available if further land is required to support the acceptability of the proposals. supported by a Concept Masterplan

(Appendix 2), Vision Statement (Appendix 3) identifying the key technical considerations & opportunities to development.

- The Site is not the subject of any major landscape designations.
- Call for Sites correspondence should be considered under this submission; Landscape & Visual Appraisal (March 2024); Landscape Sensitivity Review (March 2024). Ecology Cover Letter (March 2024); Draft Bat Mitigation & Habitat Management Plan (March 2024) ; Preliminary Ecological Appraisal (March 2024); Phase I Geo-environmental Desk Study & Coal Mining Risk Assessment Development Principles.
- The Site is not the subject of any major ecological designations;
- The Site does not contain any heritage assets;
- Positive engagement with Gloucestershire County Council Highways has since taken place regarding the scheme & the connecting road;
- Potential to incorporate an integrated green & blue infrastructure network as well as an effective SuDS Strategy across the site;
- Compliance with the DLP Visions;
- Deliverability In accordance with the NPPF
- Compliance with 'Tests of Soundness;
- Would promote a sustainable pattern of development that meets the development needs of their area;
- Align growth & infrastructure;
- Improve the environment & mitigate climate change.

Draft Officer Response

The LP is based on a strategy of dispersal of development around existing settlements proposing continued development of Lydney, the reuse of Beachley camp and new development at Newent. Agreed that Lydney is a sustainable location for further growth with the District, particularly taking into account its road network and railway station. It is recognised that Lydney has already experienced a large amount of development over the last plan period, and the Strategy therefore seeks to sustainably disperse the major strategic allocation sites across the towns in the district (taking constraints into account) as well as Newent and Beachley Barracks. Landscape assessments have also directed that larger scale development in and around Lydney could have harmful impacts. Any additional demands arising from the needs of a development proposed would need to be provided for by the developer. Given the changes to the NPPF (December 2024) and the subsequent uplift in housing need in the District over the 20 year period, it is likely that the Strategy will need to be reviewed.

Proposed sites- West of Lydney and land to south of Highfield Road -The sites subject of these representations are located in reasonable proximity to some facilities, they are however not needed for allocation as part of the Draft Plan strategy and as undeveloped fields on the edge of the settlement, they would need to be evaluated against any other options in the event that additional land was shown to be needed to meet the Plan's housing requirement in Lydney. The Plan represents the FoDDC's considerations at the time of preparation early 2024. Recent reforms to the NPPF will be taken into account and a review of the strategy may be required. Subsequent changes to the agreed strategy will be subject to further consultation. The additional sites suggested will be considered as part of any Local Plan strategy review.

Agree it is important to establish strong active travel routes the council is currently preparing an active travel strategy, comments from NE are noted.

GWT comments regarding the high priority constraints are noted. Comments regarding school places are noted.

It is noted the objection to the designation of an area as Important Open Areas and also the criteria for designation. The IOAs (and keynote) are reviewed during each update of the Local Plan. All suggestions for review of the IOAs will be considered and amended where appropriate. There may be cases where it is considered unreasonable to amend the current status of a site, and each parcel of land will be considered on an individual basis.

All suggestions for amendments to policy wording and supporting text will be taken into consideration and revised where appropriate.

Understand the concern regarding the existing connectivity issues at Higher Lydney Park and would not wish for this to be repeated. This is an issue which would need to be addressed at the planning application stage.

Policy LP.62 Harbour Regeneration, Lakes and Industrial Areas

Number of Representations: 8

Observations: 4

Objection: 1

Support: 3

Observations:

- Para 11.44 Harbour corridor regeneration has commenced with new signage, information panels, tree planting, boundary improvements & an arts trail. Scope for LP to support further regeneration along the harbour corridor to better connect the harbour with the station & up into the town centre. (Regeneration, FODDC).
- National significance for its historic value (SAM) The recreational potential of the harbour needs to be balanced against the biodiversity value of the site in addition to the significant implications for the estuary. Welcome the acknowledgement in 11.46 of the complexity of the area. No reference to the treatment of waste water & any run off whether can be adequately provided for & no adverse effects on the canal & the integrity of the River Severn SAC, SPA and Ramsar sites will result. (EA)
- This is an incredibly sensitive site ecologically, right next to the Severn Estuary SPA, SAC & Ramsar. GWT aware a lot of the development proposed in the area has already been undertaken. A visitor survey & recreation strategy 2017 to support the development, would hope the mitigation measures proposed are being undertaken. It would be useful for a new survey to be carried out, post development, to understand how pressures have changed if mitigation measures are working as hoped or further measures are needed. As development continues, any proposals will need to put the protection of the SAC/SPA/Ramsar at their core. Opportunities

to help connect & educate people about the estuary & its value should be sought. Appropriate assessment is required for any further development in the area. (Gloucestershire Wildlife Trust)

- NE aware of potential impacts resulting from the proposed development. This site already has high level of recreational disturbance. More visitors could disturb Lydney Harbour Pools SPA primary roost, impact saltmarsh habitat & impact bird gestures including high tide roosts downstream of the Plusterwine. (Natural England)
- A section of the development is focused on tourism, this provides the potential for green infrastructure, BNG & creation of wetlands. Factors such as tree removal & desilting need to be considered. Plummers brook is currently not accessible to the public, will it be as part of this development? With predicted sea level rise, how resilient is the development to this risk?
- Lydney Severn Estuary Visitor Survey & Recreation Strategy re: mitigating recreational pressure on the Severn Estuary SPA highlight the increased recreational pressure on notified features of the Severn Estuary, SPA's designated wild bird assemblages. (Natural England)
- The consultation document makes reference to further expansion of Lydney, the current strategy will need to be reviewed, take account of future housing proposals, not already in the pipeline. (Natural England)
- Recommend a conversation with Natural England to discuss mitigation options for the Severn Estuary & considerations for Habitat Regulations Assessment. (Natural England)
- Consideration be given to the in-combination effects of residential development & access to sensitive areas of the Severn Estuary, taking account the conclusions of the visitor survey. (Natural England).

Objection:

- Appreciate efforts made to redevelop & improve Lydney Harbour area still large areas of land already have good access roads & services look derelict & unsightly. To make the approach to the harbour more attractive use derelict land for the required housing.

Support:

- Lydney NDP Review Steering Group support policy and supporting text.

Draft Officer Response

The Consultation Draft Local Plan has arrived at a strategy which makes major strategic allocations for mixed development at sustainable locations where there are opportunities mainly around the towns and major villages. The LP Strategy is to see further development at Lydney and for the Town to become a focal point within the FODD.

This policy is intended to continue to enable the further regeneration of the harbour, support and enhance its potential for tourism and recreational uses while supporting employment uses which are compatible.

Ecology team will reach out to Natural England to discuss impacts to the Severn Estuary SAC, SOA and Ramsar. Any future developments will require a Habitat Regulations Assessment. Recreational Impacts to the estuary will be considered and any applications that cannot demonstrate that adverse impacts cannot be mitigated for where an Appropriate Assessment cannot rule out adverse impacts will be refused. Future applications are likely to be required to include information on the estuary to its visitors to include the impacts of recreational activities such as dog walking on the estuary.

Policy LP.63 East of Lydney

Number of Representations: 13

Support: 5

Observations: 7

Object: 1

Support:

- para 11.47. In last sentence for clarity delete one "which".
- Under the 3rd bullet point it is noted that the allocation of required open land for mixed recreation has still to be quantified. While there is a map included misleadingly it is in a different position in the text compared with other similar maps.
- Lydney NDP group support Policy including paragraphs 11.47 and 11.49.

Observations:

- LP.63 plan not clear. no quantification.
- The allocation includes the headwaters of Plummer brook. It will be important to retain this feature in an unmodified or enhanced catchment that respects the natural topography to maintain or restore natural or naturalised flows downstream and within the site. Environment Agency
- The new area identified for employment uses, east of the bypass, borders core woodland NRN is around 400m of the Severn estuary, making it ecologically sensitive a site we may have concerns with. Opportunities for connectivity given the proximity to core habitat should be sought. GWT
- High-quality, relevant GI must be factored into the design of the site early on a GI framework like Building with Nature used to inform its design & development. GWT
- The proximity of the planned housing to the Lydney Harbour development & the Severn Estuary, would ask new residents are made aware of the sensitivities of these areas the need for their protection through information in welcome packs. (Glos Wildlife Trust)
- Although a previous allocation, would a specific reference help to ensure due weight is given to safeguarding the setting of Crump Farmhouse, a Grade II Listed Building? (Historic England).
- Lydney Park Estate closer to the A48 has potential to be a created wetland that could take water away from Lydney when the tide is high preventing flowing into the Severn. The location near a train station can connect to the Gloucestershire/Severn Way; potential to keep people away from the more sensitive bird sites along the shore. Natural England.
- Natural England draws your attention to the "the tree in the right place for the right reason" strategy - Gloucestershire Local Nature Partnership: Gloucestershire Tree Strategy| Gloucestershire LNP (gloucestershirenature.org.uk) encourage aligned proactive communication with them & NE LNRS for Gloucestershire area.
- Aware of the previous projects in the Cinderford area by the council's "Gloucestershire Rainscapes" encourage the continuation or development of a new project like Rain gardens| Gloucestershire Wildlife Trust.
- In a sensitive location being close proximity to the Wye Valley & Forest of Dean Bat sites SAC & Severn Estuary SAC/SPA/RAMSAR. Development should incorporate mitigation & enhancement for the species and habitats. (Natural England).

- The proposed development bounded by Allaston & Driffield Road to the north the town will diminish the visual aspect when approaching from the south could be mitigated by releasing land to the east between the bypass the railway line e.g. Hurst Farm & Plummers Farm. Drainage & run-off could then be mitigated by improvements to Plummers Brook.
- The proposed access through Augustus Way not adequate for the volume of traffic generated, neither Allaston Road. A second access onto an improved Driffield Road will be essential.
- Many public services for the town have been significantly diminished, residential expansion of Lydney must be conditional on services health, education, public transport & police being in place before commencement; any s.106 monies must be ring-fenced for the benefit of Lydney and its residents.
- Within this eastern part of the site an area has already been cleared of its former foundry buildings, redundant structures remain still require to be cleared. Good potential to establish standalone access to the eastern part of the site from Lydney Park Boulevard, extant planning permission in place to support the principle of this. Former JD Norman site has a lengthy planning history currently allocated for employment generating uses in the adopted Allocations Plan Policy AP48. The benefit of rolling the site into the wider 'Lydney East' allocation is questioned, the site should benefit from its own standalone allocation, akin to the approach taken in the adopted Allocations Plan. Being rolled into a much larger allocation the site has no clear relationship with the other elements of the strategic site.
- A standalone allocation policy would enable the support for mixed use development to be more clearly expressed, include more granular details on the balance between elements of the site which may be suitable for employment & which for residential development. E.g. the southern extent of the site is more suited to employment given its prominent road frontage, the north is more suited to residential development given its more discreet location proximity to existing connections to the nearby park & onwards to the town centre.
- The site's suitability in principle for employment use is long established, and this forms the basis of the existing allocation. However, in the context of a likely increase in the district's housing need, It is believed the site could and should do more to meet the district's development needs, and as such the Council is strongly encouraged to amend the allocation to reflect a mixed use development on the site as per the suggestion in the SA. The officer's conclusion is the site is "currently identified for employment uses" there is potential to "consider mixed use". It is recognised that the site has lain vacant and derelict for many years, its prominent location within the town means its redevelopment would have a considerable benefit to the character of the immediate area.
- The site continues to benefit from a highly sustainable location within the settlement, within a short distance of the range of services and facilities in the town, and less than a mile from the district's only train station at Lydney, from where access to higher tier services is available throughout the day. As a brownfield site it continues to have excellent potential to contribute to the district's housing needs in a sustainable way, whilst delivering a significant improvement to the character and appearance of the area.

Object:

- Objection to the proposed employment area south of Crump Farm. It is considered that this land should be brought forward for residential uses given the development focus on Lydney, as additional land for housing will need to be found to meet the increase in the overall housing needs

reflected in the proposed changes to the Standard Method. The land is being actively marketed for employment uses to-date no serious interest has been shown. Notwithstanding the foregoing the Proposals Map should in any event be amended to reflect the recent grant of planning permission reference P0745/I8/OUT.

Draft Officer Response

Support for and comments made to this policy are noted, the textual errors will be amended and GI quantified.

The policy is considered to be an essential part of the Strategy of the Local Plan. It is a mixed use development some of which has been delivered. The plan refers to employment generating uses and the allocation is considered essential to the employment land supply of the area.

The Plan represents the FoDDC's considerations at the time of preparation early 2024. Recent reforms to the NPPF will be taken into account and a review of the strategy may be required. Subsequent changes to the agreed strategy will be subject to further consultation.

Impacts to the Severn Estuary SAC, SPA and Ramsar must be considered and a Habitat Regulations Assessment will be undertaken. Conditions with homeowner packs will be required as a condition for any residential housing applications including information packs showing impacts of recreational activities on the estuary and payment into the recreational mitigation strategy will likely be required.

A Habitat Regulations Assessment will be required for any applications likely to impact the Severn Estuary or the Wye Valley and Forest of Dean Bat SAC. Any applications which fail to demonstrate that adverse impacts cannot be ruled out with appropriate mitigation and compensation will be refused.

Opportunities will be sort to link GI to core habitats will be encouraged.

Policy LP.64 Land South of the Bypass adjoining Station Link Road

Number of Representations: 3

Observation: 1

Support: 2

Object: 0

Observation:

- The area identified is part of the existing Lydney Town Marsh & Sidings Local Wildlife Site, plans for new recreational uses will need to be carefully considered to ensure habitats & species are not detrimentally impacted. Disturbance by dogs to any birds or other species utilising the reed beds may be a significant negative by product of increased recreation. Pleased further enhancement of the site for biodiversity is proposed & will be interested to see more detail (i.e. how it can further support connectivity). (Gloucestershire Wildlife Trust).

Support:

- Support the statement that the allocated area west of the link road which accommodates the river is suitable only for informal use. (Environment Agency)
- Lydney NDP Review Steering Group support.

Draft officer response

Comments noted.

Policy LP.65 Land off Augustus Way & Court Road, Lydney

Number of Representations: 11

Support: 6

Observations: 5

Object: 0

Support:

- Support the allocation of 275 new dwellings on LP.65 - the site is in a sustainable location with good access to schools , local services.
- Paragraph 11.52 - For clarity, alter 3rd sentence to read "&.or any subsequent permissions. It is considered that there is scope for a greater number than the 200 dwellings that were originally permitted."
- Support allocation of this site. With respect to the wording of Policies LP.65 & LP.66, in broad agreement. Policy LP.65, is interlinked with LP.66 & lies adjacent to our client's land, states that 'access should be as the approved scheme also via Augustus Way may include provision for access to the allocated site to the southeast (Policy LP.66).' We suggest that this wording is amended to state 'should' as opposed to 'may' include provision for access this is key to the success of the allocation as a comprehensive development.
- Lydney NDP group Support allocation

Observations:

- Just above headwaters of small watercourse proposed increase in dwellings should ensure protect dry or seasonally wet valleys.(Environment Agency
- Site already granted outline permission for 200 homes looking to increase this by an extra 75 would hope this would not compromise the design or quality of the 4.7ha GI proposed for the site. (GWT)
- Lies to the north of the town, close to large proportions of core NRN. Opportunities to provide habitat enhancements to support connectivity to the (woodland) NRN should be sought. (GWT)
- As stated in the plan, development must only be permitted where it can be demonstrated it will not have an adverse effect on the integrity of the Wye Valley & FOD Bat SAC a precautionary approach must be taken if there is a risk. (Glos Wildlife Trust).
- The site is in a sensitive location close proximity to the Wye Valley & Forest of Dean Bat sites SAC & the Severn Estuary SAC/SPA/RAMSAR. Development here should incorporate mitigation and enhancement for the species and habitats. (Natural England).

- The proposed development bounded by Allaston Road & Driffield Road to the north of will diminish the visual aspect when approaching from the south, could be mitigated by releasing land to the east between the bypass & the railway line e.g. Hurst Farm & Plummers Farm. Drainage & run-off could then be mitigated by improvements to Plummers Brook.
- The proposed access through Augustus Way will not be adequate for the volume of traffic generated, neither will Allaston Road. A second access onto an improved Driffield Road will be essential.
- Any residential expansion must be conditional on services such as health, education, public transport & police being in place before commencement; s.106 monies must be ring-fenced for the benefit of Lydney & its residents.
- Supports the proposed allocation of land at Allastone via Policy LP.65 & Policy LP.66 in the process of preparing the site for some delivery. Land at Driffield Road to the east no notable planning history, spatially it presents as a rational extension to the settlement on the assumption Augustus Road/Court Road come forward for development.
- Driffield Road is a sunken lane of limited capacity not suitable to serve as the primary means of vehicle access to the site technically challenging & costly to increase its capacity.
- Primary vehicle access to the site will need to be pushed through my client's land from Court Road to the north, no formal contact between the respective landowners, in principle my client would be open to exploring access options.
- Good practice to consider a masterplan-led approach for both allocations, ensure two sites respond holistically to landscape considerations, to access constraints, to incorporate open space & green infrastructure.
- Up to 275 units are allocated, increasing density to around 19 dwellings per hectare, this remains low.
- The draft allocation policy requires no more than 9.5ha of the site to be developed, provide public open space & green infrastructure.
- Principle of this increased yield is supported, context of the changes proposed to the standard method important for all sites in sustainable locations to maximise delivery.
- Could increase delivery still retaining substantial open space & landscape buffering.
- Land off Driffield Way is currently proposed for allocation around 200 units, around 475 dwellings are now proposed at Allastone.
- Context of a likely increase in the district's housing need, the two allocations could contribute to meeting the district's housing needs in a sustainable location.
- An additional increase in capacity should be included in the final submission plan.
- Draft Policies LP.65 and LP.66 seek to allocate a total of 475 homes at two neighbouring sites to the north of Lydney. Similar to the Land at Highfield Lane, these parcels are located in an area that is topographically more elevated than the Site online mapping shows that there are also outward views. As part of the 200 homes sought at the Land off Driffield Road, Draft Policy LP.66 requires a pedestrian and cycle access from Driffield Road, comprising a single-track lane of a rural character. The provision of pedestrian and cycle routes along Driffield Road will therefore be challenging and would not be considered to promote safe and suitable access for all users, as required by the NPPF (paragraph 114b). This would mean that in access terms, the site could become more reliant on the Land off Augustus Way, so it is not a certainty that the 200 homes on this site could be delivered in the short-term given the differing ownerships and potential priorities of each party.

Draft Officer Response

The Consultation Draft Local Plan has arrived at a strategy which makes major strategic allocations for mixed development at sustainable locations where there are opportunities mainly around the towns and major villages. The LP Strategy is to see further development at Lydney and for the Town to become a focal point within the FODD.

The policy will need to be very clear on the expectations of the site. This includes the requirements of the development itself on site and access to it as well as open space and ecology. The development would benefit from a masterplan for the three allocations.

Policy LP.66 Land off Driffield Road Lydney

Number of Representations: 10

Observations: 5

Object: 1

Support: 4

Observations:

- The site lies to the north of the town, close to large proportions of core NRN. Opportunities to provide habitat enhancements to support connectivity to the nearby core (woodland) NRN should be sought. As stated in the plan, development must only be permitted where it can be demonstrated that it will not have an adverse effect on the integrity of the Wye Valley and FoD Bat SAC and a precautionary approach must be taken if there is a risk..
- Would encourage the use of a GI framework such as Building with Nature to help achieve an optimal GI design that links to the neighbouring development site. (GWT)
- Poor access to A48 along Driffield Road.
- Policies LP.65 & LP.66 seek to allocate a total of 475 homes at two neighbouring sites to the north of Lydney similar to Land at Highfield Lane. These parcels are located in an area that is topographically more elevated than the Site & online mapping shows that there are also outward views.
- As part of the 200 homes sought at the Land off Driffield Road, Policy LP.66 requires a pedestrian & cycle access from Driffield Road, provision of pedestrian & cycle routes along Driffield Road will be challenging & would not be considered to promote safe & suitable access for all users, as required by the NPPF paragraph 114b.
- In access terms, the site could become more reliant on the Land off Augustus Way, it is not a certainty that the 200 homes on this site could be delivered in the short-term given the differing ownerships & potential priorities of each party.
- Outside of West Dean the Parish Council has concerns about the proposed development land off Driffield Road, even with access being from August Way the increased traffic is a concern and is likely to impact on the narrow Driffield Road with increased traffic flows which will also impact on Primrose Hill from the additional 240 houses. There is also a need to maintain the Public Rights of Way crossing this area. The Parish Council is extremely worried about the impacts of this development on the already overstretched infrastructure i.e. sewage system, school places etc. and the plan should address these concerns. (West Dean PC).

Object:

- The proposal for 200 new dwellings (in addition to the 275 new dwellings planned in policy LP. 65 will require more infrastructure school places, surgeries & local dentists already stretched to capacity.
- Concerned the access roads (Court Road & Augustus Way) will become overloaded & make access for emergency vehicles very difficult.

Support:

- Lydney NDP Steering Group support policy and supporting text.
- Natural England note the site is in a sensitive location its close proximity to the Wye Valley & Forest of Dean Bat sites SAC & Severn Estuary SAC/SPA/RAMSAR. Development should incorporate mitigation & enhancement for the species and habitats. (NE)
- Policy LP.66 states 'Development should have its vehicular access via allocated land at Court Road/ Augustus Way will utilise a new access from Augustus Way'. not considered this provides the flexibility sought by the NPPF, policy is not sound on this basis. Greater flexibility to provide a second vehicular access, from Driffield Road, should be included within the policy, the creation of new passing bays within both highways land & utilising the margins of the site itself, can also be utilised as an access point.
- The wording should be revised policy LP.66: 'Development should have its primary vehicular access via the allocated land at Court Road / Augustus Way which will in turn utilise a new access from Augustus Way, with a possible secondary vehicular access (such as access from Driffield Road) to be agreed, provided it is considered safe and appropriate by the highways authority'.
- No concerns over requirements to ensure pedestrian/cycle access is provided onto Driffield Road, nutrient neutrality is achieved, proposals should not have an adverse effect on the integrity of the Wye Valley & Forest of Dean Bat SAC .

Draft Officer Response

The Consultation Draft Local Plan has arrived at a strategy which makes major strategic allocations for mixed development at sustainable locations where there are opportunities mainly around the towns and major villages. The LP Strategy is to see further development at Lydney and for the Town to become a focal point within the FODD.

The policy will need to be very clear on the expectations of the site. This includes the requirements of the development itself on site and access to it as well as open space and ecology. The development would benefit from a masterplan for the three allocations.

Understand the concern regarding the existing traffic issues at August Way/Driffield Road/Primrose Hill, Lydney and would not wish for this to be exacerbated. The Council engages regularly with GCC Highways and makes them aware of the potential development sites. Issues such as public transport hubs, highway networks, parking provision and traffic management measures are discussed with and the remit of GCC Highways. Equally, GCC Highways comment on allocations and on individual applications and request necessary highway works/mitigation and contributions. Walking and cycling paths are encouraged through Policies 24 and 25. It is recognised that better bus services are required and this continues to be an aspect for further work. Bus companies are consulted on the draft plan and their input is taken into account. Bus services are generally run by private companies.

An Ecological Impact Assessment must be included for any future application within this site which must include a full impact assessment on the Wye Valley and Forest of Dean Bat SAC. A Habitats Regulations Assessment will be undertaken for future applications to ensure that there will be no adverse impacts to the Wye Valley and Forest of Dean Bat SAC. Any applications considered to have adverse impacts will be refused.

A Habitat Regulations Assessment will also be required for recreational impacts to the Severn Estuary SAC, SPA and Ramsar.

Links to NRNs will be considered by the ecology officers when assessing the application.

Policy LP.67 Land at Highfield Lane Lydney

Number of Representations: 5

Observation: 1

Object: 2

Support 2

Observation:

- Gloucestershire Wildlife Trust no significant concerns regarding the impact of this allocation on biodiversity & ecological networks. A full ecological appraisal should be undertaken. The site is surrounded by trees to the west & south-east should be maintained where possible to support biodiversity/ connectivity to wider nearby core woodland habitat.

Object:

- Further over-development of this area traditionally been open, farming land.
- Driffild Road, a narrow lane already susceptible to flooding with excess run-off further development will make the situation worse.
- Access to so many new houses from Centurion Road.
- Located in an area that is topographically more elevated than the Site & online mapping shows there are outward views from the site.

Support:

- Natural England note the site is in a sensitive location being in close proximity to the Wye Valley & Forest of Dean Bat sites SAC & Severn Estuary SAC/SPA/RAMSAR. Development should incorporate mitigation & enhancement for the species and habitats.
- Lydney NDP Steering Group support policy

Sustainability Assessment:

- The SA scores the 'Character (built and natural)' section as 'positive', The tone of this summary is positive, seeking opportunities to mitigate the impacts of development.
- The tone used in the 'Character (built and natural)' section for the Site does not explore how the landscape impacts of the development could be mitigated, scoring this category as 'double negative'.
- It is recommended that the SA reassesses the Site, taking account of the true extent of the proposed development and the opportunities for mitigation & green infrastructure enhancements.

Draft Officer Response

The Consultation Draft Local Plan has arrived at a strategy which makes major strategic allocations for mixed development at sustainable locations where there are opportunities mainly around the towns and major villages. The LP Strategy is to see further development at Lydney and for the Town to become a focal point within the FODD.

The policy will need to be very clear on the expectations of the site. This includes the requirements of the development itself on site and access to it as well as open space and ecology.

An Ecological Impact Assessment must be included for any future application within this site which must include a full impact assessment on the Wye Valley and Forest of Dean Bat SAC. A Habitats Regulations Assessment will be undertaken for future applications to ensure that there will be no adverse impacts to the Wye Valley and Forest of Dean Bat SAC. Any applications considered to have adverse impacts will be refused. A Habitats Regulations Assessment is likely to be required for recreational impacts to the Severn Estuary SAC, SPA and Ramsar.

Links to core habitat will be considered by the ecology officers when assessing the application.

Policy LP.68 Holms Farm Lydney

Number of Representations: 5

Observations: 3

Support: 2

Object: 0

Observations:

- Significant large ponds with protected amphibian recorded with a need for significant terrestrial habitat. (Environment Agency).
- This site is very ecologically sensitive, bat activity (including lesser horseshoes) no doubt linked to the SAC (the site is close to Devil's Chapel Scowles, Wye Valley & FoD bat site) & Brockhollands LWS. The retention of buildings & further habitat support within new buildings & structures will be essential. A robust lighting mitigation strategy must be put in place, restricts lighting after dusk. Even very low levels of light can impact the activity of horseshoes & myotis species (also recorded in the area). GCN and slow worm have also been recorded. This should all have been factored into the 2023 planning application made for the majority of the site.
- NHS Trust has interest in re-developing Lydney Community Hospital to provide a social benefit use for community (Glos NHS)
- Support the principle of residential development on this site. The draft plan proposes increasing both the site area and the scale of development. The enlarged allocation is for around 42 dwellings and now includes the former Lydney Hospital site, taking the allocation to around 2.8ha in total. It would be prudent to amend the settlement boundary to align with the allocation. A rational extension to the settlement to wrap the boundary to the full extended site area, including the additional land this site is highly sustainable. Additional increase in capacity should be included in the final submission plan, reflecting the capacity unlocked by the extended western boundary.

Support:

- Natural England the site is in a sensitive location being in close proximity to the Wye Valley & Forest of Dean Bat sites SAC & Severn Estuary SAC/SPA/RAMSAR. Development here should incorporate mitigation and enhancement for the species and habitats.
- Lydney NDP Steering Group support policy.

Draft Officer Response

Support noted, The site at Holms Farm will require careful development and the design will need to protect the wildlife and especially the bat population.

We note that the site is extremely sensitive with regards to impacts to the Wye Valley and Forest of Dean Bat SAC. Full surveys will be required in accordance with our guidance for all Zone A sites and appropriate compensation will be required for the loss of any bat roosts or foraging and commuting habitat. If future applications fail to demonstrate that there will be no adverse impacts within an Appropriate Assessment the application will be refused.

A Habitat Regulations Assessment will be required for recreational impacts to the Severn Estuary SAC, SPA and Ramsar.

Great crested newts have previously been recorded on site and any future applications will be required to consider impacts to great crested newts along with appropriate mitigation and compensation.

An Ecological Impact Assessment is considered necessary which must consider impacts on protected and notable species and habitats and provide appropriate mitigation.

Policy LP.69 Mead Lane Lydney

Number of Representations: 2

Observation: 1

Support: 1

Object: 0

Observations:

- Area south of Mead lane lies in an area of high flood risk, the source is from potential tidal flooding & local ordinary watercourse. The site benefits from flood risk infrastructure.
- Incorporates a small tributary of the Severn - linked to the cut & the Lyd - important for eels, a number of culverts and barriers to fish. (EA)

Support:

- This area has been available for development for at least 30 years, has not been taken up. There is a feeling that this area is unlikely to provide substantial industrial use. (Lydney NDP Steering Group).

Draft Officer Response

The employment area referred to in policy LP.69 is an important mixed employment areas and encourages a wide range of employment uses. Although there is a wish to provide a more active

and attractive frontage to Station Rd it is within the context of the area providing and continuing to provide this range of employment. New development must respect the areas of existing housing nearby.

Policy LP.70 Land between The A48 & Mead Lane Lydney

Number of Representations: 2

Observation: 2

Observation:

- The southern part of the site lies within an area of high flood risk, development layout should be undertaken sequentially. The site benefits from existing flood risk infrastructure.
- Incorporates a small tributary of the Severn - linked to the cut and the Lyd important for eels. A number of culverts and barriers to fish. (EA)
- The possibility of flooding & the high water table makes this land unattractive, has therefore been vacant for many years. (Lydney NDP Steering Group).

Draft Officer Response

An undeveloped area directly south of the bypass is allocated for employment generating uses. The site is considered to offer potential for a wide range of uses. It is acknowledged that it has been allocated for some time but has remained undeveloped. The majority of the site is capable of being developed but the southern part is constrained by flood risk meaning that the net developable area is limited to about 6.5ha assuming that land within the indicative flood zone 3 cannot be developed. This figure also takes account of the need to retain an area of woodland and protect the watercourses. The site is suitable for a variety of employment generating uses.

Policy LP.71 Lydney Railway Station

Number of Representations: 9

Observations: 3

Support: 6

Object: 0

Observations:

- Wrong!! it isn't a mixed use site as per the notation no housing is proposed. Part has now got temporary permission on appeal for storage.
- The statement Lydney Station Parking requires reinforcing to reflect "Car parking is also essential and the existing parking available is not adequate for the current demand, let alone the additional demands placed by development in and around Lydney and communities seeking to travel by rail."
- Rewrite "Development should therefore cater for increasing this parking provision alongside other transport and access improvements" (Mark Westwood)
- The allocation of land to the north of the station to improve access & support creation of a transport hub is very welcome. Improving access to Lydney Town Centre & FoD via local bus services/active travel links, in addition to the DFR.

- The importance of connectivity to Lydney town centre and the wider Forest area could be expanded upon in the supporting text. Improving access to the south facing platform (services to Cardiff) should be made in the supporting text as this isn't possible when the level crossing barriers are down. It is alluded to in the policy but not made explicit but is a key ongoing issue. Developer contributions will help improve facilities at the station. Officers would welcome involvement in a masterplan for the area and look forward to taking this forward with other stakeholders.
- Needs to discuss the capacities of the A48, A40 & B4215; the need for traffic modelling; resilience of the network (flood/ bridges at Over & Chepstow); Impacts of cross-boundary development (Monmouthshire, Herefordshire), impacts of significant development at Ledbury & Ross-on-Wye, plus freight routes etc.
- Beachley, close to an existing congestion hotspot (A48 into Monmouth) unlikely to be big enough to attract the level of funding (from the development itself or government) required infrastructure to resolve the congestion issue.
- Larger settlements seem to be allocated in close proximity of settlements identified as towns a significant number of small allocations across the districts. What proportion of the proposed growth is within walking distance of a town centre, as a dispersed growth strategy does not lend itself to promoting sustainable transport.
- Due to relatively dispersed nature of the growth it may be difficult to make the case for the developer funding needed to mitigate the cumulative effect of growth provided.
- Severe congestion leading to air quality issues & journey time uncertainty along the A48 Chepstow.
- Existing & projected congestion on the A48 & A40, concentrations of safety issues at various points, some sections among the worst performing
- Majority of these routes experience capacity constraints, likely to worsen in the future
- Single width carriageways with limited over-taking
- Limited crossings of the River Severn traffic management challenges can occur when one of the Severn crossings is closed, incidents on the M5 putting pressure onto diversionary ongoing impact of the removal of Severn Bridge;
- Role of Lydney Station or Transport Hub & links to it; poor connectivity by bus to onward destinations in the FOD (extension of 23 & 72 to the railway station would be welcome).
- Capacity for additional rail services currently limited by rolling stock availability.
- Welcome developer contributions e.g. in relation to Policy LP.63 (& Policy LP.70. This would also support a longer-term strategic case for improving that rail corridor.
- HGV flows between the 2 counties via this network (affecting Chepstow, Lydney & Monmouth). (GCC)

Support:

- Lydney NDP Steering Group support policy and supporting text.
- This site is where a masterplan has previously been carried out which showed the policy was not financially viable.
- The policy should be amended to allow for more flexibility in proposals and allow for temporary uses on the site. a masterplan shows the policy is not viable. (Network Rail).

- Paragraph 11.59- Correct 5th sentence to read "Development should therefore cater for increasing this alongside other improvements."
- Paragraph 11.61 For clarity alter the last sentence to read "In addition other regeneration and transport initiatives will be needed, especially those linked to improving the services which use the station and will benefit the site and its users."

Draft Officer Response

The policy is intended to support the enhancement of Lydney station, its facilities and allowing a range of supporting development and encouraging greater use and interchange of travel means. The policy tries to address that connectivity to the station which need to be improved, as well as parking, passenger facilities and access to parts of the station would benefit from improvement. The policy does not refer to housing and the notation will be amended to reflect this.

All suggestions for amendments to policy wording and supporting text will be taken into consideration and revised where appropriate.

Policy LP.72 Lydney Town Centre

Number of Representations: 3

Support: 3

Support:

- Policy LP. 73 Lydney Town Centre Highway Strategy broadens scope for environmental improvements see comments to LP.26. (Environment Agency).
- Mention pedestrians & wheelchair users. (Regeneration – FODDC).
- Lydney Neighbourhood Steering Group support Policy.

Draft Officer Response

Support noted, policies will be amend as appropriate.

Policy LP.73 Lydney Town Centre Highway Strategy

Number of Representations: 1

Observation: 1

Observations:

- Do not feel that traffic lights on the Bream Road junction will solve the problems of heavy traffic passing through Lydney more innovative solution needed.
- Newerne Link been proposed for many years, is considered a "dead duck" by most stakeholders. (Lydney NDP Steering Group).

Draft Officer Response

Comments noted. The Lydney Highways Strategy is being developed by GCC to whom any points should be addressed.

Newent

Number of Representations: 12

Observations: 9

Support: 2

Object: 1

Observations:

- Paragraph 11.64 forms part of primary planning area D8. Approx. 220 houses committed & outstanding, equates to 66 primary places.
- In isolation secondary places be accommodated with the existing provision in Newent cumulatively along with other proposals further places may need to be added.
- Additional sixth form provision is required, when the impact of the appraisal sites, which fall within the Newent education Planning Areas, are factored in the need for additional schools to meet demand will be significant. (GCC).
- The new plan should be doing more to disaggregate growth across the District.
- Newent is a sustainable location for a greater scale of growth over the plan period.
- Preferential location for increased growth is to the west of the existing settlement.
- Previously promoted Land at Conigree Court through the (SHELAA) considered in detail within the 2022 assessment. Considered through the Sustainability Appraisal (July 2024) (SA) assessed for allocation through the emerging Local Plan 2021-2041.
- Failed to pick up on the sites connections for walking & cycling to the town centre local amenities including schools. SA assessment for land at Conigree Court should be revisited & re-evaluated.
- Considered a sustainable location to accommodate potential additional development.
- No insurmountable constraints to development , benefits from good proximity to the local services & amenities available in the town centre.
- Inevitable degree landscape & heritage sensitivity associated with an edge of settlement site, could robustly be mitigated with a landscape led masterplan.
- The potential to deliver substantive benefits for Newent, including infrastructure & employment delivery, supermarket to serve the wider settlement & address existing infrastructure shortfalls.
- Small proportion of non-development part of site identified as a key wildlife site (wild daffodils) could be retained, enhanced as part of the GI & BNG associated with the wider development site.
- Black Box Planning & Conigree Court welcome engagement with officers in respect of consideration of the site opportunities within the Draft LP.
- Various technical assessments & evidence are being advanced.
- Gloucester St - lack of upgrading infrastructure, the sewage plant, current one has caused problems in Onslow Road raw sewage in houses, further developments cannot take place without addressing this problem.
- Access from Gloucester Rd, road to & from Gloucester, flooding still occurs & congestion for commuters is horrendous.

- A step too far, town centre already struggles, future generations do not shop, many empty premises in town.
- Please leave Newent as it is.
- Further development in/around Newent be directly linked to cast iron commitments from Developer: build & have fully operational increased capacity for Sewerage, Dr's Surgery, traffic management to reduce cars/severely restrict non-essential HGV's through town centre, electricity, parking before the sale of any additional residential development properties are permitted.
- Promises to provide increased services are WORTHLESS!
- Going to kill Newent instead of developing it, new site is disconnected from the old town, businesses will migrate & leave the old town empty.
- New retail units? Can't fill the ones in town, other than with charity shops. What are they going to be?
- Hinges on connectivity, already struggle to fund any bus services, why should it suddenly get better?
- The present climate, it is difficult to feel an improvement is possible.
- Proposed development areas are located on a Principal Aquifer & some within a groundwater Source Protection Zone, designated for the protection of public drinking water supply. Several licensed groundwater abstractions are designated within the area.
- Already densely populated further development should ensure that all appropriate measures taken that the underlying aquifers are protected by appropriate planning.
- Where previous contaminative uses are indicated, redevelopment should ensure existing contamination is not mobilised to pollute groundwater receptors. (Environment Agency).
- Previously highlighted land surrounding Newent is the least constrained in terms of biodiversity. To the north of the town is an area of the core NRN two local wildlife sites (LWS), Ell Brook Meadows & Newent Lake Park. Additional LWS's to the west of the town.
- Opportunities to deliver enhancements for NRN through development with high-quality GI, to connect this area with nearby core habitat.
- Water quality significant constraint in this location. River Leadon catchment in a poor condition, partly due to sewage effluent, an important detrimental impact on the ecology of the river, must not be exacerbated by additional development.
- Traditional orchards are a historic biodiversity feature of Leadon Vale & be enhanced & connected as part of new green infrastructure. (Glos wildlife Trust).
- Newent half the size of Lydney has a poorer sustainability profile.
- 600 new homes, compared to Lydney which is only proposed to accommodate 313 additional homes over the above the previous allocations & existing commitments.
- 4.15. not considered to represent the most sustainable distribution of development needs revisiting. A greater proportion of the District's housing need should be apportioned to Lydney & less to Newent.

Support:

- Proposed development coupled with a strategic economic development plan for Newent specific to the town, ensure the local area does NOT just become a 'dormitory' town for Gloucester.

- Unique & thriving in its own right promote a local food & drink 'hub' that incorporates good attractive opportunities & new business, attracts visitors & interest from outside of the town & region. (Peter Mitchell)
- A good plan with some ambitious strategies.
- Newent reflects the LPA's historic lack of understanding & empathy with the town, its community, culture heritage & agricultural market town economy.
- What's missing? Strengthening NPPF policies on Best & Most Versatile Agricultural land offers an opportunity to strengthen national policies welcome in Newent, also in the other farming communities in the district.
- Little effort put into assessing & supporting the role of agriculture as a land use a key economic sector.
- Nothing on public transport, the LPA not the transport authority, ensuring new developments have the infrastructure to accommodate buses, encourage their use within the remit of this plan.
- These representations have regard to our client's land interests at Conigree Court, Newent and responds to the Regulation 18 consultation for the emerging Forest of Dean Local Plan 2021-2041.
- Commentary on the spatial strategy is spread between the introductory text to Chapter 8, the supporting text of LP.27 and the policy text of LP.29. The effect is that the plan's spatial principles are disjointed and do not read coherently.
- The draft Local Plan would benefit from a clearer, more coherent approach to explaining the proposed spatial strategy.
- The key spatial principles of the plan are fragmented across Policies LP.4, LP.5, LP.27 and LP.29.

Objection:

- Live in Blenheim Drive the Appledown Estate, strongly opposed the original plans, still object to the revised plans.
- Since moving to Newent nearly 18 years ago we have seen many new houses built the town seems to be in decline.
- Have lost 2 butchers, 2 greengrocers, 2 banks, 1 pub, a gift shop, a jeweller's, a museum, a card shop & a police station.
- Could expect to obtain a next day doctor's appointment, unlikely to be in the same week, waiting time 2 weeks, not the fault of the surgery/bad management, too many people needing appointments, not enough.
- Newent has a retained fire crew, a good job, a real concern more houses such a small station struggle to manage should a large incident occur. Teams from Gloucester or the Forest would have to come through ever increasing traffic.
- A police point at the fire station, rarely seem to have a police presence in the town.
- State of the roads does not lend itself to more homes being built, Newent Bypass is particularly bad.
- Pot-holes are circled to identify for repair, take weeks for repairs to be carried out. Increased traffic from more homes will not help this.
- Oak Park, Merlin Gate, Picklenash Grove & Noent Edge have been built the smaller developments of 3 / 4 houses dotted about & 2 retirement complexes.

- If building continues not long before we merge with Gorsley & Kilcot/ Rudford & Tibberton Newent all little villages lose any sense of identity they had.
- The infrastructure isn't in place to support any more new homes.
- All well & good to say new shops will be built we already have shops lying empty.
- GP's Surgery doesn't need to be relocated needs to be another surgery the current one struggles to fill vacancies
- In danger of becoming just another soulless dormitory town.
- Sad given how much history is here what a sense of community it did have.

