



# Forest of Dean District Council **LOCAL PLAN**

## Options Consultation Report 2025



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## I Introduction

**I.1** This paper provides an overview of the responses received to the FoDDC 'Local Plan Options to Deliver the Additional Housing Requirement' consultation (Options Consultation 2025) which ended in September 2025 and to propose draft officer responses to these comments. The analysis will support a revised strategy to accommodate the additional housing required as a result of changes to the National Planning Policy Framework (NPPF) in December 2024.

**I.2** This report outlines how the Council engaged with the community and stakeholders through the most recent consultation process and sets out the main findings of the consultation, analysis of the comments received and provides summaries of the representations received during the consultation.

1. a brief overview of the consultation
2. a summary of the comments by question
3. a draft officer response by question

**I.3** A summary of the responses received to the 10 questions are published in Section 4 of this document.

**I.4** The document will inform the Local Plan and in particular the next stage of the process which in this case is to agree a revised strategy.

**I.5** In line with the Local Development Scheme which was agreed by Full Council in February 2025 the programme for the Local Plan preparation agreed by Full Council in February 2025 is as follows:

Revised Draft Local Plan (Regulation 18)	Consultation January 2026
Published version of Local Plan (Regulation 19)	Consultation Summer 2026
Submit to Secretary of State	November 2026
Examination	Winter 2026/2027
Adoption	2027-2028

**I.6** As the Local Plan progresses the process becomes more formal and evidence in support of the Local Plan will continue to be prepared and updated. This will include the viability study , Infrastructure delivery plan, transport evidence including modelling and the Housing and Economic Needs Assessment (HENA).

## 2 Consultation Methodology

**2.1** The Regulation 18 consultation on the Local Plan Options to Deliver the Additional Housing Requirement July 2025 (Options consultation 2025) took place between Thursday 31st July 2025 and Thursday 11th September 2025.

### Background

**2.2** During the summer of 2024 the Council consulted on a Draft Local Plan July 2024, this set out all the policies that reflected the Council's preferred spatial approach for accommodating future development in the District. However, in December 2024, the Government published a revised National Planning Policy Framework (NPPF). Among other things it introduced a new way of calculating housing need and has had a significant effect on the Local Plan production. The Draft Local Plan July 2024 used the 'old' method of calculation providing allocations for 6600 homes over the 20 year local plan period (330 homes per year). The new method, introduced in December 2024, resulted in an increase in the minimum number of houses which must be delivered in the District to 600 new homes per year.

**2.3** The housing requirement has therefore increased from 6,600 dwellings over a 20-year plan period to a minimum of 12,000 over a similar period or 13,200 dwellings over the revised 22 year plan period proposed in the consultation . This means there is a shortfall of approximately 6,000 dwellings from that allocated in the Draft Local Plan Consultation 2024 and the currently agreed Local Plan strategy is highly unlikely to deliver this significant increase in housing requirement.

**2.4** Due to the revised housing requirement, the Council is looking at new options for the distribution of houses and associated employment sites. The key issue is how to accommodate the increased scale of growth and changes that are expected during the plan period in a way which is sustainable and appropriate. This requires an assessment of the current limits to growth including national and local constraints, and where opportunities for growth could be accommodated. The purpose of the consultation document was to provide an explanation of the issues and constraints for development in the District and the options available to accommodate the additional homes and to guide where sustainable development could be located. This Options consultation 2025 is a chance for different strategy approaches to be appraised and commented on before setting the strategic approach for the Plan.

### Consultation Options

**2.5** The consultation document along with the supporting sustainability appraisal provides a detailed overview of each of these options and discusses whether they are considered sustainable and suitable. The options were set out as follows:

**2.6 Option 1: Selective planned expansion of existing settlement(s)** – This option would follow a pattern similar in distribution of development to the Draft Local Plan 2024 consultation document, but to a greater extent than currently proposed. The strategy would be based on growth at the most sustainable settlements. These would be the areas with the best access to services and facilities, access to jobs and well connected by modes of sustainable transport and active travel.

**2.7 Option 2: General distribution of housing around all existing settlements** (planned sharing of the housing numbers across all settlements) - This option would result in each settlement across the district with a settlement boundary, defined in the Draft Local Plan 2024, regardless of its scale or location, receiving a share of the required housing numbers. The strategy would also result in a distribution of mixed

use and/or employment sites across the settlements. It would not necessarily follow the pattern of existing services and facilities.

**2.8 Option 3: Maximum incremental change to the extent of absolute constraints** - This option would simply consider the ultimate capacity of settlements and allow development where possible. This is an option which could also be termed dispersal. Such an option would deliver development that is reasonably sustainable but the option is capacity led and a range of less sustainable dispersed sites would be more likely.

**2.9 Option 4: Planned new settlement(s)** – This option would identify one or more new settlements and promote a scale of development that would create a new sustainable community supported by the appropriate infrastructure.

**2.10 Option 5: Negotiated agreement that some development will be passed to adjoining authority(ies)** - Development outside of the Forest of Dean District is an option in planning policy terms. It would be where an agreed major element of the FoDD required development would be met in an adjoining area, but only with the approval of the LPAs where the development would occur.

**2.11 Most Sustainable Combination of Options** - In order to achieve the revised housing target, it was suggested that a combination of both Option 1, ‘selective planned expansion around the most sustainable existing settlements’, along with Option 4, ‘the development of one (or more) sustainable new settlements’ would be an appropriate sustainable response. A strategy reliant on either the extension to existing settlements, or the development of sustainable new settlements alone, will not achieve the number of new dwellings now required and distributed over the plan period.

## Methodology

**2.12** The Options Paper 2025 was agreed for consultation at Full Council on 24th July 2025, the consultation commenced 31st July 2025 and closed on 11th September 2025 with an extension until 30th September 2025 for Parish Councils if requested. 15 Parish councils requested this extension of time to accommodate their committee schedules.

**2.13** The following methods were used to seek views:

- an online questionnaire (10 questions with free text boxes)
- a paper version of the questionnaire

**2.14** Responses were also received by:

- written representation, email and letter

**2.15** Two explanatory leaflets were also available, one explained the Local Plan and plan process. The other was a summary of the consultation and how to comment. The leaflets along with posters were sent to all Parish and Town Councils and local Libraries, as well as handed to every visitor at the 7 consultation events.

**2.16** Public events were held at the following 7 locations:

<b>Location</b>	<b>Date</b>
Corse & Staunton Village Hall, Gloucester Road, Corse, GL19 3RQ	Tuesday 12 August 2025, 3pm to 6.30pm
Cinderford Miners Welfare Hall, Wesley Rd, Cinderford, GL14 2JN	Wednesday 13 August 2025, 3pm to 6.30pm
Lydney Community Centre, Naas Lane, Lydney, GL15 5AT	Thursday 14 August 2025, 3pm to 6.30pm
Kings Head Inn, Birdwood, Nr Huntley, Glos, GL19 3EF	Monday 18 August 2025 3pm – 6.30pm
Newent Community Pavillion, Newent, GL18 1QA	Tuesday 19 August.2025, 3pm to 6.30pm
Tidenham Memorial Hall, Coleford Rd, Tutshill, NP16 7BN	Wednesday 20 August 2025, 3pm to 6.30pm
Coleford District Council Offices, High St, Coleford, GL16 8HG	Tuesday 26 August 2025, 3pm to 6.30pm

**2.17** The consultation was promoted in the following ways:

- an article on the Council's news site.
- posts on the Council's social media channels.
- press releases sent to the local media.
- public notice in two local newspapers.
- correspondence to those that took part in the previous Regulation 18 consultations, those who signed up to the Local Plan contact database, as well as statutory stakeholders.
- posters were distributed to all local libraries, Town and Parish Councils.