Draft Officer Response

This was based on a strategy of dispersal of development around existing settlements proposing continued development of Lydney, the reuse of Beachley camp and new development at Newent. Comments regarding infrastructure are noted it is considered that the development to the East of Newent can be satisfactorily accommodated. A planning application was allowed on appeal, on a part of the allocation, for a mixed use site including up to 375 dwelling, a school, employment area, local centre, infrastructure and landscaping.

Any additional demands arising from the needs of a development proposed would need to be provided for by the developer. The policy requires access to public transport and active travel access to the remainder of the town. It also requires new GP facilities it is not intended to replace the existing. It is agreed that at present it is in agricultural use, but the need for additional land is such that some new greenfield allocations are needed.

Conigree Court Newent - The scale of development is not in accord with the Draft LP strategy with development at the 3 main strategic housing allocations and some major villages. The Plan represents the FoDDC's considerations at the time of preparation early 2024. Recent reforms to the NPPF will be taken into account and a review of the strategy may be required. Subsequent changes to the agreed strategy will be subject to further consultation. The additional sites suggested will be considered as part of any Local Plan strategy review.

The Environment Agency's comments regarding the Principal Aquifer and a groundwater Source Protection Zone are noted. A water cycle study will be carried out to inform the local plan policies with regards to water resources, quality, extraction, nutrients, and pressure on groundwater sources, waste water treatment, etc.

GWT comments regarding the core NRN and local wildlife sites (LWS) are noted. comments regarding school places are noted.

Agreed that Lydney is a sustainable location for further growth with the District, particularly taking into account its road network and railway station. It is recognised that Lydney has already experienced a large amount of development over the last plan period, and the Strategy therefore seeks to sustainably disperse the major strategic allocation sites across the towns in the district (taking constraints into account) as well as Beachley Barracks. Landscape assessments have also directed that larger scale development in and around Lydney could have harmful impacts. Equally, comments of concern about the over-reliance on Lydney are also noted. Given the changes to the NPPF (December 2024) and the subsequent high uplift in housing need in the District over the 20 year period, it is likely that the Strategy will need to be reviewed.

Policy LP.74 South East Newent- Mixed Development Site Allocation and Supporting Text.

Number of Representations: 56

Observations: 16

Objections: 27

Support: 13

Observations:

- Allocating space for a doctor's centre is not enough, real challenge will be to recruit & fund the additional GPs to work in the new centre.
- To expand to the extent proposed needs its own recycling centre, fly tipping will increase on the surrounding rural lanes. Oak Quarry site is too far away for many people. (Taynton Parish Council).
- 700 houses extra = 2000 + extra inhabitants
- Are Severn Trent to invest in extending capacity & fix leaks?
- Site in Culver Street be more involved in checking on works in progress - there is a check sheet for Councils to follow! (Progress Report)
- Haphazard planning of industrial units
- More derision of town centre school & employment. what type of employment?
- Can refusal reasons for the recent application be overcome?
- How is the open space to be maintained?
- Loss of Grade 3a agricultural land?
- Site poorly related to Secondary School & Leisure Centre.
- "A single focal point" within the new development seems will have two town centres: old & new town, how this could work?
- Sucking custom & life from the existing town centre, are you able to provide any case studies?
- Is there a need to relocate the primary school or provide a new one, our existing school has a large site & birth rates are dropping.
- Where is the supermarket, is not accommodated in this plan. Why?
- With pitches at both our schools, rugby ground & football ground are they needed? outdoor pool?
- The site is very large likely to become larger, is out of scale with the town.
- In its current form it would represent a 20% increase in housing.
- Must be designed as a number of distinct "quarters" not to be completely overwhelming, residents may easily integrate into the town
- Will interrupt the historic views of May Hill which are a feature of the approach to town from Gloucester.
- Landscaping must respect sight lines & enhance these views.
- Rural farming area, puzzling to build yet another 700 new houses as well as 700 plus that have already been built during the last 10 years.
- NO NEW INFRASTRUCTURE to support the extra population increase.
- GP surgery/pharmacy struggles to meet demand already support those living in smaller villages & hamlets, increase in population will increase their workload.
- Newent schools have to cope with ever-increasing numbers of pupils, many rely on long bus journeys to & from school.

- New building projects are proposed are promised NEVER DELIVERED.
- Unless the infrastructure is built before housing, present services will finally disappear under ever-mounting pressure.
- Developers want financial return from housing already raking in millions from previous housing projects surely, could afford to build the promised infrastructure first.
- Not against new housing projects as long as all the promises are fulfilled.
- Half-built projects in Newent abandoned years ago occupy land that could be used for social housing.
- Newent Town Council asks for a discussion with FODDC in relation to spatial strategy in LP & LP.74.
- Perception LP does not adequately set out a clear understanding of economic, cultural, historic or social position of Newent.
- Proposals within LP.74 are not viewed positively in this context.
- To place further significant development on the southeast side of Newent would unbalance the development of the town (given recent developments in the same area).
- Second centre creates significant risks for Newent Town Centre must be considered in conjunction with policy LP.77 viewed as wholly inadequate & negative.
- Newent Town Council would not have initiated such a large site on the southeast side of town - smaller sites would more easily integrate into the community.
- Policy LP.74 might be best for delivering maximum benefit if infrastructure delivery & investment are secured, not occurred sufficiently with previous developments, similar promises to invest in Newent.
- Specific matters should be taken into account with regard to agricultural land, public transport services, nature corridors & landscape.
- The NTC paper discuss the points above more fully. (Newent Town Council).
- Might the Local Plan refer specifically to the need for future development & related infrastructure to respect & safeguard the significance of the affected Grade II Listed Buildings within the immediate vicinity of this substantial proposed allocation? (Historic England).
- Gorsley & Kilcot PC reiterate previous concerns raised in Policies LP.75 & LP.76.
- No significant initial concerns re: the impact of this allocation on biodiversity & ecological networks, a full ecological appraisal should be undertaken. The scale of the development & opportunities for biodiversity enhancement, like to see the site developed with a GI framework, the site accredited under the Building with Nature scheme, to secure the best outcomes. (Glos wildlife Trust).
- Tributary of Ell brook runs through the site. Masterplan needs cross sections to ensure Suds don't dwarf the watercourse. Phasing not to preclude commitment to long management train & source control measure such as green rooves & rain gardens. (Environment Agency).

Objections:

- A small market town of historical values, locals are proud to be part of.
- Had our quota of new housing over the last 10 years, big majority of 'social housing' more crime, the town is no longer a safe environment.
- No police.

- Flooding & sewage systems no longer cope, more housing detrimental to effects of sewage - already leaking in several areas Culver St & flooding, have experienced water in my home.
- Newent has one of the best growing agricultural soils be kept as agricultural fields for growing our own food be self-sufficient.
- Once these sites have been built on its TOO LATE!
- Deer kites returning, other predatorial birds, Stag head beetles are rare, Newent is on the list for Stag beetles.
- Building more houses forces nature out, regardless promise of "hedges etc" not enough for deer.
- New shops outside the town totally "kill" Newent, make sure shops in the centre are kept.
- Newent has the best microclimate & soil for agriculture purposes
- 100% No more Building in Newent! .
- Up to 600 houses is unlikely to benefit the Town.
- Most families will secure employment in Gloucester/Cheltenham carry out their weekly shopping at accessible retail centres.
- Unlikely to make these journeys on public transport, placing an additional burden on the B4215
- This is not a sustainable development proposal. (Taynton Parish Council).
- Severn Trent withdrew its objection to this plan for no reason no assurance that the present system will cope with more demand.
- Further retail development outside the town centre will drive another nail into a struggling town centre.
- Newent has always had its fair share of growth over the years for a small town, it is out of all proportion.
- Deserve better a reprieve for a number of years before more building takes place.
- Have lost a number of factories, so no employment in the town.
- Are not sustainable as we are now, how can further development be sustained!
- Do not have employment, have suffered the loss of several factories.
- People will have to drive their place of work ensuring that we will be a dormitory town.
- Have productive land in Newent, always been known for the quality of food we can produce & could be feeding people.
- Not thought out for the people, a great shame only there to make the numbers up.
- Concept of Newent as a small market town has disappeared the centre with the square & accompanying shops will be a thing of the past.
- The centre will no longer take precedence, new development will create an entirely different ethos.
- More pollution, less wildlife, more noise, rubbish, far less green space.
- Sick of the noise of traffic already!
- Seen a 25% increase in residential properties without any increase in local services.
- 100% decline in provision in the last 15 years, whilst the town's population has grown by a quarter.
- More empty shops than ever, except for take-away, which provide only part-time evening commerce.
- Local sewage works already has daily tanker emptying because it has reached capacity.
- No large scale investment in industry or business, two medium size business (LFI and CARGILL) closed down contributes to the status of Newent becoming a commuter town!

- No farmers, no food!
- Vehicle connections affecting B4215 - What is proposed exactly?
- B4215 floods regularly, has potholes which will be worsened by developers' traffic
- Para 1. After & during development How do you proposed to deal with congestion on B4215 & Newent town, whilst benefitting the existing settlement of the town?
- Para 3. proposed G.P. & school facilities appears desirable, distance involved for the present population to reach them is not practicable.
- Para 4. the need for inter-connectivity, not just in Newent.
- Other FOD towns; there are no inter-connecting buses to them, only an hourly service to Gloucester.
- No work for locals.
- Traffic, highway safety, noise, parking the largest & longest cul-de-sac Foley Road.
- Gloucester Street so busy you can wait five to ten minutes to crossroad.
- Hundreds of homes added to streets coming off Foley Road.
- Not enough nursery places & schools.
- The planned new estate will be dangerous for the children living in the residential area.
- Bus service is dreadful.
- Poor access/egress - Safety (old ladder factory).
- Access onto Gloucester Road - safety.
- Sewerage Improvement - enlarge.
- GP - bigger site - more staff.
- Schools - back road - Glebe Rd, too narrow & potholes, parking.
- Shops - need a cheaper supermarket, ie. Aldi's.
- Noise pollution.
- Improved roads for more traffic.
- This area of Newent needs a convenience shop.
- Any bus service could in a few years be scrapped.
- Any development needs to have a roundabout at B4221 Junction.
- Would like it to be ALL affordable housing.
- Access to site Junction of Horsefair Lane & B4215 is not good, coming out opposite to fire station not good.
- Agree with the policy if planners could solve the access concerns.
- Not able to cope with the extra 1000+ cars a day.
- No consultation with the local residents re: type of houses required, need affordable houses for first times, bungalows for downsizers NOT more executive type of houses.
- Why build houses all in 1 place, plenty of brown field spaces around Newent could support the type of houses that are wanted by local people.
- Traffic - how will it be managed?
- Detrimental to town centre!! School & GP surgery yes! But no to retail shops.
- Cycle routes - should be routed into Newent town to encourage support of retail in town!
- Smaller cheaper housing for young people/couples/single people/elderly? reported by NDP plan.
- Solar panels on roofing of all new houses should be a prerequisite.
- The additional cost for developers - funded by government loans? Repaid on sale of houses.

- Allow a LIDL or Aldi supermarket to take over the old chicken AVARA site!!
- Onslow Rd recently experienced overflow of sewage due to drainage problems caused by increased demands of Merlin Gate development.
- Active travel options from into Newent are poor, as is public transport.
- No safe cycle route to larger towns like Gloucester.
- Avara foods has shut down many of the workers at other businesses travel in from towns such as Gloucester.
- Dubious proposed employment opportunities would support new inhabitants within Newent, instead drawing in people who work elsewhere.
- Without proper redevelopment of Newent's road structure, adding hundreds of new homes will only exacerbate this situation.
- The Government's stated preference to take a brownfield & grey belt-first approach to development.
- Development would be on arable land is currently farmed at a time when pressures on food production are increasing.
- Contrary to the stated aims of the Government, & FODDC.
- Plans include using Oak Tree Way as access for building works, as an access road to a number of houses is a totally unsuitable road it is thin, tight, double parked, & played on by children.
- Construction traffic simply wouldn't be able to access this proposed site without considerable disruption to local inhabitants, causing likely infrastructural damage to nearby roads.
- Proposed mitigations will only serve to split the town.
- Existing retail outlets are struggling within Newent, volume of residents who choose not to use the local small businesses go to Gloucester or Ross-on-Wye would see the few remaining shops close turn into more takeaways or barbers, the town has an excessive amount of for its size.
- Carbon footprint wouldn't be improved by the construction of so many houses, how would the construction companies be monitored on their carbon emissions?
- The air quality significantly compromised by having such a steep increase of new dwellings, due to increases of traffic.
- New community centre or youth centre would be beneficial in preventing any potential increase of Anti-social Behaviour.
- What would the district council do to support the Constabulary in mitigating anti-social issues? suggest a CCTV network in town centre & lake areas to help with the identification & movement of offenders.
- Previous comments have been reiterated as per Newent Settlement chapter and Policy LP.76.
- Seen & watched absolute eyesore of poorly built houses built in & around Newent.
- Always been a SMALL but busy market town it used to be safe & enjoyable to walk around.
- People who live In Newent want to stay in a peaceful town like myself, can't afford to live in little villages like Hartpury & surrounding areas.
- If they wanted to live the 'city life' would move to Gloucester, Cheltenham. Tewkesbury.
- Meek Road area absolute eyesore creates a lot of noise pollution from cars, dogs & children due to it being so built up.
- Houses will destroy natural habitats rabbits, owls, pheasants, foxes depend on fields left to hunt/ find food & water, already destroyed fields & woodlands to create homes (Meek Road area & up by the primary/secondary school).

- Rely on these surrounding fields to walk & exercise give people an outlet of stress from day to day life.
- People go for walks they want to see birds & wildlife developing.
- Parking or lack of it, Meek Rd a nightmare for overpopulation of cars randomly parked in stupid places.
- Interested in the profit & how many houses they can squeeze into the area don't take on board modern family life.
- Should be improving the one that we currently have has been here since Roman times carries a lot of history has been lost due to over developments.
- Understand people need to live somewhere no more houses being built as 5 phases in that area have already gone ahead.
- Saving the land rather than destroying it.
- Should not have to shoulder a disproportionate amount of housing, when the proposals don't include sufficient space & support to encourage business to the area.
- Should be positive discrimination from the district council to encourage business to the town to provide local employment.
- A retail shopping area to the east of the town is too remote to the rest of the commercial centre.
- Objection raised to the extent of the allocation
- Potential for significant change in association with improving the access around the town whilst protecting the centre.
- Opportunities to provide additional development that can benefit its surroundings, land to the south & east is identified having potential.
- The Council's approach to Newent is supported the expansion of the town proposed to the south east.
- The SA assessed a larger area than the proposed allocation (page 284 of the Appendix I SA of Site July 2024 see map attached.
- SA should conclude the assessed area "Meets SA site promoted by Robert Hitchins Ltd edged red on the plan forms part of the proposed allocation includes the existing employment allocation, which wasn't assessed in the SA see map attached.
- In principle supported; object to the quantum spatial distribution of uses within the site, to the detail shown in the concept plan page 148 of the Reg 18 Local Plan.
- Outline planning submitted April 2023 for part of the proposed allocation. Red line of application P0584/23/OUT predominantly takes up the northern portion of the proposed allocation, a section (in the northeast corner) which lies outside of the proposed allocation appears to be no reason this area has been excluded given the planning application.
- Associated technical reports demonstrate the suitability of this area for part of a mixed-use scheme should be included. see map attached.
- The settlement boundary be amended as shown to reflect the inclusion of this area acknowledged in the Policy Team's response to the application "the principle of development is considered acceptable (on condition it meets the requirements of all other relevant Local Plan policies.)"
- Illustrative Masterplan demonstrate how the site can deliver the mix & scale of development in the application, contribute to meet housing needs for Newent & FOD, development might be laid out to respond to constraints & opportunities on the site.

- Proposed residential development assists in meeting housing needs it will provide a variety of house types & sizes.
- Bring forward an area for employment & a local centre.
- Prepared with detailed technical reports although refused July 2024 considered all the technical reasons for refusal can be resolved.
- The application was supported by the policy team.
- Now pending an appeal in November 2024.
- It is considered that should the appeal be successful then the allocation & the concept plan should be amended accordingly.
- Empty shops landlords don't want to maintain them, if businesses are attracted to a new retail area, could spell the end of many businesses in the town centre.
- Inaccessible - If businesses withdrew from the town centre elderly & less mobile would not have shops that were close to them.
- Would not have a surgery within walking distance, forced to use buses or dial-a-ride (which is expensive if you are on a pension).
- B4215 floods in winter in both directions (to Gorsley & Gloucester). Cars try & drive in the middle of deep water to reduce the damage to their cars, tailbacks are miles.
- Building on more land means lesser area of vegetation to absorb the rain so it compounds the problem of flooding.
- Already an increase in traffic joining the A40 at Highnam due to additional houses at Churcham.
- Roads cannot cope with the traffic volume.
- Fields proposed to build on are a wildlife refuge. Habitats will decline.
- The plan does not help increase biodiversity it does the opposite.
- Cars parked on Oak Tree Way have restricted vision.
- Local hospitals already overstretched.
- Will be a development like Kingsway Gloucester no community focus - a commuter belt for those who work elsewhere.
- How does the plan think new shops will be supported & increase employment where other shops in the main street were not able to be competitive & survive
- Aware of serious crimes including a murder in a house opposite the play area on the corner of Meek Road, a drug supply business raided & closed.
- Why take away police support & increase the population?
- Object to any development on the area per policy LP.74 object to PO584/23/OUT APP/PI615/W/24/3348402.
- Visited my local Memorial Hall in Newent looked at Maps of different areas in the FOD noticed Newent has been targeted yet again.
- Field in which Robert Hitchens wants to build will be a Death Trap, waiting to happen.
- One lot if houses built on a "FLOOD PLAIN" "Pickelnash Grove".
- Not enough fire & ambulance services.
- Has turned into a place where you may as well drive pass, it does not have anything to entertain Tourist & Locals too.
- People stopping other people having "FUN", by complaining.

- Why did they move here in the first place, they knew about different events that were on in Newent, i.e. The Onion Fayre.
- Adding more Houses, will KILL NEWENT
- A lot of people like myself have lived here a long time, will move out & then the Town will not be a safe place to stay in.
- People arriving in Newent, are ILLEGAL IMMIGRANTS, were in a local Takeaway.
- Newent is under The Forest of Dean Wing, "to make up the numbers",
- Rural Area will be a massive impact in & around the town there will be Accidents which will cause chaos.
- Lived in Newent since 3 years old remember as a teenager the change in 13 years is crazy not entirely positive.
- Smaller town, less houses, a much happier place to live for kids, we used to hang around the park in the chill out zone, everyone was safe.
- No rides, no face painting, no family orientated events, no live music, becoming a miserable place to live compared to towns like Ross or Ledbury.
- People cannot afford to shop weekly groceries or things like prescription glasses in Newent.
- Schooling system, especially for the young children is very poor.
- Need infrastructure & better economics! building 700 more houses isn't the way!
- Better, more affordable, self-sufficient, brought back to an acceptable living standard, then plans made about adding to the population of Newent.
- This site contains significant trees on the Ancient Tree Inventory, this allocation is in conflict with policy LP 9 "Planning permission will be refused for development resulting in the loss, deterioration or fragmentation of irreplaceable habitats, including ancient woodland, ancient hedgerows and veteran trees, unless there are wholly exceptional reasons and a suitable compensation strategy will be delivered. E.g, a wholly exceptional circumstance could include national infrastructure projects (that "trump" everything) or (in Planning terms) "the benefits outweigh the harm"
- The significant trees are: Veteran Tree Tree ID: 168105 Pedunculate oak, Notable trees Tree ID: 168107 Ash Tree ID: 168106 Pedunculate oak.
- Draw your attention to Natural England standing advice on Ancient Woodland, should be used in conjunction with the NPPF, when making decisions, you should refuse planning permission if development will result in the loss or deterioration of ancient woodland, ancient tree & veteran trees. Standing advice states that 'Where a proposal involves the loss or deterioration of ancient woodland or ancient or veteran trees you should not take account of the existing condition of the ancient woodland or ancient or veteran tree when you assess the merits of the development proposal. Its existing condition is not a reason to give permission for development. A woodland or tree in poor condition can be improved with good management.' (Woodland Trust).

Support:

- National Trust not objecting to this allocation in principle.
- Consider provision of BNG should be in addition to recreational space, conflicts between using the same space to provide both.
- On site GI extremely important this allocation has the capacity to contribute to the Nature Recovery Strategy for Gloucestershire. The policy could reference the Strategy ensure proposed

development on this site creates new habitats, provides networks to existing habitats better manage existing areas for wildlife.

- Long-distance views of the allocated site from May Hill need to be considered & appropriate sensitive soft landscaping must be designed into any scheme.
- Tree planting along the southern edge of the development be used to soften the perception of the extension of the town from May Hill. (National Trust).
- Welcome policies allocation of 40% previously undeveloped land to be used for recreation, GI & biodiversity improvements. (Natural England).
- Proposed allocation is under the control of two promoters, Hitchens & Strategic Land Estates control the other half of the site.
- The neighbouring site appealed against non-determination a date for a Public Inquiry is awaited.
- Primarily residential, mixed-use presents an opportunity to provide needed additional housing to provide additional services, facilities & employment, to serve the new development & the wider community.
- I1.64 clear the ambitions for this allocation are to provide both benefits for existing residents & new residents.
- Broadly acceptable recommend the site area is extended in accordance with the proposed masterplan by Strategic Land Estates (Appendix I). Allow for the proposed GI corridor within the allocation & include the entire central field to create a clear boundary for the allocation.
- 600 new dwellings on 20ha of land is generally supported, if proposed changes to the Standard Method are implemented, opportunity to increase the proposed number of dwellings to approx. 825 dwellings. 2.7ha of land for employment including a retail unit about 1250m² together with smaller units.
- Generally supported, being clearly evidenced is a need for that level of employment land illustrative masterplan demonstrates a retail unit of 1,250sqm could be accommodated on the site.
- Look to work collaboratively with neighbouring developer to ensure proposed employment requirements are provided across the site.
- 3.3ha of land for community facilities generally supported provided it can be clearly evidenced there is a need for these facilities.
- Pedestrian & cycle connections generally supported.
- Look to provide a range of Active Travel Measures to improve connectivity to Newent Town Centre, & the development site subject to having necessary rights to make those connections facilitated by the LPA.
- The illustrative masterplan shows the primary access be taken from B4215 could provide access to the proposed retail unit, be demonstrated as part of a future application.
- Connections could be provided between the site & neighbouring land, subject to being facilitated by the LPA to enable & prevent future land ransom positions.
- Public transport facilities generally supported, would look to provide services to improve connectivity.
- Multi-function recreation space generally supported; the provision of GI & recreation space would be a key component of any scheme on the site.
- Supportive of the proposed allocation on Land to the South-East of Newent.
- Landowners, other developers, key stakeholders & local community to bring forward development on this site in a timely manner.

- Undertaking a wider range of supporting technical work to demonstrate delivery on the site & form part of a comprehensive development.
- Supported with pedestrian links between the two sites.
- Re: P0584/23/OUT Outline application for mixed use development including up to 375 houses.
- Suggest relocating the Secondary school in Watery Lane to this site & building some of the housing on the vacant site more central to the town, occupants much more likely to stay in Newent.
- The proposed new site access to centre would be quieter in Watery Lane rather than Gloucester Street.
- The proposed new site could occupy the new school, new doctors' surgery, possibly new primary school, more business opportunities would fit in with the existing business park adjacent to the site. (Upleadon Parish council).
- Agree with principles of the policies.
- Taking everything outside of the centre of Newent would kill the spirit & heritage of the town.
- Existing centre needs investment, buildings need refurbishment, independent retailers need encouragement & respect to build their businesses.
- The town could be pedestrianised on certain days of the week?
- Young people need to believe they are valued have services already available celebrated by locals & have new ones set up.
- The Lake is a loved part of Newent, if cleverly lit at night (lights in the trees, lighting up the dark spaces) it would feel safer.
- Have a primary school in Newent not full & smaller schools in the surrounding areas offer different things, beneficial for local families need more investment.
- Have a secondary school suffering the consequences of under-investment, low moral serves local families & from around the Forest & Gloucester.
- GP surgery currently well placed for the older generation within a short walk of the sheltered housing, could be extended, carpark designated for the surgery & staff parking for library & police.
- The beauty of Newent town centre it is a 15 minute walk from most residences.
- New housing is required, the infrastructure needs to be in place before a strain is put on the existing.
- Residents have been asking for a supermarket that won't kill the independent businesses.
- Memorial Hall needs to be refurbished/rebuilt, must be a way around this to work through the objections & bring most folk on board.
- Citizens assembly could work through all of this.
- Focus on just the town/area relevant to those that live there.
- Government legislation ensure developers provide schools, shop, GP surgery, public transport before any development.
- High standard green building be insisted; i.e. solar panels, recycled/ rainwater use, etc.
- Use of large area of agricultural land.
- GP surgery moved from centre of town where it is easily accessed.
- Already overloaded sewage works.
- Smaller units for first time buyers & downsizers, housing should be built with impending climate emergency in mind, i.e. good insulation, energy efficient heating, adequate living space & surrounding green spaces.

- Too much unnecessary traffic passes through Newent, a further bypass is needed.
- Agree housing is needed countryside & Newent must have its share.
- Support affordable housing for first time buyers, young local people starting off - NOT buy to let.
- Don't need 4/5 bedroom housing with multiple en-suites. People who can afford those are not in need of newer houses already have a home.
- Fear for prosperity of town centre if shops/facilities move outside of the town.
- New housing estates already built have not added to the footfall in the town centre.
- Doctors Health Centre & pharmacy should remain in the town centre location with further facilities built where necessary re-location is not an option.
- Pond in the fields off Gloucester Rd is a habitat for tadpoles, frogs & Emperor dragonflies, species of water plants, can this be conserved within the new development as a green area for walks & recreation?
- Make Gloucester Rd/B4215 a roundabout.
- New development an exit from (above roundabout)
- Build apartments, not more houses.
- Building on precious farmland food security is at risk with climate change, we need all the food producing land.
- Ensure adequate infrastructure provided e.g. sewerage & road network - notably the junction to the main road to/from Gloucester.
- What changes will be made to the Gloucester Road / B4215 intersection to accommodate significant increase in traffic flow exiting the housing development using that intersection?
- No traffic lights any traffic expert appreciate will need to be even if part-time to ensure those who live on that side of Newent don't endure 30 mins of potential bottlenecks.
- Major queues forming at peak hours since the recent housing development off Foley Road have been completed, any mention or consideration of this?
- Who in the GCC highways department has been involved with this planning application?
- Provide updates & assurance we will receive clear detailed guidance regarding comments raised.
- Impact on Newent - B4216 junction, volume of traffic to FOD & Gloucestershire & cycle safety.
- Environmental impact & loss of public footpaths, general access to greenspaces not only impacting wildlife, the mental health benefits of having that outdoor space.
- Development/developers plans for community investment delivering on their promises. what are they offering to improve/provide who will monitor their delivery?
- What plans to ensure the town centre doesn't continue to decline in investment moving more retail & facilities further.
- Significant numbers of Newent residents distressed regarding the communication of the development concerns were not being acknowledged.
- Majority are realists regarding future development requirements, want informal representation that can answer questions deal with real concerns.
- Professional responses would be very much appreciated.

Draft Officer Response

This site is the subject of a considerable number of representations. The Plan represents the FoDDC's considerations at the time of preparation in early 2024. This was based on a strategy of dispersal of

development around existing settlements proposing continued development of Lydney, the reuse of Beachley camp and new development at Newent.

A revised NPPF was published in December 2024, the plan strategy will be reviewed in the light of these NPPF 2024 changes and any subsequent changes to the agreed strategy will be subject to further consultation.

However, a planning application was allowed on appeal for up to 375 dwelling, a school, employment area local centre, infrastructure and landscaping on a part of the allocation. The inspector concluded

‘The appeal scheme as with any greenfield development, would result in some limited short-term visual and landscape harm. However, the level of this harm would not be at a level to bring it into conflict with the relevant development plan policies. There would also be very limited heritage harm to the setting of nearby heritage assets albeit outweighed by the public benefits of the scheme. Collectively these harms attract limited weight against the proposed development. I am satisfied that all other matters weighing against the proposal could be addressed by conditions and/or obligations.’

‘The benefits of the scheme set out’ in the appeal ‘are accepted by the Council. The most significant of these is the provision of up to 375 dwellings (40% of which would be affordable) in an area of need where the local authority is unable to demonstrate a five-year supply of housing. I also accept the stated economic and environmental benefits, and the weighting applied to them by the Appellant.’

‘Collectively the benefits of the scheme would clearly outweigh the identified harm. There would be no conflict with the Development Plan when read as a whole and the appeal scheme would represent sustainable development.’

As part of the plan process the revised draft plan will need to take account of the appeal decision for the land to the east of Newent to the South of Gloucester Road. The points made in the representations must be considered and they include access, impact of the development on the countryside, ecology.

It is agreed that the site is greenfield and lies outside the current envelope of the village. It is in a location where the design will be important in creating an acceptable appearance when developed.

Noted, although it is considered that the development can be satisfactorily accommodated, any additional demands arising from the needs of the development proposed would need to be provided for by the developer.

Policy LP.75 Cleeve Mill Lane Newent

Number of Representations: 11

Object: 4

Observations: 6

Support: 1

Object:

- Comments made previously in the above Newent chapter are reiterated.

- Comments made previously as per Policy LP76 are reiterated.
- Further development is necessary, this scale would be more appropriate unless the sewage treatment & flooding issues are properly addressed would still object.

Observations:

- This is a more ecologically sensitive site, close to core NRN, Ell Brook Meadows LWS.
- The site doesn't include any core or opportunity NRN. There are recordings on/close to the site of some protected species, including lesser horseshoe bats, development must put measures in place to preserve & protect them, no mention of this in the LP. (Glos Wildlife Trust)
- Gorsley & Kilcot PC reiterate previous comments made for Policy LP.76.
- Will take away valuable green space & wildlife add potentially another 2000 to 3000 inhabitants to the current 6000 in Newent.
- Big increase for a country town hardly any good shops, restaurants, pubs, community hubs for young people, no decent supermarket, no visible police presence.
- The "new" GP unit a relocation of the current GP practice how are elderly people going to get there?
- Destroy the look of the town create an almost separate new entity that does not fit in with the current look & feel of the town.
- Creation of a new primary school will divide Newent rather than integrate this new part.
- Town centre can hardly cope now with the traffic there is a bypass it will increase the noise & pollution around the town have a negative impact on the environment.
- This "new town" will not be beneficial to Newent a dormitory for commuters do not contribute to this town other than sleep here & spend their money elsewhere.
- The B4215 towards Gloucester will become even busier, morning commute congestions through Highnam & along the A40 to the roundabout into Gloucester.
- This site is adjacent to Newent's two business parks, wouldn't employment land or mixed use be a better option?

Support:

- Newent Town Council supports allocation LP.75 for development would prefer to utilise this site for housing alongside mixed-use development include additional land currently outside the settlement boundary to the east, up to a buffer with the sewage treatment works.
- Potential to create a mixed frontage on Gloucester Street, provide business premises, integrate the site with the existing petrol filling station, provide a small supermarket an Aldi or a Lidl.
- The allocation of 45 dwellings on the site. No access point is shown. Confirmation sought.
- Paragraph 11.70 "development of the site should relate to the development to the south". The current frontage Gloucester Street is an important area of natural landscape on the route into Newent Town Centre, brings the countryside close into the edge of the centre of Newent.
- Current development opposite (to the south) comprises the side of employment sheds & housing, landscaping treatment does little to soften the blank facade of the employment shed. A well-designed landscape strategy is sought to ensure that the site frontage with Gloucester St remains green & softens what could otherwise present a very urban setting.

- Paragraph 11.70 without a clear proposal for recreational use on this land, a likely buffer required from the sewage treatment works, the future use of land in this location needs to be considered further.
- Land to the east left outside the allocation could attract development proposals for housing, including the creation of green areas in a buffer between development & the sewage treatment works.
- Sensible to plan for a larger development up to buffer limits with the sewage treatment works incorporate the remaining land in between as an extensive green buffer.
- View of the eastern side of a development would be significant in the approach into Newent along Gloucester Street, open recreation area not included, important to ensure development proposals incorporate building/plot design to avoid creation of large blocks of development, include significant landscaping & tree planting on this boundary.
- Development on the western & northern edges of the allocation site should be complementary in scale & design to existing development which is adjacent. (Newent Town Council).

Draft Officer Response

This site is a current allocation in the Allocations Plan and is retained in this Draft Local Plan for 45 dwellings. Many of the comments made to LP74 were repeated for LP75 and as such are not specifically relevant to the site. The comments can be assessed in more general terms and the policy will be redrafted to include the expectations for the site, such as landscaping access etc.

It is noted that the site is close to NRN.

Policy LP.76 North of Ross Road Newent

Number of Representations: 8

Support: 4

Observations: 1

Object: 3

Support:

- Small housing provision, use for employment purposes would support if it included provision for a retail store more beneficial to the town centre than the proposed location on the east of the town.
- Pedestrian & cycle access to & from town centre through the park & Old Maids Walk simple & closer than the current plan, adaptations to the crossings at the traffic lights.
- Access to the canal, restoration could be worked at the same time as this development with the correct funding.
- Access by foot via nice route to benefit the people of Newent instead of a road without a footpath, potential to improve the national footpath currently directed along a road without a pavement. (Herefordshire & Glos Canal Trust).

- Newent Town Council supports LP.76 for mixed uses, strong desire to provide high-quality development would contribute to meeting identified needs in Newent, take opportunities arising from the long-term restoration of the canal.
- Would strongly support development to support tourism in Newent.
- Reference to canal-side facilities is welcome could include visitor facilities, eating & drinking, hotel or other visitor accommodation.
- Location of a small supermarket on this site would be welcome, subject to suitable access being available (potentially requiring a roundabout at the junction of Horsefair Lane, Ross Road & Glebe Close, to facilitate access into/out of the site for development would generate higher levels of traffic).
- Housing, to occupy no more than 0.8ha as indicated.
- Innovative designs be positively considered to address site constraints present, e.g. from land contamination associated with previous industrial activities. (Newent Town Council).

Observations:

- Gorsley & Kilcot Parish Council concerned over further development of Newent as the most local town providing amenities for the parish.
- Major concerns about sustainability of further housing development in Newent.
- To be sustainable local services such as GP, schools & shops need expanding and improving.
- Infrastructure including sewage, roads & public transport will require improvement.
- Additional housing built already stretched the sustainability of Newent, the town will not be able to sustain any further development without vast improvement to infrastructure & local services. (Gorsley & Kilcot Parish Council)

Objections:

- The house dumping ground of the forest, don't have suitable facilities including sewage plant to cope.
- The road network is not suitable our B Road is already taking more traffic than it can cope with, leading to accidents & lengthy delays.
- Please reconsider your constant plans are unsuitable for our area on so many levels.
- Moved to Newent in 2009) seen more than 25% growth in population without perceivable enhancements to its infrastructure.
- Local police presence provided via Coleford.
- Waiting times for appointments at local surgery weeks, one dispensing chemist struggles to keep up with demand.
- Inadequate sewage facilities are well publicised.
- Access to the town from either direction along the B4221 bypass is dangerous both junctions being recognised as accident hotspots.
- Hundreds of houses on grade 1 agricultural land.
- Dwindling employment opportunities, hundreds more car journeys per day for work in surrounding larger towns.
- Increased traffic increases incident risk & pollution.

- More aligned with high numbers of houses in perceived planning space than mindful community planning with a Town's prosperity & people at its heart and core.
- Other investments to improve Newent as a strong service centre have been sporadic Newent's 'offer' is not much changed.
- Reliant only on land use policies, realisation of objectives for Newent lacked a whole-council approach to align policy with inward investment & economic development support.
- The proposed strategy in the Reg18 Consultation would increase the role of Newent to provide a more significant proportion of the district's housing need than in previous plans.
- The same promises are being made, to invest & improve Newent's ability to handle this growth.
- Scepticism about the delivery of these ambitions, concern how they might be approached, previous strategies, little detail about Newent in the draft LP been stated before there is not sufficient detail what this entails & how it will be delivered.
- The need for housing is not in question.
- The housing shortage a consequence of decades of indifference to coherent multi agency involvement, a planning system seemed more advantageous for developers than our communities.
- Benefit more by developing & building our communities to accommodate their long-term growth & prosperity.
- Is reasonable to expect our District Councillors & Local Authority to convey our community interests evident through representations of Newent Town Council.
- Detailed expectations of the new Government administration a diligent approach given far-reaching consequences for our communities, children & our grandchildren.
- Newent has done its bit and cannot cope with anymore.

Draft Officer Response

The aim of employment uses under Policy 76 is to complement the town centre and not to harm it through reduced footfall. Any retail use would need to be tested to ensure that it did not unduly compete with the town centre itself.

Comments regarding pedestrian and cycle access are noted.

Footpaths/cycleways and vehicle access will be directed by GCC Highways.

Comments regarding restoration of the canal are noted. The Local Plan seeks to protect and support the canal restoration route. And all comments of support with regards to tourism and leisure on the canal-side are noted.

Housing development of no more than 0.8ha noted.

Reference to land contamination noted and any future permission will seek to ensure that this issues are addressed appropriately.

Concerns regarding additional development in Newent are noted, however, the Council has a duty to provide higher numbers of housing across the district, and the agreed Council's strategy is that the main towns (such as Newent) are more capable of sustaining higher levels of development.

Comments regarding the need for infrastructure delivery and services investment are noted. This is an issue across all of the planned development in the District, and will be addressed through a mixture

of liaison with various stakeholders (such as GCC, NHS, water companies, etc.) and Section 106 contributions.

Concerns regarding sewage are noted. Severn Trent is made aware of future planning allocations in order for them to be able to plan for future investment in the area.

The Council engages regularly with GCC Highways and makes them aware of the potential development sites. Issues such as public transport hubs, highway networks, parking provision and traffic management measures are discussed with and the remit of GCC Highways. Equally, GCC Highways comment on allocations and on individual applications and request necessary highway works/mitigation and contributions.

Concerns regarding the use of Grade 1 agricultural land is noted. The Local Plan carries out Sustainability Assessments on all potential sites for development to find the most suitable and sustainable areas of land to develop. However, given that the current strategy seeks to develop around Newent, as it a main town, this means that the land on the outskirts of the built form of the town is agricultural (of varying grades). A balance needs to be struck as to whether the need/demand for housing in this sustainable area outweighs the loss of the agricultural land.

Employment opportunity concerns are noted and the Plan seeks to encourage more employment by allocating land for it.

Note that the consultation responses have been made prior to the changes to the NPPF (December 2024) which now requires an 82% increase in the housing need for the Forest of Dean District (12,000 houses across the 20 year plan period).

Policy LP.77 Newent Town Centre

Number of Representations: 8

Object: 3

Observations: 3

Support: 2

Objections:

- Location of the complementary retail development to the southeast of the town would not support the town centre; would have the complete opposite effect.
- If sited north of Ross Road as per Policy LP76, the presence of a larger retail food store would be of greater benefit to the existing town centre.
- The development of a second centre to support the allocation of LP.74 creates significant risks for Newent Town Centre, must be considered in conjunction with policy LP.77 wholly inadequate & negative.
- Newent Town Council would not have initiated such a large site on the southeast side of town - smaller sites would more easily integrate into the community.
- LP74 might be the best for delivering maximum benefit to the town if infrastructure delivery & investment in the town centre are secured (two things that have not occurred sufficiently with previous developments based on similar promises to invest in Newent).

- Policy LP.77 & supporting text have misjudged the views of the local community in Newent.
- Local people want their town centre to remain the focus of their community feel that proposals in the plan present an active danger to this goal.
- Urge FODDC to develop a different strategy for the future of Newent Town Centre instead of the approach in LP.77 & para 11.74.
- Is not welcome is contested by Newent Town Council.
- A poor future for Town Centre, opportunities for small environmental improvements that 'will be taken', has been said before without significant delivery.
- Little value or confidence in Newent Town Centre, hide-bound by Conservation Area & Listed Buildings considerations though other places manage to prosper within such constraints.
- Towns with attractive historic town centres cores perform better than places reliant on shed-like shopping locations.
- NTC would support a district planning strategy which understands the opportunities & needs of Newent sets out positive proposals.
- Contain active proposals to develop or redevelop town centre sites to improve tourism, retail & economic infrastructure, based on the investment the historic core & development on edge of town centre & edge of centre sites.
- Investment brings in local people and visitors.
- Indicate there is little scope for development in Newent Town Centre LP.76 is close to Newent Town Centre & could provide important complementary uses.
- Other potential sites for development may exist, some existing town car parks (which would need to be replaced).
- More imaginative approach to manage change within the CA to improve its economic functions, well-functioning town centre would be the main attraction for visitors likely to encourage local people to stay than travel, a suburban shopping centre likely damage town centre activity.
- A requirement for shops may serve a purpose in providing local options, must not come at the expense of a serious strategy for Newent Town Centre.
- Potential to create a high-quality town centre for its residents & for tourist visitors based
- Draft LP displays an insufficient understanding & appreciation of Newent its hinterland, & opportunities that this affords.
- Urge FODDC to engage more strongly with the local community, its Town Council a local plan strategy for the area is effective, opportunities are not missed.
- Long term discussion about the provision of a public transport hub, has never been realised, consensus that a transport hub should be located within or very close to the town centre.
- Alongside existing parking provision would provide walking & cycle access to bus services.
- Better more frequent bus services required to provide inter-town services for commuters & shoppers, local loop services to facilitate sustainable access to the town centre from outlying housing areas of Newent.
- Significant development brought increased traffic congestion, particularly around the town centre, needs to be addressed comprehensively through traffic management & signalling solutions. (Newent Town council).

Observations:

- Gorsley & Kilcot Parish Council reiterate comments made on Policy LP.76.

- LP 77 Newent town centre has evolved changed over centuries act as a commercial & social centre for the people of the town & the surrounding agricultural hinterland.
- Investment was promised in the current local plan none has arrived.
- This policy seems to withdraw the promise of investment in the centre to help it meet the challenges of the future.
- It seems to picture a town centre which is atrophied, frozen in time, an agricultural market town museum, a horrible fate to foist on our community.
- Many historic town centres around the country, work very well in the modern day, should be easy, now we are moving away from the dominance of the private car.
- Town centre, its human scale, walkable level layout, green/blue heart has a huge amount to offer for the future.
- Para 11.73 mention pedestrians & wheelchair users. (Regeneration – FODDC).

Support:

- ‘Significant part of the town centre lies within an area where there is a flood risk developments will need to respond accordingly whether through assessments & mitigation or the application of the sequential and exceptions tests’. (Environment Agency)
- Natural England note the site is in a sensitive location close proximity to the Wye Valley & Forest of Dean Bat sites SAC. Development here should incorporate mitigation & enhancement for bats.

Draft Officer Response

Comment noted regarding the retail development to southeast of Newent. However, the purpose of a neighbourhood centre is to support the residential housing without providing such an extent of retail services which would adversely impact upon the town centre.

Comment regarding request for a large retail food store noted, however, it would need to be demonstrated that the retail store would not have an adverse impact upon the town centre. Equally, the aim of employment uses under Policy 76 is to complement the town centre and not to harm it through reduced footfall.

The suggestion of smaller sites is noted, however, the Council needs to provide higher numbers of housing across the district, and the agreed Council’s strategy is that the main towns (such as Newent) are more capable of sustaining higher levels of development.

Comments regarding the need for infrastructure delivery and investment are noted. This is an issue across all of the planned development in the District, and will be addressed through a mixture of liaison with various stakeholders (such as GCC, NHS, water companies, etc.) and Section 106 contributions.

It is noted that parts of the local community do not agree with the proposed level of development in the town.

The Council is very much aware that Newent has a highly valued Conservation Area and many listed buildings and future development must take accord of this. It is noted that this is also an asset which can help the town to prosper.

Regular engagement between the Council and Newent Town Council is encouraged and the Council's Local Plans team will endeavour to improve upon this.

The Council engages regularly with GCC Highways and makes them aware of the potential development sites. Issues such as public transport hubs, highway networks, parking provision and traffic management measures are discussed with and the remit of GCC Highways. Equally, GCC Highways comment on allocations and on individual applications and request necessary highway works/mitigation and contributions. Walking and cycling paths are encouraged through Policies 24 and 25. It is recognised that better bus services are required and this continues to be an aspect for further work. Bus companies are consulted on the draft plan and their input is taken into account. Bus services are generally run by private companies.

Reference in Para. 11.73 to pedestrians and wheelchair users can be incorporated into the paragraph.

The Local Plan does not seek to allocated land which is in flood zone 2 or 3. Furthermore, a SFRA level 2 will be carried out where necessary for the local plan. Any future planning permissions will be subject to assessment and mitigation where appropriate (as advised by EA and LLFA).

Any future permission would have to take into account any relevant habitat assessment and comply with any requirements set out in LP8 Nature conservation - protected sites, LP9 Habitat and Species protection and LP10 Green and blue infrastructure.

Beachley Barracks Supporting Text

Number of Representations: 16

Objection: 8

Support: 3

Observations: 5

Support:

- Land agents wishes to further define the site boundary with the Council on the basis of the significant DIO landholding, potential developable areas and areas that might be used for environmental mitigation measures, including the Beachley & Sedbury Saltmarshes Local Wildlife Site and wish to work with the Council to correctly define these. However, this paragraph also identifies "sufficient land for about 600 dwellings and also 10ha for other uses in addition to any buildings to be retained". On the basis of our comments above (with regards to commercial land and the total developable area being approximately 21ha) reference to a figure of 10ha should be deleted. Submits a masterplan for the allocation.
- Ensure that significant infrastructure improvements, including a Chepstow bypass, enhanced public transport, increased healthcare facilities, and proper policing resources, are in place before any construction begins.
- Reference to the further expansion of the Wye Valley Greenway and connections to Beachley in the specific cycle route policy (LP.25) is welcomed, along with the supporting text referring to providing support to any potential links to Chepstow. (Monmouthshire CC)

Observations:

- The supporting text refers to the inclusion of retail space but there is no detail provided on size or type of uses, we have concern over the scale of commercial development on this site and the potential resultant impact on Chepstow Town Centre. (Monmouthshire County Council)
- Paragraph 11.75 - Beachley Barracks site forms part of primary planning area D1. In this relatively remote location, an additional 600 houses, equates to 180 primary places, which is slightly less than a one form entry primary school. GCC have a specification for the formation of a new school. The total cost of the provision would need to be funded through developer contributions. In this instance given the overall pressure for places in the district, a site large enough to ultimately accommodate a 2-form entry primary school, with nursery is required. Initially however a single form entry school maybe all that is required. Furthermore, accommodating 118 secondary places (including sixth form) within the existing provision in Forest South would be difficult particularly with other proposals. (GCC)
- Part of the A48 in Chepstow is located in an Air Quality Management Area any proposed development that would have a significant impact on the road network, and thus local air quality within this area should be properly assessed for air quality impact in line with an appropriate methodology and include proposed mitigation to reduce or eliminate those impacts. (Monmouthshire County Council)
- The map within the plan does shows the colour coding for 'residential' development covering the existing recreation area at the Beachley site.
- The current transport infrastructure is not adequate therefore no development on the proposed scale, should be permitted at Beachley without actual improvements

- The existing recreation spaces at Beachley are varied and offer a fantastic template for improvement. If development of the area goes ahead, the currently leisure space must not be lost, including the running track, playing fields, assault course and network of walks in open space, surrounded by wildlife and nature.
- Access to the SARA station must not be impeded in any way.
- Natural Environment - The areas of SSI must be protected and retained. Free access to walk the wild areas surrounding the peninsular is imperative.
- What will happen if Beachley Barracks does not close? Is there a proposal for the reallocation of the proposed 600 dwellings and related buildings / greenspace.

Object:

- The preferred strategy is also heavily reliant on Beachley Camp barracks being released for development. This represents a significant risk in terms of deliverability. The DIO's representations to the Second Preferred Option consultation in 2022 suggest that disposal of the site was 2029. This would represent a considerable threat to the soundness of the strategy.
- This will significantly increase the traffic usage and pollution on the one road going into and out of Sedbury and Beachley. The only way this could work would be to add another exit off the M48 to specifically service Beachley area. This will also lead to an increase in traffic and pollution on an already dangerous road. This will significantly increase congestion through Sedbury onto the A48 as traffic would have to also filter through Chepstow for commuting to Cardiff, Newport and Bristol.
- Sedbury and Tutshill are situated in England and separated by the International boundary that is the River Wye; whereas Chepstow is in Wales. they are not part of Chepstow
- A site visit is suggested to see the traffic especially at rush hour which gridlocks Sedbury
- 600 houses would probably generate some 2500 people, of which some 550 would be children. The existing schools Offa's Mead and Wyedean Academy are already seemingly full so additional provision for schools would need to be made.
The Local doctors surgery is straining to facilitate its existing registered clients, and doesn't seem physically able to be expanded to accommodate additional consultation rooms or indeed additional doctors.
- There is a small Spar grocery store, butchers, pharmacy and cafe. It is felt these facilities would be unable to satisfy the needs of the additional residents.
- The road from Sedbury into Beachley has flooded every year since 2009 that we have lived here. If you add an extra 2,000 people this will be absolute chaos.
The bus service timetable will not meet the demands of these extra people.
The local services and infrastructure are already stretched and unable to cope. there are no dentists, one doctors a primary and secondary school. The minor injuries unit in Lydney has shut
- Only a bypass will overcome the traffic issues, needs collaboration between England and Wales to relieve transport issues of bottlenecks and congestion.
- No development should be permitted until infrastructure is provided
- Developments in Tutshill, Sedbury and Beachley will increase the population of Tidenham Parish by over 845 properties which, in a parish of approx. 7000 people, will mean at least 25% increase in population.

- Employment and skills - a great idea as teenagers at Wyedean school who are looking for work experience and later
- employment are disadvantaged due to a lack of opportunities and poor transport to get to work.

Draft Officer Response

The LP provides allocation for housing over the plan period, the development of Beachley Barracks is likely to take place in the latter half of the plan period. It is understood the site is likely to become available and is a large area with previously developed land. It lies close to facilities in Chepstow and Tutshill/ Sedbury. The LP must address its future and at the same time consider how it may contribute to the future needs of the FoDD. At present the redevelopment for a form of mixed development is considered appropriate, with about 600 dwellings being accommodated.

It will be a requirement of any development that it is able to provide for its infrastructure needs and the FoDDC is concerned especially for any adverse impact on known problems that already exist such as at Chepstow. The LP will need to be very clear on the expectations of the site. The allocation policy specifies what is needed to make the development acceptable. This includes the requirements of the development itself on site and access to it, as well as landscape and ecology. In view of the complexity and scale of any allocation the provision of a masterplan to guide the development is suggested. Overall, the test for whether access would be acceptable would fall back to the national guidance though the policy should reflect the need for a reduction in private travel, an increase and support for home working and provision of public transport.

Appropriate housing type and tenure will be considered so that the site delivers in line with the housing needs.

The development of the site will need to take account of other relevant policies in the LP such as those addressing climate adaptation and mitigation which will seek to secure carbon neutrality by 2030 in compliance with priorities of the Council Plan.

The policy will set out the employment, retail and greenspace requirements.

Any redevelopment of this site should ensure that the presence of any contamination is adequately characterised prior to re-development, as there is the potential for disturbance of contaminants resulting in the re-mobilisation of contaminants that can leach to groundwater. Issues such as ensuring remediation of any contamination, selection of appropriate foundation design, appropriate decommissioning of any groundwater boreholes/wells often found on such sites and disposal of drainage must also be considered.

It is acknowledged that Sedbury, Tutshill and Beachley are situated in the Forest of Dean District and that Chepstow is part of Monmouthshire. The text is recognising the close relationship between the villages and the town, in terms of geography and also the use of Chepstow's services and facilities by many of the villages residents.

Comments noted reference to location on peninsular will be added. Policy makes reference to any schemes must requires to demonstrate long term resilience in respect of liable flooding and possible sea level rise. Issues of contamination will need to be addressed.

Comment noted. To ensure that the allocation takes full account of the protected sites and interests and delivers any net gain in the optimum way through compliance with other relevant policies of the LP eg BNG , Green infrastructure etc.

Full Ecological Impact Assessments will be required and the site is likely to require extensive ecological survey and appropriate mitigation and compensation. The site will require extensive bird and bat surveys and likely other protected species surveys - parcels of land designated for mitigation will be required for any future application. A Habitats Regulations Assessment will also be required in relation to the Wye Valley and Forest of Dean Bat SAC, Severn Estuary SAC, SPA and the River Wye and all future applications will need to demonstrate that there will be no adverse impacts on these sites before approval can be granted. Mitigation for protected species cannot be included for net gains within the Biodiversity Metric.

Agreed, implementation of the proposal should be through an agreed masterplan, any proposal should identify key buildings to be retained as heritage assets although currently not designated.

Any proposals will be expected to comply with other policies in the LP such as LP 24 active travel, LP22 site conditions, LP21 flooding and water conservation etc.

Policy LP.78 Beachley Barracks

Number of Representations: 72 comments to chapter and policy.

Support: 11

Observations: 32

Objections 29

Glos Wildlife Trust:

- Beachley Camp is positioned in a sensitive location on the peninsula between the River Wye and the Severn Estuary. GWT has identified the following constraints as high priorities for development in this location. Development here could impact 4 SACS, including the Wye Valley Woodlands, the Wye Valley and FoD Bat Sites SAC, the Severn Estuary SAC/SPA/Ramsar and the River Wye SAC. Beachley and Sedbury Saltmarshes LWS occupies the southwest of the peninsula. There are areas of core NRN located on the Beachley Camp site and the majority of it is wetland opportunity area.
- To understand the impact on the range of designated sites which surround Beachley Camp, a habitats regulations assessment (HRA) would need to be undertaken in line with the Conservation of Habitats and Species Regulations 2017.
- Any development here should take into account the additional recreational pressure that around 1,500 additional residents will have on the adjacent designated sites, along with the impact on other nearby sites, including Lancaut nature reserve.
- Any development would need to ensure the integration of high-quality GI that connects the site with the wider landscape. A GI framework, such as Building with Nature, should be utilised from an early stage in the design process of any development plans to ensure the site is developed with high quality GI at its core which is vital given its location.

Environment Agency:

- The site being on a peninsular could be susceptible to tidal flooding/sea level rise over its lifetime (i.e 100 years at least, not just the Plan period). This source of flood risk has not been listed in the constraints within policy LP78 or paragraph 11.90.
- We have also previously highlighted that the brownfield and MOD nature of the site may present risks of land contamination. There may also be a query over the foul drainage provision at this site (we comment on this later on in this response). Given the possible impacts on Designated Sites as well, we believe this site may prove very difficult to develop in terms of viability. At present there is insufficient evidence base on flood risk in particular to be confident about this site. Therefore we continue to raise concern about it. At present, we would have to advise we object to its inclusion in the Plan.
- Beachley Barracks The area is located partly within a Principle Aquifer and adjacent to surface water receptors. MOD sites are often subject to previous contaminative uses, which can lead to contamination of soils and groundwater for hazardous substances. Any redevelopment of this site should ensure that the presence of any contamination is adequately characterised prior to re-development, as there is the potential for disturbance of contaminants resulting in the re-mobilisation of contaminants that can leach to groundwater. Issues such as ensuring remediation of any contamination, selection of appropriate foundation design, appropriate decommissioning of any groundwater boreholes/wells often found on such sites and disposal of drainage must also be considered. These matters are likely to present a significant constraint to the development and impact upon viability.
- Paragraph 11.75 one of few allocations where natural environment referred to. What are sea level rise predictions for area? Welcome references to existing GI and natural environment resources eg trees green space and estuary

Natural England:

- This site lies in the flood zone for the Severn Estuary SAC/SPA/RAMSAR.
- This site has potential issues such as flood risk with sea level rise which will increase with climate change and could create potential impacts such as run off and sewage into the estuary.
- Potential impacts also arise from both diffuse and source pollution onto migratory fish species.
- The increase in housing and lighting could impact migratory birds and the increase in population in the area will pose potential impacts of recreational disturbance on local bird populations.
- The sites location is cut off from town centre facilities and employment. We question the suitability of this site for redevelopment as housing. As an alternative, we suggest that the site has the potential to provide a good opportunity for green space provision and for people to enjoy the estuary via activities such as bird watching.

Historic England:

- A heritage assessment should inform the proposed master planning to ensure the historic use and character can be appreciated in any future designs.

Tidenham Parish Council:

- In summary, given the high number of proposed new houses in the Local Plan for Tidenham Parish, together with the new houses built in the last five years, and the absence of any significant improvements, or direction for improvement in the Local Plan, in infrastructure, road network and active travel, Tidenham Parish Council suggests the Local Plan for this area of the Forest of Dean is not feasible and needs to be reconsidered. There is already a need for improved roads with more capacity and rerouting, more GP surgeries, dentists, pharmacies, schools and school places, shops and other leisure facilities. All of which needs to be in place before any significant new house building is considered.
- Road network – heavily congested with tailbacks heading into Wales during rush hours and at weekends
- Beachley road runs through the small village of Sedbury, is already used by many people and has a long 20mph section by the schools. There have also been fatal accidents on the faster sections of road towards Beachley. With 845 new houses proposed in the local area these problems will only get worse.
- Increased traffic which will also drive pollution levels even higher for those living near the A48.
- Transport Plan - there is demand for a comprehensive transport plan to include cycle and foot paths, and traffic calming measures in the parish.
- There are few safe cycle or footpaths between Beachley, Sedbury, Tutshill and Chepstow, the nearest main town. There are no safe routes for mobility scooters or prams/pushchairs only via steps or a steep hill where the pavement is not wide enough.
- Vehicle usage, and in particular cars - The word car does not appear in the Local Plan and there appears to be no consideration for car users in the parish or Forest of Dean, yet most residents use their cars as their everyday transport. In addition, the government drive to increase the number of EV's on our roads over the next few years does not align with the Local Plan for active travel, or public transport.
- Monmouthshire CC are considering additional housing in and around the main routes into/out of Chepstow which will also have an impact on the congestion on the A48.
- Whilst those that have EV's contribute to improving the environment they won't improve the heavy congestion that is being experienced.
- Has Monmouthshire County Council's Local Plan team been consulted?
- Infrastructure - the Local Plan does not address the lack of infrastructure requirements sufficiently. There is a lack of GP surgeries, dentists, pharmacies, schools and school places, shops and other leisure facilities in the parish today. Beachley, Sedbury and Tutshill must be considered individually and as whole, there are too many services where residents are relying on Chepstow.
- Road Safety - consideration must be given for a safe crossing on the A48 at Sedbury Lane. Pedestrians, including children attending local schools, risk crossing the A48 at this point with traffic often travelling at the 50mph speed limit or more. There is currently no safe crossing.
- Sewage Treatment - with the increased number of proposed new houses in the parish there need to be assurances that there are going to be improvements to sewage treatment, especially in the Loop Road, Beachley area where there are properties not connected to the main sewage and still using septic tanks.

- Contingencies plans - What if the First Rifles do not vacate the Beachley Barracks site in 2029, or if this date is moved out. Are there any contingencies being consider?
- It is likely that improvements and additional provision of infrastructure, including sustainable modes of transport will be required to demonstrate that the site can be satisfactorily provided for.

Monmouthshire County council:

- Regarding Beachley Camp specifically, there is also concern over the reference to commercial uses in the policy. The supporting text refers to the inclusion of retail space but there is no detail provided on size or type of uses, we have concern over the scale of commercial development on this site and the potential resultant impact on Chepstow Town Centre. MCC
- Additional development in the South of the FODD, will exacerbate existing traffic issues in Chepstow without mitigation it will worsen at the A48 air quality management are, aggravate existing blight and severance and increase road congestion MCC expect FOD offers measures to mitigate the increase in congestion around Chepstow. MCC cannot support the proposed Plan unless it is accompanied by a comprehensive and funded package of transport improvements that avoids aggravating these existing problems. The integrated package of transport improvements should include network of walking & cycling routes, potentially a new active travel bridge linking Sedbury and the Mabey Bridge development site in Chepstow. A park and ride railway station east of Chepstow, Improved frequency and reliability of train services, improved bus service, The Chepstow Traffic Relief Road proposal. any proposed development that would have a significant impact on the road network, air quality impact assessment and include proposed mitigation to reduce or eliminate those impacts. MCC

BOBA:

- Meetings between BOBA and FODDC took place in 2018 and BOBA has engaged with the Local plan since this time to discuss the future of Beachley Camp. BOBA consider FODDC has not discussed their concerns and would like to further engage with the District Council for them to consider their representations.
- BOBA was not seeking any special consideration other than to note its presence at Beachley, its interest in the military cemetery maintained by the Commonwealth War Graves Commission (CWGC) where an international complement of military persons is buried, as is the first Commandant of the Army Apprentices School, later College. The setting along with St John's Church (Grade II listed) is important to the history of boy soldiers in the British Army and a site that the National Army Museum (London) has made special note of, as custodian of the legacy of the British Army.
- BOBA is a complement of veterans returning to Beachley for its annual reunion and works with other veteran organisations to help 'service people' when they have left their respective armed service. Beachley presents an opportunity to bring some of those service providers to a recognised place in England.
- The BOBA report gives factual background and presents a costed proposal for the future use of the Beachley Camp. A whole life support facility. Repurposing would be by far the most sustainable form of development avoiding wholesale demolition with the massive carbon penalty added to the carbon footprint of any wholesale redevelopment of the site. The BOBA proposal will generate 300 jobs servicing at any one time about 600 occupants. Around the same level

of occupancy as the current infantry battalion. So, it will not have any greater impact on public services, transport and amenities. It also provides the opportunity to provide bespoke first responder services.

- The Local Plan document under section 8 Tidenham I - Beachley - it states "As Crown Land it is exempt from the planning system as applied by the Local Authority" - If that is a correct statement in law, then there is no need to allocate the site at all.
- Sustainability appraisal - If it is not essential, which the statement says clearly it is not, then why commit to an unsustainable option in making this or any Local Plan?
- Negotiated agreement - and all public services will be drawn from Wales.
- Due to reduced housing numbers Beachley is no longer necessary
- At the point of considering any planning application for Beachley Camp the Core Policies such as CP4 of the Adopted Local Plan carried forward to the emerging or a newly Adopted Local Plan should form part of the decision-making criteria.
- As the MOD have said they want to remain in situ until at least 2029 it would be appropriate to omit Beachley from a being a strategic site and possibly reintroduce it at a later date on first 5 year review post adoption.
- The housing in Beachley Camp is not in the defined boundary of the Beachley settlement. The proposed settlement boundary of the Beachley Camp land allocation is not shown.
- After 6 years of trying to engage with FoDDC at Page 45 under Concerns - BOBA gets a mention "An alternative use suggested by the Beachley Old Boys Association (BOBA) for the whole of the site which has notable support in various representations."

Welsh Water - HMA will be required on site

Object:

Transport and travel:

- Road network – Inadequate transport infrastructure which cannot easily be upgraded to the required standard
- This transport infrastructure - including public, active, and car - needs improving before any further houses.
- To develop without the delivery of transport improvements is unjustified and impractical, creating more difficulties that would be solved. The existing 'dead-end' road is not suitable for transporting the increased volumes of traffic the development would bring, both at development stage and from residents thereafter.
- One of the most important paragraphs in the document. A real, realistic and committed to plan around the transport requirements is essential. The major commuting already has significant impact on the area, further development is obscene without further investment in transport infrastructure. Public transport is a small part, significant road building will be required. A third Severn crossing is a proposal near Lydney that may help. Do not build without a plausible plan for transport infrastructure.
- The congestion issues through and around Chepstow are well documented, development of this site would exacerbate traffic congestion and the development will significantly increase congestion through Sedbury onto the A48 as traffic would have to also filter through Chepstow for commuting to Cardiff, Newport and Bristol.

- Concern about traffic implications at High Beech Roundabout Chepstow and through Chepstow.
- The single route of access to the A48, have resulted in high volumes of traffic and near-gridlock during rush-hours. Tailbacks into England will get worse
- Traffic using Beachley Road to join the A48 has already increased through the development of new housing adjacent to Wyedean School. The proposed further developments in Sedbury and Tutshill and Beachley are expected to add a further dwellings will further contribute to the congestion at this access point to the A48.
- A new road will be required if this development goes ahead.
- The M48 runs directly over the Beachley Barracks proposal of 600 houses, which will most likely include 1,000 cars. Currently, to drive from below the M48 in Beachley to actually be on the M48 above the starting point involves driving approximately 6 miles!
- Vehicle usage, and in particular cars - Increase the traffic usage and pollution on the one road going into and out of Sedbury and Beachley.
- We also need to consider that the gateway to Wales and the South West is through Chepstow and they too will be considering a Local Plan with additional housing in and around the main routes into/out of Chepstow which will also have an impact on the congestion on the A48.
- Whilst those that have EV's contribute to improving the environment they won't improve the heavy congestion that is being experienced.
- Part of the A48 in Chepstow is located in an Air Quality Management Area. As such we request that any proposed development that would have a significant impact on the road network, and thus local air quality within this area should be properly assessed for air quality impact in line with an appropriate methodology and include proposed mitigation to reduce or eliminate those impacts. A48 in Chepstow one of most polluted roads in UK.
- The only way this could work would be to add another exit off the M48 to specifically service Beachley area.
- Need for Chepstow Bypass: A bypass for Chepstow is essential before any additional housing is built. Without this infrastructure, the traffic increase will be unsustainable and will significantly impact the quality of life in the area.
- Proposals for land in Monmouthshire at High Beech roundabout will further increase pressures
- There needs to be collaboration between England and Wales to find a solution to the traffic problem
- A site visit is required to coincide with school and work rush hours; it will be seen how with the addition of hundreds more vehicles attempting to exit will undoubtedly add to what is currently grid lock through Sedbury and trying to gain access to the A48 and onwards.
- Will cause issues for emergency vehicles
- The Sustainability Appraisal assessment of this site acknowledges that there is "existing congestion"
- Evidence base does not adequately justify that the scheme can be provided for in terms of transport and infrastructure.
- The single route in and out brings health and safety risks in a flood event or for emergency services gaining access or escape/access route with no alternative if that route became blocked.
- Significant transport improvements would therefore be required
- Will add to poor air quality experienced by local residents.

- Footpaths - there are few safe footpaths between Beachley, Sedbury, Tutshill and Chepstow, Castleford Hill is no longer wide enough for mobility scooters the other footpath is via steps
- Does the projected traffic generation go beyond the capacity of the A48 through Chepstow? If so a new bridge over the Wye and bypass is required and contributions from developers will be required.

Active travel / sustainable travel / public transport

- There are few safe cycle or footpaths between Beachley, Sedbury, Tutshill and Chepstow, the nearest main town
- The current public transport options are insufficient to accommodate the increased population. The proposal to improve cycling, walking, and public transport is unlikely to meet the demand, leading to more reliance on cars and further congestion. Additionally, Chepstow Train Station lacks the capacity and infrastructure to handle increased usage.
- There are no safe routes for mobility scooters or prams/pushchairs. There are two routes, one route is via multiple steps and a footpath next to a 50mph road (Beachley Road and across the A48 Chepstow bridge) and the other a steep hill where the pavement is being taken over by the retaining embankment and undergrowth (Castleford Hill) and is now not wide enough for mobility scooters or prams/pushchairs
- The reference to the further expansion of the Wye Valley Greenway and connections to Beachley in the specific cycle route policy (LP.25) is welcomed, along with the supporting text referring to providing support to any potential links to Chepstow.
- It is a relatively remote location and poorly connected for cycle, bus and pedestrian travel. It is over 2.5 miles to walk into Chepstow so it is naive to believe that this will be a viable means of getting to the bus or train station in Chepstow for onward journeys.
- Not demonstrated that sustainable travel can be properly and safely provided for.
- Not a sustainable location for development future residents would be reliant on private cars.
- With the nearest employment centres of Bristol, Newport and Cardiff within easy commuting distance by private car, but beyond cycling distance and limited opportunity to travel by public transport, the vast majority of residents of the redevelopment site would likely be car dependent, which would work against the Forest of Dean Council Plan and its priorities in terms of creating thriving communities, decarbonising, protecting nature and fostering sustainable communities.
- An additional 600 homes presents insufficient potential demand to sustain a relevant public transport offer
- Contrary to the Policy's principle that Development will "only be permitted where the scheme can be satisfactorily provided for in terms of transport, using cycling, walking and public transport, and where the current or improved infrastructure can accommodate the trips arising
- Speed limits on Beachley Road would need to be reduced and the road potentially widened to incorporate cycle lanes and pavements
- There is no spare parking capacity at Chepstow Station and no bus links.
- For any cycle connection to the Severn Bridge, which is elevated across Beachley peninsula, an extensive ramped arrangement may be needed and this is likely to be subject to National Highways agreement.
- Another issue I would like to raise regarding travel solutions. The OAP bus pass is only authorised for use in the country of issue. This means that pass holders cannot even use the bus to go from

Tutshill/Sedbury to Chepstow and return. Although this would not result in removing massive numbers of cars from the roads, it would help. This may be something you wish to explore with the neighbouring authority.

- Tidenham Parish is very poorly supported with regards to public transport, especially in rural areas. The bus service between Chepstow and Coleford only operates three days of the week and then only once a day. Other services do operate between Chepstow and Beachley and Chepstow and Lydney / Cinderford but have limited stops in Sedbury and Tutshill, and often require changes.
- Any planning needs to take into consideration a clear understanding of the journeys made by residents for commuting, hospitals, shopping, recreation, services - the majority of which are not viable by use of public transport. It is naïve to think residents work within the local community and naïve to think that catching a bus to Bristol or Newport or train to Cardiff or Gloucester, will put residents within realistic reach of their destination. Instead, residents will continue to be dependent on cars, in order to reach the myriad of destinations, for which public transport is not viable.

Infrastructure:

- Infrastructure - the Local Plan does not address the lack of infrastructure requirements sufficiently. There is a lack of GP surgeries, dentists, pharmacies, schools and school places, shops and other leisure facilities in the parish today.
- Current infrastructure is inadequate and is not located in close proximity to local services and facilities. the infrastructure should catch up with the current requirement before any consideration is given to further development.
- The Local doctors surgery is straining to facilitate its existing registered clients, and doesn't seem physically able to be expanded to accommodate additional consultation rooms or indeed additional doctors. GP are all based in Wales to avoid the longer waiting lists of Wales hospitals we have to ask our referrals to go via the Shropshire commissioning group.
- Schools - 600 houses would probably generate some 2500 people, of which some 550 would be children. The existing schools Offa's Mead and Wyedean Academy are already seemingly full so additional provision for schools would need to be made. Children from Wales attending local schools are forcing children from the area to travel to Woolaston and St Briavels increasing car use.
- Community Facilities - The existing recreation spaces at Beachley are varied and offer a fantastic template for improvement. If development of the area goes ahead, the current leisure space must not be lost, including the running track, playing fields, assault course and network of walks in open space, surrounded by wildlife and nature. To lose this would be detrimental to the well-being of existing residents and those who move into any new properties.
- Negative effects on local recreational amenity.
- There is a small Spar grocery store, butchers, pharmacy and cafe. It is felt these facilities would be unable to satisfy the needs of the additional residents.
- Para.11.8.3. There is not a broad range of shopping opportunities in Sedbury. Quality of existing stock of shops is variable.

Sewage Treatment:

- Recent developments in Tutshill have unresolved sewage overflow issues - those living in Tutshill, especially Sedbury Lane experience raw sewage on a regular basis, while is cleaned up by the Water company, the drainage issue is not being addressed. The system certainly cannot support further development - until such a time as developers are made to face up to their responsibilities.

Commercial uses:

- Regarding Beachley Camp specifically, there is also concern over the reference to commercial uses in the policy. We have concern over the scale of commercial development on this site and the potential resultant impact on Chepstow Town Centre.
- Delivery and viability issues the decision to vacate the site (in 2029) may be subject to review. The site will definitely not be available for development in the next five years and may not become available at all during the plan period.
- The supporting text refers to the inclusion of retail space but there is no detail provided on size or type of uses.
- While the aim to reduce commuting is laudable how can a reduction in commuting be achieved with 'retail space' alone. It is unlikely that all of the employment roles could be filled from the population within the development
- The provision of employment through new businesses in the area will add to the increase in traffic, with employees, deliveries and customers travelling to and from the business units.
- Beachley Barracks is remote and will prove difficult to find suitable commercial development as evidenced by the failed commercial development at the Old Ferry Inn.

Climate change / Ecology:

- These housing proposals will not tackle climate change, but will exacerbate it.
- Natural Environment - The areas of SSI must be protected and retained. Free access to walk the wild areas surrounding the peninsular is imperative.
- An area of outstanding natural beauty, to be preserved.
- Existing nature and wildlife areas to be retained for all.
- Largely surrounded by areas at risk of flooding, with the M48 crossing directly above the site, and with the microclimate of the river often resulting in strong winds through the area, means that it is unlikely to be the most desirable location for housing.
- The site is highly constrained in terms of ecology, flooding and heritage.
- In respect of ecology, the site is within the Severn Estuary SAC, River Wye SAC and Severn Estuary SSSI. The high ecological sensitivity of the site would need to be considered in any proposals and these designations would need to be properly protected.
- The site is largely surrounded by Flood Zones 2 and 3 and some of the site to the west lies within such zones. The probability of the immediate surrounding area being impacted by flooding is therefore high and the impact of climate change may also exacerbate the impacts.
- There may be contamination issues and given its location on a peninsula this raises the issue of access and flood risk.
- The site's relative inaccessibility - a matter noted in the emerging Local Plan - along with its location essentially surrounded on three sides by the River Severn and the risk that that poses

in terms of flooding in the longer term, potentially brings about risks with regard to deliverability which may compromise the site coming forward for development within the Plan period.

- It is difficult to see on the maps provided in the document where developments will avoid the flood risk zone. Currently the fields and some back gardens from Bridget Drive, Pennsylvania in Sedbury to Beachley are subjected to the tidal floods of the Severn Bore which also affects the Wye estuary.

Historic Environment

- There are three Grade II listed buildings within the assessment area and the Old Severn Bridge (Grade I) passes over the top of the site.

Other

- What will happen if Beachley Barracks does not close. Is there a proposal for the reallocation of the proposed 600 dwellings and related buildings / greenspace. There is no certainty the site will come forward for development.
- It is unclear at this stage whether the site would be able to deliver a scheme that takes into consideration the designations on and around the site so further technical work would be required, especially with regards to ecology, heritage, flood risk and transport. Until this work is undertaken it cannot be determined that the site is capable of delivering 600 dwellings as part of a viable scheme.
- There is no mention of the SARA Lifeboat & Rescue Station at Beachley in the plan. Whilst the station building is owned by SARA and is correctly shown as outside of the 'Beachley Camp' area, the car park (which is right under the Severn Bridge) is owned by and leased from the MOD. The car park is vital to the function of the Rescue Station and in fact is about 50% too small (needs to be 50% larger) as is evidenced on many Sunday mornings. There is also a SARA requirement for a small amount of storage space outside of the station buildings. When the Beachley Camp is re-purposed, it would be ideal for the current car park and a small amount of adjacent land to be transferred to SARA, to ensure sustainability of the operation there. SARA would welcome a discussion about this. I believe that the Coastguard facility (the building and their car park) is shown on your map as being within the Beachley Camp areas also, but will leave them to comment upon that. (SARA)
- Para. 11.90. Flood risk zone - It is difficult to see on the maps provided in the document where developments will avoid the flood risk zone. Currently the fields and some back gardens from Bridget Drive, Pennsylvania in Sedbury to Beachley are subjected to the tidal floods of the Severn Bore which also affects the Wye estuary.
- Coordinate the locations of housing and workplaces
- There is also a WW2 War Graves on the site There are almost 100 German and Italian soldiers buried there who were prisoners of war.
- The map within the plan does show the colour coding for 'residential' development covering the existing recreation area at the Beachley site.
- The SA for the site is flawed, There are some differences in the SA 2024 when compared to the SA produced to support the previous consultation on the Preferred Option in 2022, but it is not clear what evidence has led to the revised assessment. Eg the SA objective for Active Travel in the

SA July 2024 has changed from a neutral rating (yellow) to a positive rating (light green +). S reply to SA direct

- All plans should apply a sequential, risk-based approach to the location of development - taking into account all sources of flood risk and the current and future impacts of climate change
- Beachley Barracks site cannot be relied upon to make a significant contribution to meeting the housing needs of the Forest of Dean. It has limited scope and does not provide a long-term future to meeting needs of the district in a sustainable location, indeed as an option
- Such is the profit made by housing developers that Section 106 agreements to cover the above should be enforced.
- The level of development is unsustainable. Our suggestions for the Local Plan are:-
- No developments at all until all existing permissions (particularly in Chepstow and Lydney) are complete and their effects experienced.
- No developments until the future of the Beachley site is determined, where, incidentally the plan should specify that all trees should have TPOs.
- No developments at all until alternative transport systems are in place. These should be, at a minimum,
- A bypass at Chepstow with another bridge over the Wye. would need cooperation of Welsh government.
- A direct rail link from the Forest to Bristol via a loop at Caldicot
- Para 11.78 - There are various conflicting site areas and wish to work with the Council to correctly define these. However, this paragraph also identifies "sufficient land for about 600 dwellings and also 10ha for other uses in addition to any buildings to be retained" . On the basis of our comments above (with regards to commercial land and the total developable area being approximately 21ha) reference to a figure of 10ha should be deleted.
- Chepstow's police force is already struggling to manage the current population. An increase in residents without a corresponding increase in police resources could lead to a rise in antisocial behaviour, burglary, and petty crime.
- A number of representations provided suggestions for the timescale of the land being vacated from 2029 to 2035

Cross border consultation:

- Has the Local Plan team consulted with Monmouthshire County Council's Local Plan team?

Object:

- Fully support the need for housing, deeply concerned about the potential negative impacts these developments will have on the local community, including increased traffic, pollution, safety risks, and the strain on already overstretched local services.
- Beachley Barracks Development
- The proposed development at Beachley Barracks will significantly increase traffic on the already congested A48, especially through Sedbury, where the road infrastructure is inadequate.
- This area, which includes two busy schools, is already a high-risk zone for road traffic collisions (RTCs).

- Sedbury Road is in poor condition, increase in traffic will heighten the risk of accidents, particularly involving children.
- The current public transport options are insufficient to accommodate the increased population.
- The proposal to improve cycling, walking, & public transport is unlikely to meet the demand, leading to more reliance on cars and further congestion.
- Chepstow Train Station lacks the capacity and infrastructure to handle increased usage.
- local healthcare infrastructure is already overstretched. The single doctor's surgery in Sedbury is overburdened, access to emergency medical care is limited, no local minor injury unit or emergency facilities. The proposed development will exacerbate these issues, potentially putting lives at risk.
- Currently no NHS Dentists available in Chepstow, Bristol, Thornbury, Newport and Lydney. This requires urgent attention as building 100's of homes for 1000+ people who automatically will not have access to NHS dental services.
- A bypass for Chepstow is essential before any additional housing is built. Without this infrastructure, the traffic increase will be unsustainable and will significantly impact the quality of life in the area.
- Chepstow's police force is already struggling to manage the current population. An increase in residents could lead to a rise in antisocial behaviour, burglary, and petty crime.
- These proposals are meaningless without infrastructure plans and recommendations to back them up.
- I formally object to LP 78, 79 and 80 without infrastructure support to reduce and redirect traffic through the area it will be a road safety and pollution hazard.
- There is no enforcement of infrastructure development within the plans.
- There is zero NHS dentist provision in either the English or Welsh areas surrounding the sites so this is another consideration needed.
- LP 78 and 79 - residents in the local area can only support these plans if concrete proposals for the relevant road, rail, public transport, health and education improvements that would be necessary are made at the same time as the property development.
- Support in principle
- Land agents wishes to further define the site boundary with the Council on the basis of the significant DIO landholding, potential developable areas and areas that might be used for environmental mitigation measures, including the Beachley & Sedbury Saltmarshes Local Wildlife Site and wish to work with the Council to correctly define these. However, this paragraph also identifies "sufficient land for about 600 dwellings and also 10ha for other uses in addition to any buildings to be retained". On the basis of our comments above (with regards to commercial land and the total developable area being approximately 21ha) reference to a figure of 10ha should be deleted. Submits a masterplan for the allocation.
- Principle of reusing a brownfield site is supported
- Agree in principle with this policy but I note that no quantitative value for Greenspace area is quoted.
- Not opposed to the building of new houses, but the transport infrastructure must be in place first.
- I would suggest that a road bridge be constructed between Beachley and Mathern industrial complex below the M48/A466 roundabout.
As stated above, this would require the cooperation of the Welsh Government, is this achievable?

- The OAP bus pass is only authorised for use in the country of issue. This means that pass holders cannot even use the bus to go from Tutshill/Sedbury to Chepstow and return. Although this would not result in removing massive numbers of cars from the roads, it would help
- Encourage active travel, cycle walk, social housing, commercial premises, public transport (environmentally friendly), Skills centre/Education/Training, Footbridge Sedbury to Chepstow to allow emergency access for ambulance disability access for aging population encourage active travel safe passage for school children, Orchard community garden/visitor centre coffee shop.
- Agree in principal but requires the following conditions:- in-depth feasibility studies to establish existing infrastructures and services can safely support further developments, eg. Sewers, phasing of plan, joined up thinking and working across boundaries to address the problem of the increasing traffic and air pollution on the A48.
- No problem with any development!! however Road access is terrible, Public transport is poor. buses only go to Chepstow. No bus to Gloucester, Sewage works to allow extra housing, Medical facilities, Nearest school is in Sedbury, Shops, nearest shop is Sedbury, then into Chepstow.
- Type of housing, majority of the housing stock should be council housing, very low cost house to purchase. There are too many 2/4/5 bedroom houses already in the district. Think of young first time buyers/renters
- While support the need for housing, deeply concerned about the potential negative impacts these developments will have on the local community, including increased traffic, pollution, safety risks, and the strain on already overstretched local services.
- I'm pleased to see that a primary school will be build alongside the houses.
- I would like the houses to be environmentally friendly, with an emphasis on sustainability, including solar panels. It would also visually appealing to have a variety of designs of houses. The recently built housing estates around Tutshill and Sedbury are not very imaginative.
- There should be a health clinic, on the Beachley site to avoid overloading the already over stretched resources in Tutshill and Sedbury.
- Encourage active travel, cycle walk, social housing, commercial premises, public transport(environmentally friendly) Skills centre/Education/Training, Footbridge Sedbury to Chepstow to allow emergency access for ambulance disability access for aging population encourage active travel safe passage for school children Orchard community garden/visitor centre coffee shop
- Should be updated to reference latest NPPF.

Observations:

- The map within the plan does shows the colour coding for 'residential' development covering the existing recreation area at the Beachley site.
- Will the current houses in Beachley be utilised as social housing as i know some have recently had new double glazing

Draft Officer Comment

Beachley Barracks is situated on the peninsular between the Rivers Severn and Wye, it no longer benefits from any local facilities although is in close proximity to Sedbury and the services it provides as well as further services provided in Chepstow. The Draft Plan strategy proposes continued development of Lydney and new development at other centres such as the reuse of Beachley camp and at Newent.

It is understood the site is likely to become available and is a large area with previously developed land. The LP must address its future and at the same time consider how it may contribute to the future needs of the FoDD. At present the redevelopment for a form of mixed development is considered appropriate, with about 600 dwellings being accommodated. The development of Beachley Barracks is likely to take place in the latter half of the plan period.

It will be a requirement of any development that it is able to provide for its infrastructure needs and the FoDDC is concerned especially for any adverse impact on known problems that already exist such as at Chepstow. The LP will need to be very clear on the expectations of the site. The allocation policy specifies what is needed to make the development acceptable. This includes the requirements of the development itself on site and access to it, as well as landscape and ecology. In view of the complexity and scale of any allocation the provision of a masterplan to guide the development is suggested. Overall, the test for whether access would be acceptable would fall back to the national guidance though the policy should reflect the need for a reduction in private travel, an increase and support for home working and provision of public transport.