**2.18** The following organisations and individuals were consulted

- Statutory consultees
- Infrastructure providers
- Residents
- Developers and land agents
- Local businesses and organisations
- Parish and Town Councils
- Adjacent Local Authorities

### 3 Feedback Analysis

**3.1** The purpose of the consultations was to identify and test the options for a new strategy. This section of the report sets out the main findings of the consultation, summaries of the comments received. The feedback received from the consultation will help develop a strategy and shape the Revised Draft Local Plan and influence the next stages.

#### Consultation Responses

**3.2** The consultation resulted 363 responses from individuals, organisations and statutory consultees, with 2350 individual representations to the specific questions. The purpose of these consultations was to identify the key planning issues and opportunities the new Local Plan should address and which of the proposed options could deliver the most sustainable development strategy for the District.

**3.3** The feedback received will help us shape a Revised Draft Local Plan and influence the next stages. This section outlines how the Council engaged with the community and stakeholders through the most recent consultation process and sets out the main findings of the consultation and analysis of the comments received. (71 online survey responses, 267 by email and 25 written representations).

**3.4** Of the 363 submissions received 33 were on behalf of organisations, including local community groups, developers, 49 from statutory consultees including Parish and Town Councils and national organisations. The remainder were submitted by individuals, the majority being local residents. The organisations that provided representations are listed below:

- CPRE, Department of Education, The Coal Authority, Dwr Cymru, Gloucestershire Constabulary, Gloucestershire Wildlife Trust, Historic England, HBF, Natural England, National Grid, National Highways, Network Rail, Severn Trent, Sport England, South West Housing Association Planning Consortium, The Canal and River Trust, Wye Valley and Malvern Hills National Landscape Teams.
- Neighbouring Councils of Herefordshire Council, Monmouthshire County Council, Wych Avon and Malvern Hills District Council and the Strategic Local plan Authorities of Tewkesbury Borough, Gloucester City and Cheltenham Borough Councils and Gloucestershire County Council
- 19 Town and Parish Councils within the District and 2 adjoining Parish Council as well as 3 Neighbourhood Development Plan Steering groups.

**3.5** In total 327 people mainly local residents attended the consultation events. The following number of people attended each event in person.

Birdwood - 149  
 Cinderford - 16  
 Coleford - 11  
 Lydney - 28  
 Newent - 44  
 Staunton/Corse - 62  
 Tidenham - 17

**3.6** Over the course of the Consultation the online document received 10,892 page views and 3372 visitors. The Council consultation webpage received 1189 views.

**3.7** Artificial Intelligence (AI) tools have been used to aid the summary of the consultations responses for this report. Nevertheless the summaries have been reviewed and manually checked by Local Plan Officers. This has speeded up the analysis timescales in accordance with Government aspirations in the use of IT to facilitate local plan production.

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## 4 Summaries of written comments

**4.1** This section summarises the main issues identified from the consultation and lists comments from specific consultees.

### Question I

**4.2** Overall, Question I received 226 written comments. The question asked about the plan period.

*Do you have any comments or views on the proposed plan period for the new Local Plan? (Please set out below with evidence or justification to support your comments). Should the plan look forward to year 2043? (If not, what year, and what is your reasoning?)*

**4.3** Based on the responses, there are several key themes regarding the proposed plan period:

1. Plan Period Length: - Many note the NPPF and that strategic policies should look ahead over a minimum 15 years from adoption. Some support the 2043 end date as it provides a longer horizon for infrastructure, housing, and economic development planning - Others believe the 2043 date is too far ahead to accurately predict housing, job, and infrastructure needs - A few suggest a shorter plan period of around 10-15 years would be more appropriate and allow for more frequent reviews and adaptability. There are concerns over the length of time allowed for an examination, suggesting a longer plan period would be more realistic as 2043 is just within the 15 year required timescale possibly 2047, i.e. 20 years after adoption.

2. Regular Reviews: - Many emphasise the need for regular reviews or a mid-point review, given the potential for changing circumstances, policies, and government priorities. The Plan should be reviewed every 5 years.

3. Local Government Reorganisation: - Several responses highlight the need to consider the potential amalgamation of the Forest of Dean District Council into a new unitary authority, which could impact priorities, governance, and funding. Local Government reorganisation will see the district council abolished in 2027 so the plan period should be as short as possible, thus allowing the new local government arrangements to produce their own plan.

4. Evidence Base and Adaptability: - There is a strong emphasis on ensuring the plan period is supported by a robust evidence base and regular review this includes mechanisms for adaptability in light of governance changes or emerging circumstances. Suggestion population forecasts suggest population will decrease and housing will no longer be required.

5. Housing Targets: - Some question the accuracy and justification of the increased housing targets imposed by the government, suggesting they may not reflect local needs or constraints. Other state it is important that the new Forest of Dean Plan includes the correct housing requirements informed by the new standard method calculations as a starting point. Many request that the Council should be questioning the government and ask for justification for the the new standard method. The new standard method should be reviewed.

6. Environmental and Community Impact: - Concerns are raised about the potential harm to the environment, rural character, and communities like Lowbands and Pendock due to large-scale developments.

7. New Settlements: - A few responses suggest that if new settlements are part of the strategy, the plan period should look further ahead, at least 30 years, to account for the longer timescales required for delivery.

8. The LP period through its extension puts further pressure on finding extra housing numbers by extending the period by 2 years. This also moves the plan into a grey area with LGR reform and the possibility of a change of government.

### **Statutory consultees responses**

**CPRE** - We are content with looking forward to 2043. Whatever end date is chosen there are likely to be changes in policy, data or events which require review within the plan period.

**Churcham Parish Council** - The plan should not look forward to the year 2043 since this adds a further 1200 houses to the target figure, we believe the level of growth dictated by an 82% uplift is not a realistic figure since by no stretch of the imagination does this reflect the actual housing need within the Forest of Dean. Given their current performance it is likely that the incumbent government will not be in power in four years time and given the pushback from many Councils complaining the housing demands are not realistic and risk harming the environment and countryside any new administration will probably address this issue and remove the unsustainable targets. As such, it is unwise to commit to an extra two years and the resulting 1200 extra houses under this flawed growth calculation.

**Coleford Neighbourhood Development Plan** - Given required compliance to new legislation, this a reasonable time period to effect the Plan with appropriate consultation time. Also means infrastructure requirements should be able to be planned and delivered in advance of development. That is the minimum period to ensure all the needs are met within the plan period. This will be especially important in the case of a new settlement.

**Coleford Town Council** - Over a revised 23-year plan period the housing requirement would be increased to 13,200 dwellings. This means there is a shortfall of a minimum of 6,600 dwellings from that allocated in the Draft Local Plan Consultation 2024. Given required compliance to new legislation, this a reasonable time period to effect the Plan with appropriate consultation time. Also means infrastructure requirements should be able to be planned and delivered in advance of development. Furthermore, land supply has to be regulated, avoiding the recent rush by some companies to challenge certain LAs and set up situations where large sites have come about through weighted balance. Land banking must not happen.