Appropriate housing type and tenure will be considered so that the site delivers in line with the housing needs.

The comments from BOBA are noted and FODDC will continue to engage with BOBA. Point 5 in the Policy LP.78 allows for the accommodation of a wider community use such as BOBA is proposing.

The development of the site will need to take account of other relevant policies in the LP such as those addressing climate adaptation and mitigation which will seek to secure carbon neutrality by 2030 in compliance with priorities of the Council Plan.

The policy will set out the employment, retail and greenspace requirements.

Environment Agency, Natural England and GWT comments are noted, the text and policy will be amended as appropriate.

Any redevelopment of this site should ensure that the presence of any contamination is adequately characterised prior to re-development, as there is the potential for disturbance of contaminants resulting in the re-mobilisation of contaminants that can leach to groundwater. Issues such as ensuring remediation of any contamination, selection of appropriate foundation design, appropriate decommissioning of any groundwater boreholes/wells often found on such sites and disposal of drainage must also be considered.

Comments noted with reference to location on the peninsular will be added. Policy makes reference to any schemes must requires to demonstrate long term resilience in respect of liable flooding and possible sea level rise. Issues of contamination will need to be addressed.

Comment noted. To ensure that the allocation takes full account of the protected sites and interests and delivers any net gain in the optimum way through compliance with other relevant policies of the LP eg BNG , Green infrastructure etc.

Agreed, implementation of the proposal should be through an agreed masterplan, any proposal should identify key buildings to be retained as heritage assets although currently not designated.

Any proposals will be expected to comply with other policies in the LP such as LP24 active travel, LP22 site conditions, LP21 flooding and water conservation etc.

Full Ecological Impact Assessments will be required and the site is likely to require extensive ecological survey and appropriate mitigation and compensation. The site will require extensive bird and bat surveys and likely other protected species surveys - parcels of land designated for mitigation will be required for any future application which will be informed by surveys. A Habitats Regulations Assessment will also be required in relation to the Wye Valley and Forest of Dean Bat SAC, Severn Estuary SAC, SPA and the River Wye and all future applications will need to demonstrate that there will be no adverse impacts on these sites before approval can be granted. Applications that cannot demonstrate that there will be no adverse impact on a European Protected Site will be refused. It should also be noted that mitigation for protected species cannot be included for net gains within the Biodiversity Metric and where large portions of mitigation are required offsite net gains may be required.

Sedbury and Tutshill

Tidenham Parish: Beachley, Sedbury and Tutshill General comments

Number of Representations: 14

Support: 2

Object: 7

Observations: 5

- Sedbury and Tutshill are not physically part of Chepstow. They are situated in England and separated by the International boundary that is the River Wye; whereas Chepstow is in Wales. This is an irresponsible misrepresentation. Chepstow is in another country, under a different devolved government, which I believe has declared that it will not build new roads.
- Amenities in the villages are limited, lack of health care facilities.
- Minor injuries lacking since Lydney closed can only get to Cinderford by car.
- Poor transport facilities.- The A48 is a bottleneck. There is only one route through Chepstow and a journey that used to take 5 minutes now takes up to 30 minutes. If there is an accident nothing can move. The additional houses in Sedbury, Lydney and Chepstow have challenged the road network. The additional houses proposed in Beachley, Sedbury and elsewhere will all need to travel on the A48 and delays will only get worse. A bypass, originally proposed with a bridge over the Wye at Bulwark/Thornwell to Beachley needs to be in the plan or it is doomed to be seen as a failure. The impact of the 345 houses on the Fairfield maybe site has not been felt yet.
- Medical - Currently the medical support on the East of the border is provided by Welsh based surgeries making it difficult for the English based population to get their English NHS rights. With the additional population considered, there should be scope for an English based GP surgery to service Tidenham, Woodcroft, Tutshill, Sedbury and Beachley.
- Careful consideration needs to be made as to what type of industries are introduced because heavy lorries for transporting goods away from the industries could damage the minor road structures of the villages, contribute to road safety needs and add to the bottlenecks of traffic.
- Schooling - There are insufficient primary school places and the catchment area oddly is a created with a circular arc which includes Wales, many of them getting into the local schools preventing English residents getting places even though they are in walking distance. This needs resolving.

- There are also very unrealistic opinions in the paper about employment possibilities. There are very few opportunities to create new jobs of businesses in this part of Gloucestershire. Chepstow has also seen employment opportunities reduce with the closure of Fairfield Maybe and the conversion of that site to housing, increasing the bottleneck on the A48.
- Given the high number of proposed new houses in the Local Plan for Tidenham Parish, together with the new houses built in the last five years, and the absence of any significant improvements, or direction for improvement in the Local Plan, in infrastructure, road network and active travel, Tidenham Parish Council suggests the Local Plan for this area of the Forest of Dean is not feasible and needs to be reconsidered. There is already a need for improved roads with more capacity and rerouting, more GP surgeries, dentists, pharmacies, schools and school places, shops and other leisure facilities. All of which needs to be in place before any significant new house building is considered.
- Additional development in the South of the FODD, will exacerbate existing traffic issues in Chepstow without mitigation it will worsen at the A48 air quality management are, aggravate existing blight and severance and increase road congestion MCC expect FOD offers measures to mitigate the increase in congestion around Chepstow. MCC cannot support the proposed Plan unless it is accompanied by a comprehensive and funded package of transport improvements that avoids aggravating these existing problems. The integrated package of transport improvements should include network of walking & cycling routes, potentially a new active travel bridge linking Sedbury and the Mabey Bridge development site in Chepstow. A park and ride railway station east of Chepstow, Improved frequency and reliability of train services, improved bus service, The Chepstow Traffic Relief Road proposal. any proposed development that would have a significant impact on the road network, air quality impact assessment and include proposed mitigation to reduce or eliminate those impacts. MCC.
- there is not enough Infrastructure and service's in the area at the moment I would like to know how you intend to deal with this problem as there is no real details in this plan all it seems to be interested in is new dwelling numbers
- The reference to the further expansion of the Wye Valley Greenway and connections to Beachley in the specific cycle route policy (LP.25) is welcomed, along with the supporting text referring to providing support to any potential links to Chepstow. MCC.
- Enabling home-working is fine and welcome but home-working is not possible for many, many jobs and also, many employers, including the civil service, are increasing the number of 'on-site' days employees are required to attend work. It is unrealistic to suggest this plan will be able to deliver support for homeworking. How will this be consulted with individuals and employers.
- Objection to the settlement boundary - amend site at the dingle Sedbury. The proposal is a logical extension and 'rounding off' of the estate which has been developed. This parcel has been excluded whereas I believe it is a sustainable location(as confirmed in the recently refused planning application), as it is adjacent to the existing settlement with excellent access to a range of local services and facilities. It has been arbitrarily restricted, where is can potentially be suitable for development, as it is on the edge of the settlement, and other housing surrounds it (Norse Way & Model Cottages). The land has regularly been subject to fly tipping and anti-social behaviour.
- Agree in principle to the proposed changes but the conditions are crucial if these plans are to succeed. The infrastructures, namely the transport systems and roads are a priority, especially the A48 which would become more of a bottleneck in many places. At the moment the A48 is our gate to the ever distant health systems and time is of essence in emergencies and health vehicles

need a quick access in emergencies. Bottlenecks of traffic on the A48 can have dire effects on villagers survival.

- Land at Sedbury Lane (Ref: 885) The site has, in part, been consistently promoted as part of the 2011 SHLAA Call for Sites (approximately 2ha). It was subsequently included within the Allocations Plan Further Changes published in December 2016 for approximately 40 dwellings, although it was stated that the site would only be required if it is necessary to meet any backlog. There are no significant barriers to development. The site is free from planning and physical constraints and could deliver 150-200 much needed homes, including affordable, within five years. It is economically viable and has clear sustainability credentials. The site is close to key employment markets, local services and facilities and benefits from good road links and public transport provision to towns and cities further afield. The site is unconstrained and is capable of coming forward immediately.
- Support the requirement for additional housing, especially affordable housing.
Concerned that the draft plan does not deal with the traffic issues.
- Whilst there appear to be policies to encourage greater use of walking and cycling, the roads (especially the A48 heading south towards Chepstow) does not have footpaths to facilitate this.
- The A48 towards Chepstow and the roads beyond Chepstow to the M48 are not adequate for current traffic let alone further growth.
- Concerned that, even if a Chepstow Bypass was provided, the end connection to the motorway junction roundabout would still not be adequate - in the mornings and at other busy times, especially when traffic is diverted off the M48 and back on again (e.g. when there are wind related traffic restrictions), traffic tails back towards Bulwark.
- The draft plan must not deal with only housing but be more joined up considering road infrastructure as well as other facilities required by an enlarged population.
- There is the potential for the Sedbury site to need consideration within this legislative framework to its proximity to a National Landscape designation. We have been unable to find any reference to this important criterion. (West Dean Parish council).

Draft Officer Response

It is acknowledged that Sedbury, Tutshill and Beachley are situated in the Forest of Dean District and that Chepstow is part of Monmouthshire. The text is recognising the close relationship between the villages and the town, in terms of geography and also the use of Chepstows services and facilities by many of the villages residents. Tutshill and Sedbury have a range of shops, schools and a range of facilities.

It will be a requirement of any development that it is able to provide for its infrastructure needs and the FoDDC is concerned especially for any adverse impact on known problems that already exist such as at Chepstow. The allocation policies specify what is needed to make the development acceptable. This includes the requirements of the development itself on site and access to it, as well as landscape and ecology.

Land off Sedbury lane was not considered in preference to allocations in other parts of Sedbury which were considered adequate and appropriate to meet the needs of the LP. The Plan represents the FoDDC's considerations at the time of preparation early 2024. Recent reforms to the NPPF will be taken into account and a review of the strategy may be required. Subsequent changes to the agreed strategy will be subject to further consultation.

Noted that Sedbury is next to the Wye Valley National Landscape, however, the proposed allocation sites are not adjacent to it or within it.

Policy LP.79 Land South of the A48 at Tutshill

Number of Representations: 29

Support : 2

Observations : 12

Object:15

Environment Agency:

- Site includes and borders tributary of Severn. Ensure BNG doesn't exclude the watercourse in baseline surveys

Gloucestershire Wildlife Trust:

- This site is close to the Wye Valley and FoD Bat Sites Special Area of Conservation (SAC) (within the core sustenance zone of Caerwood and Ashberry goose house maternity roost) in an area with a lot of bat activity, the Severn Estuary SAC/SPA/Ramsar, Park Grove LWS, in an ecologically sensitive location. Exiting hedgerows are likely to be used by the bats for commuting and feeding and their removal or fragmentation must be avoided. Horseshoe bats are known to use the old railway line (now the wye valley greenway) as a commuting route.
- The design of the GI on site will need to be clear on areas that are for recreational use and any areas that are for habitat enhancement, or, given the size of the site, there is a risk that habitat enhancements will not be achieved. A GI framework such as Building with Nature should be used from the early stages of design to achieve the required multifunctionality whilst protecting the sensitive ecology. The cumulative impacts of other nearby development (including the proposal at Dayhouse quarry, the establishment of the wye valley greenway and the recent developments that have already occurred at Tutshill and Sedbury within the Bat SAC core sustenance zone), will need to be considered as part of a full ecological appraisal.

Natural England:

- Note that the site is in a sensitive location due to it being close proximity to the Severn Estuary SAC/SPA/RAMSAR. Development here should incorporate mitigation and enhancement for the species and habitats.

Environment Agency:

- Site includes and borders tributary of Severn. Ensure BNG doesn't exclude the watercourse in baseline surveys

Historic England:

- The Grade II* Listed Mead Farmhouse and associated Grade II Barn face south and the mainline railway divides them from the bulk of the proposed site allocation. However, one would tend to

expect that such a sizeable proposed Local Plan allocation adjacent to this historic complex be accompanied by evidence to show how an appropriate design and mitigation could be achieved.

Tidenham Parish Council:

- In summary, given the high number of proposed new houses in the Local Plan for Tidenham Parish, together with the new houses built in the last five years, and the absence of any significant improvements, or direction for improvement in the Local Plan, in infrastructure, road network and active travel, Tidenham Parish Council suggests the Local Plan for this area of the Forest of Dean is not feasible and needs to be reconsidered. There is already a need for improved roads with more capacity and rerouting, more GP surgeries, dentists, pharmacies, schools and school places, shops and other leisure facilities. All of which needs to be in place before any significant new house building is considered. These issues can be summarised as follows:
- The A48 is already heavily congested with tailbacks most mornings with commuters heading into Bristol, Newport, Cardiff.
- Beachley Road between the barracks at Beachley and the A48 runs through the small village of Sedbury, is already used by many people and has a long 20mph section by the schools. There have also been fatal accidents on the faster sections of road towards Beachley. These problems will only get worse with increased traffic which will also drive pollution levels even higher for those residents living near to the A48.
- Due to the distances travelled and terrain (very hilly), there will be little relief with the suggested active travel suggestions in the Local Plan.
- Transport Plan - there is demand for a comprehensive transport plan to include cycle and foot paths, and traffic calming measures in the parish. There are few safe cycle or footpaths between Beachley, Sedbury, Tutshill and Chepstow.
- Vehicle usage, and in particular cars - The word car does not appear in the Local Plan and there appears to be no consideration for car users in the parish or Forest of Dean, yet most residents use their cars as their everyday transport. the government drive for EV's does not align with the Local Plan for active travel, or public transport.
- Whilst EV's contribute to improving the environment they won't improve the heavy congestion that is being experienced.
- Has the Local Plan team consulted with Monmouthshire County Council's Local Plan team?
- Infrastructure - the Local Plan does not address the lack of infrastructure requirements sufficiently. There is a lack of GP surgeries, dentists, pharmacies, schools and school places, shops and other leisure facilities in the parish today. There is no mention of infrastructure in the Sedbury and Tutshill proposals.
- Public Transport - Tidenham Parish is very poorly supported with regards to public transport, especially in rural areas. The bus service between Chepstow and Coleford only operates three days of the week and then only once a day. Other services do operate between Chepstow and Beachley and Chepstow and Lydney / Cinderford but have limited stops in Sedbury and Tutshill, and often require changes.

- **Road Safety** - further consideration must be given for a safe crossing on the A48 at Sedbury Lane. Pedestrians, including children attending local schools, already risk crossing the A48 at this point with traffic often travelling at the 50mph speed limit or more. There is currently no safe crossing.
- **Sewage Treatment** - with the increased number of proposed new houses in the parish there need to be assurances that there are going to be improvements to sewage treatment, especially in the Loop Road, Beachley area where there are properties not connected to the main sewage and still using septic tanks.

Support:

- Supports the identification of Land south of the A48 at Tutshill as a draft housing allocation for approximately 180 dwellings, the site remains suitable, available and deliverable
- Offers an ideal opportunity to continue growth in Tutshill and develop a high-quality, sustainable residential scheme that could make an important contribution towards meeting housing needs in the district.
- **Site Context and Surroundings** The site is well related to the existing settlement edge of Tutshill and is also contained by a number of physical features, including a number of existing hedgerows around the perimeter of the site, the A48 to the north and the Chepstow to Gloucester railway line to the south.
- The site is sustainably located within easy walking and cycling distance of local facilities and the public transport network.
- Local amenities are available within Tutshill and Sedbury include primary and secondary schools, nursery schools, a GP surgery, a convenience store, a post office and a pharmacy. There are additional services and facilities in Chepstow town centre. 1.5 km to west
- There are bus stops located to the north and west of the site on the A48 and Gloucester Road. Chepstow railway station is located approximately 1.5 km of the site.
- The site would be deliverable in the short term and would help to increase the supply and choice of housing in Tutshill. The site can deliver a wide range of market and affordable homes to meet the district's needs.
- Development of the site would contribute towards economic growth and have wider social benefits to the local community.
- The site is not subject to any landscape quality designation and lies outside of any statutory designated area and is well contained, the views would be largely restricted in extent to partial/ glimpsed mid-range views.
- **Highways** It is proposed that the site will be accessed from the A48 to the north via a priority controlled junction. The Transport Assessment confirmed that the required visibility splays can be achieved, and the site access junction will operate comfortably within capacity in both the morning and evening peak periods with the proposed development traffic.
- The site would support active travel.
- **Heritage** The Archaeological and Heritage Report concludes that the proposed development has the potential to give rise to a very minor level of harm to the significance to the Grade II* Mead Farmhouse and Barn that could be successfully mitigated submitted.
- **Flood Risk** The site falls within the Environment Agency's flood risk zone 1 (i.e. land assessed as having a less than 1 in 1,000 annual probability or Green Infrastructure Policy).

- The provision of green infrastructure would comprise a community parkland, informal walking routes, amenity space, an equipped children's play area and areas for informal recreation. The green infrastructure will contribute positively to the site's landscape character, enhance biodiversity and provide community benefits through the provision of public open space and recreational facilities.
- Financial contributions towards infrastructure requirements arising as a result of the development, will be secured via planning obligations and conditions following the grant of any planning permission.

Object:

- Tutshill and Sedbury are of part of Chepstow.
- 180 houses was the subject of a planning application P1574/19/OUT in October 2019, It was subsequently withdrawn, following the comments that were submitted by consultees in response to the application proposals.
- GCC objected to highways at planning application stage regarding access and safety for pedestrians and cyclists
- Traffic issues in the area, already significant congestion, will increased noise and pollution, minor accidents cause gridlock.
- Forming safe access to this large site directly from the A48 may not be straight forward given the location on the inside of a long sweeping bend on a known busy primary route.
- The site is not well located for pedestrian and cycle accessibility and advises that development proposals must demonstrate a better level of connectivity for walkers and cyclists.
- The site is also close to two listed buildings, one Grade II and one Grade II*, and therefore these must be taken into account so that their settings are adequately protected.
- The site is also bounded by the A48 to the south and a railway to the south. The site will therefore need additional screening to avoid a negative impact on potential residents from noise, and to prevent unauthorised access to the railway.
- The wider area extending towards the Severn Estuary and the Wye is protected and ecologically sensitive and the development will need to demonstrate it can take place while protecting these interests as well as delivering any enhancements. The site is therefore at high risk of not being brought forward due to ecological, flood risk and transport connectivity constraints.
- Where is the recreation land
- The Local Plan does not address the lack of infrastructure sufficiently. There is a lack of GP surgeries, dentists, pharmacies, schools and school places, shops and other leisure facilities in the parish today. Beachley, Sedbury and Tutshill must be considered individually and as whole, there are too many services where residents are relying on Chepstow.
- The A48 to the north and the railway line to the south will likely generate significant noise levels that could detrimentally impact the amenity of prospective occupiers.
- The railway line is also a significant physical boundary to the site and the development is unlikely to fund and railway crossing infrastructure. This means that any pedestrian or cycle access/egress will need to be from the A48.
- Pedestrian infrastructure along the A48 is limited so does not promote safe and suitable access for all users of the highway, particularly wheelchair users and families with pushchairs.

- One option is conversion of the A48/ Gloucester Rd T- junction into a compact four-arm roundabout junction with pedestrian and cycle crossings, due to the reconfigured junction and reduced traffic speeds.
- It would also better delineate the start of the urban area if used with a gateway feature.
- The current A48 crossing point to Old Sedbury Lane remains very poor and unsafe and conversion to a controlled crossing at this location or the existing Gloucester Road junction would not seem viable.
- Rising traffic flows on the A48, in part due to the number of housing developments (ongoing and being proposed), is leading to material increases in cross-river travel which is not sustainable.
- The A48 cannot sustain any more traffic. A minor collision in Chepstow causes major gridlock along the A48 towards Lydney and traffic often queues past this site.
- There is limited retail offer in Sedbury and Tutshill. Re-allocating a small part of the site for a neighbourhood discount or similar food store, close to the frontage would provide better opportunities for local services used daily by residents. This would be accessible by foot and cycle and could help to contain local travel, following local and national guidance for transport sustainability.
- Protecting the site from noise. By agreeing to develop the proposed site with 180 new builds will only increase the traffic noise let alone the air pollution caused by vehicles trying to get out of Chepstow.
- Significant congestion on the A48 and through the village of Tutshill further development cannot be supported by existing infrastructure.
- The area is of a rural nature and as such is rich with wildlife (active foxes, active badgers and sets, deer, squirrels, etc.) encroaching further on the local natural habitat will serve to push out and endanger the wildlife.
- Additional adjacent housing will devalue the area and change completely the environmental landscape and peaceful community.
- A significant reduction in quality of life with additional noise pollution,
- Increased congestion, increased travelling and waiting time and safety issues of access onto the A48 junction,
- Light pollution will increase in an area of quiet and peace,
- An increased strain on local amenities and public services for which are currently already challenging to obtain appointments, negative impact on health, safety and security.
- Brown field development areas should be exhausted first
- Plans must be supported by robust transportation infrastructure , encompassing public transport and active travel provisions, this is indispensable to accommodate new residential developments.
- Requires mandatory provision of adequate transportation connections as a precondition for any new housing development.
- Plan's acknowledgment of highway challenges in Chepstow must translate into concrete, pre-development mitigation strategies.
- Developers, should bear the financial responsibility for rectifying these infrastructure deficiencies.
- The roads around are not suitable for the extra houses with access to A48. Additional routes need to be sourced.
- Sedbury and Tutshill are not physically part of Chepstow but separated by the International boundary of the River Wye;

- Make a site visit to coincide with the morning school and getting to work rush;
- Schools - The existing schools Offa's Mead and Wyedean Academy are already seemingly full so additional provision for schools would need to be made. Schools local children in Woodcroft - an easy walk to Tutshill school, unable to get places as "too far away". This is forcing parents into cars to take their children to Woolaston or St Briavels.
- The Local doctors surgery is straining to facilitate its existing registered clients, and doesn't seem physically able to be expanded to accommodate additional consultation rooms or indeed additional doctors. All local GPs are based in Wales
- There is only a small Spar grocery store, butchers, pharmacy and cafe, it is felt these facilities would be unable to satisfy the needs of the additional residents.
- The schools are full , therefore families travel to schools with available places adding to the congestion on the roads.
- If developers can build the needed bypass, provide sustainable public transport and doctors/dentists etc then there may be a possibility of further development.
- Whilst we appreciate that the Council is pressurised by central government, we do think that there is still a local responsibility to prevent the drab, suburban, characterless sprawl.
- Housing developments in the South end of the Forest of Dean results in more commuting by car, mainly to Bristol, so housing is rarely provided for local people.
- The effect on the environment is dreadful; wild life is driven out, air pollution increases dramatically (Chepstow's Hardwick Hill features amongst the most polluted routes in the country),
- Sewage systems are overloaded and all other services compromised - health, education, police etc. but, above all, the transport infrastructure.
- No developments at all until all existing permissions (particularly in Chepstow and Lydney) are complete and their effects experienced.
- No developments at all until alternative transport systems are in place. These should be, at a minimum, A bypass at Chepstow with another bridge over the Wye and direct rail link from the Forest to Bristol via a loop at Caldicot
- Such is the profit made by housing developers that Section 106 agreements to cover the above should be enforced.
- These housing proposals will not tackle climate change, on the contrary, will exacerbate it.
- The majority of people commute out for work - all via those bottle necks of Chepstow, Gloucester and Monmouth - the public transport is very poor and so everyone is and will be using cars.
- The GP's covering this settlement are all based in Wales and our referrals go via the Shropshire commissioning group - an improvement, Any further developments must support an English GP practice in this settlement.
- Recent developments in Tutshill have unresolved sewage overflow issues
- Concern about traffic implications at High Beech Roundabout Chepstow and through Chepstow.
- The biggest issue is that the current transport infrastructure is not adequate to sustain any more development in these areas.
- My understanding is that the A48 near Tesco's is already one of the most heavily polluted roads in the UK. The roads around the area get severely congested during rush hour and when an accident on the M4, a car broken down on the A48 to Larkfield roundabout, closure of the Severn Bridge

due to adverse weather conditions or work on the bridge. Even large events at Cardiff impact on the roads here.?

- The recently built housing estates around Tutshill and Sedbury are not very imaginative.
- Tutshill and Sedbury are 2 distinct villages not one settlement.
- Tutshill and Sedbury are not more closely related to Chepstow than Beachley. Beachley and Sedbury have a close connection and all 3 are within the parish of Tidenham, Chepstow is not.
- There are very few shops and services in either Tutshill or Sedbury. Both villages are reliant on Chepstow, Lydney or far further afield for most things. Health care, hospitals and A & E in particular are already an issue, as is the lack of public transport.
- Loss of green space and the increase in traffic and pollution. This has an impact particularly on the large elderly population and children living here. We need easy access to green space for our health & well-being and to reduce the use of cars.
- This plan will NOT provide a low carbon future. Queues of traffic into Chepstow are already intolerable at times, creating air & noise pollution in Tutshill and Sedbury. More building here (para 2.16) will simply cause more congestion, more traffic noise and pollution. The current roads cannot cope and it's not safe to cycle.
- The needs of an ageing population have NOT been incorporated into this plan.
- Building here will NOT improve healthy lifestyles or enhance the quality of life for residents or even for visitors. It will be more difficult to access truly green space - nature, fields and wild places.
- The heritage of this area is a rural agricultural landscape. By building here this is being eroded more and more.
- Tourism here is based on the natural and rural environment NOT on houses and parks and so the environment should be maintained as it is.
- Building housing here does NOT provide resilient and diverse employment opportunities. More people will still be commuting.
- A Green council should NOT be condoning the destruction of good agricultural land by building in Tutshill and Sedbury. Such a policy is unsustainable. We need to develop food security in this country and produce food in this area for the benefit of local people and to reduce food mileage.
- Road network - the A48 is already heavily congested with tailbacks most mornings, in school term times and holidays, with commuters heading into Bristol, Newport, Cardiff. This queuing traffic will only get worse with 845 new houses proposed for the local area
- Footpaths - there are few safe footpaths between Beachley, Sedbury, Tutshill and Chepstow, one route is via multiple steps and a footpath next to the A48, the other a steep hill where the pavement is being taken over by the retaining embankment and undergrowth (Castleford Hill) and is now not wide enough for mobility scooters or prams/pushchairs,
- Active Transport - due to the distances travelled and terrain (very hilly), there will be little relief with the suggested active travel suggestions in the Local Plan.
- Infrastructure - the LP does not mention lack of infrastructure in the Sedbury and Tutshill proposals
- In principle agree that all villages and towns included in the document do need developments. However requires an in-depth feasibility studies to establish existing infrastructures and services can safely support further developments, eg. Sewers, phasing, cross boundary working to address the problem of the increasing traffic and air pollution of the A48. It is not just Chepstow that suffers from this, but all villages on the A48 in Gloucestershire.

- Recent developments in Tutshill have unresolved sewage overflow issues - those living in Tutshill, especially Sedbury Lane experience raw sewage on a regular basis, while is cleaned up by the Water company, the drainage issue is not being addressed. The system certainly cannot support further development - until such a time as developers are made to face up to their responsibilities.
- These proposals are meaningless without infrastructure plans and recommendations to back them up.
- LP 78 and 79 - residents in the local area can only support these plans if concrete proposals for the relevant road, rail, public transport, health and education improvements that would be necessary are made at the same time as the property development.
- There is zero NHS dentist provision in either the English or Welsh areas surrounding the sites so this is another consideration needed.
- There is no enforcement of infrastructure development within the plans.
- I formally object to LP 78, 79 and 80 without infrastructure support to reduce and redirect traffic through the area it will be a road safety and pollution hazard.

Observations:

- Full consideration needs to be given to the provision for Sewage and drainage of surface water on this site because the present system, which I believe emanates from Birch Grove has overflowed across Sedbury Railway Bridge many times. Reported this to Welsh Water but the problem persists after periods of intense rainfall when foul water drains are overwhelmed by surface water.
- Local Plans must be supported by robust transportation infrastructure, encompassing public transport and active travel provisions, this is indispensable to accommodate new residential developments. Failure to implement these essential components will exacerbate the existing horrendous congestion and air quality issues within our community. You must advocate for the mandatory provision of adequate transportation connections as a precondition for any new housing development. Your plan's acknowledgment of highway challenges in Chepstow must translate into concrete, pre-development mitigation strategies. Moreover, developers, rather than the public purse, should bear the financial responsibility for rectifying these infrastructure deficiencies.
- According to the FoD Draft Local Plan Policy LP79 Land South of the A48 at Tutshill, the descriptions reads that the site is not well located for pedestrian and cycle accessibility and advises that development proposals must demonstrate a better level of connectivity for walkers and cyclists.
- The site is also close to two listed buildings, one Grade II and one Grade II*, and therefore these must be taken into account so that their settings are adequately protected.
- The site is also bounded by the A48 to the south and a railway to the south. The site will therefore need additional screening to avoid a negative impact on potential residents from noise, and to prevent unauthorised access to the railway.
- The wider area extending towards the Severn Estuary and the Wye is protected and ecologically sensitive and the development will need to demonstrate it can take place while protecting these interests as well as delivering any enhancements. The site is therefore at high risk of not being brought forward due to ecological, flood risk and transport connectivity constraints.
- Pleased to see that a primary school will be built alongside the houses. I would like the houses to be environmentally friendly, with an emphasis on sustainability, including solar panels. It would also

visually appealing to have a variety of designs of houses. The recently built housing estates around Tutshill and Sedbury are not very imaginative.

- The Plans state there is a 'range of facilities' in these areas. I'm not sure what that refers to, but the Leisure Centre, for example is only open after school hours during the week and it would be good if it was upgraded and open at the weekend with more activities.
- suggest that any further development of the land North of the Wyedean Fields Development should have a separate Junction or Junctions.
- Concern over the landscape impact of this allocation and resultant loss of boundary screening to provide a safe access.
- Requires in-depth feasibility studies to establish existing infrastructures and services can safely support further developments, eg. Can the local sewers cope with extra effluent - some joined up thinking and working across boundaries to address the problem of the increasing traffic and air pollution of the A48. It is not just Chepstow that suffers from this, but all villages on the A48 in Gloucestershire. In principle I agree that all villages and towns included in the document do need developments.

Draft Officer Response

Sedbury and Tutshill are identified as a major villages in the settlement hierarchy and Policy LP.4 of the Draft Local plan. with a range of services and in close proximity to Chepstow and the Services and facilities it provides. Two sites have been identifies for housing allocations would be appropriate. It is well located. The settlement hierarchy is based on the function and size of the settlements and it's suitability as a location for growth, the hierarchy is reflected in these allocations.

The policy will need to be very clear on the expectations of the site. This includes the requirements of the development itself on site and access to it as well as landscape and ecology.

Together the two proposed allocations allow for the appropriate level of change for Sedbury and Tuthill . The Plan represents the FoDDC's considerations at the time of preparation early 2024, the plan will be reviewed in the light of NPPF 2024 and consultation responses. Any subsequent changes to the agreed strategy will be subject to consultation.

It is agreed that the site is ecologically sensitive and full ecological surveys will need to be undertaken and impacts must be assessed on any protected species likely to be using the site. Full bat surveys in accordance with our current guidance for Zone A sites will need to be undertaken and there are high populations of dormice in the wider area and therefore dormouse surveys will be required where appropriate. A Habitat Regulations Assessment will be undertaken and permission will not be grated where adverse impacts cannot be ruled out.

Policy LP.80 Land adjoining Wydean School

Number of Representations: 23

Support: 1

Object: 15

Observations: 7

Gloucestershire Wildlife Trust:

- This site is close to the Wye Valley and FoD Bat Sites Special Area of Conservation (SAC) (within the core sustenance zone of Caerwood and Ashberry goose house maternity roost) in an area with a lot of bat activity, the Severn Estuary SAC/SPA/Ramsar, Park Grove LWS, in an ecologically sensitive location. Exiting hedgerows are likely to be used by the bats for commuting and feeding and their removal or fragmentation must be avoided. Horseshoe bats are known to use the old railway line (now the wye valley greenway) as a commuting route.
- The design of the GI on site will need to be clear on areas that are for recreational use and any areas that are for habitat enhancement, or, given the size of the site, there is a risk that habitat enhancements will not be achieved. A GI framework such as Building with Nature should be used from the early stages of design to achieve the required multifunctionality whilst protecting the sensitive ecology. The cumulative impacts of other nearby development (including the proposal at Dayhouse quarry, the establishment of the wye valley greenway and the recent developments that have already occurred at Tutshill and Sedbury within the Bat SAC core sustenance zone), will need to be considered as part of a full ecological appraisal.
- As a smaller site with less opportunity to integrate green space, we would still want to see GI integrated into the site wherever possible (i.e. into buildings) to support local ecology (such as bats). Existing wetter area could be enhanced for biodiversity.

Tidenham Parish Council:

- In summary, given the high number of proposed new houses in the Local Plan for Tidenham Parish, together with the new houses built in the last five years, and the absence of any significant improvements, or direction for improvement in the Local Plan, in infrastructure, road network and active travel, Tidenham Parish Council suggests the Local Plan for this area of the Forest of Dean is not feasible and needs to be reconsidered. There is already a need for improved roads with more capacity and rerouting, more GP surgeries, dentists, pharmacies, schools and school places, shops and other leisure facilities. All of which needs to be in place before any significant new house building is considered. These issues can be summarised as follows:
- The A48 is already heavily congested with tailbacks most mornings with commuters heading into Bristol, Newport, Cardiff.
- Beachley Road between the barracks at Beachley and the A48 runs through the small village of Sedbury, is already used by many people and has a long 20mph section by the schools. There have also been fatal accidents on the faster sections of road towards Beachley. These problems will only get worse with increased traffic which will also drive pollution levels even higher for those residents living near to the A48.
- Due to the distances travelled and terrain (very hilly), there will be little relief with the suggested active travel suggestions in the Local Plan.

- Transport Plan - there is demand for a comprehensive transport plan to include cycle and foot paths, and traffic calming measures in the parish. There are few safe cycle or footpaths between Beachley, Sedbury, Tutshill and Chepstow.
- Vehicle usage, and in particular cars - The word car does not appear in the Local Plan and there appears to be no consideration for car users in the parish or Forest of Dean, yet most residents use their cars as their everyday transport. In addition, the government drive to increase the number of EV's on our roads over the next few years does not align with the Local Plan for active travel, or public transport. Whilst EV's contribute to improving the environment they won't improve the heavy congestion that is being experienced.
- Has the Local Plan team consulted with Monmouthshire County Council's Local Plan team?
- Infrastructure - the Local Plan does not address the lack of infrastructure requirements sufficiently. There is a lack of GP surgeries, dentists, pharmacies, schools and school places, shops and other leisure facilities in the parish today. There is no mention of infrastructure in the Sedbury and Tutshill proposals.
- Public Transport - Tidenham Parish is very poorly supported with regards to public transport, especially in rural areas. The bus service between Chepstow and Coleford only operates three days of the week and then only once a day. Other services do operate between Chepstow and Beachley and Chepstow and Lydney / Cinderford but have limited stops in Sedbury and Tutshill, and often require changes.
- Road Safety - With 245 new houses being proposed for Tutshill and Sedbury further consideration must be given for a safe crossing on the A48 at Sedbury Lane. Pedestrians, including children attending local schools, already risk crossing the A48 at this point with traffic often travelling at the 50mph speed limit or more. There is currently no safe crossing.
- Sewage Treatment - with the increased number of proposed new houses in the parish there need to be assurances that there are going to be improvements to sewage treatment.

Support:

- Support the continued allocation of land adjoining Wydean School with a higher number of 74 dwellings. Arising from consultation draft NPPF. A concept plan and master plan are supplied. • The Site's development in support of the Forest of Dean District Council's (the 'Council') economic, social, and environmental objectives. • The site would read as a visual extension to the existing site. • There are no technical matters that would affect the continued allocation being retained, at the greater level of development, i.e. around 74 dwellings.
- Access, there is a retained access right to the Site from the Existing Development. The retained access right includes utility capacity. The development of the Site will be supported by a Transport Statement , connect to the sustainable transport network around the Site.
- Landscape and visual impact. It is recognised that the Site forms the visual edge of Sedbury and the visual impact of development on the landscape will constitute a central component of any future development.
- Topographically, the Site is broadly level and is physically defined by its relationship to the Sedbury Lane to east, the railway line to the north, and the existing developed edge of Sedbury to the south and west. In practical terms, the Site is considered to be visually discrete and contained by its natural boundaries.

- Technical considerations in relation to the Site are subject to ongoing survey and assessment work. This includes how best to protect and enhance the dormouse habitat included as part of the Existing Development's boundary.
- Density - It is therefore suggested that the draft allocation's wording is revised to enable a higher density of development to come forward. The site can accommodate around 74 homes, based on a development density of 39dph.
- Relationship to the Existing Development It is envisioned that the Site would represent a complementary extension of the Existing Development but one that would take the opportunity to create a well designed high quality edge to Sedbury.
- In principle agree that all villages and towns included in the document do need developments.

Object:

- The current infrastructure and local amenities (roads, schools and doctors) is not coping with the existing population. More houses will add further pressure.
- Traffic issues: The roads around the area get severely congested and Chepstow often grinds to a halt, when an accident breakdown or Severn Bridge closed. Poor road network, inadequate traffic lights into Chepstow controlled by Welsh government.
- Road network - Additional pressure on A48 /Tutshill and Sedbury junctions, Local roads are congested most mornings and a minor accident causes gridlock in the area. • Concern about traffic implications at High Beech Roundabout Chepstow and through Chepstow. Must be supported by robust transportation infrastructure , encompassing public transport and active travel provisions as a precondition for any new housing development.
- Footpaths - there are few safe footpaths between Beachley, Sedbury, Tutshill and Chepstow, the nearest main town for shopping, pubs, restaurants, coffee shops, etc. There are basically two routes, one route is via multiple steps and a footpath next to the A48 50mph road (Beachley Road and across the A48 Chepstow bridge) and the other a steep hill where the pavement is being taken over by the retaining embankment and undergrowth (Castleford Hill) and is now not wide enough for mobility scooters or prams/pushchairs, let alone for parents with children walking alongside prams/pushchairs. There are also few footpaths in the parish with many being single track, overgrown or in a state of disrepair.
- Infrastructure - the Local Plan does not address the lack of infrastructure requirements sufficiently. Whilst there is some mention of infrastructure in the Beachley Barracks proposal there is no mention in the Sedbury and Tutshill proposals, where it is proposed to build 245 new houses. You will need to consider the Local Plan is on top of the 250 new houses built in the Tutshill area in the last five years with no infrastructure improvements.
- Active Transport - due to the distances travelled and terrain (very hilly), there will be little relief with the suggested active travel suggestions in the Local Plan.
- Need for a new bypass as Chepstow congested at rush hours and is often grid locked and congested. Queuing traffic causes pollution levels to increase.
- Air quality issues on the A48 in Chepstow, (Chepstow's Hardwick Hill features amongst the most polluted routes in the country),
- Using Crane Pool Avenue to access this new development would be far too dangerous.
- 175 houses in a cul-de sac is not safe especially during an emergency that may require emergency services. The current road infrastructure was not designed to handle the increased traffic that

would result from this development. The road is narrow with a blind curve, making it unsafe for the additional vehicles. Request a site visit to coincide with the morning school and getting to work rush to see current congestion and access onto A48. This new development should have a separate access.

- The increase of traffic on Sedbury lane which is currently used as part of the Wye Valley Greenway, the very popular route used by locals and tourists as access to the countryside.
- The environmental damage and noise pollution would be extremely high to access the area and would need to go through an established green space as part of the Wyedean fields development opposite the site.
- Developers, rather than the public purse, should bear the financial responsibility for rectifying these infrastructure deficiencies.
- Schools currently over capacity and spaces not available for local children
- Doctors surgery are oversubscribed and straining to facilitate its existing registered clients, and doesn't seem physically able to be expanded to accommodate additional consultation rooms or indeed additional doctors. All the local doctors practices are based in Wales, causing issues with referrals.
- The balance of smaller community, green spaces and a quieter development for which children can grow up on and play in the quieter streets "the old fashioned way" on Wyedean fields would be completely altered by this development effectively turning the estate into a huge through road having already dealt with 2+ years of building and upheaval.
- Loss of green space and last remaining dog walking area.
- Sedbury is no longer a village just urban sprawl
- This is on the route of the Wye Valley Greenway which will not be able to cope with the increased traffic.
- This is an important ecological site that is enjoyed by everyone in the area. The site cannot be accessed by the adjoining land recently developed as this is Greenfield land already established with the building on the new estate.
- Sedbury and Tutshill are not physically part of Chepstow, but in different countries.
- There is not a wide range of facilities as stated, a small Spar grocery store, butchers, pharmacy and cafe would be unable to satisfy the needs of the additional residents. Leisure centre has limited opening times. More facilities would keep people in area.
- The existing site is currently experiencing problems with drainage and sewerage,
- Policy LPI8 Land of Recreation and Amenity Value advises that land identified as Important Open Areas (IOA) will be protected from development. In this case, the site adjoins the IOA, and any future development will have to bolster borders to protect the IOA.
- This could be a risk to the site being brought forward based on ecology constraints.
- There is a local responsibility to prevent the drab, suburban, characterless sprawl which is the result of this constant pressure to build houses at almost any cost to the quality of life of the existing population and the environment generally.
- Housing developments in the South end of the Forest of Dean results in more commuting by car, mainly to Bristol.
- Housing is rarely provided for local people.
- The effect on the environment is dreadful; wildlife is driven out, air pollution increases dramatically

- No developments at all until all existing permissions (particularly in Chepstow and Lydney) are complete and their effects experienced
 - No developments at all until alternative transport systems are in place. I.e. A bypass at Chepstow with another bridge over the Wye and A direct rail link from the Forest to Bristol via a loop at Caldicot.
 - Such is the profit made by housing developers that Section 106 agreements to cover the above should be enforced.
 - These housing proposals will not tackle climate change, but exacerbate it.
 - Public transport is very poor
 - The majority of people commute out for work - all via those bottle necks of Chepstow, Gloucester and Monmouth –
 - We need work where you are putting houses or put houses where work is.
 - There are birds, pheasants, and other animals constantly present in the area and we should be protecting these habitats.
 - The residents of Wydean Fields estate pay an annual service charge which included the Green Open Space The only plausible route for the access road to these suggested houses would be to ruin this Green Open Space, which is totally unacceptable.
 - Houses should be environmentally friendly, with an emphasis on sustainability, including solar panels.
 - It would also visually appealing to have a variety of designs of houses. Recently built housing estates around Tutshill and Sedbury are not very imaginative.
 - Footpaths - there are few safe footpaths between Beachley, Sedbury, Tutshill and Chepstow, the nearest main town for shopping, pubs, restaurants, coffee shops, etc. One via multiple steps and a footpath next to the A48 and the other a steep hill is now not wide enough for mobility scooters or prams/pushchairs.
 - Whilst there is some mention of infrastructure in the Beachley Barracks proposal there is no mention in the Sedbury and Tutshill proposals, where it is proposed to build 245 new houses.
 - Requires in-depth feasibility studies to establish existing infrastructures and services can safely support further developments.
 - Impact on Quality of Life: Increased traffic will pose a danger to children who currently play in the area, and construction traffic will bring significant disruption, including noise, pollution, and road damage.
 - Strain on Emergency Services: Chepstow's police force is already struggling to manage the current population. An increase in residents without a corresponding increase in police resources could lead to a rise in antisocial behavior, burglary, and petty crime.
 - These proposals are meaningless without infrastructure plans and recommendations to back them up.
- LP 80 - this seems to be a relic from the previous development on this site - there is no longer viable access to the remaining parcel of land which is accessed via the green space of the new development.
- This site option needs to be reviewed/reassessed/removed is incompatible with the current plan of access and development from the existing estate - access would need to be via the single track Sedbury Lane & environmental impact assessments are needed to mitigate flood risk.