**Corse Parish Council** - doesn't have a strong opinion on the proposed plan period ending in 2043. However, a longer plan time would help with infrastructure, housing, and economic development, and allow for the coordination of long-term projects. The potential merger of the FoDDC into a unitary authority should be taken into account especially to consider any impact on the Local Plan. The plan should show solid evidence and include a clear process.

**Gloucestershire Constabulary** - The timing of the next Local Plan should consider the time required to complete the consultation and various versions of these documents. As the process needs to be mindful that any document or plan could be out of date after 5 years, especially if each successive government makes changes to planning guidance. Getting this right will also ensure greater control over any developments which are looking to use gaps in the system, as developers are continually using the changes in guidance or 'out of date' information to circumnavigate the local planning system, thereby enabling

permission to be granted without due care to the community's needs. Streamlining the writing and consultation processes would enable a quicker turnaround and enable the council to maintain control of development within the area and keep up with national changes intended by the Government to speed up the planning process.

**GCC** - suggest that the timescale of the Forest of Dean Local Plan should run to the same timescale as the Cheltenham Gloucester and Tewkesbury Strategic and Local Plan which is also currently being progressed.

**GWT** - Yes

**Hartpury Parish Council** - Presumably this is a government requirement

**Herefordshire Council** It is noted that the Forest of Dean (FoD) faces a similar position to Herefordshire with a significant requirement to increase housing delivery in line with the new standard method set out in the NPPF. The FoD has an increased housing delivery target which has almost doubled from 6,000 to over 12,000 new homes over a twenty year plan period and 13,200 new homes for the proposed FoD Local Plan period 2021 -2043. Herefordshire faces similar pressures and must now plan for over 27,260 new homes over a twenty-year plan period. It is noted that the Plan period will be from 2021-2043 and the aim is to submit the Local Plan to Examination by December 2026 with this being the cut-off date for submission under the current plan making system. The consultation document remains at a high-level options stage and does not yet identify options for allocations or include mapping of potential growth areas, as a result Herefordshire Council is unable to provide specific feedback or understand preferred development options and locations, including the impact that this could have for the requirement of services near to county's boundary. As a point of clarification, we are interested to understand how you plan to meet the December 2026 deadline as this is a short space of time, given the fundamental shift in housing numbers, the additional sites and infrastructure that will need to be planned for, in addition to satisfying the duty to cooperate with neighbouring authorities such as Herefordshire. This timescale is very ambitious for such a major uplift in housing numbers for the district.

**Home Builders Federation (HBF)** - There is a need to rebase the plan period to 2025 in line with the PPG para 2a-004 in Planning Practice Guidance (PPG), which notes that when setting the baseline for the standard method the most recent assessment dwelling stock is used. The standard method also requires the affordability adjustment to be the most recent data, in this case it is the median affordability ratio for 2024 that was published in March 2025. Other Matters- Duty to Co-operate (OTC) - have been unable to locate a current OTC statement. There should already be evidence of OTC as this should be an ongoing process. We note that in the past Forest of Dean have been able to plan to meet their own needs, but we would question if such a significant increase in the housing requirement from the new standard method means a clear longer-term vision including some fundamental choices need to be made. Incremental additional to existing settlements alone are unlikely to be able to accommodate such an increase.

**Huntley Parish Council** - The plan is looking too far ahead. The current government has mandated these housing targets and a future government could overturn them. The plan should cover until 2035 at the latest.

**Lydney Town Council** - NPPF Para 22 states 'Strategic policies should look ahead over a minimum 15 year period from adoption'. Lydney Town Council (LTC) recognise that the December 2024 NPPF and revised housing requirement calculation methodology must be addressed by FoDDC within the Local Plan

process and these will impose a delay to the scheduled adoption of FoDD Local Plan to at least 2027. It recognises the requirement of planning ahead for at least 15 years makes it logical to extend the Local Plan period to 2043 to be in line with NPPF para 22. However, LTC urge FoDDC to progress the re-alignment of the Local Plan within the most efficient quickset timescale. It agrees FoDDC should harness the content and evidence bases established by the 2024 Reg 18 Local Plan to the maximum extent. The lack of an up to date Local Plan creates a significant risk of speculative development across the district and at Lydney which will be unlikely to be coordinated with needed infrastructure. It will undermine the delivery of the preferred approach to growth and delivery of FoDD Local Plan vision. By way of example, Lydney Town Council's Planning & Highway Committee have previously objected to the Allaston Road development, based on various factors, including some of those mentioned in this paper, however the developer has appealed and the housing and infrastructure issues Lydney is facing is growing, without the much-needed public service infrastructure. LTC is preparing an updated Neighbourhood Plan (LNP2). It will replace the made LNP. This has recently completed its Reg14 consultation. The proposed plan period is until 2041. This was to coordinate with the emerging FoDD Local Plan. LTC regret this misalignment and will wish to agree how best to address this in preparing the submission plan.

**Maisemore Parish Council** - I agree that the Local Plan should run until 2043.

**Natural England** supports the NPPF. The NPPF states that Plans should have a minimum timeframe of 15 years to include 5 year cycles of reflection based on changing circumstances and evidence base. This gives flexibility to adapt to changing conditions. By the time this plan is adopted a 2043 timeframe will fit this statement.

**Newent Town Council** - Agree with 2043. The Plan is unlikely to be adopted until 2027, this gives one year's grace over the recommended minimum period of 15 years to allow for further revisions which may be required before adoption. Although the total number of houses is therefore increased, we consider it wise to have a small contingency period in order to protect the viability of the Plan.

**Pauntley Parish Council** - Looking as far ahead as possible, whilst being a sensible approach conceptually, should always be regarded as carrying a suitable health warning, as the reality is that there is always a high degree of uncertainty in crystal ball gazing so far forward in an already uncertain world. HM Government has demonstrated how fragile its own projections are when it can decide upon a more than 100% increase in housing need compared to figures published earlier in the same year. For that reason, knee jerk changes in projections that far into the future are not at all helpful and should not be used by a local authority to be quite so prescriptive in its own plans. A degree of responsibility, rather than merely abdication, must always be applied when looking so far into the future and figures should always be monitored throughout and cross-checked with emerging data to prevent errors as has already happened with the government's devolution figures.

**Pendock Parish Council** - The rationale for a plan period to 2043 is sound as the extended period will allow greater opportunity for delivery.

**Redmarley NDP Group** - Do not hold strong views on the proposed plan period ending in 2043. However, a longer horizon can provide clarity for infrastructure, housing, and economic development, as well as allow for coordinated delivery of projects that require significant lead time. The proposed timeframe should also take into account the potential amalgamation of the Forest of Dean District Council into a new unitary authority. Such a change could significantly influence strategic priorities, governance structures, and funding allocations, which in turn may affect the deliverability and focus of the Local Plan. While I have

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no objection to 2043 as an end date, the plan period must be supported by a robust evidence base and include a clear mechanism for regular reviews to ensure it remains relevant and adaptable in light of governance changes or other emerging circumstances. The consultation documentation provided suggest this is not the case.

**Redmarley Parish Council** - 15 years is the minimum period that local authorities are required to plan for as outlined by the NPPF. The Parish Council has no further comment to add.