- The new Barratt development has not been created with this expansion in mind the road structure & development layout is incompatible.
- The area is a flood zone for the adjacent fields and green space assumed Barratt homes did not develop on this site during the creation of the Wyedean fields estate.
- Any further development would need an environmental assessment & mitigation of flooding that should have been done during the Barratt development.
- I formally object to LP 78, 79 and 80 without infrastructure support to reduce and redirect traffic through the area it will be a road safety and pollution hazard.
- The proposed access to the new housing through the Wyedean Estate is highly problematic.
- The current road infrastructure was not designed to handle the increased traffic that would result from this development.
- The road is narrow with a blind curve, making it unsafe for the additional vehicles.
- Increased traffic will pose a danger to children who currently play in the area, and construction traffic will bring significant disruption, noise, pollution, and road damage.
- The use of the green space, which is paid for and maintained by residents, for access routes will diminish the quality and availability of this communal area.

Draft Officer Response

Sedbury and Tutshill are identified as a major villages in the settlement hierarchy and Policy LP.4 of the Draft Local plan. with a range of services and in close proximity to Chepstow and the Services and facilities it provides. Two sites have been identifies for housing allocations would be appropriate. It is well located. The settlement hierarchy is based on the function and size of the settlements and it's suitability as a location for growth, the hierarchy is reflected in these allocations.

The policy will need to be very clear on the expectations of the site. This includes the requirements of the development itself on site and access to it as well as landscape and ecology.

Together the two proposed allocations allow for the appropriate level of change for Sedbury and Tuthill. The Plan represents the FoDDC's considerations at the time of preparation early 2024, the plan will be reviewed in the light of NPPF 2024 and consultation responses. Any subsequent changes to the agreed strategy will be be subject to consultation.

Chapter 12 Other Settlements Villages and Supporting Text.

Number of Representations: 6

Support: 0

Object: 4

Observations: 2

Object:

- Distribution of housing with district requires re-assessment to ensure allocations deliver growth to the whole district (likely changes to NPPF will uplift housing requirements by ca. 80%).

Observations:

- Revision of the print layout suggested
- Feasibility assessments may be requires at several schools. Greatest pressures for schools are in some of the villages to the west of Gloucester as well as those close to Chepstow. (GCC Education).

Draft Officer Response

Sites identified within the local plan represent opportunities to support the overall strategy and accord with the settlement hierarchy.

Comments regarding school are noted. Developer contributions will be required to support infrastructure delivery necessary for the allocation.

The Local Plan was prepared under a previous version of the NPPF which has now been superseded by the NPPF December 2024 . The reforms to the NPPF and the uplift in local housing need will be taken into account and subsequent changes to the agreed strategy will be subject to consultation.

Alvington

No comments received.

Aylburton

Number of Representations: 19

Support: 0

Object: 14

Observations: 5

Aylburton PC object for following reasons:

- 20 homes at this location would be detrimental to the village for several reasons.
- No clear way the site will be accessed.
- Chapel Hill already has considerable access issues with vehicles parking along the road when visiting The Cross Pub.

- Addition of site traffic will cause considerable issues. The increase in the volume of traffic to an already busy section of the A48 will also be a problem.
- School capacity: Aylburton C of E is already full.
- There is also a lack of other facilities in the village, such as doctors' surgeries and shops.
- The changes to the existing settlement boundary and the linear aspect of the village; a large reason for the refusal of several planning applications thus far.
- Impact on the conservation area.
- The village is at increased risk of flooding. Building on this land is likely to cause drainage problems for existing homes and further increases flooding risk.

Observations:

- Aylburton needs new properties (starter homes and smaller houses for downsizing) However, the land selected for potential development is far from "fit for purpose".
- Build a new 'town' with infrastructure and facilities to cope.
- Village could only support 10 houses.
- Allocation includes headwaters of a tributary of Stockton Brook (EA).
- Print layout revisions would be appropriate.
- Proximity to River Severn SPA/SAC/Ramsar and surrounded by core NRN. GI and BNG could enhance NRN. Ecological appraisal is necessary.
- Taurus Crafts is a large national organisation – it is unfair to promote them over the local business on site. Should refer to it as 'Lydney Park Estate'.
- Propose alternative site Land to side of No.2 High Street.
- Propose alternative site Old Prospect Farm.
- Propose alternative site adjoining Prospect Farm (abandoned allotments).
- Propose alternative site- to reinstate the proposed by-pass (running from Taurus roundabout to a new roundabout at Sandford Road/A48 junction) and build housing in that area, around the memorial playing field and to the rear of Stockwell Lane.

Object:

- Land selected for development is not fit for purpose.
- Natural springs in and around land.
- School is full to capacity.
- Lack of doctors/dental care, increase pressure on local health services.
- Sewage system needs upgrading.
- Further risk of flooding /flash floods to village carrying debris on A48 contrary to LP29.
- Poor drainage.
- Aylburton pipeline runs under Chapel Hill (won't withstand heavy plant work).
- Loss of mature trees and shrubbery.
- Harm to wildlife/ ecology including bats in area.
- Unsustainable – not in walking distance of shops/facilities.
- Poor cycle route, does not reach village.
- Limited bus service, no integrated transport proposals to support development.
- Increased pollution.

- Increased congestion and parking – increased junctions/ traffic on A48.
 - Parking is a major issue.
 - Access is hazardous – site is on a bend on a narrow road with parked vehicles and frequent farm traffic.
 - No road crossing in village.
 - No employment in village.
 - Trains from Lydney are appalling if commuting.
 - Draft Plan takes no account of the last Aylburton Community Plan (2009).
 - Impact on Conservation Area.
 - Out of scale with village, density of housing out of scale with rest of village.
 - Lack of services and facilities - only facilities are 2 pubs.
 - Taurus Crafts is not a shop nor a recreation site.
 - Would change linear aspect of village.
 - Scale is not proportional to existing village i.e. it's a roughly 15% increase.
 - Construction process would cause chaos.
 - Contrary to local plan hierarchy policy.
 - The upheaval of ancient and bio diverse land.
- As a keen walker in the area, I have observed first hand a wide variety of birds of prey, insects, bats, hares and wildflowers on this site.
- The removal of this land for the development of thirty or more houses would be incredibly sad.
 - Ruining a unique and peaceful vantage point of the River Severn and adjacent areas, home to many animals.
 - The cycle route outlined in the provided Sustainability Appraisal does not meet the development site there is no cycle route through the village.
 - Single lane roads adjacent to the A48 such as Chapel Hill and Church Road already at capacity with regards to on road parking and farm vehicles.
 - Without traffic calming measures in the village and considering the layout of the A48 and adjoining roads, the risk of death or injury remains high.
 - When driving through the village in adverse weather conditions, observed already dangerous amounts of water running down the High Street, bringing debris such as rocks and wood with it.
 - The removal of vegetation adjacent to the A48 would further issues with already at capacity drainage, increasing the amount of run off through the village, further damaging housing.
 - The scale of the proposal is disproportionate to the size of the village with an estimated 15% increase in size to the existing settlement.
 - A distinct lack of facilities, shops, surgeries and school places in the village.
 - The inclusion of Taurus Crafts in the proposed plan is deceitful this is a tourist attraction first and foremost not an amenity that would benefit additional homes in the area.
 - Changing the settlement boundary, the history and character of the village would be greatly altered.
 - The village also accommodates many listed buildings which would be at risk if the proposed development went ahead, many of these dwellings would be within the proposed path of construction, currently no clear access points to the development site.

- As an occasional visitor to the Cross Inn, there are no safe areas to traverse the A48 within Aylburton.
- With approximately 10k vehicles passing through the village per day many at speed and the inclusion of heavy agricultural vehicles, adding additional housing would further exacerbate traffic, congestion and pollution within the boundary of the village.
- As a frequent visitor to Lydney Harbour, there is much potential for the development of homes and flats on disused industrial land with recently improved transport links on foot accessibility to the railway station and Lydney town centre.
- The village is considered a small village.
- The scale of the 'development' is disproportionate compared to the size of the village. 30 houses close to a 15% increase in the size of the existing village's current c.200 homes.
- The village historically is linear in design. This development would cause a significant shift in this layout.
- The village is a conservation area and the impact this large development would have on the area should not be ignored.
- There are no clear obvious access points to the land shown on the draft plan.
- The development is likely to cause significant disruption to residents. How will future residents access their homes?
- Chapel Hill is a single lane does not have the capacity to deal with the extra vehicles the new homes would bring.
- An average of 2 cars per home, there could be up to 60 additional cars.
- The road already struggles with parking and access, so additional cars would just make the matter worse.
- The village school is already at capacity and there is a waiting list. There would be no spaces available for the children from the new development.
- The village has no public services or facilities! No doctors' surgery, dentist, shop, etc.
- My family and I have lived in the village for 3 years found it impossible to register as NHS patients even in the nearest towns.
- The development would have a negative environmental impact. The land is currently used for farm animals includes mature trees which would be lost; it is a wildlife corridor.
- The development would be on a steep bank creating a risk of subsidence.
- The village is at risk of flooding, could increase the risk of further flooding in the future if drainage isn't maintained properly, already drains along the village High Street which are packed full of sediment/stones, etc.
- The area is unsustainable even by FoDDC's own measuring system.
- Inadequate bus service and cycling route does not run through the village, stops at the entrance to the village, is not within walking distance of shops/services/facilities.
- People will be forced to use cars!
- Additional traffic created by the development will increase pollution and congestion within an already traffic heavy village.
- Not in harmony with the size of the village.
- Access is unclear.

- Affect the historical essence and that of CA.
- Lack of emergency defibrillators for the new houses.

Observations:

- Believe Aylburton needs new properties (starter homes and smaller houses for downsizing) However, the land selected for potential development is far from "fit for purpose".
- Build a new 'town' with infrastructure and facilities to cope.
- Village could only support 10 houses.
- Allocation includes headwaters of a tributary of Stockton Brook (EA).
- Print layout revisions would be appropriate.
- Proximity to River Severn SPA/SAC/Ramsar and surrounded by core NRN. GI and BNG could enhance NRN. Ecological appraisal is necessary.
- Taurus Crafts is a large national organisation – it is unfair to promote them over the local business on site. Should refer to it as 'Lydney Park Estate'.
- Propose alternative site Land to side of No.2 High Street.
- Propose alternative site Old Prospect Farm.
- Propose alternative site adjoining Prospect Farm (abandoned allotments).
- Propose alternative site- to reinstate the proposed by-pass (running from Taurus roundabout to a new roundabout at Sandford Road/A48 junction) and build housing in that area, around the memorial playing field and to the rear of Stockwell Lane.

Draft Officer Response

The land at Chapel Hill Aylburton is proposed in the draft LP for housing and is the subject of a number of objections. The points made must be considered and they include access, impact of development on adjoining residential area and on the countryside, ecology, and traffic. There are constraints that would need to be addressed before any development of the site.

The LP has arrived at a strategy which makes major strategic allocations for mixed development at sustainable locations where there are opportunities around the towns. It promotes development around Lydney to enhance its role in supporting the district as a whole. There are a number of sites identified for development at a number of other large settlements, as well as a few smaller proportionate allocations such as at Aylburton and their distribution is an important part of the strategy to meet the housing requirements of the Local Plan and in order to provide a range and an adequate supply of land for housing, there is a need for the allocation of new greenfield sites in smaller more accessible settlements. Aylburton is located in a relatively sustainable location on a major transport route A48 with good access to Lydney and the services it provides. Aylburton is therefore considered to be able to accommodate 30 dwellings during the plan period on land.

There are other sites suggested in responses as alternative to Chapel Hill that will be evaluated through the plan process and sustainability appraisal.

Policy LP.8I Chapel Lane Aylburton

Number of Representations: 64

Support: 1

Observations: 2

Object: 61

Support:

- **Welcome allocation for residential development. We are working with land owners to try and ensure this comes forward.**

Observations:

- More retirement living spaces should be offered with a smaller footprint
- It is called 'Chapel Hill' (not Chapel Lane) in Sustainability Appraisal
- Consider Lydney for housing which has better infrastructure
- Close proximity to the River Severn SPA/SAC/Ramsar and is surrounded by core NRN. Sustainable extensions with high quality GI and BNG could enhance the NRN. An ecological appraisal will be necessary for all development locations given the sensitivities surrounding the village.
- Create a cycle way for Lydney to Chepstow
- Alternative Proposed Site: Barn at the bottom of Cross Farm Close for development
- Alternative Proposed Site: Stockwell Farm (10-12 houses) on non-farmed land with good access.
- Alternative Proposed Site: factory site next to Cross monument (4-5 units).
- Alternative Proposed Site: land/paddock adjacent to Maplefields housing (10-12 houses).
- Alternative Proposed Site: Old Allotments sites on Upper Common.
- Build a whole new development on a suitable existing site – consider disused industrial site in Harbour Road, Lydney
- Use brownfield sites.
- Alternative Proposed Site: Consider land next to the Business Park.
- Proximity to River Severn SPA/SAC/Ramsar and surrounded by core NRN. GI and BNG could enhance NRN. Ecological appraisal is necessary.

Object:

- Object to proposals for Aylburton on land adjacent to Chapel Hill.
- Will significantly impair our view, we will overlook and be overlooked, reducing sunlight will have a significant impact to the way we currently use our outdoor space.
- Disturb our peace and tranquility.
- The land is on a significant hill the current roads are not sufficient severely lacking parking.
- Increase in road size will have significant impact 30 houses is a lot for that size and geography of land, cheap small housing not in fitting with the architecture of other houses (including our own) in the immediate area.
- Our house value will be severely impacted. We would expect to be significantly compensated.
- Lydney has very little offering both from a leisure and employment perspective requires forceful and desperate investment for it to be an attractive place to live.

- Better land options with less impact in the village, i.e. land next to the business park on the left towards Alvington.
- A lot of the demographic work in Bristol or outside the forest (not Lydney), the transport systems and offerings are not fit for purpose.
- Aging demographic in the area more retirement living spaces should be offered with a smaller footprint will easily free up more than 30 good sized family houses in the forest, which is more sustainable.
- A cycle path between Lydney and Chepstow would be a great way to link the Forest of Dean to Chepstow.
- Lydney has very little both from a leisure and employment perspective requires forceful and desperate investment for it to be an attractive place to live.
- The plan incorrectly refers to "Chapel Lane" when it is actually called "Chapel Hill."
- Chapel "Hill" should not be underestimated in terms of the terrain.
- The local primary school is already at full capacity, with a waiting list. The school lacks the space for expansion.
- The water supply pressure will likely drop, affecting our current systems negatively.
- An increase in sewage and surface water runoff could add approximately 30 tons per hour of rainwater, leading to heightened flooding risks.
- The site is very close to conservation area and poses a floodplain risk, could cause potential harm to local wildlife habitats, given the proximity to conservation areas.
- The local community is overwhelmingly opposed to this development, with many residents sharing similar concerns.
- The development does not align with sustainable growth practices, given the lack of infrastructure.
- The draft plan lacks credibility and should be thoroughly reviewed.
- There is an error stating access to retail nearby.
- Taurus crafts is not a place to buy groceries and the statement in the plan is false. There is no services or retail of any kind nearby.
- Impair the view.
- Cause overlooking.
- Reduce sunlight.
- Disturb peace, tranquillity and quality of life.
- Construction process and site traffic would cause chaos, dust, debris and constant noise of machinery.
- Terrain of the land
- Increase in traffic & highway safety concerns. Already 10k+ vehicles per day using A48 (12% speeding), this would increase use of Chapel Lane by 60+ cars a day.
- No safe crossing over A48.
- Chapel Lane is a narrow single track lane used by large farm vehicles, no pavements or verges too narrow for vehicles to pass
- Roads leading to Lower Common and Upper Common are narrow and not well maintained.
- No parking in village – parking on roadside from public house.
- Plans do not show how traffic would enter and leave site.
- Disproportionate Development.

- A48 Junction/Traffic/Village traffic congestion and air pollution will rise.
- No retail services in vicinity – have to travel by car to shops, Taurus Crafts is not a shop for weekly grocery.
- No local shops, only 2 pubs, 2 community halls and an associated playing field.
- Lack of footpath/ cycle path/no active travel facilities. The cycle track identified in plan starts outside village.
- Local school is at capacity and no room to expand.
- No health services, doctors or dentists – strain on existing services.
- strain on infrastructure, particularly the roads, water supply and sewage systems.
- Water supply pressure will drop.
- Aylburton Water is a volunteer run co-operative Private Water Supply, the cast iron pipes will not likely withhold modern construction equipment.
- Spring fed water reservoir which supplies many of the homes is at risk
- Flooding /Flood risk. Rainwater and flooding. Drains can't cope. The land acts as a natural drain and sink for flood water. Road regularly floods.
- sewage system is currently at capacity and the increase of houses will quite possibly cause problems
- Harm to wildlife and natural habitats. Reduction in biodiversity.
- mature trees are an essential habitat as well as assisting in the improvement of air quality to offset the pollution from the increased traffic already on the A48.
- Local community is overwhelmingly opposed.
- Not sustainable.
- Lack of infrastructure
- Transport systems are inadequate – limited bus services.
- Many village residents travel out of the District for employment.
- Insufficient leisure and employment opportunities.
- Strong local opposition.
- Harm to scenic landscape.
- Harm to character of village and linear nature.
- Very close to an environmental/conservation area.
- Contrary to Draft Local Plan policy LPI and 4, 5, 6, 22, 24,43.
- Access is narrow to site on a sharp bend with no pavements/verges.
- Site is of great local importance both historically and naturally – harm to medieval village.
- Residents are reliant on cars.
- Out of scale with village (12-15% increase in number of houses in settlement)
- Density of housing out of keeping with village
- Site is boggy ground with stream running through it and natural springs
- Concern for subsidence
- No regard for Aylburton Community Plan
- Visibility prominent due to elevate position
- Steep terrain and landscaping will add significant cost; hardly appropriate for affordable home or for elderly
- Does not meet the present needs of the village

- Against net zero carbon emissions
- This is agricultural land
- Impact on groundwater, watercourses and protected abstractions
- The ancient village surrounded by village links to tourism aims
- Impact on adjacent Conservation Area
- Will damage relationship between local people and the council
- Aylburton does not have a town centre
- Current population is underestimated
- Impact on Aylburton Water Main (co-operative Private Water supply) would not withstand modern heavy plant traffic
- 10 houses is the maximum this site could support
- The document is horrendously difficult to read and full of platitudes and buzz words
- Impact on house values
- The proximity to Lydney does not provide a compelling argument for this development
- Should put draft plan on hold until revisions for NPPF revisions are clear
- Building on 'greenfield sites' does not protect and enhance the environment
- Contradiction in number of houses 'typically less than 10 and elsewhere 30 houses'
- Detailed analysis of SA for the proposed allocation
- Detailed analysis of SA for the proposed allocation: concluding there are more negative points than positive
- The Sustainability Appraisal (SA) details the site (Both for 66 dwellings - Aylburton 1, and 33 Dwellings - Aylburton 2) as having negative impacts for Active Travel, Landscape, Land Quality and Biodiversity, concluding the site to be less sustainable.

Draft Officer Response

The land at Chapel Hill Aylburton is proposed in the draft LP for housing and is the subject of a considerable number of objections. The points made must be considered and they include access, impact of development on adjoining residential area and on the countryside, ecology, and traffic. There are constraints that would need to be addressed before any development of the site.

The LP has arrived at a strategy which makes major strategic allocations for mixed development at sustainable locations where there are opportunities around the towns. It promotes development around Lydney to enhance its role in supporting the district as a whole. There are a number of sites identified for development at a number of other large settlements, as well as a few smaller proportionate allocations such as at Aylburton and their distribution is an important part of the strategy to meet the housing requirements of the Local Plan and in order to provide a range and an adequate supply of land for housing, there is a need for the allocation of new greenfield sites in smaller more accessible settlements. Aylburton is located in a relatively sustainable location on a major transport route A48 with good access to Lydney and the services it provides. Aylburton is therefore considered to be able to accommodate 30 dwellings during the plan period on land.

There are other sites suggested in responses as alternative to Chapel Hill that will be evaluated through the plan process.

Policy LP.82 Aylburton Business Centre

Number of Representations: 3

Support: 1

Observations: 1

Object: 1

Support:

- Support consolidation and expansion for employment use

Observations:

- Moving speed limit boundary and decreasing speed limit may mitigate some risk.
- Proximity to River Severn SPA/SAC/Ramsar and surrounded by core NRN. GI and BNG could enhance NRN. Ecological appraisal is necessary.

Object:

- Exiting Stockwell Lane onto A48 is dangerous – visibility is poor, speeding cars and volume of traffic. Moving the speed limit boundary & decreasing the speed limit between Alvington & Aylburton may mitigate some of the risk.

Draft Officer Response

This is an established business centre, the Local plan will support the further development within the existing site. Any proposals will need to comply with other policies of the plan such as Policy LP 39 requires that employment generating uses must be appropriate for the site on which they are proposed. This may mean simple compatibility with neighbouring uses (whether other employment or residential for example) but also in respect of their wider impacts including traffic and other environmental impacts.

A Ecological Impact Assessment will need be undertaken including any anticipated impacts on protected species and European Protected Sites. If there are considered to be any significant effects on a European Site the application will not be granted and mitigation. Application that include green infrastructure linking core NRNs will be supported. Any permission would have to take into account any relevant habitat assessment and comply with any requirements set out in LP8 Nature conservation - protected sites, LP9 Habitat and Species protection and LP10 Green and blue infrastructure.

Beachley Village: Settlement Summary

Number of Representations:

5 comments received

- Beachley Village - support opportunities for improved services and active travel links to Beachley Camp

- With world events and the current requirement of the Military to meet those events - any plan to develop Beachley into a residential area is highly unlikely.
- I have been a resident in Beachley for the last 41 years I am very interested in the future plans. I was on the Parish council for 4 Years.

Land Loop Road, Beachley:

- Land at loop Road Beachley should be included as an allocation in the Plan, it has been positively assessed by the SHELAA. The site is available, suitable, and deliverable for housing
- The Site measures approximately 2.9ha, located off Loop Road adjacent to, though outside, the settlement development limit of Beachley.
- It will be important for continued incremental and proportional growth to come forward in the district's established towns and villages.
- Ensure a steady delivery of housing across the plan period to maintain a housing land supply, as smaller sites can be delivered much more quickly than strategic sites.
- In the context a revised NPPF and housing need the Council will need to identify more sites for allocation and should be considered for allocation to increase supply.
- It is important that a range of sizes and in a range of settlements, in order to distribute the benefits of growth across the district.
- Allocation at Beachley Barracks, is intended to be delivered predominantly in the second part of the plan period, as per draft policy LP.78.
- The Ministry of Defence (MoD) site is currently occupied by due to be vacated by 2029, the delivery of development is therefore contingent on the MoD releasing the land for development, failure to do so could have significant implications for meeting the projected housing numbers of the emerging Local Plan.
- Questions also remain as to the capacity of the highway within and around Chepstow to cope with significant amounts of development in this area. Therefore, the emerging Local Plan will need to allocate smaller sites in the south of the district to provide.
- Noting the ecology, landscape and flood risk constraints the SHELAA identified that the inclusion of the site for further consideration as part of the local plan review was based on a presumption of any future development being formed of linear single plot development adjacent to Loop Road. The site was not assessed through the Sustainability Appraisal (July 2024) and is not proposed for allocation through the Draft Local Plan.
- Constraints and Opportunities: it is recognised that the site falls within an area of ecological sensitivity and that any development would need to demonstrate how it will mitigate the recreational pressures on the Severn Estuary and other areas of sensitivity.
- To mitigate any perceivable landscape impacts development is considered appropriate in a linear pattern along Loop Road, alongside the provision of significant Green Infrastructure.
- Both sites offer opportunities to deliver growth, which is well related to existing settlements, and well located for access to local services.

Draft Officer Response

The settlement of Beachley is situated on the peninsular between the Rivers Severn and Wye, it no longer benefits from any local facilities (this will be updated in the settlement summary) although it is in close proximity to Sedbury and the services it provides as well as further services provided in

Chepstow. The Draft Plan strategy proposes continued development of Lydney and new development at other centres such as the reuse of Beachley camp and at Newent. New housing will be permitted when proposed on sites identified in the LP in the manner described in the relevant policies. Within the LP settlement hierarchy, Beachley is classified as a small village. Whilst technically suitable, the scale of development is not in accord with the LP settlement hierarchy and the policies for small villages such as Beachley which support only small scale development. This is a greenfield site adjacent the River Severn in a prominent position and situated to the east of the village settlement boundary, adjacent flood zones 2 & 3 and within an area of ecological sensitivity.

Comments have been noted,

Beachley will be reordered alphabetically in the LP.

With regard to Beachley Camp, responses are dealt with in a separate chapter however, the site is known to likely become available and is a large area with previously developed land. It lies close to facilities in Chepstow and Tutshill/ Sedbury. The LP must address its future and at the same time consider how it may contribute to the future needs of the FoDD. At present the redevelopment for a form of mixed development is considered appropriate, with about 600 dwellings being accommodated.

Blakeney: Settlement Summary

No comments received.

Bream: Settlement Summary.

Number of Representations: 4

Object: 2

Observations: 2

Object:

- Suggest sites for housing allocations Land to rear of Winding Wheel to be included in LP

Observations:

- Suggest sites for housing allocations - Land at Woodside, Bream.
- Suggest sites for housing allocations - Land at Coleford Road, Bream
- Close proximity to Wye Valley and Fod Bat SAC.
- There are also concerns about the proposed development within the West Dean area: Bream - some increases but the change to the settlement boundary to allow for development off Lydney Road is a concern and by doing so seemingly ignores the detailed response to both WDPC and local residents when building here came before planning earlier this year.(West Dean PC).

Draft Officer Response

Bream is a major village within the settlement hierarchy, it has a good range of services and is on a main route. The draft LP considered that the 3 policies LP.83 LP.84 and LP.85 provide for sufficient

growth within Bream for approximately 70 dwellings during the plan period. There is a current planning application on Land at Lydney Road. There is a current planning application on Land at Lydney Road.

Recent reforms to the NPPF will be taken into account and a review of the strategy may be required. Subsequent changes to the agreed strategy will be subject to further consultation. The additional sites suggested will be considered as part of any Local Plan strategy review.

Comment noted regarding SACs. Any future planning application would require an Ecological Impact Assessment and a Habitat Regulations Assessment in accordance with our current guidelines for the Wye Valley and Forest of Dean Bat SAC. Planning permission will not be granted where an Appropriate Assessment cannot rule out adverse impacts to a European Protected Site. Cumulative impacts will also need to be considered and significant buffer zones and lighting plans are likely to be required.

Policy LP.83 Land Off Ryelands Road, Bream

Number of Representations: 1

Observations: 1

Observations:

- Close proximity to Wye Valley and Fod Bat SAC.

Draft Officer Response

Comment noted. Any future planning application would take this into account and habitat assessments would be carried out.

Policy LP.84 Land at the Rugby Club, High Street, Bream

Number of Representations: 4

Support: 2

Observations: 2

Support:

- Ideal site for sustainable brownfield development. More suitable than other suggested locations in Bream
- Sport England are supportive in principle. Need to ensure that any scheme does not negatively impact on function as Rugby Club.

Observations:

- Close proximity to Wye Valley and Fod Bat SAC.
- LP.84 not on plan!

Draft Officer Response

Support and observations noted. Policy LP84 requires the replacement of Bream rugby club building and facilities. Planning permission has been granted for this development, it should be expected to be

developed in accordance with the permission. The policy is shown on the Policies Map as a mixed use development.

An Ecological Impact Assessment which must also assess impacts on the Wye Valley and Forest of Dean Bat SAC. Permission will not be granted if adverse impacts to the SAC cannot be ruled out.

Policy LP.85 Land at Lydney Road, Bream

Number of Representations: 8

Object: 5

Support: 1

Observations: 2

Support:

- Support draft allocation. There is currently a planning application for this land for up to 30 dwellings. Site is deliverable and developable in plan period

Object:

- Numerous residents of Bream have recently opposed to the planning application for 30 dwellings on same field
- Horrific smells from poultry farm, air pollution
- Access unsafe. Fast moving traffic and low visibility, use by haulage vehicles
- Sensitive location for biodiversity – harm to wildlife
- Structure integrity of the site (mining) – causing subsidence and sinkholes
- Increase in surface water flooding events
- Capacity of sewage and drainage systems
- Noise and light pollution
- Loss of privacy and views
- Better as pasture or community orchard
- Brownfield sites in villages should be used
- Increase in car usage
- No employment in village
- Public transport not a viable option
- Close proximity to Wye Valley and Fod Bat SAC
- Adversely affect the biodiversity impacting negatively on wildlife.
- Application failed to meet the 10% biodiversity net gain requirement

Observations:

- Current application on site
- Questions regarding the process , consultation and approvals for a settlement boundary change.

Draft Officer Response

The LP defines Bream as a large village in the settlement hierarchy, it is the largest village in terms of population other than Sedbury/Tutshill. Bream has a good range of services and facilities as well as being close to other centre and located on a main transport route. Major villages are large villages with

employment and/or services important to the wider area with some scope for additional development. Across the plan period, approximately 70 new homes are envisaged in Bream. It is envisaged that this site would be developed early in the plan period is allocated for up to 45 dwellings. Due to the level of services and relatively good access Bream enjoys, it is considered to be a sustainable location. A current planning application has been refused on the site and is currently awaiting an appeal. The points made must be considered and they include access, impact of development on adjoining residential area and on the countryside, and traffic. There are constraints that would need to be addressed before any development of the site. The site will require careful evaluation in respect of the nearby bat SAC, a full Habitat Regulations Assessment will be required for any application and adverse impacts to the bat SAC must be ruled out and the sufficient mitigation and compensation applied where necessary. Applications will not be granted where an Appropriate Assessment considers that the bat SAC would be adversely impacted by the development.

Brierley: Settlement Summary

No comments received.

Brockweir: Settlement Summary

No comments received.

Bromsberrow Heath: Settlement Summary

No comments received.

Clearwell: Settlement Summary

No comments received.

Drybrook and Harrow Hill: Settlement Summary

Number of Representations: 3

Observations: 2

Object: 1

Observations:

- Includes part of culverted tributary of Cinderford brook. Significant opportunity to divert water course in open cut through the site. (Environment Agency)
- Adjacent to the GWT Central Forest Priority Landscape Area (PLA) on the eastern boundary of the settlement. A constraint and an opportunity. The PLA's are based on the NRN, is more likely

to form a core part of the NRN, development on land outside of the core NRN could deliver valuable enhancements through BNG. (Glos Wildlife Trust).

- Drybrook Parish Council to consider embarking upon the development of their own Neighbourhood Plan (NDP).
- Wish for detailed dialogue with the FODDC before any future decisions are made.
- Absence of community planning & investment to create an optimum settlement for the health & wellbeing of the ever-growing community.
- Expectation” that the village will “evolve” & additional houses will be able to take advantage of this evolution suggest there is a greater plan to develop the village as a community.
- Evolution of Drybrook will not happen without joint partnership with the PC & FODDC.
- The roads are busy, narrow and congested.
- Inadequate provision of safe pavements for people to move easily on foot around the village.
- No village green or central square & very poor pedestrian & cycle access around the village.
- Less footfall around the village to support local business services or for community interaction.
- Cinderford is our major centre for many services, the public transport links & active transport links are inadequate.
- The village has currently very limited access to employment currently serves only Primary Education needs.
- Social cohesion focused on preserving & developing into the future & wish to proactively resist developments that can facilitate social decline.
- Proposed development of 97 new dwellings in Drybrook, presents both opportunities & challenges for our village.
- Would substantially lift the population, not enough as a catalyst for investment & improvement, especially bus services, although it would anchor the provision of existing local services.
- Further significant growth requires justification; smarter Planning processes & better regulation for Planners, smarter thinking to reflect local circumstances.
- The construction & subsequent increase in population will likely boost the already limited local economy.
- There has been a considerable ‘Lack of Investment’ in Drybrook
- The village currently lacks a Post Office, Butchers, Petrol Station.
- Affordable housing essential to address local needs, young families & individuals, & those residents who wish to live in the locality, ensuring Drybrook remains accessible to all demographics.
- The existing services, such as schools & healthcare facilities, will also face additional pressure with the proposed development.
- It is crucial to plan for adequate expansion & proper funding of these services to meet future demand.
- Existing services, such as schools & healthcare facilities, will also face additional pressure with the proposed development
- Development should incorporate sustainable practices such as energy-efficient buildings, renewable energy sources, green spaces that promote biodiversity.
- Development should incorporate sustainable practices such as energy-efficient buildings, renewable energy sources, & green spaces that promote biodiversity.

- Consideration also needs to be given that areas within Drybrook fall under the Wye Valley Special Area of Conservation (SAC).
- A comprehensive flood risk assessment should be conducted to identify any potential risks to the new development and surrounding areas.
- Incorporating Sustainable Drainage Systems is essential for managing surface water runoff & reducing the risk of flooding.
- Upgrading existing drainage infrastructure may be necessary to accommodate increased water flow.
- Ongoing monitoring & maintenance of drainage systems.
- Infrastructure investment.
- Address potential traffic congestion, implementing effective traffic management strategies.
- The proposal for a roundabout opposite the Hearts of Oak public house is not an effective or efficient traffic management strategy.
- Drybrook Parish Council initiatives such as local events & community programmes can foster social cohesion & strengthen the village's sense of identity.
- Maintaining Drybrook's features and heritage is essential as the village grows.
- It is dominated by surrounding forest & agricultural land, which needs to be preserved.
- Increased population density can sometimes lead to anti-social behaviour & crime if not carefully managed.
- Development should include; walking trails, an area of community space to facilitate social interaction & physical activity.
- Thoughtful planning and design can ensure that new housing complements the existing environment and respects the village's cultural landscape
- Previous development at Mannings Farm was given no consideration to the village or existing residents. Anti-social behaviour and drug dealing is prevalent.
- Concept of the 20-Minute Neighbourhood emphasizes 'living locally,' individuals should be able to meet most of their daily needs such as shopping, exercise, education, socializing, & healthcare within a 20-minute walk from home, with safe cycling & local transport options.
- Drybrook PC would like to propose that the Old Orchard between Drybrook Car Park & Quabbs Road be identified & designated as an important open area & potential future recreation space for the village centre.
- This area needs this protection as any future attempt to seek planning permission for housing would mitigate against any vision to enhance the quality of the village for the community by developing a more open civic space at the entrance to Drybrook Farm.
- Could it be included in areas identified on the FDDC Policies Map? (Drybrook PC).

Object:

- Dumping executive housing on villages and towns which have declining amenities and infrastructure.
- Housing need is entirely spurious, given the large number of second homes and air b n b in the Forest of Dean.
- Drybrook is clearly a village in decline lost a butcher's, a baker's from a settlement that had a post office, a bank, a dozen shops and a Cinema it has virtually nothing.

- A chemist, a co-op and a second hand shop. The GP surgery has a single GP.
- A further 97 houses would exacerbate congestion in the village, especially around the start and finish of the school day and other local road systems at commuting times for work.
- Would the sewer system cope and would the centre of the village be more prone to flooding with an additional 97 properties uphill.
- There is a derelict house and derelict toilet block in the centre of the village, repairing and repurposing these would be a better use of resources.
- Questions need to be asked about allocation of section 102 monies from previous developments and accountability to the community of the decision makers.
- Don't appear to have a handle on empty properties or brownfield sites in the Dean but happily dispense with agricultural land.

Draft Officer Response

The LP has arrived at a strategy which makes major strategic allocations for mixed development at sustainable locations where there are opportunities around the towns. In addition, there are sites identified for development at a number of other large settlements, principally at major villages. Their distribution is an important part of the plan strategy and broadly follows the plan hierarchy. Drybrook is identified as a major village in Policy LP4 where there are services to support some additional development. Part of the reason for making allocations is to support local services.

The site adjoins one that is recently completed, it expands and consolidates two AP allocations of 18 and 50 dwellings. This additional land provides approximately 30 dwellings more than the Allocations Plan. The allocation is in keeping with the strategy of the plan and is considered available for the purpose.

It is agreed that at present it is in agricultural use, but the need for additional land is such that some new greenfield allocations are needed.

Policy LP.86 Drybrook Farm, Drybrook And to the Rear of High Street Drybrook

Number of Representations: 3

Observations: 2

Support: 1

Observations:

- Surface water flood route runs through the centre of the site. (Environment Agency)
- Adjacent to the GWT Central Forest Priority Landscape Area (PLA) on the eastern boundary of the settlement. Both a constraint and an opportunity. The PLA's are based on the NRN, land within them is more likely to form a core part of the NRN, development on land outside of the core NRN could deliver valuable enhancements through BNG. (Glos Wildlife Trust).
- Drybrook Parish Council request specific amendments & inclusion in the LP regarding Policy LP.86.
- A significant area (needs further discussion) between the Drybrook Main Road and the farm be set aside for community / civic space developed by commercial partners or compulsory purchase or community Land Trust Mechanisms.

- Recommendations to amend and add text of policy: (1st paragraph)The site should provide pedestrian... and Cycle access from Drybrook Road via the old Farmhouse to the development recently completed to the northeast and directly to the High Street while vehicle access is likely to be close to restricted from the Drybrook Road via the former Drybrook Farm buildings which are part of the allocation.
- (2nd paragraph) - and some the provision of community open space adjoining and opening on to the main Drybrook Road while enabling the former Drybrook Farm buildings to be developed for community services or retail provision. The development of the site will need to demonstrate it will not have an adverse impact on the nearby bat SACs and the populations they support. The landscaped areas and associated open space will need to provide some benefit for the village overall.
- The proposed development of 97 new dwellings in Drybrook does offer an opportunity for growth and revitalization.
- It is essential to ensure that this growth is proportionate & sustainable in meeting local & 'appropriate solutions' to housing for Drybrook
- Needs to align with key policies from the Forest of Dean District Council's Core Strategy, NPPF, NPFR & the 'replaced' Allocations Plan.
- Ensuring development of our village is sustainable & inclusive, it can meet the needs of both new & existing residents while preserving Drybrook's cohesion.
- Planners need to encompass a more people centric design – as proposed 'Solutions & Inclusions' outlined above, not just develop 'Residential Dwellings'.
- Adopting better principles of building with nature, improved green spaces.
- There needs to be some restoration to 'local pride', belonging & social interaction, making Drybrook a 'destination to live, not just to reside within a 'corridor'.
- We have encouraged residents to participate in this consultation has not been either accessible or conducive to the average member of the public, we have received numerous comments to that effect.

Support:

- We support the proposed extended allocation at Drybrook (LP86) and we would ask the Council to ensure that they keep the draft allocation within the Local Plan, because the land owner has intentions of bringing this site forward for residential development during this next plan period with it now having a feasible access strategy.

Draft Officer Response

Comments noted

There are sites identified for development at a number of other large settlements, principally at major villages. Their distribution is an important part of the plan strategy and broadly follows the plan hierarchy. Drybrook is identified as a major village in Policy LP4 where there are services to support some additional development. Part of the reason for making allocations is to support local services.

The site adjoins one that is recently completed, it expands and consolidates two AP allocations of 18 and 50 dwellings. This additional land provides approximately 30 dwellings more than the Allocations

Plan. The allocation is in keeping with the strategy of the plan and is considered available for the purpose.

Applications which increase GI connectivity to the woodland will be encouraged. Full Ecological Impact Assessments will be required and impacts to the adjacent woodland will be carefully considered. Lighting will be a key consideration.

Surface Water will be considered at planning application stage by the relevant expert body.

Dymock: Settlement Summary

Number of Representations: 1

Support: 1

- Support long term aim of restoration of Herefordshire & Gloucestershire Canal linked to conserve/protect/enhance Dymock CA heritage assets. (Regeneration, FODDC).
- Scope for sensitive regeneration to enhance range and quality of visitor economy uses.

Draft Officer Response

Support noted.

Edge End: Settlement Summary

No comments received.

Ellwood: Settlement Summary

No comments received.

English Bicknor: Settlement Summary

Number of Representations: 1

Support: 1

- Have reviewed the local plan and generally supports it in terms of its effects on the Parish. This is due to the plans having little impact on the village. (English Bicknor Parish Council).

Draft Officer Response

Support noted.