**Rudford & Highleadon Parish Council** - Forest of Dean District Council is not likely to exist in 2 years and so the Plan may change. The Parish Council is in favour of a shorter time period i.e. until 2030, with the number of new homes to be built during that period reduced proportionately.

**St Briavels Parish Council** - Supports the proposed extension of the Local Plan period to 2043.

**Strategic and Local Plan Authorities** - The NPPF requires that strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. FoDD are proposing to extend the plan period to 2043 to ensure sufficient time for the examination process to be completed. The SLP authorities support this extension and are likely to adopt a similar timeframe in their own approach. The SLP authorities acknowledge that the vision and objectives may need to extend over a longer timeframe. This would account for the substantial lead-in period required to implement any selected new settlement options and provide scope for pursuing ambitions that go beyond achieving net zero.

**South West Housing Association Planning Consortium (SWHAPC)** - notes that the proposed emerging Local Plan period has been extended by two years, now covering the period 2021 to 2043 to allow for the additional time needed to update the Plan in response to changes in housing needs.

The NPPF also requires that strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Given that the Council anticipates adoption of the Local Plan in 2027, the SWHAPC supports the emerging period 2021 to 2043 as this will allow for a 16-year time horizon from adoption.

**Tidenham Parish Council** - agrees with the Plan period but feels 600 dwellings a year over the period is not achievable, especially as the average for the area over the last 10 years is 358. News reports also suggest this is a national issue and not just FoDDC. The Parish Council suggest the Plan should be reviewed every 5 years.

**Upleadon Parish Council** - Are happy for the plan period for the new Local Plan of 2043.

**West Dean Parish Council** - Support the proposal to produce a Local Plan for the period up to 2043. By doing so it will provide a structure for the District's development for the foreseeable future that is shaped to provide for the District's inhabitants, local housing need and business development.

**Westbury-on-Severn Parish Council** - Agree with 2043

## Question 1 - Draft Officer Response

**4.4** The NPPF requires that strategic policies should look ahead over a minimum 15 year period from adoption to anticipate long-term requirements and opportunities such as those arising from major improvements in infrastructure. It is unlikely that the new Local Plan will be adopted prior to 2027 and many responses question whether this is still an underestimation of the timescale due to the length of time reported for current examinations.

**4.5** Many of the comments received expresses a preference for an shorter plan period and an early review. It is a statutory requirement for all Local Planning Authorities to have an up to date local plan. Therefore the Council will continue to review the Local Plan in line with current national guidance. NPPF (December 2024) paragraph 34 specifies that:

*Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every 5 years, and should then be updated as necessary<sup>19</sup>. Reviews should be completed no later than 5 years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every 5 years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.*

Footnote 19 explains that

*“Reviews at least every five years are a legal requirement for all local plans (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012).*

**4.6** Therefore in order to allow for sufficient time post adoption the Local Plan period will be reset to '2025 to 2045.'

## **Question 2**

**4.7** Overall, Question 2 received 251 written comments. Question 2 asked about Sustainable Areas and Sustainable Settlements.

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

### **Key themes**

1. Sustainable development is meeting the needs of present without hindering the needs of future generations
2. Locating development near existing services/infrastructure: This was the most common theme, with many respondents stating that new development should be located at settlements where there are already existing services and infrastructure like schools, healthcare facilities, shops, public transport, etc. This is seen as the most sustainable approach as it reduces the need for travel, supports existing communities, makes efficient use of existing investment, and avoids overburdening communities while waiting for new services.
3. Sustainable development should not involve the building of housing on greenfield sites. All efforts should be taken to use brownfield sites first, and also to convert redundant buildings into residential developments.

4. Providing new services with development: Several respondents also supported the idea of locating development where new services and infrastructure can be provided alongside the housing. This could include planning for new settlements with integrated services, facilities, and employment opportunities. If a new settlement was brought forward, facilities and services would need to be somewhat established to ensure that these communities are not isolated and will be able to thrive independently.
5. Major development in isolated or poorly serviced areas often creates significant challenges. Infrastructure may take years or even decades to catch up, leaving residents underserved in the interim. This can strain public services, put pressure on schools and roads, and make it difficult to build a sense of community.
6. Sustainability and environmental impact: Many responses emphasised the importance of minimising environmental impacts, protecting greenfield/agricultural land, reducing car dependency, reducing the need to travel and emissions, and aligning with sustainability principles outlined in the NPPF. Paragraph 11a of the NPPF outlines that all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas and adapt to its effects
7. This must be a balance of social economic and environmental considerations. Therefore, in the highly ecologically sensitive area that the Forest of Dean district covers, there will need to be a mixed approach to find the best locations that balance these 3 factors.
8. The problem with new services is there is no guarantee they will or can be provided. There are countless instances where infrastructure is promised with CIL or section 106 payments, and it just does not happen. Also, research shows it is more sustainable to site expansion around existing infrastructure.
9. Settlements are not created overnight. They are traditionally born out of need to be close to a particular resource or a position of convenience. In modern history that would be the creation of a new town to house workers of a large corporation or industry preventing the need for long distance commuting.
10. Sustainable transport and travel are also a consideration of sustainable development, paragraph 110 of the NPPF states that significant development should be focused on locations which are or can be made sustainable through limiting the need to travel and offering a genuine choice of transport modes. Build near to the rail network.
11. Capacity constraints in existing settlements: It was acknowledged that while focusing growth in existing towns/villages is preferred, there are capacity constraints, and expansion may only deliver a certain level of development before being overwhelmed.
12. Rural villages and dispersed growth: Some responses highlighted the role of smaller villages in accommodating proportionate growth to maintain vitality, support local services, and provide housing choices, especially through small/medium sites.
13. Paragraph 5.2 of the Consultation Document identifies that in considering sustainability, factors like proximity to public transport and active travel routes, proximity to employment opportunities and existing community facilities and services, access to green spaces, the efficient use of land, and existing infrastructure to support the day-to-day needs of the community, are important. These measures are useful indicators of sustainability, and do not simply relate to existing services.

14. Infrastructure delivery and viability: Concerns were raised about the challenges of delivering promised infrastructure alongside new development, with many examples cited where services failed to materialise or lagged behind housing delivery, affecting viability.
15. There is a need to consider the interaction between employment and housing, recognising that an increase in the number of jobs can itself generate a requirement for additional housing to support growth.
16. Developments adjacent to council and county boundaries run the risk of merging into an urban sprawl with a lack of coordinated control.
17. Short term and medium term development can only be delivered where existing services are available or have the scope to be able to be extended. There is not sufficient time for new services to be planned, contracted, built and put into operation.
18. The Settlement Hierarchy Paper of 2023 advises that centres capable of accommodating further development should ideally have the following: 1, Employment, or employment sites close by. 2, Good or very good public transport accessibility. 3, Easy access to several daily services such as primary school, village hall, pub, shop The Paper states that there may be exceptions to the rule, if one is absent, it should be compensated for by another element to be regarded as a rural service village. It is considered that given the increase in the Standard Method that a review of the settlements that are capable of accommodating further development should be undertaken as well as including a new settlement at the most sustainable location.

## **Statutory consultee responses**

**Churcham Parish Council** - One only needs to walk around Forest of Dean towns and see the empty shops and run down areas and facilities to deduce that there is a lack of inward investment and critical mass to sustain a vibrant high street and to attract potential employers to the towns. Recent Gloucester County Council insights report details that the Forest of Dean has a higher level of deprivation than the rest of the County with areas in Cinderford and parts of Lydney being among the most deprived, with significant households affected by multiple deprivation dimensions. Sustainable development ultimately should mean improving the lives of those in existing deprivation within the Forest of Dean and this can only be achieved by expanding existing facilities to improve them so they are fit for purpose and viable moving forward. This will only happen if new development with inward investment is located with existing services to help those established communities and where the extra investment is focused on those local services that are already serving the community. The promise of new services where there is not already an established community is a promise that we see continually broken since funding is either redirected, eroded or not there. Doctors and dentists cannot be conjured out of thin air and it is indeed the case that even where there are existing services in established towns, these are often struggling owing to lack of trained medical staff.

**Corse Parish Council** - Sustainable development is most effective when growth is in areas that already have good access to services, infrastructure, and public transport, or where these can be easily and quickly provided. Larger projects where facilities are not available are less sustainable, as it requires creating new infrastructure from scratch. This would be a longer process leaving new communities underserved. The Parish Council feel that development within existing settlements encourages regeneration and would reduce transport emissions.

**CPRE - Yes**

**Coleford Neighbourhood Development Plan Steering Group** - Both of these methods are reasonable ways forward but are only part of the overall sustainability equation. Also important is the question of land use, protection of land required for agricultural use, protection of land for environmental qualities, now and for future generations. The critical point is that these methods are consulted upon and planned accordingly. a, Brownfield sites should take priority for redevelopment. They will be provided with infrastructure which will need improvement, but are accessible. Some smaller sites may be available in Coleford. b, In larger settlements, existing/allocated sites will be taken forward relatively quickly within the 15 years or so of the LP period. New settlements need to be judiciously planned for, with new infrastructure installed within the development period, Some small scale build could be started earlier with residents using existing services on a temporary basis. For sustainability, these should be close to major communications links e.g. railway along the Severn, A48/M50. CNE1 and CNE3 policies already address some of the mitigation issues to sustain identity and distinctive rural character in and around Coleford. c. Moves toward adapting to and minimising climate change mean planning needs to allow for new technologies which will affect situational planning. Access to employment can be online now, with commuting being less frequent; renewable energy is being brought in for new development, and new settlements especially could certainly make more of this, if key policies are in place for developers to comply with. d. The character of each settlement should be maintained, for example in Coleford. Coalway, Broadwell, Mile End have their own identities and should remain separate but linked, as is current policy within CNDP (CNE2 Green Ring). It has been accepted that Coleford has these geographical constraints and therefore sustainable small scale growth over the long term has always been seen as the way forward. e. The natural environment has greater emphasis in NPPF terms, so Coleford's SACs for bats requires protection (see CNE3 Green Infrastructure and NPPF para 194). In economic terms tourism is the main employment lead, and natural attractions are often why people come here. We need to keep that balance.

**Coleford Town Council** - Balance in planning means considering the various needs, using existing resources in a sustainable way, and enabling delivery in a practical and agreed manner, not cutting off possible routes forward over the longer time period than just this Local Plan. Brownfield sites – whatever the size – should take priority for redevelopment. They will be provided with infrastructure which will need improvement, but are accessible. In Coleford these sites are limited currently. Given the expected total housing number, within larger settlements, development of known existing/allocated sites should happen toward the beginning of the LP period. Some more new development is likely there, but it is important to keep the rural nature of the Forest, so not just urban sprawl. Hence CNE1 and CNE3. From census 21 stats, 7 output areas in Coleford have the higher densities, and these correlate to new developments. New infrastructure leading to a new settlement which is planned and thus controlled is also good planning. This will need early planning to deliver in the latter part of this LP, possibly flowing on into next LP. It is likely this will happen where a higher level link exists e.g. adjacent to M50 or A40/48. Renewable energy and upgrade of internet is still ongoing. This means access to employment can and does work differently (especially following Covid) so residential and employment are not necessarily in the same places now. The character of each settlement should be maintained, including where there are different identifiable settlements within the host town, for example in Coleford. Coalway, Broadwell, Mile End have their own identities and should remain separate but linked, as is current policy within CNDP (CNE2 Green Ring). Natural environment has greater emphasis in NPPF terms, given climate change, so Coleford's SACs for bats, especially Lesser Horseshoe Bats, need protection (see CNE3 Green Infrastructure and NPPF para 194). Para 198 Protecting tranquil areas also emphasises their value in environmental AND economic

terms: tourism is the main employment lead, and natural attractions lend footfall. We need to keep the balance. The Dean Forest Wye Valley Dark Skies Initiative has recently been updated: this needs to be maintained.

**GCC** - The Historic Environment is gaining an increasingly important role in planning for Sustainable Development and Economic Growth. This is reflected in the environmental objective of the National Planning Policy Framework (NPPF) that includes protecting and enhancing our natural, built, and historic environment, Heritage is a real resource stimulate economic activity, housing benefits from sense of place. welcome that heritage is included as a topic and has its own sustainability objective against which to consider each potential growth option. Yes, any new development should be located where people have access to services and facilities; and importantly, they must also be close enough so that those daily services and facilities (including access to public transport) can be accessed by walking, wheeling, and cycling.

**Gloucestershire Constabulary** - Sustainable and healthy places are dependent on future residents feeling safe, with public spaces designed to reduce ASB and crime while removing any fear of crime, and homes designed to include the current security features.

**Gloucestershire Wildlife Trust** - Sustainable development is defined as development that meets the needs of the present without hindering the needs of future generations. This must be a balance of social economic and environmental considerations. Therefore, in the highly ecologically sensitive area that the Forest of Dean district covers, there will need to be a mixed approach to find the best locations that balance these 3 factors. When defining sustainable areas and settlements, it is important that the Local Plan goes beyond housing numbers and service access to consider environmental carrying capacity and ecological resilience. A settlement can only be considered genuinely sustainable if it:

- Has space to embed Green Infrastructure (GI) at the outset, delivering both ecological connectivity and human health benefits.
- Can realistically achieve Biodiversity Net Gain (BNG) in a way that contributes to the Local Nature Recovery Strategy and the proposed Biosphere objectives.
- Avoids adding to cumulative and in combination pressures on sensitive designations such as the Severn Estuary SAC/SPA, Wye Valley Woodland SAC, Bat SAC and the Statutory Forest.
- Incorporates long-term ecological management and monitoring, ensuring sustainability is not just theoretical but demonstrable.

**Hartpury Parish Council** - We would prefer existing services to be upgraded to meet the future need. Buses are a prime example of existing services that would need minimum upgrade.

**Herefordshire Council** - Yes as our understanding of the National Planning Policy Framework (NPPF) directs new growth in this way.

**Home Builders Federation** - we do agree that it is essential for the Plan to provide for a range and choice of sites that includes enough housing allocations to meet the housing needs of Forest of Dean in full.

**Huntley Parish Council** - It means both. A development could be located by existing infrastructure and services, or in a location where new can be provided as part of the development.