Hartpury (including University and College)

Number of Representations: 15

Objections: 12

Observations: 3

Hartpury Parish Council:

- Welcome the fact that the FoDDC is making progress with the development of the District Local Plan, as this will help us all greatly with examination of planning applications.
- Welcome the use of an analytical process as a major input to this plan. However, an analytical process does depend on suitable correct input data to achieve an appropriate output.
- Sustainability Appraisal Report: the criteria used are subjective, and quite incorrectly judged in many cases. For example, the Parish Council would imagine that a "Town Centre", at the very least should contain a shop selling groceries and newspapers etc., a full-time post office, and a place of worship. Hartpury has none of these.
- The nearest shop is in Ashleworth, and there is no footpath that one can use to get there, nor along the main road to the Cross Hands garage.
- A regular bus service is surely more than 4 a day. You cannot realistically access either the nearest shop or the GP surgery by bus, or commute to work in Gloucester.
- The main highway through the village, the A417 is regularly closed each winter due to flooding at Maisemore, with a significant diversion, along narrow lanes; the development of Hartpury University has exacerbated this, with considerable traffic in both directions in the rush hour. The A417 is itself a main diversion route for the M5/M50.
- The GP surgery and primary school are under strain from development in neighbouring villages, especially Ashleworth and Maisemore, which are not in the FoD. The main sewerage system in the village has been inadequate for many years, and while Severn Trent say that it is now adequate, this has not been proven, and it causes a lot of distress for many of our residents. It is certainly not clear that it would support new development, again because of development in Ashleworth and other villages.
- The Parish Council would also note that Hartpury is the only village in the summary table that has "Orange" SA scores that have been taken forward to the Local Plan, whereas there are 20 sites in the SA that are identified as "Dark Green" or "Light Green" that have not been taken forward. This implies that Hartpury is being treated differently from all other parishes.

Hartpury:

- A site at Foley Rise in Hartpury is proposed as a Local Plan housing allocation for up to 10 dwellings. It would be more appropriate scale than those proposed and can come forward in the shorter term, and would help deliver housing numbers and support the future vitality and viability of the village.
- Development is disproportionate to existing size of village
- The Inspector at Foley Rise concluded that this site represented a "suitable location" for housing development, however, dismissed the appeal on the grounds that "the overall level of development proposed would not be capable of assimilating successfully into its surroundings.". The Inspector in the appeal letter referenced "significant engineering works" which would not be required if a smaller portion on the eastern part of this site at Foley Rise was developed for up to 10 dwellings

and possibly less. A smaller development at Foley Rise could come forward as a Local Plan housing allocation for up to 10 dwellings which would address the issues raised by the Inspector, notably quantum of development and the associated engineering/ other works and the resulting landscape impact.

- Hartpury does not have the infrastructure to support a new housing development. There is no shop, no doctors surgery and no dentist in Hartpury. Hartpury primary school is full. The nearest doctors is Staunton Corse.
- There are no youth facilities.
- The road network in and around Hartpury is already congested.
- The A417 between Maisemore and the Over roundabout floods - which happens almost every year. This causes traffic to flow along small rural roads in an attempt to gain access to Gloucester. Before new housing is built in Hartpury significant investment is required in the A417 between Maisemore and Over roundabout, or significant widening of the other possible routes to Gloucester (Corsend Road through to Highleadon and the B4215).
- There are no employment opportunities in the village. Even farming work opportunities do not exist.
- The village currently has a pleasant character as the number of people in it is just about supported by the facilities present. The developments suggested will mean the village will have doubled in size in the space of 20 years. The character of the village will be ruined if the facilities are not developed as well to keep pace with the population.
- There are no local amenities for teenagers, the play park is not ideal for toddlers, the nursery is full and adding extra population pressure will cause antisocial behaviour as needs are not being met.
- More consideration needs to go into the location and style of housing and a LOT more development of facilities is required to support that housing,
- Information on Hartpury is not accurate and very misleading. Stating that it has shops and that there are employment opportunities gives the impression that it can easily accommodate development of many new houses. There are no shops in Hartpury. People need to go outside Hartpury to buy things and to do activities and for things like doctor's surgery, dentist, optician, banks, cash points, gym, entertainment, etc, etc.
- Hartpury - There are two LWS's to the south, Carter's Grove and Hartpury Meadows, and Deans Coppice to the East. There are also some core areas of NRN (mainly woodland). (GWT).

Environmental:

- There is no positive impact on the environment required by LPI only the following negative impact:
The large and diverse amount of wildlife using the field and hedgerows will be displaced / loss of habitats.
The flooding risk will increase substantially - will increase runoff and the balancing ponds suggested will run off into the ditch that feeds the floods in the old quarry
Increased air pollution due to increased vehicle usage.
Increased noise pollution due to the increase of circa 120 residents.
Increased light pollution due to the development.

Increased amount of sewage spillages - Due to the local sewage network operating over capacity and sewage entering residents' homes from time to time the situation will just increase and worsen. The sewage system is not fit for purpose.

- Does not support net zero carbon emissions
- Privacy would be substantially compromised - due to the landscape both the new proposed development, the residents on Broad Street and Quarry Close will be vastly overlooked.
- Requirement not supported by need.
- Lack of infrastructure or amenities to support new housing
Primary school currently being at capacity.
The doctor surgery within Corse and Staunton services a huge area and population circa 6400 registered patients covering 240 sq. kilometres and 14 parishes, this surgery is operating well over capacity.
- Increase in vehicles at school pick up & drop off times it will create further congestion and potential dangerous conditions for children and parents going to the local school
- Roads in need of repair
- Hartpury University continues to grow and put a strain on our infrastructure
- Due to the loss of view and substantial loss of privacy dwellings on the southside of Broad Street and back end of Quarry Close would see a loss of up to 15% (average) loss of property value.
- As Hartpury is classed as a small village this proposal would grossly contravene Policy LP 4. The proposal is 1250% above "settlement hierarchy
- Contrary to Policy LP. 5 - The proposal currently sits outside the settlement boundary.
- Contrary to Policy LP. 7 Infrastructure -the village infrastructure is beyond lacking to even sustain the current requirements and needs of the village. Further housing will increase pressure on facilities.
- Contrary to Policy LP. 9- Habitat And Species Protection The proposed site has been used as grazing land for livestock for decades, very old large hedgerows and forest areas surround and are within the proposed site, currently the area is full of a diverse range of wildlife which includes rabbits, stoats, field mice, bats, birds of prey, newts, badgers, hedgehogs and squirrels.
- Contrary to Policy LP. 21 – Flooding and Water Conservation - Dwellings along the southside of Broad Street see annual flooding due to the run off of surface water from the proposed site. The proposal will substantially increase the risk of flooding, potentially causing property damage and a risk to life.
- Contrary to Policy LP. 23 - Community Facilities
The village facilities are very limited consisting of a full capacity primary school, public house and a small park only. The village has no shop or post office.
- Contrary to Policy LP. 24 - Active Travel
The village has very limited public transport with the local bus service providing only 4 daily buses to Gloucester.
The village has very limited pedestrian zones to allow safe travel around the village, or crossing the main road, the risk increases due to the busy A417.

Draft Officer Response

The land at Broad Street is proposed in the draft LP for housing and is the subject of a number of objections. The points made must be addressed within the policy and considered at the planning

application stage, they include access, infrastructure, amenities, aesthetics, protecting the environment, pollution, sewerage, flooding, ecology, access and traffic/transport issues.

The proposed site is considered to be able to be developed and capable of delivering the number of dwellings allocated. Hartpury is a small village as defined in the settlement hierarchy policy. The village has only a few services and is located on a major transport route, it is noted that it does not have any shops.

The LP has arrived at a strategy which makes major strategic allocations for mixed development at sustainable locations where there are opportunities around the towns. It promotes strategic development around Lydney, Newent and Beachley. In addition there are a number of sites identified for development at a number of other larger settlements, as well as a few smaller proportionate allocations such as at Hartpury and their distribution is an important part of the strategy to meet the housing requirements of the Local Plan and in order to provide a range and an adequate supply of land for housing, there is a need for the allocation of new greenfield sites in the smaller more accessible settlements. Hartpury is situated on the A417 and has good access to Staunton /Corse and Gloucester and the services they provide.

Hartpury Sustainability Appraisal:

Hartpury PC Comments on sustainability appraisal

A town centre should consist of a shop, post office and place of worship as a minimum which means that Hartpury should not be referred to as a town. Nearest shop is 1.1 miles. We believe this box should be orange. Public transport is not a sufficient service with only 4 buses per day Gloucester bound and timings are not suitable for those working past 5.30 which therefore limits the possibility of travel to Gloucester for employment let alone anything further afield. This box should be orange.

The Character Appraisal is out of date and this would no longer be classed as an open character landscape and this would be extremely visible from higher surrounding areas.

Land adjoining cackleberries Over Old Road is a single track road and very narrow. The A417 regularly floods especially in the winter and is closed, sometimes for long periods. The field floods in one corner. This is not a main route through the Village and is not close to the College. SA criteria The Parish Council feel that this is orange and not green.

Hartpury The A417 regularly floods especially in the winter and is closed, sometimes for long periods. The Orchard should be protected. SA criteria The Parish Council agree that this is red

Land off A417 Hartpury: Access onto Broad Street may be considered good but traffic from Ashleworth also uses this road which has increased due to new developments; this traffic increases considerably when there is flooding in the Tewkesbury area. The A417 regularly floods especially in the winter and is closed, sometimes for long periods. This box should only be + green (not ++). There is no public footpath along the Eastern boundary. SA criteria The Parish Council feel this should be red.

Land at Broad Street. There is no obvious access to either the A417 or Corsend Road and this should be red. The A417 regularly floods especially in the winter and is closed, sometimes for long periods. SA criteria The Parish Council feel that this should remain red.

Land South of Corsend Road A new access onto Over Old Road is not available and A417 may be considered good but the A417 regularly floods especially in the winter and is closed, sometimes for long periods. Landscapes - would be visible when built as at the bottom of a hill and surrounding footpaths - GHA 24, GHA 25 and GHA 31 SA Criteria The Parish Council feel this should remain orange.

Land adjoining Hartpury Primary school. Access onto Broad Street may be considered good but traffic from Ashleworth also uses this road which has increased due to new developments; this traffic increases considerably when there is flooding in the Tewkesbury area. The A417 regularly floods especially in the winter and is closed, sometimes for long periods. This box should only be + green (not ++) SA criteria The Parish Council feel this should remain orange.

Land off Foley Rise. While access off Foley Rise may be considered good but the A417 regularly floods especially in the winter and is closed, sometimes for long periods. There are no suitable footpaths nearby. Whilst the site may not flood there is the potential for flooding of houses on lower ground on the A417 Previous planning application appeal P1615/23/FUL was refused due to the effect of the proposed development on the character and appearance of the area. The Parish Council feel this should be red especially due to previous planning application refusals. SA criteria The Parish Council feel this should be red.

Land off Broad Street Access onto Broad Street may be considered good but traffic from Ashleworth also uses this road which has increased due to new developments; this traffic increases considerably when there is flooding in the Tewkesbury area. The A417 regularly floods especially in the winter and is closed, sometimes for long periods. This box should only be + green (not ++) The Parish Council is very concerned about run off as the land is considerable higher than the existing properties in Broad Street. SA criteria The Parish Council feel this should be red.

Further objections to Sustainability Appraisal

Objection to Sustainability Appraisal: A third site, "Land adjoining Hartpury Primary School" has been given a broadly positive overall judgement, but has not been included in the draft plan. This site appears to have the best credentials in terms of overall access (straight onto the A417), notwithstanding the comments concerning the flooding. Development of this site could potentially also relieve Over Old Road and may also be able to facilitate an alternative pedestrian route to and from the school, village hall and play area.

Policy 87 Over Old Road, Hartpury

Number of Representations: 11

Observations: 2

Objections: 9

- Site is too large and are not commensurate in size and scale to the village. A development of 10 dwellings at Foley Rise would be more appropriate scale can come forward in the shorter term and would help deliver housing numbers and support the future vitality and viability of the village.
- The Inspector at Foley Rise concluded that the site represented a "suitable location" for housing development, however, dismissed the appeal on the grounds that "the overall level of development

proposed would not be capable of assimilating successfully into its surroundings.". The Inspector in the appeal letter referenced "significant engineering works" which would not be required if a smaller portion on the eastern part of this site at Foley Rise was developed for up to 10 dwellings and possibly less. A smaller development at Foley Rise could come forward as a Local Plan housing allocation for up to 10 dwellings which would address the issues raised by the Inspector, notably quantum of development and the associated engineering/ other works and the resulting landscape impact.

- The elevated position of these properties, relative the village and access roads, is likely to create an eyesore for the village, not in keeping with the rural aspect of the village.
- This is agricultural land.
- Building on this land would be detrimental to the village's aesthetic and would likely depreciate the value of housing in the area.
- The proposed land is apparently selected without vision or purpose (other than to build more houses). It is therefore unlikely that the development can or will reflect the needs of the village.
- Lack of infrastructure; local infrastructure and amenities struggle to cope with existing demand. Existing amenities are over-subscribed school(s) and childcare and limited child outdoor play facilities. For secondary school age children there is no school with in the locale so those children will have to either catch a bus or be driven by parents, again increasing traffic. The doctors surgery running at capacity in Corse covers Hartpury University and Hartpury College with long waiting lists. There are no grocery shops in the village; no permanent post office; no dentist; and no youth engagement centres. There are 2 pubs in the area. and in the outlying area a church. A vet is present in the village.
- There are no work opportunities in Hartpury
- Over Old Road has become busy and more housing will increase the pressure on the highways in the area particularly at school time. Any housing must address amount and flows of traffic on Over Old Road.
- Hartpury is growing significantly to become a town and destroying the village.
- Destroying countryside and unsettling and killing wildlife habitats. Dormice and the Greater Crested Newt are present in the field. There are many circling birds including a stunning Wake of Red Kites. These are protected species, and their natural environment needs to be protected and undisturbed. specialists should conduct investigations on these fields to ensure that we protect valued wildlife and biodiversity.
- There will be a significant increase in light pollution affecting the bat population in the trees. Artificial light exposes bats to predators when leaving rest sites (roosts) and causes them to abandon roosts altogether. Lighting near bats' travel routes can increase their flight time and energy use by cutting them off from food and water sources.
- A huge increase in noise disturbance for us.
- Greatly concerned about the devaluation of our property
- The development will significantly increase pollution: air pollution, sewage, noise. This goes against the FoD objectives of zero emissions.
- The local area has previously suffered the effects of flooding from excessive water run-off. The development will cause serious flooding for houses at Quarry Close and Over Old Road. These houses already have big ditches and flow pipes that need to be maintained to control flooding. The

construction will reduce rain water draining into the field so the water will work its way down to these houses as the field slopes down towards the houses.

- Increased risk of road accidents and congestion, especially with Hartpury college expansion. The college is already related to a significant number of local RTAs.
- Increased congestion on the Over Old Road, by the primary school in a rural and active farming area where heavy machinery is commonplace. Over Old Road has become busy with development over recent years which will increase with more development and events at the school and village hall.
- Public services/ Transport links - the bus service run by Swanbrook (354) is called the Hartpury Shuttle but only serves Hartpury College/university and terminates at the college. The 351 run by Stagecoach travels between Gloucester and Tewkesbury is not a frequent service so is not useful for commuters using it for work purposes.
- Where will the access be located
- Site visit should take place during school pick up times
- Maisemore gets flooded more with climate change, increased traffic to Gloucester on small back roads will be a very big problem. There will be serious congestion, accidents, and these back roads will get totally ruined and become very dangerous.
- Will change ambience of the village
- Reliance on cars and no parking for visitors
- The new development will significantly increase pollution: air pollution, sewage, noise. This goes against the FoD objectives of zero emissions.
- When considering the natural wildlife habitat why were plans for a solar farm near Hartpury rejected on appeal because of concerns about its impact on the landscape and wildlife. Among the concerns about the effects of the Elgin Energy plan near Murrells End Farm was that on endangered skylarks when the area in LP88 hosts just as much wildlife and indeed is home to a rare orchid.
- New people moving into Hartpury may not necessarily want to get on well with others, so this can create a Us and Them situation.
- Youngsters got nothing to do in the village so will hang around and create problems
- Does not meet Forest of Dean objectives of sustainability, protecting the environment and biodiversity, and achieving net zero emissions.
- There is also the concern over root disturbance of the many fine trees in our garden and in the general area that when at a time we are concerned about carbon emissions should not be destroyed. In one year, a mature live tree can absorb more than 48 pounds of carbon dioxide.
- Please clarify " Hartpury is capable of accommodating a modest degree of change," what does a modest degree of change equate too numerically?
- There are two LWS's to the south, Carter's Grove and Hartpury Meadows, and Deans Coppice to the East. There are also some core areas of NRN (mainly woodland).

Draft Officer Response

The land at Over Old Road is proposed in the draft LP for housing and is the subject of a number of objections. The points made must be addressed within the LP policies and considered at the planning application stage, they include access, infrastructure, amenities, aesthetics, protecting the environment, pollution, sewerage, flooding, ecology, access and traffic/transport issues.

The proposed site is considered to be able to be developed and capable of delivering the number of dwellings allocated. Hartpury is a small village as defined in the settlement hierarchy policy. The village has only a few services and is located on a major transport route, it is noted that it does not have any shops.

The LP has arrived at a strategy which makes major strategic allocations for mixed development at sustainable locations where there are opportunities around the towns. It promotes strategic development around Lydney, Newent and Beachley. In addition there are a number of sites identified for development at a number of other larger settlements, as well as a few smaller proportionate allocations such as at Hartpury and their distribution is an important part of the strategy to meet the housing requirements of the Local Plan and in order to provide a range and an adequate supply of land for housing, there is a need for the allocation of new greenfield sites in the smaller more accessible settlements. Hartpury is situated on the A417 and has good access to Staunton /Corse and Gloucester and the services they provide.

Policy LP 88 Broad Street Hartpury

Number of Representations: 31

Support: 1

Observation: 4

Object: 26

Support:

- Supports the Council in the preparation of the new Local Plan and particularly in the identification of an area of land off Broad Street as a suitable site for development;- however, the draft allocation boundary should be reviewed. At present, the eastern boundary to the allocation comprises an arbitrary line through a field that would result in an awkward form of development;- The allocation of a wider site would enable a higher quality development to be achieved with additional benefits in terms of the delivery of affordable homes, open space and biodiversity net gain;- Furthermore, given the direction of travel in respect of national planning policy, it is anticipated that the Council will need to accommodate significant additional housing and it should be noted that the additional land (i.e. the land parcel to the south of the draft allocation) is available and deliverable for residential development.

Object:

- Hartpury summary is inaccurate.
- Hartpury does not have the infrastructure to support a new housing development. Hartpury does not have a shop, doctors surgery nor dentist in Hartpury. Hartpury primary school is oversubscribed. There is a Pub, village hall, a Vets and an Upholstery shop. New residents will use Ashleworth post office hub which does sell essentials.
- Limited bus service only 4 a day and none on Sundays.
- There will be increased pressure on the GP surgery in Staunton(the next village).
- The proposed development will increase the number of houses in Hartpury by over 40%. The Local Plan approach you suggest "Hartpury is capable of accommodating a modest degree of

change". An extra 66 homes with the potential to raise the current population by a third could not be considered modest.

- The land in the plan is a prime example of the agriculture supported in the area, in the past 20 years it has always grazed flocks of sheep and been mown for winter feedstock, in the DEFRA Southwest Region Agricultural Land Classification maps, the land identified for development is classified as good to moderate abutting areas classified as very good, it is not "Grey Land" or "Brown Field" it is productive agricultural land.
- Sites are too large and are not commensurate in size and scale to the village.
- A development of up to 10 dwellings at Foley Rise in Hartpury would be of a more appropriate scale.
- Poor access.
- The site is not flat as suggested
- Building in Hartpury is not sustainable and contrary to LP.I.
- The additional people in the village are going to put too much pressure on the facilities and infrastructure of the area.
- Not investing in required infrastructure.
- The road network in and around Hartpury is already congested. This is particularly the case when the A417 between Maisemore and the Over roundabout floods - which happens almost every year. This causes traffic to flow along small rural roads in an attempt to gain access to Gloucester. The Corse end Road by the bridge over the leadon also floods. Before new housing is built in Hartpury, significant investment is required for the A417 between Maisemore and Over roundabout, or significant widening of the other possible routes to Gloucester (Corsend Road through to Highleadon and the B4215).
- Surrounding roads suffer from being in a bad state of repair now & broad street in particular, has numerous pot holes. Potentially another 80 cars (2 per household, probably more) will make the situation even worse.
- Forcing people to travel goes against net zero emissions objective.
- Concern about the health and safety of children and parents getting their children to and from school. It is very difficult to cross the A417 and then Over Old Road will be an accident waiting to happen.
- There are no youth services for an increase in residents
- Broad Street is no longer safe for pedestrians or horse riders because of the already vastly inflated volumes of traffic due to recent housing developments in both Hartpury and very significant sized developments in Ashleworth and the continual expansion of Hartpury College & University. There is no pavement nor lighting and the traffic is far too heavy for the size and capacity of the road causing it to be dangerous to walk or ride on.
- Hartpury is a small rural village with little infrastructure (no doctors/dentist/shops) meaning all these properties will have to use cars to access any facilities.
- The school cannot support the new development.
- The development of 40 houses seems totally disproportionate to the existing size of the village.
- Hartpury is surrounded by roads that frequently flood. Ham Road in Ashleworth was closed for many weeks last Winter as was access to Gloucester via Maisemore causing dangerous and congested traffic in small lanes trying to access both Cheltenham and Gloucester. Additional

housing of this size will create further traffic problems as well as possibly creating worse flooding in the areas it already happens to so regularly.

- The area suggested slopes down towards Broad Street, most of the houses along Broad Street , is part of the old quarry and floods extensively already. Adding built environment to the area suggested will increase runoff and the balancing ponds suggested will run off into the ditch that feeds the floods in the old quarry.
- Building another 40 houses on beautiful open fields does not meet draft plan aims of promoting and supporting new solutions which achieve net zero carbon emissions alongside measures to protect and support the environment More houses and cars means more carbon emissions.
- The plan seeks to protect and enhance biodiversity and they do this by requiring net gain in excess of the required minimum. Developing important natural spaces, such as large fields, which are home to numerous types of wild life, plants and trees, totally contradicts this.
- The proposed development will also destroy beautiful countryside that supports a range of birds, mammals and reptiles including great crested newts.etc.
- Whilst there is the need for housing, the council are not investing in the local area enough.
- Upland location of field with a rising gradient and steep slope to adjoining properties.
- Will exacerbate flooding of adjacent properties
- Potential overshadowing of existing properties
- Depreciation of adjoining properties values and loss of view
- Further development to the road infrastructure and local amenities should be recognised in this statement.
- Policy should reflect the requirement that any new housing must be in keeping with the existing housing stock and be developed for an appropriate demographic. This should recognise that there are limited low-skilled jobs in the local area, and the above noted lack of amenities undermines attempts at creating affordable housing.
- Lastly, in line with the Build Sustainability Core Aims of the plan, there should be an explicit aim to repurpose any existing unused buildings and enhance the environmental credentials of existing stock, before committing to new build. Any new build should seek to use zero carbon heating solutions, with improved public transport accessibility.
- Drainage and sewage: There are problems in Quarry close with blocked drains. Where are the planned sewage and drainage arrangements for these houses, attaching to existing ones this is going to cause a massive strain on the system and cause potential public health problems.
- Increased pollution, air sewage and noise pollution
- There are no employment opportunities in the village
- With climate change, Maisemore easily gets frequently flooded. More people living in Hartpury, it will become a big safety issue when so many vehicles are trying to get to Gloucester and the small and very dangerous back roads.
- The Plan mentions the need to address the sharp decline in many species, destroying natural habitats for many animals is not addressing their decline, it's creating it and going to make it even worse.
- The plan states that developments need to be located so that the form & mix and/or proximity to essential services & facilities reduces the need to travel. This statement really does not apply here as it will increase the need to drive for essentials for most people.
- This is greenfield land

- The increase in vehicles at school pick up & drop off times will create further congestion and potential dangerous conditions for pedestrians especially children and parents going to the local school.
- The bus service only runs from 7.30 till 5.50.
- The requirement for housing in the village is not supported by need. The people requiring accommodation in the area are not going to be able to afford the kind of houses built.
- Hartpury- There are two LWS's to the south, Carter's Grove and Hartpury Meadows, and Deans Coppice to the East. There are also some core areas of NRN (mainly woodland).
- In line with the Build Sustainability Core Aims of the plan, there should be an explicit aim to repurpose any existing unused buildings and enhance the environmental credentials of existing stock, before committing to new build. Any new build should seek to use zero carbon heating solutions, with improved public transport accessibility.
- Some residents have raw sewage inside their properties and gardens. What is being proposed can only exacerbate this chronic situation.
- Hartpury University continues to grow and put a strain on our infrastructure especially with flooding and the doctors' surgery
- Objection to allocation in Hartpury (off Broad Street) owing to flooding, lack of GP, school is full, no shops, only 3 buses a day, traffic
- Loss of Natural Green Space and Killing Wild Life and their Habitat: The developments are destroying 2 green fields with hedges for lots of wildlife; so open countryside. Newts dormice, bats, crows, mice
- Hartpury University is earmarked for further development which already impacts upon the village and its limited services.
- The Forest of Dean talks about the importance of sustainability and therefore should have policies in place to achieve these objectives. But this housing plan has no sustainability credentials. It does not promote public transport, energy-efficiency, protecting the environment or other eco-friendly practices. Rather, it creates pollution, flooding, congestion, etc. Building these houses will be contravening the sustainability policies.
- The initial documentation for the draft local plan refers to an option I to build a new settlement within FoDC jurisdiction, but this was discussed and discounted.
Why was this option discounted so early on as it appears to be a logical solution as all the points noted above can be mitigated with a brand-new community.
Will the FoDC consider this plan again as an alternative contribution to hitting their 2041 targets for 6,600 houses.

Draft Officer Response

The land at Broad Street is proposed in the draft LP for housing and is the subject of a number of objections. The points made must be considered and they include access, aesthetics, protecting the environment, pollution, flooding, ecology, access and traffic/transport issues.

The proposed site is considered to be able to be developed and capable of delivering the number of dwellings allocated. Hartpury is a small village as defined in the settlement hierarchy policy. The village has only a few services and is located on a major transport route, it is noted that it does not have a shop.

The LP has arrived at a strategy which makes major strategic allocations for mixed development at sustainable locations where there are opportunities around the towns. It promotes strategic development around Lydney, Newent and Beachley. In addition there are a number of sites identified for development at a number of other larger settlements, as well as a few smaller proportionate allocations such as at Hartpury and their distribution is an important part of the strategy to meet the housing requirements of the Local Plan and in order to provide a range and an adequate supply of land for housing, there is a need for the allocation of new greenfield sites in the smaller more accessible settlements. Hartpury is situated on the A417 and has good access to Staunton /Corse and Gloucester and the services they provide.

The Sustainability Appraisal will be reviewed updated alongside the local plan.

The Plan represents the FoDDC's considerations at the time of preparation early 2024. Recent reforms to the NPPF will be taken into account and a review of the strategy may be required. Subsequent changes to the agreed strategy will be subject to further consultation.

Policy LP.89 Hartpury University and College

Number of Representations: 9

Support: 2

Observations: 5

Object: 2

Support:

- Is the masterplan shown up to date?
- Support with conditions -Hartpury university and Hartpury College Response
- Agree in principle with this policy. However, in the table under Special Requirements it would be preferable to use the wording "Development must accord...." rather than "Development should accord".
- Hartpury University and Hartpury College welcomes the publication of the Draft Local Plan and the evidence base underpinning the draft policies. The Draft Local Plan offers an excellent opportunity for Forest of Dean District Council to guide the development of the district and promote the enhancement of the environment over the plan period.
- Hartpury University and Hartpury College was established in 1948 and is a provider of further and higher education. It is among the UK's leading specialist education providers in animal, agriculture, business, equine, sport and veterinary nursing. It gained university status in 2018. The college offers A-levels, T Levels and vocational diplomas in the land-based and sports sectors. The university offers PhDs, and postgraduate and undergraduate degrees. The university and college provide education opportunities to over 4,600 students from over 60 countries.
- The educational institution generates significant economic and social value for the district, with a recent analysis estimating that the economic impact of the university and college is six times our cost base.
- The university has alongside Forest of Dean District Council and Cinderford Town Council to help secure £20 million of funding from the Government's Levelling Up Fund, which was announced

in October 2021 and will be used to improve leisure and community facilities, introduce new education opportunities, repurpose vacant buildings and grow the local economy.

- The inclusion of Policy LP. 89 in the Draft Local Plan is welcomed by Hartpury University and Hartpury College. Notwithstanding this, we would respectfully submit that the policy wording could be improved so that it provides the necessary policy framework to facilitate the longer-term development and adaptation of the campus and the wider estate over the lifetime of the Local Plan, together with the environmental enhancements and sustainability benefits that underpin our commitments under the United Nations Sustainable Development Goals. To this end, we would submit that the policy needs to present a broader vision for the university and college, thereby ensuring that the policy remains sufficiently robust for the lifetime of the new Local Plan which will be in place until 2041.
- Range of Land Uses - Policy LP. 89 states that proposals for the further development of the university and college for educational purposes and uses ancillary to those will be supported. This support for the further development of the university and college is welcomed, but we would submit that the policy should recognise the potential of the campus and wider estate to accommodate other land uses. In order for the educational facilities to adapt over time, a broader range of land uses may be required, and it is important that the policy is future proofed to address this. To this end, we would advise that the policy should include reference to a small but focused list of complementary uses that provide a synergy with the educational and sporting functions, thereby ensuring the longer-term viability of the university and college.
- The potential for renewable energy and supporting infrastructure such as battery storage should be reflected in the policy. Policy LP. 14 supports the development of renewable energy, should also be recognised in the context of Policy LP. 89 and the potential that exists at Hartpury University and Hartpury College.
- Student accommodation is also a key component of how the university and college serve the needs of our students. It is important that we consider innovative solutions which will include making efficient use of existing buildings.
- By including reference to a broader mix of uses in Policy LP. 89 will need to be followed by a Masterplan for the estate, which considers the potential for such opportunities and allows for a holistic and plan-led approach. The enhancement of landscape character and the transition to a low carbon and sustainable future will be key pillars of the Masterplan process. We would encourage the District Council to provide a policy basis that is aligned with our vision and is sufficiently flexible to facilitate suitable development options over the lifetime of the new Local Plan.
- Hartpury University and Hartpury College is committed to preparing a Masterplan and has already commissioned feasibility work that is being undertaken by relevant professionals to ensure that this process is evidence-based and adopts a joined-up approach.
- The current wording of Policy LP. 89 rightfully emphasises the importance of the local landscape and the setting of Hartpury House. The maintenance and enhancement of the landscape have and will continue to be key components of how we manage the estate.
- There is a need to formulate a strategic transport plan, which will facilitate and promote active travel and more sustainable public transport options to the campus.
- Policy LP. 89 should include a statement outlining that the Masterplan will serve a key role in identifying those areas of the estate that are considered suitable for development and those areas that are considered unsuitable for development but can instead be subject to landscape and

biodiversity enhancements. The current wording refers to the Masterplan identifying "general areas that are not considered suitable for buildings", but it does not reference there being a need to identify areas that are suitable for buildings.

- There is an opportunity to strengthen this policy, so that it reflects our vision and objectives to continue the development of the campus with state-of-the-art facilities and complementary development. The policy should include reference to a broader range of land uses which could provide opportunities to improve environmental sustainability and landscape quality. The inclusion of renewable energy and storage technologies within the policy would be aligned with other related policies in the Draft Local Plan, whilst also providing site-specific support for our objectives to improve sustainability.
- The inclusion of other uses, notably hotel and conference facilities with ancillary residential accommodation, would be complementary to the primary educational and sporting functions. The future development of such uses could strengthen the commercial position of the university and college, thereby ensuring longer-term viability.
- The combination of the Local Plan policy and the Masterplan provides an opportunity for a collaborative and plan-led approach to guide the future development of the campus and the wider estate.

Observations:

- Development should follow the design themes already set to keep a unified feel on the site and to reflect the character of Hartpur House.
- The policy, and proposed landscape plan, should refer to the need to respect and safeguard the setting of the Grade I Listed Church of St Mary, and associated Listed structures, including the Scheduled Hartpur Court and the Grade II* Listed Tithe Barn. (Historic England)
- Hartpur- There are two LWS's to the south, Carter's Grove and Hartpur Meadows, and Deans Coppice to the East. There are also some core areas of NRN (mainly woodland). (GWT)
- Expand text to reference that Hartpur University & Hartpur College main campus includes the farm, agri-tech centre, business start-up units. This organisation is FoD's largest employer with 650 members of staff in 2024 - can we make this clearer here? The site also houses 11 complementary businesses/employment uses. As FoD's only University, FoDDC's Levelling Up programme is supporting investment in a new building to support careers, enterprise and innovation on site alongside EV car parking.
- Para 12.10 - can the definition be expanded to include: equine and business?

Object:

- This site contains ancient woodland and significant trees. These are Catsbury Wood, Plantation Ancient Woodland Site, 3.2HA at SO78992449, Rudgeley Wood, Ancient Semi Natural Woodland, 7.3HA at SO78992377, Darley Wood Ancient Semi Natural Woodland, 2.1HA at SO 79542302 and veteran trees described below, on the Ancient Woodland Inventory. Therefore, this allocation is in conflict with your policy LP 9 Habitat and Species Protection (page 32), of this plan, which makes the following statement on irreplaceable habitats - 'Planning permission will be refused for development resulting in the loss, deterioration or fragmentation of irreplaceable habitats, including ancient woodland, ancient hedgerows and veteran trees, unless there are wholly exceptional reasons and a suitable compensation strategy will be delivered. For example, a wholly

exceptional circumstance could include national infrastructure projects (that "trump" everything) or (in Planning terms) "the benefits outweigh the harm."

The veteran trees are:

All Pedunculate Oaks

Tree ID: 186674

Tree ID: 185729

Tree ID: 138696

- Natural England standing advice on Ancient Woodland, which should be used in conjunction with the NPPF, states that when making decisions, you should refuse planning permission if development will result in the loss or deterioration of ancient woodland, ancient tree and veteran trees. Furthermore, the standing advice states that 'Where a proposal involves the loss or deterioration of ancient woodland or ancient or veteran trees you should not take account of the existing condition of the ancient woodland or ancient or veteran tree when you assess the merits of the development proposal. Its existing condition is not a reason to give permission for development. A woodland or tree in poor condition can be improved with good management.'

www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions

- The 40 new houses along with the expansion of Hartpury University will mean that that the traffic on the A417 will get very busy. This is a very dangerous road. Maisemore tends to get flooded more frequently with climate change.

Draft Officer Response

All suggestions for amendments to policy wording, supporting text and definitions will be taken into consideration and revised where appropriate, including reference to buildings of historic importance.

The policy demonstrates a commitment to the future development of the college/ University whilst requiring an overall landscape strategy to be delivered. The site will be able to evolve and develop further mainstream and ancillary activities alongside landscape enhancements as appropriate. FODDC welcome the intentions of Hartpury College and University to produce a Strategic Development and Landscape Masterplan to help shape the future development of the site, the enhancement of the existing landscape and heritage assets and working with them to establish the potential of the site.

GWTs comments are noted re the LWS's and NRN and also the objection from NE on ancient woodland and significant trees

Much of the activity on the site requires a rural location, travel to and from the site can potentially be less sustainable and new applications will therefore be required to demonstrate how this will be addressed and where necessary mitigated. Any additional load on infrastructure (e.g. drainage and highways for example) would also need to be appropriately mitigated. The strategy will be expected to bring with it ecological enhancements and be compatible with protecting and enhancing the setting of Hartpury House and the local landscape.

Any updates to the masterplan will be published on the Council website.

Huntley: Settlement Summary

Number of Representations: 3

Observations: 2

Object: 1

Observations:

- 6.04 hectares site is promoted off The Fairways, Huntley for residential development on the fringes of Huntley.
- The site comprises of an agricultural field and largely enclosed by trees and hedgerows.
- Huntley has a number of local facilities and services within easy walking distance of the site including Huntley c of E school, convenience stores, petrol stations, public house, village hall and a church and bus services.
- The site is well related to the existing built form of Huntley and would provide a natural extension to the settlement.
- A suitable and sustainable location for housing
- The site would be deliverable in the short term
- Huntley NDP should be the deciding factor where new homes should be built.
- The views to the south of the A40 as you approach the village from Gloucester should be protected, and the settlement boundary enforced.
- If new homes are required outside of the settlement boundary they should be built on the North side of the A40.
- There are bats which forage on the land and hedgerows to the south side of the A40 and they should be protected from light pollution and noise, which would be caused by additional housing on this area.

Object:

- Huntley (SHLAA REF 22003) object to the settlement boundary position at Huntley. Considered to be in the incorrect place.
- Settlement boundary should include all of the residential development along the Huntley Road which also forms part of the village.
- The existing settlement boundary is drawn too tightly, to maximise development opportunities, the boundary should encapsulate most residential development forming the entire village.

Draft Officer Response

The settlement hierarchy identifies Huntley as a large village. Policy LP4 identifies that large villages could support only small scale development of housing in small groups typically less than 10 dwellings. Huntley has with some services including a school and is located on a transport route.

Two sites are separately proposed one on the former Huntley Golf Course to the east of the village and adjacent the settlement boundary. The other to the west at Broom Hill. For both sites the scale of development is not in accord with the consultation Draft LP strategy which focuses development at the 3 main strategic housing locations and some major villages.

The Plan represents the FoDDC's considerations at the time of preparation early 2024, the plan will be reviewed in the light of NPPF 2024 and consultation responses.

The settlement boundaries for all settlements including Huntley have been comprehensively reviewed and many have been amended. A settlement boundary is a line that is drawn on a plan around a village or town and used as a policy tool reflecting the area where a set of plan policies are to be applied. The settlement boundary does not necessarily have to cover the full extent of the village nor be limited to its built form. The settlement boundaries as a whole are drafted in order to balance the need for development with that of conservation and new allocated sites are included such as at Poplars Grove. The settlement boundaries are intended to define settlement to allow for the appropriate level of change.

Kempley Green: Settlement Summary

No comments received.

Littledean: Settlement Summary

Number of Representations: 8

Object: 6

Observation: 1

Support: 1

Object:

- Disappointed that land to the north of Oak Way (as part of the previously promoted parcels) is not proposed for allocation. Would like to bring its alternative development potential as a stand alone low density scheme for around 20 bungalows.
- The draft plan only allocates 53 dwellings within Littledean. Given the sustainability credentials of the village, suggest that this number could be much higher.
- It is difficult to see how small sites would come forward bearing in mind the tightly drawn settlement boundary and 'open' spaces within the village are allocated for other purposes.
- There is a piece of green land between Silver Street and Sutton Road given its location, this could only ever be accessed via the proposed Sutton Road allocation if built.
- The obvious way to increase delivery would be to enable additional dwellings by extending the settlement boundaries or allocations to increase development potential.
- Littledean is defined as a large village. Policy LP.4 recognises the role of such settlements as forming a secondary tier for the focus of development is welcomed.
- To facilitate the delivery of additional housing and accommodate BNG at Land off Beech Way it will be necessary to amend the settlement boundary.
- Development of land off Beech Way has already been refused for many reasons, none of which has changed.
- Why is this small parcel of land off Beech Road still proposed. It has been refused previously and nothing has changed since.
- Littledean is a small hugely historical village with narrow roads and a sizeable conservation area, used as a busy through route.
- Poorly equipped for further development.

- There are no facilities such as car parking, doctors, dentists.
- Public transport is scant
- Any housing in Sutton Road will discharge onto a narrow country lane.
- Further development will compound hardships residents already face as it is a major through route to Cinderford.
- Littledean has become a dormitory of Cinderford.
- In danger of losing its unique historical identity.
- Preservation of the village is the key to its success.
- Proposed Allocation on land at Nailsmiths Court: include within the settlement boundary to assist meeting the significantly increased housing requirement.
- The vehicular access to Nailsmiths Court would represent a proportionate rounding off of the settlement, site has a strong residential context.
- Establishment of the principle of residential development of land adjacent to Nailsmiths Court.
- Littledean has 2 hotels, takeaway, brewery, stores, community centre, pottery, Church, post office, garage and is in close proximity to services and facilities in Cinderford.
- Roads are too narrow to permit two lanes of traffic.
- Littledean in the hierarchy of LP.4 could be upgraded to a Major village.
- If Policy LP.9I can be delivered with sufficient landscape mitigation, see no reason why Land north of Oak Way cannot achieve the same.
- The two allocations together would be more proportionate in terms of growth of the village versus the 145 dwellings previously proposed.
- Proposed site Land North of Oak way, accessed from Elton Road. Suggest proposed wording for a new Policy LP.XX Land north of Oak Way, Littledean
 'Land (around 0.75ha) north of Oak Way, Littledean is allocated for around 20 new dwellings and landscaping/open space. The dwellings shall be bungalows or single storey dwellings unless otherwise agreed with the LPA.
 The proposals shall demonstrate how they have taken account of:- The site's prominent position on the northern edge of the village and the need to respond to this through appropriate landscaping and design measures;- Continued enjoyment of the Public Right of Way;- The need to protect the setting of the Grade II listed building of Littledean Jail;- The amenity afforded to existing residents on Oak Way.'
- Provide environmental protection throughout - support biodiversity and nature recovery and provide new Green Infrastructure;
- The plan for Littledean involves building 36 new houses over a field that historically had 4 ponds, some with frogs & newts, rich meadow flora, old willows etc.
- Building here will create even more pressure on the Sutton Road, Littledean junction.
- Littledean is already often jammed up with traffic this development will make it worse.
- Littledean has become part of the commuter belt for people who work in Gloucester but want to be near quality countryside.
- Living in the Sutton Road development will lead to people choosing to on occasions to divert through Soudley to reach the A48 when Littledean is jammed up.
- Littledean is a very old settlement dating back thousands of years should be allowed to preserve its integrity rather than getting slowly subsumed by creeping development into a Cinderford-Elton township.