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**Littledean Parish Council** - feel that areas with infrastructure already in place such as services and public transportation should be considered, this could be alongside areas where new can be provided subject to these being in place prior to any development being available for living in. Focusing development within existing settlements promotes regeneration and helps to reduce transport emissions. Although larger projects in undeveloped areas are less sustainable because they require building new infrastructure from scratch they should not be completely discounted, however, this approach would take far longer to achieve and may result in services in new communities being underserved.

**Lydney Town Council** - NPPF Paragraphs 7-14 define the national criteria for sustainable development that the planning system and Local Plans should seek to address and achieve. NPPG Standard Method Calculation; The December 2024 revised standard methodology for calculating strategic housing requirements has resulted in the requirement for FoDDC to plan for a further 6600 homes in addition to those previously identified in the 2024 draft plan. The imposed requirement may not be compatible with the delivery of balanced sustainable development which was expressed in the previous Reg18 version which was built upon evidence of meeting needs and demand for both housing and employment and taking account of previous delivery rates. Which ever option is perused LTC consider will be likely to be harmful to Lydney's character, natural environment, rural setting and rural economy. Local Plan FoDDC Local Plan (Reg 18) has proposed a vision and objectives towards sustainable development within the FoDD area, which all policies including the strategy for site allocations should deliver. Local Plan Sustainability Appraisal The SA of the Local Plan is intended to ensure all options for development and then the preferred approach is assessed and refined to minimise harm and maximise the delivery of sustainable development. LNP Whilst it is now beyond its planned period, the made Lydney Neighbourhood Plan is an adopted part of the development plan for Lydney. The draft updated Neighbourhood Plan (LNP2) sets an updated vision and objectives and revised policies. These reflect the community's aims for the sustainable development of Lydney. The updated plan should inform and influence the FoDDC Local Plan approach to development at Lydney. LNP2 Policy LYD ENVI sets key criteria that LTC wish to see addressed in securing acceptable and sustainable balanced growth within and outside of the current development boundary of the town. LTC recognise larger settlements present the most sustainable opportunity to closely connect housing with jobs, facilities and open space to benefit existing and new residents. It also sees Lydney is a main 'Gateway to the Forest' area and acknowledges the significant role it should play in delivery of balanced sustainable growth within FoDD and housing need. However, it shares and supports the opinion expressed in the FoDDC options paper (para 7.7) that ' ..there may be some scope for new allocations at Lydney but on initial examination of the basic constraints, landscape, ecology, land use (forest), and potential flooding will be significant limiting factors. For the purposes of plan options, some relatively small additional sites may be allocated, albeit site(s) have yet to be identified.

**Maisemore Parish Council** - If we are serious about sustainable development then we need to boost existing infrastructure and service provision, thus reinforcing the viability of our communities.

**Natural England** - The need for sustainable development in local plans requires a balanced approach. Overall the FoDC goal should be to align growth with infrastructure, reduce environmental impact, promote social inclusion, and support economic growth, often favouring locations that maximise the efficient use of land, particularly in existing urban areas, and support large-scale development that can fund necessary improvements. NE favours regeneration of existing settlement boundaries that can enable renewed neighbourhoods through its Green Infrastructure Framework Our Green Infrastructure Framework supports the government's economic growth priorities by encouraging the targeting of investment where

it can deliver the most returns. Green Infrastructure mapping data pinpoints nature-deprived areas with precision, ensuring Green Infrastructure strategies help to bring nature to communities with the greatest need. Our evidence-based standards support the Government's vision that everyone can access quality green space close to home. Within existing settlement boundaries NE are ambitious in wanting to see green connections between green spaces that work for people, economy and nature.

**Newent Town Council** - have concerns over the ambiguity of the question. 'Where new can be provided' could mean at existing settlements or at a new settlement. New development of any significance will almost inevitably require increased service provision whether at existing or new settlements.

**Pauntley Parish Council** - Not necessarily and certainly not at the expense of the green belt. Any potential development sites should be drawn from the existing supply of brownfield sites, despite the reluctance of developers not to maximise bottom line profitability.

**Pendock Parish Council** - As a first and most important principle, locating new development near existing services is the most sustainable approach. This also improves the viability and sustainability of existing services so important at a time when small businesses and public sector provision are under extreme pressure. Delivery of new services is extremely challenging due to economic and financial pressures and will have a negative 'net zero' effect.

**Redmarley Parish Council** - the framing of this question is inherently biased toward legitimising the District Council predetermined approach in allocating development through Option 4 (New Settlements). New Development should be located around existing services, such as those found in the major towns of Coleford, Cinderford and Lydney. Locating development in these areas would mean that housing requirements would be met in the short, medium and long terms. Locating development in areas without any existing services will lead to significant delays in lead times as the services will need to be provided prior to housing being delivered, which can result in a failure to provide housing over the short to medium term. It should be noted that the District Council has failed to evidence any of its statements made in the consultation document through the publication of an Infrastructure Delivery Plan.

**Rudford & Highleadon Parish Council** - Locate new development where there are existing services and extend the existing infrastructure to support the additional development. The 4 market towns should be considered for sustainable development as there is significant existing infrastructure supporting these towns which could be extended.

**Severn Trent** - As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments on the impacts of future developments and to provide advice regarding policy wording on other relevant areas such as water efficiency, Sustainable Drainage Systems (SuDS), biodiversity, and blue green infrastructure. Where more detail is provided on site allocations, we will provide specific comments on the suitability of the site with respect to the water and sewerage network. In the instances where there may be a concern over the capacity of the network, we may look to undertake modelling to better understand the potential risk. For most developments there is unlikely to be an issue connecting. However, where an issue is identified, we will look to discuss in further detail with the Local Planning Authority. Where there is sufficient confidence that a development will go ahead, we will look to complete any necessary improvements to provide additional capacity.

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**SWHAPC** - Sustainable development involves both placing new developments in areas that already have established services, as well as where new necessary infrastructure can be appropriately introduced. Affordable housing in particular should be situated in sustainable locations given that households in need of affordable housing are often more reliant on local services and public transportation and may look to others in their local community for support.

**Sport England** - We agree with the need to locate new develop near to or provide the relevant infrastructure\* to create sustainable communities. Schools, libraries, leisure centres, playing fields, chemists' shops, public transport routes etc

**Staunton (Glos) Parish Council** - The need for sustainable development should mean trying to locate new development where there are already existing services.

**Strategic and Local Plan** - sustainable development means a combination of both prioritising and building on the efficient use of existing provisions, minimising environmental impact, and promoting social well-being and proactively planning new services and infrastructure in locations where all facets of sustainability can be met and development can be self-contained and future proofed. FoDD recognises that the district comprises a diverse network of settlements varying in size and function, each contributing to the area's overall social and economic fabric. These settlements not only interact internally but also maintain significant relationships with neighbouring areas beyond district boundaries. In light of this, the SLP authorities recommend a strategic exploration of these external interdependencies, particularly where they present more sustainable opportunities for development, infrastructure, and service delivery.

**Tidenham Parish Council** - Does the need for sustainable development mean trying to locate new development where there are existing services or where new can be provided? Yes. In the case of Tidenham Parish there are few sustainable employment opportunities and very poor public transport infrastructure (bus, train and walking). Most residents work outside of the Parish and commute by car to the larger towns and cities outside the area. Whilst the Council agrees new development should be close to existing settlements, this should be approached in a holistic way which includes co-ordination between County and District Councils, bus / train operators, NHS (including cross border providers) etc. Past experience shows that new services rarely follow the completion of new developments.

**Upleadon Parish Council** - Both options need to be considered

**West Dean Parish Council** - There needs to be mixture of both. It is well known that the large numbers of houses being provided currently are placing a huge strain on the local infrastructure and facilities. Medical and dental appointments are at full capacity, local schools are having to take children from out of catchment, leisure facilities are inadequate, and the road infrastructure inhibits growth. We are seeing development of estates built for profit and not for the needs of local people. Where existing services do exist and are capable of being extended in a planned way then there is scope for additional housing. But where this is difficult it seems that a new settlement where the full needs of the inhabitants are met first – e.g. adequate school places, active travel, potential for workplace/industry, shopping, sporting and leisure and medical cover are built from the beginning, and not just promised at a later date, then that would go towards a sustainable solution. Wherever a new settlement is considered the recognised pinch points (A40/A48 and the Chepstow road network) must be addressed. The poor road layout leads to congestion, additional pollution and frustration. Enhanced rail and public transport provision should be an inherent part of the (total) plan. It would also be very advantageous for business and employment growth if a new crossing of the Severn could be sought. Locations that open the Forest and the eastern side of District with South

Gloucestershire and access to the M5 needs to be investigated. In suggesting this we are also aware of the constraints placed on such infrastructure from the Severn Estuary RAMSAR listing.

**Westbury-on-Severn Parish Council** - The Parish Council are in favour of developing existing settlements rather than building entirely new settlements.

**Wye Valley and Malvern Hills National Landscape Teams** - Both approaches are likely to be required given the significant uplift in housing numbers and in line with the NPPF requirement to direct development to sustainable locations. Selective extensions of existing settlements would only be supported where evidence demonstrates that growth can be accommodated sustainably, without harm to the .....or their settings. New settlements provide the opportunity for a landscape-led approach from the outset, but these should be in locations where there would not be negative impacts on the National Landscapes.

## **Question 2 - Draft Officer Response**

**4.8** In summary the responses reflect a general consensus that sustainable development should prioritise locations with existing services and infrastructure or where new services can be realistically and viably provided. However, there is a recognition that existing settlements have capacity constraints, and a balanced approach may be needed, including dispersed growth in villages and potentially new settlements. The key is to minimise environmental impact, reduce car dependency, support local economies, and ensure timely delivery of infrastructure to avoid overburdening communities. Striking this balance while meeting housing needs is seen as a significant challenge for the Local Plan.

**4.9** NPPF Paragraphs 7-14 define the national criteria for sustainable development that the planning system and Local Plans should seek to address and achieve. '

At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs<sup>4</sup>

**4.10** Achieving sustainable development means that the planning system has three overarching objectives, economic, social and environmental, which are interdependent and need to be pursued in mutually supportive ways. One of the key aims of the planning system is to create sustainable communities by bringing housing, jobs and services closer together in order to provide high quality places that support the overall well-being of communities reducing the need for travel. These sustainable communities are capable of accommodating a degree of self-containment by having a range of services broad enough to fulfil the day to day needs of residents. This is an important ambition of the Local Plan for the Forest of Dean.

**4.11** A sustainable development prioritises and builds on the efficient use of existing provisions, minimises environmental impact, and promotes social well-being. This means considering factors like proximity to public transport and active travel routes, proximity to employment opportunities and existing community facilities and services; access to green spaces, and the efficient use of land and existing infrastructure to support the day to day needs of the community.

**4.12** The consultation responses agreed that the most sustainable locations are those with a range of employment opportunities, services and facilities and can be accessed using sustainable modes of transport. However many clarified the statements in that new development should be adjacent existing towns where there is existing provision as new settlements would take time for services and infrastructure to become

established. While others suggested the provision of new settlements in the plan presents potential to develop service provision and community infrastructure including sustainable energy strategies from the outset affecting small villages.

**4.13** Any new sustainable community development must deliver economic land to meet future requirements, moving us towards a more sustainable and greener economy, and must create sustainable and healthy places, well served by infrastructure, with good connections between homes and jobs.

**4.14** So that sustainable development is pursued in a positive way, at the heart of the NPPF is a **presumption in favour of sustainable development** (paragraph 11).

### **The presumption in favour of sustainable development**

11. Plans and decisions should apply a presumption in favour of sustainable development.

For **plan-making** this means that:

- a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;
- b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas<sup>6</sup>), unless:
  - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area<sup>7</sup>; or
  - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

The Local Plan will continue to support sustainable development and the likely performance of the LocalPlan will continue to be assessed during its development through a sustainability appraisal. The SA is used to assess and amend the LP policies and proposals as they evolve in order to achieve the best overall results. sustainability webpage - [Sustainability appraisal - Forest of Dean District Council](#)

### **Question 3**

**4.15** Overall, question3 received 250 written comments. Question 3 asked about basic constraints.

*'Section 9 includes reference to basic constraints to development for example flooding. Would you agree or wish to add or remove any of them? Please add comments to support your changes.'*

**4.16** The consultation responses regarding Section 9 "Identifying the supply of land for homes" reveal strong agreement with existing constraints such as flooding, but also highlight numerous additional constraints that respondents believe should be considered. While there is consensus on the importance of flood risk mitigation, especially given climate change impacts, respondents emphasised that the constraints consideration should be expanded to include or emphasise transport and infrastructure limitations, air pollution, biodiversity corridors, protection of agricultural land, food production, socio economic constraints, digital infrastructure, proximity to administrative borders access to jobs, accessibility to services, community

needs, school capacity, landscape and heritage impacts, and climate resilience considerations. There is also insufficient recognition of the social and community infrastructure gaps that arise when building a new settlement from scratch. Services like childcare, healthcare, youth provision, and cultural amenities are difficult to deliver without a pre-existing population base and take many years to establish. Rural areas are already more vulnerable to social isolation, particularly for older people and young adults. In terms of flooding, comments recognise that flooding from surface water is a more local matter and individual sites will need to take account of this.

**4.17** Another key omission is any discussion of energy network capacity. The transition to low-carbon living, including electric heating, EV charging, and the integration of renewable energy, places significant pressure on local grid infrastructure. This is particularly important in rural locations, where grid connections may be weak or non-existent, yet this is not considered in the current constraints.

**4.18** Green spaces are also key and should not be compromised to develop for housing.

**4.19** One respondent did not agree with the protection of the statutory forest from development. Another feels starting from the SHELAA is short-sighted and fundamentally incorrect.

**4.20** Many respondents expressed concerns about specific local flooding issues, especially surface water flooding particularly along the A40, A48, and A417 corridors, with multiple mentions of Maisemore, Churcham, Hartpury, Lowbands and the Glynchbrook area. In terms of flooding, comments recognise that flooding from surface water is a more local matter and individual sites will need to take account of this. Plans should envisage the likely effects of rising sea levels and the effect on natural drainage. The effects of rising tidal surges on both the Severn and the Wye and the implications this will have on infrastructure should be considered.

**4.21** There was significant emphasis on the need to protect biodiversity corridors, conservation areas, and historic settlements like the Chartist settlement at Lowbands. Respondents also highlighted infrastructure constraints, particularly regarding road networks that are already at capacity and the limited public transport options across the district.