- Much better to use the Sutton Road site as a biodiversity enhancement area, address the increased concern in respect of climate change and carbon reduction;
- Provide environmental protection throughout - support biodiversity and nature recovery and provide new Green Infrastructure;
- Protect rural areas and landscapes;
- The Plan also seeks to deliver greater environmental protection, including promotion of additional Green Infrastructure, thus supporting biodiversity and nature recovery.
- Much biodiversity has been lost in Littledean largely due to EU funded agricultural policy.
- There used to be primroses and cowslips in many of the fields for example, lots of ponds and streams fed from the spring line that runs round the village but these are mostly culverted now while many ponds have been filled in.
- The development emphasis should be on returning biodiversity to Littledean, promoting its extraordinary history, and keeping it small and separate from Cinderford.
- Contrary to encouraging sustainable development concentrating the development at existing centres and taking advantage of existing services and infrastructure;
- Contrary to improving connectivity & active travel opportunities, supporting the towns and villages taking advantage of the existing networks and reinforcing sustainable transport and travel opportunities (walking, cycling and public transport);
- It will make it much more dangerous for walkers and cyclists on the Sutton Road.
- Contrary to reducing its carbon emissions.
- Since traffic jams in Littledean will get even worse. Has anyone measured idling times of vehicles in Littledean at peak hours or when the Huntley Road is closed?

Observation:

- There is a core area of woodland ecological network to the south east. Habitat that is functionally linked to Greater horseshoe bat roost in Littledean also needs to be protected.
- Land to the north is outside the core NRN but within high and medium priority areas for open habitat creation.
- Land to the east appears to have lower wildlife value based on current data.
- Sustainable extensions with high quality GI and BNG could enhance NRN, an ecological appraisal is necessary. (Glos Wildlife Trust).

Support:

- Support for consolidation/expansion of tourism accommodation and attractions to build upon existing hotels & uses.
- Support scope for regeneration within CA to conserve/protect/enhance Heritage Assets.

Littledean and Policy LP.4 Settlement Hierarchy

Support: I

Observation: I

- Littledean is a settlement with a limited number of facilities
- Littledean is very near to Cinderford, one of the largest and most sustainable settlements.
- Focuses on the A41251 which provides direct vehicular connection to Cinderford.

- There is a continuous pavement, and bus stops along the A4151.
- Littledean is a truly sustainable settlement which can accommodate residential development at a scale.
- Consider the village is a candidate to be a Major Village due to its sustainability and accessibility.

Draft Officer Response

Littledean is identified in the Settlement Hierarchy and Policy LP4 as a large village with some services where housing in small groups typically less than 10 dwellings and within the settlement boundary would be appropriate. It is well located in relation to Cinderford and the services the town provides. The settlement hierarchy is based on the function of and size of the settlements and its suitability as a location for growth the hierarchy is reflected in the allocations.

Two allocations are included within the Draft Consultation Local Plan and this representation requests an enlargement of the Beech Way allocation. The Beech Way allocation has an extant planning permission, and the allocation allows for the delivery of 17 dwellings in line with the permission.

The 2 proposed allocations allow for the appropriate level of change for Littledean. The Plan represents the FoDDC's considerations at the time of preparation early 2024, the plan will be reviewed in the light of NPPF 2024 and consultation responses.

The policy will need to be clear on the expectations of the site. This includes the requirements of the development itself on site and access to it as well as design, landscape and ecology. Any development would have to consider other plan policies such as design.

Applications will require a full Ecological Impact Assessment which must assess impacts to the Wye Valley and Forest of Dean Bat SAC. Any applications which cannot rule out adverse impacts to the SAC and mitigate accordingly will be refused. Applications which support GI and corridors to NRNs will be supported and there are opportunities through BNG to enhance biodiversity within the settlement.

Policy LP.90 Sutton Road, Littledean

Number of Representations: 7

Observations: 3

Object: 4

Observations:

- There is a core area of woodland ecological network to the south east. Habitat that is functionally linked to Greater horseshoe bat roost in Littledean also needs to be protected.
- Land to the north is outside the core NRN but within high and medium priority areas for open habitat creation.
- Land to the east appears to have lower wildlife value based on current data.
- Sustainable extensions with high quality GI and BNG could enhance NRN, an ecological appraisal is necessary. (GWT)
- Littledean is a settlement with a limited number of facilities, very near to Cinderford.

- Littledean focuses on the A4151 which provides direct vehicular connection to Cinderford and its extensive facilities, a continuous pavement along the road which allows for safe pedestrian movement between the two settlements and bus stops along the A4151.
- We consider the village is a candidate to be a major village due to its sustainability and accessibility.
- We support this allocation.
- Accept the density of development appropriate.
- Accept the need to demonstrate an acceptable impact on the bat SAC.
- Question the specificity and deliverability of a pedestrian link through the open space to the north, due to land ownership queries. An alternative to the policy suggestion, is to provide a pedestrian link to Dean Crescent in the east via the existing public right of way.

Object:

- Nibbling away the valley that runs down to Soudley will be eroded by development.
- Gradually the rural nature is lost.
- Rethink this incursion into our greenfield land.
- The current permitted boundaries should remain as they are.
- Roads an infrastructure not considered.
- Will increase traffic jams in Littledean and potentially increase traffic along Sutton to Soudley Road.
- A total of 31 houses translates to 60-90 extra vehicles.
- The council should compulsory purchase this field for biodiversity enhancement.
- This will adversely impact the view and thus likely impact of the sale/value of existing houses, for that be threatened is unfair and dismissive.
- The village struggles with traffic, large vehicles /volume/speed
- Extra houses will impede and is in contraction with any green road safety priorities.
- The junction between Sutton Road and Broad Street is extremely dangerous due to cars parked legally/illegally, any extra dwellings would increase that risk significantly.
- The local primary school and GP surgery/dentist are already oversubscribed.
- New plan does away with protecting the vulnerable and visible surrounding countryside.
- Site has limited access via a single track lane with no designated safe footpath.
- Will lead to further development along Sutton Road.
- Creeping development
- Protect the nature of the environment.
- Retain existing settlement boundaries in Littledean
- Question the need for costly full price properties in the village, when there is more need for local people for social/affordable homes.
- Question foundation statements in Appendix I sustainability appraisal of site.I.
- Will potential students have to travel to other schools, adding to traffic.
- Can walking and cycling connections with the surrounding area be achieved?
- To my knowledge there is no public pavement and unless the lane were to be widened there is no space to make one.
- Prominent site on hillside on the entrance to Littledean. Access will mean loss of hedgerow.
- Will need a very characterful rural style development and high-quality landscaping.

- The wording of the policy for the housing allocation for 36 dwellings appears to prioritise the need to protect bio diversity. Does not fundamentally address design and landscape impacts.
- Littledean is an historic linear village settlement with a strong sense of character (hence the conservation Area appraisal)
- Design of development should learn from Littledean's historic character and relate to it.
- Should be mentioned in the text to command a better quality design.
- Littledean's unique landscape sits within the base of a valley the site will be visible from multiple public vantage points.
- Site plan designs should make every effort to understand levels and house building should reflect that.
- Amend this section for reference to good quality design. Mention character and landscape impacts.

Draft Officer Response

Littledean is identified in the Settlement Hierarchy and Policy LP4 as a large village with some services, where housing in small groups typically less than 10 dwellings and within the settlement boundary would be appropriate. It is well located in relation to Cinderford and the services the town provides. The settlement hierarchy is based on the function and size of the settlements and it's suitability as a location for growth, the hierarchy is reflected in the allocations.

Two allocations are included within the Draft Consultation Local Plan and one representation requests an enlargement of the Beech Way allocation. The Beech Way allocation has an extant planning permission, and the allocation allows for the delivery of 17 dwellings in line with the permission. It is agreed that at present it is a greenfield site, but the need for additional land is such that some new greenfield allocations are needed.

Together the 2 proposed allocations allow for an appropriate level of change for Littledean. The Plan represents the FoDDC's considerations at the time of preparation early 2024, the plan will be reviewed in the light of NPPF 2024 and consultation responses.

The policy will need to be clear on the expectations of the site. This includes the requirements of the development itself on site and access to it as well as design, landscape and ecology. Any development would have to consider other plan policies such as design.

Policy LP.91 Beech Way, Littledean

Number of Representations: 3

Support: 1

Observation: 1

Object: 1

Support:

- Suggested amendments in order for the allocation to be deliverable.
- Proposed policy amendment ... "About 1 ha adjoining Three Trees Way/Oak Way is allocated for up to 24 dwellings, in accordance with the following requirements :- Vehicular access from Three Trees Way;- provision of on site open space;- Protection of existing trees at entrance;- suitable

protection and enhancement of boundary hedges and approval of bat mitigation strategy; Approval of a suitable BNG strategy; Affordable housing in accordance with local policies.”

- Suggested change will increase housing supply by 7 dwellings
- Providing opportunities to enhance hedgerow boundaries, positive impacts for ecology and landscape impacts. Providing BNG.
- Maintaining the built development.
- Will meet the LP tests as a site.
- The allocation would only be capable of complying with Policy LP.12 requiring 20 percent BNG if the boundaries were enlarged

Observation:

- There is a core area of woodland ecological network to the south east. Habitat that is functionally linked to Greater horseshoe bat roost in Littledean also needs to be protected.
- Land to the north is outside the core NRN but within high and medium priority areas for open habitat creation.
- Land to the east appears to have lower wildlife value based on current data.
- Sustainable extensions with high quality GI and BNG could enhance NRN, an ecological appraisal is necessary. (Glos Wildlife Trust).

Object:

- Much of Littledean is populated by retirees, by 2041 very many of the population will be no longer with us, local houses will become available.
- Adding houses to Littledean is purely for reaching Government quotas, pandering to the local building industry and supporting the area as part of Gloucester commuting belt.
- Less significant than Sutton Rd site, development here still increases traffic along the A4151.
- If the council is concerned about the environment the Council should apply a 30 mph speed limit from Elton to Cinderford and a 20 mph limit through Littledean.

Draft Officer Response

Littledean is identified in the Settlement Hierarchy and Policy LP4 as a large village with some services, where housing in small groups typically less than 10 dwellings and within the settlement boundary would be appropriate. It is well located in relation to Cinderford and the services the town provides. The settlement hierarchy is based on the function and size of the settlements and its suitability as a location for growth, the hierarchy is reflected in the allocations.

Two allocations are included within the Draft Consultation Local Plan and one representation requests an enlargement of the Beech Way allocation. The Beech Way allocation has an extant planning permission, and the allocation allows for the delivery of 17 dwellings in line with the permission.

Together the 2 proposed allocations allow for the appropriate level of change for Littledean. The Plan represents the FoDDC's considerations at the time of preparation early 2024, the plan will be reviewed in the light of NPPF 2024 and consultation responses.

The policy will need to be very clear on the expectations of the site. This includes the requirements of the development itself on site and access to it as well as landscape and ecology.

Longhope: Settlement Summary

Number of Representations: 5

Support: 1

Observations: 3

Object: 1

Support:

- Support consolidation/expansion of employment generating uses.

Observations:

- Support the inclusion of Longhope as a large village in Policy LP4.
- Given the sustainability of the location and the number of facilities available, it is suggested that the settlement might be upgraded to a 'Major village'.
- Settlement boundary is the same as the current Local Plan, there is no increased potential for housing development at the settlement. If Longhope fulfils its role as a large village, an increased settlement boundary will be required.
- Requirement to accommodate development is significantly increased in the context of the emerging NPPF.
- Proposed site for allocation to east of Church road Unreasonable to exclude land at Church Road from the settlement boundary.
- The site has potential to deliver a small development which would have an acceptable impact on the heritage assets, conservation area and Grade II listed Church.
- A draft plan is provided showing how 5 units could be accommodated on the site.
- The site has recently been submitted to the call for sites
- Remains scope within the site boundary for a sustainable development to be forthcoming as per the findings of the SHLAA.
- Suggest site be allocated for the delivery of up to 15 dwellings should the plan include the recently permitted site on Church Rd for social housing.

Object:

- Draft plan needs additional work
- Current housing targets under Policy LP.29 are 80 percent lower than proposed changes to the standard method.
- Proposed Land to the west side of Church Road, Longhope is suitable for housing for up to 44 dwellings.
- Longhope is a sustainable village having regard to the range of services and facilities, including frequent bus services and position to local road network.
- Supported by the Travel Plan (Appendix I of this representation)
- Request that Policy LP.4, LP28, LP.29 are amended to include this site within the settlement boundary and larger villages are able to develop more than 10 houses.

Draft Officer Response

The settlement boundaries for all settlements including Longhope have been comprehensively reviewed and many have been amended. A settlement boundary is a line that is drawn on a plan around a village or town and is used as a policy tool reflecting the area where a set of plan policies are to be applied. It is considered that the Longhope Settlement boundary reflects its function as a large village.

The representations suggest two additional sites at Longhope one to the west of Church Road for up to 44 dwellings the other for approximately 5 – 15 dwellings to the east of Church Road, both adjacent the settlement boundary. For both sites the scale of development is not in accord with the consultation Draft LP strategy which focuses development at the 3 main strategic housing locations and some major villages. Longhope is identified as large village in the settlement hierarchy and policy LP4 where housing in small groups typically less than 10 dwellings and within the settlement boundary would be appropriate.

It is acknowledged recent changes to the NPPF command a significant uplift in the housing requirement for the district to 600 new dwellings per annum. This will be taken into account, and a review of the strategy may be required. Subsequent changes to the agreed strategy will be subject to consultation.

Lydbrook, Joys Green and Worrall Hill: Settlement Summary and supporting text

Number of Representations: 2

Object: 1

Observations: 1

Object:

- Support the overall allocation of Lydbrook LP92, object to the Important Open Area designation, which appears to overlay and adjoin the site. We ask the council removes as no justification for this designation.

Observations:

- The potential development at Lydbrook needs consideration within this legislative framework due to its proximity to a National Landscape, and with already constructed housing estates clearly visible above Stowfield and Joys Green, there is already a clear negative impact on the landscape. (West Dean PC).

Draft Officer Response

Support for allocation noted. Comments from The Environment Agency have been noted although the site benefits from a recent (January 2024) reserved matters permission PI 165/17/APP for 26 dwellings.

The IOA will be reviewed in light of the planning consent.

Concerns regarding landscape impacts on Lydbrook are noted. The Sustainability Appraisal assesses all sites and landscape is a factor that is taken into account. The Local Plan seeks to allocated land for development where it is considered that impacts will be minimal, or can be sufficiently mitigated.

Policy LP.92 Former Wye Garage, Lydbrook

Number of Representations: 2

Object: 1

Support: 1

Object:

- Much of the site is in Flood zones 3a and is underlain by a culverted watercourse. Scale of development proposed is deemed excessive and will make it difficult to deliver due to significant constraints on the site. EA recommends the allocation is reviewed and either withdrawn or expected allocation of houses is reduced in number. Previous site designs have failed to deliver an acceptable scheme that satisfied flood risk constraints upon the site.

Support:

- Support roll over allocation of Lydbrook.

Draft Officer Response

Support for allocation noted. Comments from The Environment Agency have been noted although the site benefits from a recent (January 2024) reserved matters permission PI 165/17/APP for 26 dwellings.

The IOA will be reviewed and aligned with the planning consent.

Mitcheldean: Settlement Summary and Supporting text

Number of Representations: 4

Support: 1

Observations: 2

Object: 1

Settlement Summary Support:

Support Active Travel proposals to improve walking/wheeling& cycling opportunities to connect the village/Vantage Point/Dene Magna School. (Mitcheldean PC).

Observation:

- With the proposed developments in Mitcheldean there are some issues which deserve consideration. Traffic on the B4224 between Mitcheldean and the Lea needs speed limits especially if there it is set to increase.
- Secondly people in Mitcheldean are trying hard to improve the community spirit with events involving local residents and these efforts are being undermined by the state of the old George pub site, which has remained untouched for years and is now spoiling the centre of the village. Surely something can be done to make the owners either develop it, sell it or clean it up.
- Other concerns are infrastructure including available capacity for school's, doctors both of which are already oversubscribed.
- Traffic on B4224 between Mitcheldean and the Lea needs speed limits.

- The state of the old George pub site, which has remained untouched for years is now spoiling the centre of the village. Surely something can be done to make the owners either develop it, sell it or clean it up.
- Community spirit being undermined by the state of the Old George Pub site.
- Infrastructure including available capacity for schools doctors both of which are already oversubscribed.

Object:

- The Council is opposed to the plan's proposals for Mitcheldean.
- The proposal does not take into account the Mitcheldean Neighbourhood development plan as it includes a new site which has ready been subject to a failed planning application.
- It also contradicts some of the policy suggestions on the general planning proposals.

Draft Officer Response

Active travel support noted

Speed limits are not a matter that can be dealt with through the Local Plan.

The Local Plan continues to supports the redevelopment of the former George Public House through a policy allocation. The building is situated in a sensitive location within the conservation area and would benefit from sympathetic development. The land is allocated in the Local Plan for approximately 10 dwellings.

Policy LP.93 Land off Carisbrook Road, Mitcheldean

Number of Representations: 19

Object: 17

Support: 1

Observation: 1

Object:

- Infrastructure will not cope with the increase in traffic.
- Utilities will not infrastructure will not be able to cope with development.
- The site is a special landscape area.
- Does not comply with Mitcheldean NDP which states no development on this site.
- General strain it would put on services in the village – school and health provision.
- School is oversubscribed
- Additional population in the village not right for Mitcheldean.
- The demand doesn't seem to be there.
- At peak times the roads are dangerously busy
- Road infrastructure is not good enough to support additional occupation
- Site is outside the village envelope
- Is grade 1 agricultural land and should be retained for food production.
- Totally inappropriate site for such a scheme.

- Planning application P1994/18/OUT for 125 houses was refused loss of agricultural land and the issue of bats the reasons are still valid concerns.
- The NPPF seems to discard concerns about food production in favour of house building.
- The site appraisal mentions the existence of pavement access to the village centre.
- The local population would be more likely to drive, increased parking and pollution.
- Problems with flooding at the junction of the connecting roads.
- Other priority sites to be developed first Cottrells bus Depot, The George, and several empty buildings in the village could be developed for housing.
- Please consider removing this area off the local plan for Mitcheldean.
- A nice simple village, a nice neighbourhood where current people know each other with low crime rates.
- More vehicles will lead to more accidents endangering peoples lives.
- Worry about anti social people in a rapidly expanding area.
- Would be a scar on the pleasant, open, rural landscape.
- Other brownfield areas in the village which would benefit from development.
- Areas of significant ecological importance, protected species of bats commuting and foraging zone between roosts at Wigpool Common and Bilbutt Farm, Bradley Court.
- Wildlife using the hedgerow and brook containing newts run alongside Carisbrook Road.
- Carisbrook Road regularly floods which would get worse once the field is concreted.
- A monstrosity of a housing estate would be an ecological disaster.
- Wholly disproportionate relative to the size of Mitcheldean.
- Employment opportunities in the Forest do not support the need, huge amount of commuter traffic.
- Local opposition is significant.
- Purpose of the council, is to represent its constituents not enable national politics.
- Example of overdevelopment of Newent should serve as a warning.
- Poor planning and lack of investment in infrastructure.
- What about the sewage systems?
- Lesser quality of life.
- Killing local farming heritage. Should protect farming communities.
- Concerns over the future of protected heritage and conservation area.
- When we moved here 22 years ago the village was very much a village, we have seen the expansion of hundreds of new homes already.
- Help improve the towns aesthetic by demolishing and repurposing currently derelict buildings.
- There are a lot of places in Mitcheldean that are still not being developed over the past few years that have been on the local plan and these should be the priority first.
- Suggest field behind Cottrells Yard.
- There is no demand for additional homes.
- Will alter character of village.

Support:

- Fully support as a draft housing allocation for approximately 180 dwellings.
- Site remains suitable available and deliverable.

- Mitcheldean is a sustainable settlement with a range of services and facilities within walking distance of the site.
- Employment opportunities at Vantage Business Village
- Primary and secondary schools located to the south.
- Shops and services within the village centre.
- Outline permission has been refused, it is considered all matters can be addressed.
- Would help to increase the supply and choice of housing in Mitcheldean
- Can deliver a wide range of market and affordable homes.
- The site falls within the Environment Agency's flood risk zone 1.
- The site can provide necessary infrastructure, green infrastructure and informal and formal recreation space.

Observation:

- Very prominent site that will need a very high-quality scheme with good quality landscaping.

Draft Officer Response

The LP has arrived at a strategy which makes major strategic allocations for mixed development at sustainable locations where there are opportunities around the towns and major villages.

There are a number of sites identified for development at a large settlement, as well as a few smaller proportionate allocations, their distribution is an important part of the strategy to meet the housing requirements of the Local Plan and in order to provide a range and an adequate supply of land for housing.

The settlement hierarchy identifies Mitcheldean as a major village and there are 3 proposed allocations for about 200 dwellings in total. Policy LP 4 identifies that major villages could support a range of uses and scales in accord with other policies and proposals in the plan. Policy 28 allocates land, in addition to the major strategic sites at Lydney, Beachley, Newent and Coleford, at 'Other housing sites' including Mitcheldean for housing.

Mitcheldean benefits from the availability of extensive services and employment land, therefore there is the scope for some change in recognition of the nature of the settlement the services available and the employment on offer.

The facilities are considered appropriate for the level of development planned and where there are increased demands for education and GPs etc, it is expected that there will be developer contributions equivalent to any shortfall arising from the development.

It is agreed that at present it is in agricultural use, but the need for additional land is such that some new greenfield allocations are needed.

Policy LP.94 St Michaels Close and High Street, Mitcheldean

No comments received.

Policy LP.95 Land at Vantage Point, Mitcheldean

Number of Representations: 3

Object: 1

Observations: 1

Support: 1

Object:

- Significant veteran trees on the boundary of the site allocation, likely to conflict with Policy LP.9 ... 'Planning permission will be refused for development resulting in the loss, deterioration or fragmentation of irreplaceable habitats, including ancient woodland, ... unless there are wholly exceptional reasons and a suitable compensation strategy will be delivered.
- Attention drawn to the Natural England standing advice on Ancient Woodland, which should be used in conjunction with the NPPF..... refuse planning permission if development will result in the loss or deterioration of ancient woodland, ancient tree and veteran trees.
- Its existing condition is not a reason to give permission for development. A woodland or tree in poor condition can be improved with good management. (Wildlife Trust).

Observation:

- Support opportunities to increase employment density at Vantage Point 27-29 Hectares.
- Need to emphasise significance of this site as one of FOD largest employment site which accommodates 100 businesses.

Support:

- Strongly supports the continued protection of Land at Vantage Point, Mitcheldean for employment uses.

Draft Officer Response

Support for this policy is noted, reference will be made to the wider significance of Vantage point employment site. Any development must meet the requirements of all policies in the Local Plan. The policy can be amended to regarding the protection of ancient woodland present on the allocation. Ask ecology Is this necessary or duplicating NPPF guidance.

The policy will be reviewed to incorporate buffer zones from the veteran trees in accordance with Natural England's Standing advice. A full impact assessment of any anticipated impacts veteran trees will be required and any applications which may cause the loss or deterioration of ancient woodland or veteran trees will be refused unless wholly exceptional circumstances apply. A Habitats Regulations Assessment on adverse impacts to the Wye Valley and Forest of Dean Bat SAC will also be undertaken and applications will be required to demonstrate that there will be no adverse impacts on the SAC.

Newland: Settlement Summary

No comments received.

Newnham on Severn: Settlement Summary

Number of Representations: 2

Observations: 2

Observations:

- Land north of Newnham-on-Severn is proposed for allocation in the Draft Plan, albeit the allocation area does not extend to full extent of the site promoted for allocation. These submissions support the site as available, suitable and deliverable for housing development and seek a modified allocation.
- Support a strategy which recognises a role for all settlements to accommodate appropriate levels of growth
- Newnham is a large village with a range of services on a major transport route and is thus a sustainable location for proportionate levels of growth, commensurate its status as a Tier I settlement.
- Land to the south is much more constrained in terms of topography, and from a heritage perspective, providing an established rural setting to the Newnham conservation area and the listed buildings therein.
- Expansion to the west would extend beyond the railway line which acts as the logical development boundary for the settlement.
- Additional land immediately adjacent to the emerging allocation is also available, suitable and deliverable for residential development.

Gloucestershire Wildlife Trust:

Newnham - The designated biodiversity features of the Severn Estuary must not be detrimentally affected by any development in this location. The land surrounding the settlement to the north, west and south appears to have lower wildlife value based on current data, although the some of the fields provide foraging habitat for Greater horseshoe bats linked to the Bat SAC. It will be important to retain sufficient foraging habitat and mitigation corridors and an HRA will be required to assess the potential impact. Sustainable extensions with high quality GI and BNG could enhance the NRN, but an ecological appraisal is still necessary.

Draft Officer Response

All points of support are noted.

It is noted that the land agent highlights there is more land available for development. However, the extent of the current allocation has been subject to a Sustainability Appraisal and is considered to be the most appropriate and sustainable amount of development for this settlement and the facilities/services it has, to also accord with the Settlement Hierarchy policy (LP.4).

It is agreed that Newnham is constrained with regards to topography and heritage. Equally, the railway line forms a defining boundary for future development.

Future planning applications in Newnham would be subject to Habitat Regulations and assessed accordingly. Equally any future application will need to provide GI and BNG where applicable as per Policies LP.11 and LP.12.

All major applications will require an Ecological Impact Assessment and most minor applications which may adversely impact the Wye Valley and Forest of Dean Bat SAC and the Severn Estuary will also require an Ecological Impact Assessment and the application must demonstrate that there would be no adverse impacts to any European Protected Site otherwise permission will not be granted.

Applications which demonstrate enhancements through GI, BNG and links to NRN will be supported.

Policy LP.96 Land to the North of Newnham

Number of Representations: 3

Observations: 2

Objection: 1

Gloucestershire Wildlife Trust :

The designated biodiversity features of the Severn Estuary must not be detrimentally affected by any development in this location. The land surrounding the settlement to the north, west and south appears to have lower wildlife value based on current data, although some of the fields provide foraging habitat for Greater horseshoe bats linked to the Bat SAC. It will be important to retain sufficient foraging habitat and mitigation corridors and an HRA will be required to assess the potential impact. Sustainable extensions with high quality GI and BNG could enhance the NRN, but an ecological appraisal is still necessary.

Environment Agency:

Whilst the site itself is deemed at minimal risk of flooding there may be potential issues in relation to access to the A48 because of the impact of climate change on future tidal flooding. Vostells brook along northern boundary.

Objection - Bats hunt moths along hedgerows but if the meadow is built on what will sustain the moths? Policy LP.96 is too vague. Horseshoe bats do not tolerate lighting at night. Relying on a lighting plan is ridiculous in regard to housing - householders can put up any lights that they want to on their own buildings.

Draft Officer Response

The planning policy and any future planning applications for this allocated site would be subject to Habitat Regulations and assessed accordingly. Additionally, any permission would seek to include high quality GI and BNG where appropriate.

Lighting can be controlled by condition on any future permission granted.

The advice from the EA is welcomed. Flood risk will be assessed during future planning applications and appropriate mitigation measures introduced in accordance with the EA and LLFA advice.

Full bat surveys will be required in accordance with our guidance. Mitigation will be informed by surveys and it is likely that significant buffer zones and mitigation parcel areas will be required. Any applications that are likely to cause adverse impacts to a European Protected Site will be refused. The buffer zones and mitigation areas must include dark areas. {Ask Caroline re. NRN, GI, BNG and lighting}.

A full Ecological Impact Assessment will be required and full surveys on any protected species that are likely to be present will be required. Applications with high quality GI and BNG which provide links to the NRNs will be supported and permissions would seek to include high quality GI and BNG. A full lighting assessment may be required as a condition or prior to determination.

Policy LP.97 Former Victoria Hotel, Newnham

Number of Representations: 2

Observations: 2

Gloucestershire Wildlife Trust:

The designated biodiversity features of the Severn Estuary must not be detrimentally affected by any development in this location. The land surrounding the settlement to the north, west and south appears to have lower wildlife value based on current data, although the some of the fields provide foraging habitat for Greater horseshoe bats linked to the Bat SAC. It will be important to retain sufficient foraging habitat and mitigation corridors and an HRA will be required to assess the potential impact. Sustainable extensions with high quality GI and BNG could enhance the NRN, but an ecological appraisal is still necessary.

Observations :

- Supports the proposed re-allocation of the former Victoria Hotel via Policy LP.97 for sensitive redevelopment and restoration of the building which is Grade II listed, with enabling development to the rear. To this end we support the open wording of the proposed allocation policy which identifies the site as suitable for 'housing and conversion of the listed building' without putting a ceiling on the number of dwellings that might be suitable or a floor on the % of affordable housing required.
- Previously, the site was allocated for around 20 dwellings to include 40% affordable, which was not considered to be viable given the high development cost.
- It is recognised that the site has lain empty for very many years, and that its prominent location within the village means its redevelopment would have a considerable benefit to the street scene and sense of arrival to the village.
- Highly sustainable location within the settlement, within a short walk of the range of services and facilities in the village, and immediately adjacent to bus stops which support services throughout the day to higher tier services at Gloucester.
- As a brownfield site continues to have excellent potential to contribute to the district's housing needs in a sustainable way.

Draft Officer Response

The points of support are noted.

The planning policy and any future planning applications for this allocated site would be subject to Habitat Regulations and assessed accordingly applications which do not demonstrate that there will be no adverse impact on a European Protected Site will be refused. Additionally, any permission would seek to include high quality GI and BNG where appropriate.

Policy LP98 High Street, Newnham

Number of Representations: 1

Support: 1

- Support sensitive regeneration of Conservation Area buildings to attract more commercial uses back to the High Street.

Draft Officer Response

Support noted.

Northwood Green : Settlement Summary

No comments received.

Oldcroft: Settlement Summary

No comments received.

Parkend: Settlement Summary

Number of Representations: 2

Observations: 1

Support: 1

- Support consolidation/expansion of employment generating uses to improve the number and range of facilities available to support the visitor economy.
- Build on existing tourism, cycling & heritage railway attractions to increase visitor dwell time in destination.
- Support active travel route proposals to connect Parkend to Lydney to encourage more non-car use whilst in destination.

Observations:

- Parkend - no change to settlement boundary but the expansion of the railway north and the expansion of Whitemead will impact due to increased tourism. (West Dean PC).

Draft Officer Response

Comments noted.

Redbrook: Settlement Summary

No comments received.

Redmarley: Settlement Summary

Number of Representations: 1

Support: 1

Redmarley Parish Council Support:

- RPC supports the Plan Settlement Summary statements and will apply planning consultation decisions on this basis. RPC expects the Planning Department and Committee to be aligned with this. Specifically "has some local facilities but generally limited opportunities for development although it has seen significant recent changes in the form of new housing."
- RPC is of the view that Redmarley cannot support further development without contravening the following Settlement Summary statement; "Few opportunities for future development therefore limited change is expected during the plan period. LP seeks to retain the character of the village and protect the surrounding countryside."
- The settlement plan summary containing the Plan map extract is incorrect in that the settlement boundary has been extended to be aligned with the outer, eastern, perimeter of the Rock Meadow development. RPC objects to the boundary movement.

Draft Officer Response

The settlement boundaries for all settlements including Redmarley have been comprehensively reviewed and many have been amended. A settlement boundary is a line that is drawn on a plan around a village or town mainly around the built up area. The settlement boundary is used as a policy tool reflecting the area where a set of plan policies are to be applied. The settlement boundary does not necessarily have to cover the full extent of the village nor be limited to its built form. The revised settlement boundary for Redmarley includes the area that has permission for 9 dwellings. A current application has been submitted on the same site reducing the number of dwellings to 8. We will discuss with Redmarley PC the location of the settlement boundary and settlement boundary the possibility of designating the area to the rear of Rock Meadow as a recreation area as shown on the revised planning application.

Ruardean: Settlement Summary

Number of Representations: 4

Support: 1

Object: 3

Support:

Promote Land at Warfield farm for development

- Ruardean is elevated to a Large Village at Tier 3 of the revised settlement hierarchy, reflecting its local services and good public transport connections to higher tier settlements nearby.

- No allocations are proposed in the village despite its elevation to a Large Village, and in the context of the expected increase in housing need through the revised standard method it is considered that a more ambitious approach to delivering development must be taken.
- The village is suitable in principle for proportionate growth.
- The site comprises around 7ha of land to the north and west of the village, arranged in an irregular shape. The site is in agricultural use, comprising two large fields divided by an internal hedgerow, plus the built area of the Warfield Farm farmyard, including machinery sheds and hardstanding.
- The landform of the area falls from south to north, with the furthest northern extent of the site lying lowest in the landscape. The southern extent of the site shares a long boundary with the built area of the village.
- Access is currently achieved via a farm track running north from West End, and although this would be an ideal pedestrian and cycle access point, in practice it is likely that a new vehicular access would need to be delivered to serve residential development.
- The site is not directly affected by any historic environment, landscape or ecological designations and is at no risk from fluvial or surface water flooding. It does sit within a wider area of non-designated but attractive landscape character.

Object:

- To the removal of an important open space planning reference P0397/23/FUL. Reinstate IOA at Crooked End Place.

Draft Officer Response

The site at Crooked End Place was designated as an important open area in the adopted Local Plan Review 2005 and was situated inside the Settlement boundary. This designation was removed in the adopted Allocations Plan 2018 but the settlement boundary was realigned in the 2018 allocations plan so that the site now fell outside the settlement boundary and therefore in open countryside, where different policies would apply. In 2023 permission was granted for 1 dwelling on the site, the report stated weighing in favour of the development is that whilst limited the proposal will contribute to the housing supply, there will be no adverse impacts on nearby properties, and subject to conditions no objections have been received from statutory consultees concerning highways and land contamination, and the scheme is for a self-build.

The site will therefore no longer comply with the important open area criteria. The remainder of the land adjacent will be reviewed.

A 7 hectare site at Warfield farm is promoted for housing. The settlement hierarchy identifies Ruardean as a large village. Policy LP4 identifies that large villages could support only small scale development of housing in small groups typically less than 10 dwellings. Ruardean has some services including a school. The agreed LP strategy makes strategic allocations for mixed development at sustainable locations where there are opportunities around the towns and at major villages. The proposed scale of development at Warfield Farm is not in accord with the consultation Draft LP strategy. However the Plan represents the FoDDC's considerations at the time of preparation early 2024. The plan will be reviewed in the light of NPPF 2024 and consultation responses. The reforms to the NPPF will be taken into account and subsequent changes to the agreed strategy will be subject to consultation.

Ruardean Hill: Settlement Summary

Number of representations: 1

Observation: 1

Observation:

Under Character and Features suggest altering the beginning of 4th sentence to read "Derives its built form from the original settlement."

Draft Officer Response

Comment noted, text will be amended to highlight Ruardean Hill is a forest edge settlement.

Ruardean Woodside: Settlement Summary

Number of Representations: 3

3 Reponses proposing land at Ruardean Woodside.

Land at Roebuck Meadows, Ruardean Woodside:

- Promoting the Site known as Land at Roebuck Meadows, Ruardean Woodside. The Site is located towards the north-western edge of Ruardean Woodside.
- The surrounding land is either in residential, grazing or community use (the village hall and associated car park).
- The application site lies within Flood Zone 1; land with the lowest annual probability of flooding and that preferred by policy for development.
- The site is not within a Conservation Area or locally valued landscape and lies 1.2km from the Wye Valley AONB.
- There are no heritage assets nearby and nor are there any Scheduled Monuments.
- We note that the policies map accompanying the Local Plan consultation has correctly deleted the playing field.
- Included in SHLAA
- A pre-application exercise, resulted in a negotiated high-quality, locally distinctive scheme. The Council's written advice expressed support for the design approach, treatment of the public realm, delivery of affordable housing, public open space and upgrade to the Memorial Hall car park (among other benefits). It was concluded, nonetheless, that the development is contrary to the current spatial strategy due to the scale of development proposed relative to the settlement's place in the settlement hierarchy. This is a situation that will persist under the New Local Plan.

Land to the east of Forest Road:

- The defined settlement boundary of Ruardean Woodside should be extended to allow additional infill plots for new residential homes. This helps to support the Council's housing supply, which will need to be increased due to the proposed new national standard method for determining housing need.

- The settlement boundary should be amended to include land south of the existing boundary on Forest Road. A recent refused planning application for a single house under Ref. P0171/24/PIP. was refused on ecology grounds, however the Council raised no objections to the proposed location of the development in terms of its sustainability.
- Ruardean Woodside has a good level of local services with a school, community centre and access to some regular bus services. Therefore, it can accommodate a limited amount of new housing growth, which would help support those local services.
- It is considered to be in a fairly sustainable location.

Land to the south of Forest Road, Ruardean Woodside:

- Land south of Forest Road at Ruardean Woodside is suitable and appropriate for residential development, would be capable of delivery early in the plan-period and should therefore be included within a revised settlement boundary for the settlement.
- The owners have recently constructed a self-build dwelling on a plot adjacent to the northern end of the Site.
- The application site lies within Flood Zone 1;
- The site is not within a Conservation Area or locally valued landscape and lies 1.3km from the Wye Valley AONB.
- There are no heritage assets nearby and nor are there any Scheduled Monuments.
- The New NPPF, which is presently out for consultation, communicates a new standard method for calculating housing need. The outcome of the standard method for the Forest of Dean is that 597 dwellings will be required per annum. That is an increase of 81% compared with the rate of delivery in the New Local Plan. Therefore, the New Local Plan will, in all likelihood, need to be revised to account for the increased amount of housing need, with significant emphasis on broadening the availability of housing land. As part of the likely review of the New Local Plan, we consider it necessary for the spatial strategy to be substantially revised in order that deliverable Sites at settlements such as Ruardean Woodside can come forward and make a valuable contribution to the supply of housing within the district.
- Draft Policy LP.4 identifies Ruardean Woodside as a Small Village as per the hierarchy on page 24. The Policy suggests that development at such villages is likely to comprise small scale residential development of up to 3 units.
- The Council's Housing Land Supply, recently updated, has been persistently below 4 years for a considerable period of time.
- Support the continued identification of Ruardean Woodside as a sustainable settlement although its classification as a smaller village in the settlement hierarchy by Policy LP.4 will continue to prevent the delivery of a high-quality housing scheme early in the plan period and the draft settlement boundary unreasonably excludes deliverable housing sites
- Request Settlement boundary is redrawn.

Draft Officer Response

Three sites are submitted at Ruardean Woodside for development to Land to the south of Forest Road, Land at Roebuck Meadows and land to the east of Forest Road. Ruardean Woodside has limited services including a school and a community hall.

The settlement hierarchy identifies Ruardean Woodside as a small village. Policy LP4 identifies that small villages could support only small scale development of housing in small groups typically of 1 to 3 dwellings and only within the settlement boundary.

The Draft Plan does not allocate any housing sites at Ruardean Woodside all proposed submission sites are outside the settlement boundary. The development of the 3 sites in Ruardean Woodside are not in accord with the consultation Draft LP strategy. However, the Plan represents the FoDDC's considerations at the time of preparation early 2024. The plan will be reviewed in the light of NPPF 2024 and consultation responses. The reforms to the NPPF mentioned in the submissions will be taken into account and subsequent changes to the agreed strategy will be subject to consultation.

Sling: Settlement Summary

Number of Representations: 3

Observations: 3

Observations:

- Proposed allocation - land to be considered for housing allocation purposes. The property denoted with an * on the map enjoys good access to the B4228 road in Sling and situated on the opposite side of the road to the current settlement boundary.
- The property and four others now situated within a SAC. When and why was the area around the property designated as a SAOC? Why was I not notified and given an opportunity to appeal? How can the SAOC restriction be lifted?
- Settlement largely surrounded by core NRN, remaining land falls within high priority areas to expand or connect NRN, development would have to be limited and carefully designed to enhance the NRN and protect areas of the core network. (GWT).
- Sling - also sees a change in the settlement boundary to allow for building on an historic meend which also has a Roman Road passing through, which should be protected under Heritage legislation. (See our comments above) There is also an iron mine in close proximity and with the British Pit also being nearby there is potential undermining in this area. (West Dean Parish council).

Draft Officer Response

If there are historic features which are not currently designated/protected, it would be beneficial to discuss this with the Council's senior Conservation Officer to discuss if these should be protected in some formal way. The Local Plan seeks to avoid negatively impacting on Heritage where possible. Features which are non-designated heritage assets can also be nominated through a NDP.

Habitat protection and enhancement (including Nature Recovery Network) would be considered as part of any planning application.

The sling settlement is adjacent to the old Bow and Ham Mines which is designated by Natural England for its populations of hibernating horseshoe bats which are of international importance. This is an international designation - Natural England should be contacted for any queries or concerns on the boundaries of the SAC. A Habitats Regulations Assessment will be required on all applications which may affect the SAC and any applications which cannot demonstrate that there will be no adverse

impacts to the SAC will be refused. When assessing applications opportunities to enhance and connect NRN will be sought and areas of core network will be protected.

Policy LP.99 Land at The Miners Arms, Sling

Number of Representations: 2

Object: 2

- Too many new houses for such a small and already densely populated area.
- Parking and traffic concerns.
- There is nothing in sling, the village is small with no shops.
- What percentage of houses will benefit local people.
- Will new homes be built by local builders?
- What percentage is for local people.
- We don't have the schools to take more pupils
- The FOD needs infrastructure.
- Sling is largely surrounded by areas of the core NRN. The remaining land falls within high priority areas to expand or connect the NRN. Any development in this location would have to be limited and carefully designed to enhance the NRN and protect areas of the core network.

Draft Officer Response

Sling is identified in the Settlement Hierarchy and Policy LP4 as a large village with some services, where housing in small groups typically less than 10 dwellings and within the settlement boundary would be appropriate. One sites is allocated for housing within the Draft Local Plan at Sling for about 20 dwellings in line with policy LP 28. This site was an allocation in the adopted Allocations Plan and has been brought forward to allow it's development.

A site has been proposed to the west of the B4228, detached from the settlement boundary and within a Special Area of Conservation and a Site of Special Scientific Interest both are national designations. It is considered that proposed allocation at The Miners Arms allows for the appropriate level of change for Sling. The Plan represents the FoDDC's considerations at the time of preparation early 2024, the plan will be reviewed in the light of NPPF 2024 and consultation responses.

Policy LP.100 Land at New Dunn Business Park

Number of Representations: 3

Observation: 1

Object: 1

Support: 1

Observation:

- Settlement largely surrounded by areas of core NRN. The remaining land falls within high Priority areas to expand or connect the NRN. Any development would have to be limited and carefully designed to enhance the NRN and protect areas of the core network. (GWT).

Object:

- Would be better before inviting new/existing businesses to increase employment cleaning up the area.
- There is no boundary fence around some of the perimeter allowing young children to go in.
- The site leaks smelly water onto the public footpath reported to the Council and the EA.
- The scrap yard didn't even have an EA permit, how are they permitted to continue activities?
- The sites are only permitted to work between certain hours on certain days and yet this is broken, so residents near by subject to more early hour weekend noise.

Support:

- Support consolidation/expansion of New Dunn Business Park, currently home to a mix of 27 businesses.

Draft Officer Response

Support noted. Habitat protection and enhancement (including Nature Recovery Network) would be considered as part of any planning application. The allocation is an existing employment allocation and has been brought forward from previous plans. The policy allows for the continued use of the site for employment uses.

St Briavels: Settlement Summary

No comments received.

Staunton (Coleford): Settlement Summary

Number of Representations: 2

Observations: 1

Support: 1

Observations:

- Staunton (Coleford) in table under dominant building materials change text to read “...stone and render....”

Support:

- Staunton Coleford Parish council has no objections to the Staunton plan, which limits development to ‘in-fill’ and expansion of housing sites. Supports the plan’s recognition of the Villages environmental and scenic qualities, which are protected.

Draft Officer Response

Support noted. The text will be amended accordingly.

Staunton and Corse: Settlement Summary and Locally Valued Landscapes

Number of Representations: 4

Support: 1

Object: 2

Observations: 1

Support:

- Welcome the approach regarding the appreciation of the unique character of our chartist Settlement. The need for special attention and protection of our Heritage assets is critical to minimise any impact within the communities of Staunton and Corse. (Staunton Parish Council).
- Special attention to the ‘open plot’ layout is particularly noted and appreciated by the Parish Council.
- There are few opportunities for development given the limited infrastructure and resources.
- Pleased to note that none of the sites brought forward in the SHLAA have been considered appropriate for development, would emphasise the importance of the site sustainability and the heritage assets. (Corse Parish Council).
- It is hoped that the changes to the housing allocation due to Labour changes to NPPF will not affect

Object:

- Settlement boundary represents somewhat of an anomaly compared with the conservation area boundary. On approach from the A417 the properties on either side of the road lie out of the settlement boundary but beyond any doubt are part of the existing settlement. The village school lies outside the settlement boundary which sits on the A417. No other settlement in the FOD has such an extensive amount of conservation area outside of the settlement. This should not

compromise the conservation interests. Heritage policies offer considerable protection to the conservation area

- More recognition should be made of the need to allow growth in the village.
- Staunton and Corse have a good base of facilities including a school, Dr's surgery, employment areas as well as good communications located on the A417, with public transport available.
- Settlement boundary offers no meaningful opportunity for further development which is lamentable.
- To ensure resilience further housing development is important to provide continuing support, increasing local population to support local facilities.
- Further areas could easily be incorporated in an amended settlement boundary which does present sites which can be identified.
- Acknowledged with the recent grant of planning permission at the former garden centre with 16 new properties outside of the settlement boundary on previously developed land.
- Proposed site: potential for land at The Swan which qualifies as bounded on all sides by existing properties.

Observation:

- Suggest the portion of the explanation table referring to May Hill have been incorrectly placed, should be inserted in Staunton Coleford entry.
- The paragraph on Coleford should be in Coleford entry.
- Note special concern given to the importance of Chartist Settlements.
- The landscape type is missing.

Draft Officer Response

The support for the protection of the unique layout and character of the 19th century chartist settlement is noted. There is a single settlement boundary for the joined villages of Staunton and Corse reflecting a consolidated part within a much more extensive and diffuse but settled area. The wider area contains a variety of facilities, services and employment but the dominant character results from a settlement established by the 19th century Chartist movement. The LP context and approach is one of preserving and enhancing this legacy whilst recognising that there may be some limited opportunities for change within the defined boundary. There has been considerable consolidation almost on a continual basis since the 1950s leading to the present structure and some loss of character. The conservation area designation is separate to the Local Plan.

Policy LP.20 has been included within the Staunton chapter for reference and so mentions other LVLs included in the policy.

An outline planning permission site at the Swan Staunton /Corse has recently been allowed, for the erection of up to 17 dwellings (up to 10 self-build dwellings and 7 affordable dwellings) with associated access, car parking and landscaping, and play area.

Tibberton: Settlement Summary

No comments received.

Upleadon: Settlement Summary

Number of Representations: 3

Object: 1

Observation: 2

Object:

- The Plan depicts Upleadon as having a population of 108. This is incorrect, we believe the population to be in the region of 250. (Upleadon PC)

Observations:

- This is an opportunity look at the village envelope again and the potential for affordable housing. Would appreciate a consultation with the Strategic housing Officer. (Upleadon PC)
- Extend the current development zone to include the old water reservoir on Edens Hill Road, is a brownfield site and a simple piece of empty land. All main services are either on site, or immediately next to the site.
- A possible simple design and mixture of houses and bungalows would allow tasteful infill and also provide down sizing opportunities for current residents who want to downsize to stay in Upleadon.

Draft Officer Response

Upleadon is classified as a small village and contains few local facilities and services and generally very limited opportunities for additional development. The settlement boundaries for all settlements including Upleadon have been comprehensively reviewed and many have been amended. A settlement boundary is a line that is drawn on a plan around a village or town and is used as a policy tool reflecting the area where a set of plan policies are to be applied. The proposed Old Water reservoir is detached from the main part of the village and it would not be appropriate to extend the settlement boundary to include the site.

The population data will be updated.

Strategic Housing Officer will be asked to contact Upleadon PC.

Upper Soudley: Settlement Summary

No comments received.

Viney Hill: Settlement Summary

Number of Representations: 1

Observation: 1

Observation:

- Suggest Historic background 1st sentence requires a correction to read ...” mineral extraction but there were very few dwellings in 1880”

Draft Officer Response

Text will be amended accordingly.

Westbury on Severn: Settlement Summary

Number of Representations: 2

Object: 1

Observations: 1

Object:

- Proposed NEW policy: Insertion of Land at The Firs Allocation Our proposed wording is as follows: Policy LP.XX Land at The Firs, Westbury-on-Severn Land (1.9ha) at The Firs, High Street is allocated for up to 40 new dwellings and landscaping/open space. The proposals shall take account of their prominent position on the northern edge of the village and the need to respond to this through appropriate landscaping and design measures. Any application should be supported by ecological survey work and details of ecological protection and mitigation measures which are likely to include the retention and enhancement of existing hedgerows for the purposes of bat conservation. Pegasus Group
- Site subject to pre-application advice for 41 dwellings. The site is relatively unconstrained.
- Site previously promoted through LP process included in the SHELAA 2022 and resubmitted in call in for sites in 2023 for consideration for continued inclusion in 2024 SHELAA.
- Any application can be supported with appropriate landscaping and design measures, and enhancement measures.
- Westbury on Severn is comparable to Hartpury as a small village but has improved public transport connections Hartpury has 2 allocations.

Observation:

- Westbury on Severn under its international designations Walmore Common is an SPA (Special Protected Area) and RAMSAR wetlands site, not a SAC.
- The village contains several listed buildings, the nationally important church spire is Grade 2* listed, with over 60 tombs in the closed churchyard all Grade 2 listed.
- Nearly a quarter of Westbury on Severn Parish is within Flood Zone 3 the A48 suffers virtually annual fluvial flood events, the area by the National Trust Water Gardens is also at risk of significant flooding due to surface water from the Longhope area as well as the consequences of locally heavy rainfall, lead to the Westbury Brook overtopping.

Draft Officer Response

Within the LP settlement hierarchy Westbury on Severn is classified as a small village, where development should be in line with Policy LP.4 that is of a small scale typically one, two or three dwellings within the settlement boundary. A new site is proposed at the Firs to the east of Westbury however, the scale of development is not in accord with the Draft LP strategy which promotes development at the 3 main strategic housing locations and primarily at major villages.

The Plan represents the FoDDC's considerations at the time of preparation in early 2024. However, reforms to the NPPF in December 2024 will need to be taken into account. The plan strategy will be reviewed in the light of these NPPF 2024 changes. Any subsequent changes to the agreed strategy will be subject to further consultation.

Comments on ecology, conservation designations and flood zone information are noted.

Whitecroft, Pillowell and Yorkley: Settlement Summary

Number of Representations: 6

Observations: 3

Object: 3

Observations:

- Promotion of Land at Lydney Road, Yorkley totalling around 3.8ha. Access would be achieved from Lydney Road via an existing access point, with visibility splays already established. (Map inserted) The site is in a sustainable location in a Tier 2 settlement, within a short walk of the key services and facilities in the village, close to bus connections to higher tier services nearby. The village school, health centre, shop, post office, community centre, pub and sports/play facilities are all located within around 400m of the site without requiring access by private car. A future development on site could look to reinforce the existing settlement pattern along Lydney Road.
- Overall, Vantage Ventures welcomes the recognition of the Whitecroft-Yorkley-Pillowell group village as a Tier 2 settlement.
- Cannot support the absence of allocations in Yorkley.
- The site is well-placed to make a meaningful contribution to housing delivery and is promoted through the representation for allocation for this purpose.
- Promotion of Land at Yorkley Court Farm Site, comprising around 44ha of land located less than a mile to the south of Yorkley. Site access is via a farm track which runs south from Lydney Road. A Site Location Plan is attached. The farmhouse is Grade II listed, has fallen into a poor state of repair. These representations primarily relate to the farmstead, adjoining land and to this small area of woodland, located in close proximity to a range of leisure assets, located in reasonable proximity to Whitecroft-Pillowell-Yorkley and Lydney and well suited to the provision of a landscape led tourism development which diversifies the historic farmstead, sufficient enabling development to restore the heritage assets would accord with the principles of Policies LP.5 and LP.43 of the draft plan. Proximity to existing service centres will support the provision of a sustainable transport and servicing strategy. Delivering an energy positive, carbon negative development the delivery of 30-40 eco lodges. Agree with the draft plan's support, in principle,

for tourism, recreation and employment related development outside the settlement boundaries. Deliver a high quality scheme, local employment and broader economic benefits.

- Land adjacent the northern border of these settlements is part of the core NRN. Development in these locations would be unsuitable due to the negative impacts on biodiversity. The core NRN extends along the eastern boundary of Yorkley and the Southern boundary of Pillowell. Whitecroft is close to the core NRN on all four boundaries and most of the undeveloped land close to the village is a high priority for open habitat creation. This should be a consideration for any proposals that come forward. (Glos Wildlife Trust).

Object:

- Take off the IOA title off my private land the title was then put on the land without informing the owners. The land in question is situated beside Cranleigh House and Osokosi on Bailey Hill. This land is unused and has been for the last sixty years. We are unable to put a fence around it with the IOA title on. keeping in contrast with the rest of the street, and not sticking out like a sore thumb like it has been for a very long time.
- The IOA designation should be removed from land at Penfold Pillowell

Draft Officer Response

Two sites are promoted in the group villages of Whitecroft - Pillowell -Yorkley. A 3.8ha site is promoted on land adjacent to the settlement boundary to the east of Lydney Road, Yorkley. The other proposal at Yorkley Court Farm, is detached from the settlement boundary and in a more rural location. Although for the purposes of the Local Plan Whitecroft, Pillowell and Yorkley are treated as major villages, the scale of development is not in accord with the Draft LP strategy with development proposed at the 3 main strategic housing locations and mainly some major villages.

It is noted that several objections have been made about the designation of individual sites as Important Open Areas and also the criteria for designation. The IOAs (and keynote) are reviewed during each update of the Local Plan. All suggestions for review of the IOAs will be considered and amended where appropriate. There may be cases where it is considered unreasonable to amend the current status of a site, and each parcel of land will be considered on an individual basis.

The Plan represents the FoDDC's considerations at the time of preparation early 2024. Recent reforms to the NPPF will be taken into account and a review of the strategy may be required. Subsequent changes to the agreed strategy will be subject to further consultation. The additional sites suggested will be considered as part of any Local Plan strategy review.

Policy LP.101 Whitecroft Road, Whitecroft

Number of Representations: 4

Support: 1

Observations: 3

Support:

- Support retention of employment use within this 3.4Ha mixed use allocation site.
- Encourage modern workspace with good broadband/mobile connectivity
- Housing designs to accommodate space for home based business, co-working spaces included in any employment/community space proposals.

Observations:

- Should the large two storey brick building be retained as a heritage feature on the site?
- Land adjacent the northern border of these settlements is part of the core NRN. Development in these locations would be unsuitable due to the negative impacts on biodiversity. The core NRN extends along the eastern boundary of Yorkley and the Southern boundary of Pillowell. Whitecroft is close to the core NRN on all four boundaries and most of the undeveloped land close to the village is a high priority for open habitat creation. This should be a consideration for any proposals that come forward. (GWT)
- The site was allocated through the 2018 Allocations Plan for 2.5ha of employment uses, and around 30 dwellings.
- Outline planning application submitted in June 2019 (P0919/19/OUT remains undetermined understood to benefit from a resolution to grant permission, subject to a S106 agreement.
- (Map inserted).
- As a Tier 2 settlement, it is important that Whitecroft contributes to the district's housing supply are explored to ensure there is resilience in the Council's forward land supply.
- Welcome the principle of the proposed re-allocation of the site via Policy LP.101.
- The site's suitability for mixed residential and employment use is long established, and this forms the basis of both the existing and proposed allocation.
- The site has a history of employment use on site, although manufacturing has declined over time and the site is not fully occupied. As such the site could do more to meet the district's development needs, the Council is encouraged to amend the allocation to support a higher housing yield at the site.

Draft Officer Response

Support for the development of the site is noted. The land agent welcomes the principle of development but considers the site could support a higher housing yield by reducing the area to be retained for employment uses.

The allocation identifies land for mixed use on a 3.4ha site. Some employment use already exists on the site, this should be protected and could be accommodated within the allocation. The balance between housing and employment use is considered appropriate.

The site benefits from a 2019 planning permission for 66 housing and is awaiting the completion of a Section 106 agreement.

Woodcroft: Settlement Summary

No comments received.

Woolaston: Settlement Summary

Number of Representations: 2

Observation: 2

Observation:

- There is an area of core NRN around the Cone Brook to the north of the settlement, which would not be a suitable development location. Land adjacent to this is a high priority for habitat creation and there is potential for traditional orchard creation. Land immediately to the south of the settlement appears to have lower wildlife value based on current data. Sustainable extensions with high quality GI and BNG could enhance the NRN, but an ecological appraisal is still necessary. (GWT)
- The population is over 790 - according to the latest Register of Electors, there are 1017 electors
- There is not a chapel - change of use to housing has recently been approved. There is only one community hall.

Draft Officer Response

Comments noted the settlement summaries will be updated.

Habitat protection and enhancement (including enhancement and protection of Nature Recovery Network) would be considered as part of any planning application. An Ecological Impact Assessment will be required for any application which could impact on notable and protected species, designated sites and important habitats.

Policy LP.102 Land to Rear of Holmlea, Netherend.

Number of Representations: 3

Observations: 2

Object: 1

Observations:

- There is an area of core NRN around the Cone Brook to the north of the settlement, which would not be a suitable development location. Land adjacent to this is a high priority for habitat creation and there is potential for traditional orchard creation. Land immediately to the south of the settlement appears to have lower wildlife value based on current data. Sustainable extensions with high quality GI and BNG could enhance the NRN, but an ecological appraisal is still necessary. (GWT)
- The location listed for this development is incorrect - it is not to the rear of Homelea but is attached to Alan's Cottage. (Woolaston PC)

- The parish council has supported planning applications, but continue to ask that affordable and social housing be included
- The plots are small for the density of housing being proposed. It does not encourage individuals to support the green idea and become self-sufficient.
- Appreciate that more homes are required, Although the LP seeks to encourage sustainable development, it does not clarify how this will be done.
- There is emphasis on greenery, however it has not been included in the new Netherend Development.

Object:

- Lack of infrastructure.
- No existing public transport.
- Not enough schools to cope with additional families. Creating need to travel for school places and adding to traffic on A48.
- Lack of parking for school drop off the new development will limit this further
- Too many cars on the roads and local residents having further to travel.
- No doctors.
- Increased traffic on A48 already at breaking point.
- Will be exacerbated by housing proposed at Sedbury.

Draft Officer Response

Comments noted, the site name can be amended to better reflect the location of the site.

All allocations must be able to demonstrate they conform to other policies of the plan such as Policy LP.7 infrastructure where new proposals should demonstrate that they can be supported by infrastructure that is available or can be provided, show how accessed by walking and cycling and contribute to GI BNG, open space and other provisions. The allocation is in keeping with the strategy of the plan and is considered available.

Habitat protection and enhancement (including enhancement and protection of Nature Recovery Network) would be considered as part of any planning application. An Ecological Impact Assessment will be required for any application which could impact on notable and protected species, designated sites and important habitats.

Chapter 13 Small Settlements

Number of Representations: 1

Observation: 1

Observation:

- There is no reference to Rudford or Highleadon whatsoever in the Local Plan, and we note that other, smaller, parishes are mentioned'. Rudford and Highleadon parish council would like to designate a settlement boundary. Is there a process for doing this ? (Rudford & Highleadon Parish Council).

Draft Officer Response

The process for designating a settlement boundary is through the Local Plan. Within the settlement hierarchy document Rudford and Highleadon would be considered Tier 4 small settlements / hamlets. This study primarily focuses on the top three tiers most of which have some degree of service provision. These are capable of providing a degree of self-containment by being able to fulfil some of the day to day needs of residents. Tier 4 identifies a number of much smaller settlements. These settlements often do not have the same range of public transport or local facilities as main settlements, but some do host certain facilities and/ or services to the local area. Homes sporadically located in the open countryside effectively form a fifth tier to the settlement pattern, which have traditionally been tied to agricultural land use. While there may be some minor and isolated opportunities for infilling within these two tiers of settlement, they have not been identified by settlement boundaries, due to their clear lack of capacity for self containment and hence overall sustainability.

Chapter 14 Monitoring

Policy LP.103 Monitoring

Number of Representations: 3

Support: 1

Observations: 2

Support:

- Support but LP.103 could be strengthened through the introduction of numerical targets and clear thresholds at which reviews are triggered. This would improve the transparency of the review process and provide additional certainty and predictability in relation to Draft Plan as a whole.

Observations:

- Important for any monitoring framework to set out monitoring indicators, along with relevant policy, data source and they will be report. Should also include targets that the Plan is opening to achieve and actions to be taken if not met.
- Be more explicit to reference 'other infrastructure including active travel routes'.

Draft Officer Response

The Authorities Annual Monitoring Report is published on an annual basis (and the data within it runs from April 1st to March 31st), which provides certainty and predictability of how and when the Local Plan is monitored. The AMR will be reviewed at the time of adoption of the Local Plan and can include more detail on the type of data that will be monitored and how actions will be taken to address any issues identified. The AMR is an iterative process and will adapt to make the report as useful as possible to inform general local policy making as well as housing supply. The text in the policy can also be reviewed and altered to include active travel routes.

Appendices

Appendix 2 Glossary

Observation: I

Observation:

- Delete Corporate Plan from glossary & replace with Council Plan (Regeneration, FODDC).

Draft Officer Response

The next version of the Local Plan will be updated with reference to the latest Council Plan.

Appendix 3

Observation: I

Observation:

Lydney is the largest of the proposals in the plan period however, the principles referenced should be relevant to many of the other proposals. There is concern that there is limited reference to recreational disturbance on the Severn Estuary relating to other developments and their cumulative impacts. The detailed proposals in the Lydney Harbour Area Recreation Study are welcomed.

Draft Officer Response

Comments Noted.

Sustainability Appraisal

Number of Representations: 14

Support: 4

Observations: 7

Object: 3

Support:

General comments re. Sustainability Appraisal:

- Forest of Dean District Council should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the emerging Local Plan's decision-making and scoring should be robust, justified and transparent.
- Note the existing sustainability problems highlighted by the SA. Particularly comments made relating to carbon management (section 3.12).

Observations:

- A number of authorities are using the doughnut economics model and its decision wheel tools in their Council and Local Plans, acknowledging that long term planning is affected by decisions made now and that without promoting a socially just plan that allows future generations to live within the planet's (district's) means then we fail.
- The Doughnut Economics Model and the social foundations and environmental limits set out in the decision-making wheel are closely reflected and incorporated into the Sustainability Appraisal of the Local Plan.
- <https://beta.bathnes.gov.uk/local-plan-options/transformative-plan-making-and-doughnut-economics-model>
- The three pillars of sustainability are economic (usually placed first), social and environmental. Would we consider adding the fourth, 'culture' to the set? It plays a socially-binding and facilitating role in the face of economic, societal and environmental challenges. Would it be possible to develop a Local Plan that supports cultural change, with the infrastructure to support it

Comments regarding Specific Sites:

Land off Driffield Road, Lydney (LYDNEY 3 & LYDNEY 4):

Support and observations:

- 'Development of the site may impact on Driffield Farm House and the open countryside character of the area though defined by existing road to east and adjoins allocated site to west and north-west'. It is not clear what the assessment criteria is for this particular part of the SA, which has then warranted a double negative score in respect of the site.
- Driffield Farm House is not a listed building and do not see why impact on the Farm House is a planning consideration in this instance.
- The site is bound clearly by the existing road, and this is supplemented with significant tall planting including hedgerows and trees, meaning the site is well-screened from Driffield Road.

- Do not consider this would have an unduly negative impact on the countryside, and further justification should be provided to understand why such a negative score in this instance has been applied.
- The landowner supports the allocation of this site adjacent to the existing allocation of land at Augustus Way/Court Road and is keen to bring this site forward for development, in conjunction with the other land identified, as soon as possible. Technical work will begin shortly to underpin the masterplan further for development.
- Should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the emerging Local Plan's decision-making and scoring should be robust, justified and transparent.
- Review SA assessment for Driffield, Lydney.

Glynchbrook, Redmarley (REDMARLEY I):

Support and observations:

- Support the Council's methodology for the assessment of development sites as part of the Sustainability Appraisal process. Support the Council's conclusions for each site. In particular, support the Council's conclusions regarding the assessment of site Redmarley I (Glynchbrook). However, would go further to suggest that the site is more than 'Unlikely to meet SA Criteria' but is in fact 'Unable to meet SA Criteria'. This is for the following reasons:
- Landscape impact - Comprises Greenfield agricultural land; would result in an expansion into and urbanisation of the open countryside; would have a significant landscape and visual impact on the countryside; site lies within the setting of the Malvern Hills National Landscape immediately to the north (resulting in harm).
- Character and appearance - site will have a significant impact on the open and unspoilt character and appearance of the countryside in this location; will have a damaging and urbanising visual impact given the existing character of the area which represents a very rural area with only small clusters of houses and other buildings set along country lanes.
- Accessibility by public transport (non-car modes) - Glynchbrook site is poorly located for access to public transport services as alternatives to private car usage; no nearby railway station; these issues are entirely contrary to national guidance contained within the NPPF and the Gloucestershire Local Transport Plan (2020-2041) which seek to encourage sustainable forms of travel; the site is remote from any nearby settlement (conflicting with the Council's strategic objectives of focussing growth to its main settlements of Cinderford, Coleford, Lydney and Newent in accordance with the Council's Settlement Hierarchy).
- Loss of good quality agricultural land - a characteristic of this area is good quality agricultural land; any loss of this good quality land will be detrimental to the national economy; the importance of high quality agricultural land has now taken on a greater significance due to the recent war in Ukraine and cost of living crisis; the government are now concentrating on national food production without reliance on foreign imports and this is exemplified by the publication of the government's recent Food Strategy; there are many other parts of the District that have lower quality agricultural land where focus should be directed.

- Ecological impact - site lies close to several Key Wildlife sites; the development of the site itself would have significant ecological implications for protected species.
- Flood Risk and Drainage - site lies within Flood Zone 3, which carries the highest risk.
- Review SA assessment for Glynchbrook – change to 'Unable to meet SA Criteria' (significant landscape and visual impact on the countryside, harm to national landscape, poorly located for access to public transport services as alternatives to private car usage, loss of good quality agricultural land, ecology impact, flood risk).

Beachley Barracks (TIDENHAM I):

Support and Observations:

- DIO suggests that the findings are clarified with regards to the site area that has been assessed as it appears the total land ownership has been used rather than the proposed development area. This is important as the total land ownership (which includes the River Wye for example) does include areas of SAC/SSSI/flood risk/listed buildings but the proposed development area is not covered by these designations so the SA ratings should reflect this and a more appropriate site boundary assessed.
- Suggest that the measurement points for the distances to the nearest school, health, village centre are further clarified given the linear nature of the Beachley site and suggest that they are under the 3km suggested from the site entrance.
- DIO supports the site specific analysis under policy LP.78 (p191 of Appendix 2A). We note the "very positive / positive" outcome across the indicators with the exception of a "neutral" rating for water quality and waste which will be dependent on non-site specific policy requirements in any case.
- Whilst the DIO doesn't question the SA objectives / indicators at this stage we would reiterate the overarching benefits of the efficient re-use of a previously developed site which should also be factored into the sustainability benefits.

Objections and observations:

- FODDC's summary of the Beachley Barracks site (Tidenham I) raises significant concerns over its availability and whether the housing numbers identified for it are genuinely deliverable during the plan period (to 2041).
- There are flaws in the scoring and selection process. From the SA assessment undertaken it is clear that the site is highly constrained in terms of ecology, flooding and heritage. The site is not located near to any services or facilities assessed in the SA and concern is raised about the potential harm this site would have to traffic congestion. In respect of ecology, the site is within the Severn Estuary SAC, River Wye SAC and Severn Estuary SSSI. The high ecological sensitivity of the site would need to be considered in any proposals and these designations would need to be properly protected. The site is largely surrounded by Flood Zones 2 and 3 and some of the site to the west lies within such zones. The probability of the immediate surrounding area being impacted by flooding is therefore high and the impact of climate change may also exacerbate the impacts. The tidal range of the River Severn (15m- third highest range in the world) means the site is vulnerable to flooding in future. Moreover, there is only one road in and out of the site currently which means there is only one escape/access route in a flood event (or any other emergency) with

no alternative if that route became blocked. There are three Grade II listed buildings within the assessment area and the Old Severn Bridge (Grade I) passes over the top of the site. Preserving and enhancing these heritage assets and their settings would need to be carefully considered in any proposals that come forwards. The SA assessment identifies that the site: (i) is not located in close proximity to local services and facilities; (ii) has unacceptable highways impacts; and (iii) has not demonstrated that sustainable travel can be properly and safely provided for. In addition, there is concern that the development of this site would exacerbate traffic congestion in the local area intensifying the problem. By FODDC's own admission, the site is not well located for cycle and pedestrian/bus travel as it is relatively remote. On account of the location of the site and the lack of sustainable transport modes available it cannot be said that this site would provide a sustainable location for development.

Land at Highfield Lane, Lydney LP.67 (LYDNEY 9):

General Observations:

- This parcel is located in an area that is topographically more elevated than the Site and online mapping shows that there are outward views from the site. Notwithstanding this, the SA scores the 'Character (built and natural)' section as 'positive', summarising that whilst it has some landscape value, "a suitable design of dwellings could however blend into the immediate character of the site". The tone of this summary is positive, seeking opportunities to mitigate the impacts of development. Conversely, the tone used in the 'Character (built and natural)' section for the Site does not explore how the landscape impacts of the development could be mitigated, scoring this category as 'double negative'. It is recommended that the SA reassesses the Site, taking account of the true extent of the proposed development and the opportunities for mitigation and green infrastructure enhancements.

Lydney West (LYDNEY 11) :

Object:

- Significant concerns with the Council's assessment of sites during the Sustainability Appraisal (SA) process. The assessment for our client's site at Lydney (Lydney 11) takes account of a larger area that was submitted through the March 2024 Call for Sites submission and we are concerned that this assessment of an enlarged area has influenced the site's score against SA criteria (see own SA appraisal included in comments received).
- Upon review of the Council's own assessment of both sites, it is noted that the Land West of Lydney scores better than Beachley Barracks, which is proposed for allocation through the emerging DLP.
- Recommend that: (a) the Council re-assesses the Site through the SA and (b) reconsiders the Site for allocation in the DLP. Land West of Lydney It should be noted that the following documents were submitted to the SHELAA and should be referred to in undertaking the SA for the site:

Newent (General Comments):

- The SA Report notes the public comments on the Second Preferred Options consultation included concerns over current levels of traffic congestion in Newent, the need to provide good sustainable links to the centre, and the need to improve transport facilities (para 5.24). The SA

Report identifies that the main short-term, temporary effects of the Plan are expected to be mainly focused on construction, including construction traffic, increased traffic due to disruption from construction, and traffic diversions (para 8.6).

Conigree Court, Newent (NEWENT 11):

• It is apparent that the SA has failed to pick up on the sites connections for walking and cycling to the town centre and local amenities including schools. Furthermore, the SA landscape-sensitivity assertion benefits from no site specific landscape appraisal, and its broad brush conclusion is tantamount to a landscape impact which could be perceived by any green field development. In this regard, the SA assessment for land at Conigree Court should be revisited and re-evaluated.

Chapel Lane, Aylburton (AYLBURTON 2):

- Using the scoring from your framework, the following comments are made on each category :-
- Town centre by road - There is no 'Town Centre' in Aylburton; only commercial offering is a pub; no access to non-driving or public transport residents to everyday essentials like banking, groceries, post office etc.; primary school by road - the congestion this brings is not sustainable and the school is already at capacity with pupils needing to go to other schools in the local area; GP by road - not accessible by road, access to GP's is very limited and increasing population without this being addressed would exacerbate the situation.
- Public transport - Very limited public transport would only be available by potential residents walking on roads without pavements to the main A48
- Employment area - Whilst there are employment opportunities highlighted locally, they are small businesses with limited recruiting.
- Vehicular access and connectivity - This has been given a positive score but increasing traffic for access to this site on the existing road infrastructure would require further work as the small roads are already congested during busy times and the roads do not have pavements, thus risking health and safety of potential residents.
- Active travel - Active travel means walking and cycling (including the use of mobility scooters) for everyday journeys. This includes journeys to school, to work, to the shops or to access services e.g. health or leisure centres. This would not be possible due to the location, without more work to existing infrastructure as well as limited access to services.
- Flood risk - Whilst this has been given a positive score, during periods of heavy rain there is flooding on the land next to the proposed site, with run off from the land. This is only just dealt with by the existing waterways with occasional surface water on the busy A48.
- Landscape physical features - The land in question is a very steep hill with established woodland on top, building into the hill would not only be costly, but also potentially damage the private water supply to residents' property in the village, who rely on this as their only water source.
- Biodiversity - This has, rightly, been given a negative score. Confirm that there are foxes, deer, birds of prey, badgers, bats, cray fish and other migrating birds using the proposed site for feeding and hunting. The area is known locally as 'Buzzards Bank' and homes many different birds and animals.
- Character - natural and built - There have been recent planning applications rightly refused due to them impacting the character of the village and area

- Heritage - raise objection to the score as the field in question was once indeed a roman road and may be of significant historical importance for archaeologists and historians.
- Finally, in reading the report and the scoring process to take these plans forward, question the logic behind it. There are MORE negatives than positives (9v7) with 2 neutrals. This is hardly convincing when compared to other proposed sites.

Former Victoria Hotel, Newnham on Severn (LP.97) (NEWNHAM ON SEVERN 2):

Object:

- Disagree with the Sustainability Appraisal (SA) that the site returns an assessment of double negative in relation to the 'heritage' SA objective simply because it is a listed building. The building is in poor and deteriorating condition after many years out of use, and its restoration through a development scheme represents the only realistic pathway to its condition improving. It will of course be important to ensure any future development responds positively to the listed building and its setting and is sensitively designed, but in principle the SA score should reflect that development is the only way in which the building's condition will improve.

Hartpury:

General Comments, Objections and Observations:

- The Parish Council would note that the criteria used are subjective, and quite incorrectly judged in many cases.
- Would imagine that a "Town Centre", at the very least should contain a shop selling groceries and newspapers etc., a full-time post office, and a place of worship. Hartpury has none of these. The nearest shop is in Ashleworth, and there is no footpath that one can use to get there, nor along the main road to the Cross Hands garage.
- A regular bus service is surely more than 4 a day. You cannot realistically access either the nearest shop or the GP surgery by bus, or commute to work in Gloucester. Concerning the main highway through the village, the A417, this is regularly closed each winter due to flooding at Maisemore, with a significant diversion, along narrow lanes; the development of Hartpury University has exacerbated this, with considerable traffic in both directions in the rush hour. The A417 is itself a main diversion route for the M5/M50. Both the GP surgery and primary school are under strain from development in neighbouring villages, especially Ashleworth and Maisemore, which are not in the FoD.
- The main sewerage system in the village has been inadequate for many years, and while Severn Trent say that it is now adequate, this has not been proven, and it causes a lot of distress for many of our residents. It is certainly not clear that it would support new development, again because of development in Ashleworth and other villages.
- The Parish Council would also note that Hartpury is the only village in the summary table that has "Orange" SA scores that have been taken forward to the Local Plan, whereas there are 20 sites in the SA that are identified as "Dark Green" or "Light Green" that have not been taken forward. This implies that Hartpury is being treated differently from all other parishes. Surely this cannot be the case.
- The Character Appraisal is out of date and this would no longer be classed as an open character landscape and this would be extremely visible from higher surrounding areas.

Land adjoining Cackleberries, Hartpury (HARTPURY 1):

- Over Old Road is a single track road and very narrow. The A417 regularly floods especially in the winter and is closed, sometimes for long periods. The field floods in one corner. This is not a main route through the Village and is not close to the College. SA criteria - The Parish Council feel that this is orange and not green.

Land off A417 (HARTPURY 2):

- The A417 regularly floods especially in the winter and is closed, sometimes for long periods. The Orchard should be protected. Access onto Broad Street may be considered good but traffic from Ashleworth also uses this road which has increased due to new developments; this traffic increases considerably when there is flooding in the Tewkesbury area. The A417 regularly floods especially in the winter and is closed, sometimes for long periods. This box should only be + green (not ++). There is no public footpath along the Eastern boundary. SA criteria The Parish Council feel this should be red.

Land at Broad Street (HARTPURY 3):

- There is no obvious access to either the A417 or Corsend Road and this should be red. The A417 regularly floods especially in the winter and is closed, sometimes for long periods. SA criteria The Parish Council feel that this should remain red.
- Land South of Corsend Road (HARTPURY 4):
- A new access onto Over Old Road is not available and A417 may be considered good but the A417 regularly floods especially in the winter and is closed, sometimes for long periods. Landscapes - would be visible when built as at the bottom of a hill and surrounding footpaths - GHA 24, GHA 25 and GHA 31 SA Criteria The Parish Council feel this should remain orange

Land adjoining Hartpury Primary school (HARTPURY 5):

- Access onto Broad Street may be considered good but traffic from Ashleworth also uses this road which has increased due to new developments; this traffic increases considerably when there is flooding in the Tewkesbury area. The A417 regularly floods especially in the winter and is closed, sometimes for long periods. This box should only be + green (not ++). SA criteria The Parish Council feel this should remain orange

Land off Foley Rise (HARTPURY 7):

- While access off Foley Rise may be considered good but the A417 regularly floods especially in the winter and is closed, sometimes for long periods. There are no suitable footpaths nearby. Whilst the site may not flood there is the potential for flooding of houses on lower ground on the A417. Previous planning application appeal PI615/23/FUL was refused due to the effect of the proposed development on the character and appearance of the area. The Parish Council feel this should be red especially due to previous planning application refusals. SA criteria The Parish Council feel this should be red.

Draft Officer Response

All comments of support, concern and general observation are noted.

Agreed that the results of the SA process should be robust, justified and transparent. The SA is an iterative process and is regularly reviewed and updated throughout the plan-making process. All strategies, potential allocation sites and policies are assessed comparatively and equally and it will be ensured that the outcomes of the assessments are clearly narrated.

Comments regarding the carbon management section (3.12) of the SA report are noted. This is an ever-changing arena whereby the Government and the political leadership of the Council (Green Party) are pushing for overall improvements for the environment and in particular to reach net zero emissions. The SA will review and highlight any updates on this aspect and take carbon management into account when considering the sustainability of the strategy, the allocation sites and the policies within the Local Plan.

Comments regarding the benefits of the Doughnut Economics Model are noted and will be considered. The Local Plan does not currently refer to this type of economic model. However, the Sustainability Appraisal does assess the strategy, the allocation sites and the policies against the three pillars of sustainability and seeks to aid the development of a plan which is the most sustainable as possible.

Comments relating to the appraisal of specific sites will be assessed on an individual basis and reviewed where considered appropriate, taking into account the comments received during this Regulation 18 Draft Local Plan consultation. Every attempt will be made to ensure that the outcomes are clear and justified. Any further updated work (such as technical work, masterplans, landscape appraisals, etc) over the course of the plan-making process will feed into revisions of site and policy appraisals.

It will also be the case that some site areas will be revised to reflect different situations and the SA site appraisals will be revised accordingly.

It is also recognised that in response to the significant uplift in housing numbers required across the district over the 20 year plan period (owing to the updated NPPF December 2024) sites which have an outcome of less than 'Meets SA Criteria' may still be selected for allocation, given the requirement for the Council to find the necessary housing numbers and the benefits of meeting housing need. Similarly, if the strategy is amended to include a new settlement(s), for example, then this will clearly have an impact on the SA assessments of potential sites for this type of development, as it is recognised that new settlement require a significant amount of infrastructure and in particular connectivity prior to construction.

Habitat Regulations Assessment (HRA)

Number of Representations: 2

Observations: 2

Observations:

- Changes in Water Quality & Water Quantity/Levels/Flow - River Wye
- There are several settlements served by wastewater treatment works that discharge to the River Wye which on the Wales side of the channel (of the same river) is failing according to the

Phosphorus Compliance information produced by DCWW and endorsed by Natural Resources Wales. The HRA states:

- 5.126 There are proposed site allocations at Coleford (within about 4-5 km of the River Wye and with a watercourse flowing from the settlement to the river) and at Beachley (within about 200m of the River Wye. The Coleford sites are some 4-5km distance from the River Wye SAC and only around 310 new dwellings are anticipated – therefore, with mitigation measures in place, no adverse effects indicated.
- Clarification of what is meant by mitigation measures means in the context of Coleford should be included. The distance between the site and the SAC is irrelevant. Confirmation of the capacity of the relevant wastewater treatment work(s) (considering proposals in the emerging AMP) should be confirmed.
- Forest of Dean Local Plan 2021 -2041: Regulation 18 Draft Habitats Regulations Assessment (HRA): HRA Screening and Appropriate Assessment AA Report. Prepared by Enfusion Ltd.
- Natural England welcome that the scope of the HRA includes The Cotswold Beechwoods SAC, The Severn Estuary SAC/SPA/Ramsar, The River Wye SAC, The Walmore Common SPA/Ramsar, The Wye Valley & Forest of Dean Bat Sites SAC, The Wye Valley Woodlands SAC.
- Section 3.0 Designated Sites: Severn Estuary RAMSAR Section 3.20 focused on the RAMSAR designation of the Severn Estuary fails to mention the European Eel *Anguilla* as a notified feature. It is important that the HRA include the species into consideration of the HRA/AA.
- Section 4.0 Potential Impact Pathways: Atmospheric Pollution (nitrogen deposition and dust), loss or damage to habitats; functionally linked land and disturbance from noise, vibration or light to sensitive species, recreational pressures, changes in Water Quality and Quantity. NE are pleased to see these pathways assessed against the protected sites and agree with their conclusions.
- NE note and agree with the local plan policies screened out of the Appropriate Assessment stage. Note and agree with the identified local plan policies which are screened into the appropriate assessment (section 4.43) such as: Policy 5 Development in the Countryside, Policy 21 Flooding and Water Conservation and Policy 25 Cycle Routes.
- Section 5.0 Appropriate Assessment (AA) agree with the recommendations in section 5.10 relating to LP. 8 Nature Conservation and have made comments to the same affect in our response.
- Bats and Functionally Linked Land, agree with the HRA recommendation relating to Cinderford Norther Quarter should make specific reference to Bats (section 5.30). Strongly welcome and agree with the HRA Recommendation (section 5.52) that use of standard wording regarding the protection of bats be included in all relevant policies.
- Birds, Fish, Otters and Functionally Linked Land. Welcome and agree with the HRA Recommendation for policies LP. 78 and LP. 80 to reference Functional linked land and concern for potential effects on it (section 5.65).
- Severn Estuary and Recreational Pressures, welcome the consideration of the Severn Estuary and Recreational pressures within this appropriate assessment. NE are an evidence led organisation and are aware of the upcoming surveys.
- NE look forward to talking through the upcoming conclusions of the Severn Estuary Project and the subsequent requirements in the near future with all Local Planning Authorities.
- NE agree and are pleased with the conclusions of the HRA/AA.
- The recurrent suggestions of stronger wording for both direct and indirect effects on designated sites throughout the plan and its allocations is of upmost importance.

- The policy recommendations are effective and Natural England would like to see them implemented in the Forest of Dean Local Plan. (NE)
- Forest of Dean Local Plan 2021 - 2041 Sustainability Appraisal Report. Interim Report for Draft Local Plan Public Consultation Regulation 18 July 2024 We note the existing sustainability problems highlighted by the SA. Particularly comments made relating to carbon management (section 3.12). Consultation with statutory consultation bodies on the SAC Scoping report.
- NE note table 8 highlights Natural England's previous advice and the council's response which included HRA to reference the Malvern Hills SSSI report.
- NE are pleased to see the feedback has been proactively incorporated into the local plan.
- Table 16A suggestions for possible changes to draft policy/mitigation and recommendations.
- NE welcome the table and the suggested changes to the policies.
- Natural England's feedback for a large number of policies is aligned.
- Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A. (NE).

Draft Officer Response

All suggestions for amendments to policy wording and supporting text will be taken into consideration and reviewed where appropriate.

All comments of support, objections and general observation are noted.

The HRA will be reviewed to include mitigation measures within Coleford.

This Severn Estuary SAC and Ramsar section shall be reviewed to ensure that all qualifying features associated with the international designation are recorded within the HRA.

Plan will be reviewed to assess the wording and where this can be strengthened.