**4.22** A recurring theme was the protection of agricultural land, with many respondents arguing that high-grade farmland should be preserved for food security reasons. There was strong support for prioritising brownfield development before using greenfield sites and data to support the investigations.

**4.23** The presence of intensive poultry units (IPUs) are incompatible with residential areas in terms of noxious & offensive fumes given off as well as taking up space which could be better used for housing. This should be added as a constraint. Change of use of land with existing units on together with prevention of additional ones would therefore inevitably ease land supply problems thereby but also would enable housing to be provided in the vicinity where it couldn't be provided now (if that land is appropriate for housing).

**4.24** With specific sites such as Beachley there is concern over flood risk and contamination issues.

**4.25** Several responses from planning professionals and developers noted that constraints should not be treated as absolute barriers but should be assessed on a case-by-case basis with appropriate mitigation measures while affording appropriate protection. Development within the Statutory Forest, National Landscapes, LDAs, open space, LVL, is achievable with necessary protections.

**4.26** Requests for data to support that brownfield sites have been investigated and questions relating to the SHELAA process.

**4.27** Comment on word perception of relatively poor access when it does exist and comments on journey times to Gloucester.

**4.28** Agree significant major investment needed for any new station costs upward of 20 million pounds needed for signalling improvements alone.

**4.29** The appraisal of constraints in section 9 was fine for the housing numbers needed in 2024. With the increased housing target the appraisal of constraints needs to be rethought adding in the constraints which come with the higher target numbers. There should be a focus on more extensive development at Lydney both in terms of numbers and delivery rate. It already has infrastructure and sustainable transport links and is unique in the district in having a railway station to serve potentially substantial further growth.

### **Statutory consultee responses**

**CPRE** - Section 9 contains a list of potential constraints. We do not propose removing any of those. The Statutory Forest is an exceptional and substantial constraint which appears to be recognised. We are surprised at the absence of Best and Most Versatile (BMV) land from the list of identified constraints. BMV land (ALC Grades 1, 2 and 3a) is recognised in the NPPF as a factor to be considered - para 187 and footnote 65 refer. Additional potential constraints. important landmarks eg May Hill, Conservation Areas (ie as in settlements), settings of National Landscapes, settings of important Listed Buildings, Scheduled Ancient Monuments, proximity to working quarries or intensive agricultural production units. proximity to working quarries or intensive agricultural production units and any new plant for electricity generation using nuclear power that may be considered for former nuclear power station sites at Berkeley or Oldbury, could be expected to encompass consideration of potential impact on land on the west side of the estuary.

**Churcham Parish Council** - Flooding is by far is the most serious constraint since we have seen first-hand the effects of flooding in our area and the dangers to life that a serious flooding event can present. We are now seeing the effects of global warming and have documented flooding in areas that are not classified as Category 3 or 2 especially on the Forest of Dean eastern borders. Associated with flooding constraint is the constraint of water run off caused by large development and the loss of water retentive land that would naturally absorb this water. This effect will put existing houses at risk of flooding where they might have not been impacted otherwise. This is especially the case where it is in close proximity or adjacent to existing Cat 3 & 2 flood plains so should constrain the location and scale of any new development. Loss of good quality productive farmland should also rank highly as a constraint given the Government's shift towards focusing on food production over nature conservation. Defra is stopping the Countryside Stewardship scheme in December 2025 with a statement, it is working with Farmers to build a more profitable farming system focused on Food Production in an uncertain world. Food security is a key issue, so given this Government focus a constraint should be included that brownfield or poor quality land that has low productivity for food production should be considered for development. Air pollution is another important constraint that should be included where for instance a new development would cause traffic jams that concentrate vehicles along a single section of road thus raising air pollution in a small area and adversely impacting houses along that route. Recent studies have linked high concentrations of traffic fumes to higher rates of Alzheimer's disease and other serious illnesses. Traffic congestion that impacts economic well-being in the Forest of Dean should be a constraint. The impact of hour-long traffic jams on logistics

and other required movements will simply make the area unviable for attracting businesses and other externally funded inward investment.

**Coal Authority** - Our records indicate that within the Forest of Dean area there are recorded coal mining features present at surface and shallow depth including; mine entries, coal workings and reported surface hazards. These features may pose a potential risk to surface stability and public safety. I can confirm that the Planning team at the Coal Authority have no comments to make on the revisions to the housing allocations chapter.

**Corse Parish Council** - The Parish Council feel that flood risk is an important consideration but would also like to see sustainability, governance and infrastructure considered. Placing larger scale developments in areas that would need additional roads and public transport would increase the need for additional funding which would cause delays. Placing a new development in areas without essential services such as schools, doctors, utilities should be avoided unless there's a fully funded plan to provide them from the start. Agricultural Land should be protected for food growth. Any harm to the rural character must be avoided.

**Coleford NDP Group** - Coleford still has issues with flooding where there is a confluence of watercourses in culverts and focus of combined sewers. Increasing density of building and focus eg on the north of the bowl round Coleford, means greater strain at key points in the water infrastructure. The distinctive character of different places needs to be conserved. The maintenance of the LVL gap is strongly supported by the Allocations Plan (AP), Draft Local Plan 2024 and the Neighbourhood Development Plan (NDP). To reverse this “would be contrary to National policy.” Generally public transport in the Forest is a major constraint. The availability/provision of transport links, already existing or able to be improved alongside development, has to be part of the sustainability equation. Strategic transport links: Access and egress for Dean will always be problematic until another bridge is built across the Severn. bridges over the Wye are also problematic at Monmouth bridge has recently had critical repair to continue to give access to the A40. Brockweir, Bigsweir and Chepstow’s old bridge are single lane only.

**Coleford Town Council**- Coleford still has issues with regard to flooding here: in the centre of town. This reflects the EA level 3 stretching right through the Town Centre. Coleford is in a bowl, where streams feed in from north west and east and leave via south. GCC Flood Authority has modelled the watercourses and is trying to progress their schemes to improve alleviation. The new development at Thurstan’s Rise has suffered from flooding for years after residents moved in. Checking of actual works on infrastructure in new developments is critical. New developments and infrastructure do not work at same rate. The strain on existing infrastructure from combined sewers, especially in Coleford with two key water authorities are difficult to resolve: Dwr Cymru oversees the Wye and Severn Trent the Severn (there is a watershed within the Parish). The capacity in pipes does not cope with intense rain and therefore also affects water quality in watercourses. Increasing density means greater strain at key points.

The scale of change in terms of population growth has been noted, and for Coleford this has meant a total increase of 10% from 2011-2021. In 2018 consistent change was allowed for in Coleford Neighbourhood Development Plan.

The Green Ring policy CNE2 was included in shaping the of the Parish, to keep separation and green spaces and be sustainable. It was accepted by the Examiner, FoDDC and the residents of Coleford. The FoDDC Planners say “assuming the physical visual gap is to be retained it will be a major constraint. The maintenance

of the gap is strongly supported by the Allocations Plan (AP), Draft Local Plan 2024 and the Neighbourhood Development Plan (NDP). To reverse this “would be contrary to National policy”.

The value of Neighbourhood Planning is that where Parishes choose to have active involvement in Planning, that is done correctly according to Regulation, and respected in law. CNDP is now being Reviewed alongside the Mining: a significant demand for housing is affordable, but where coalfield/ quarrying areas are concerned, development sites may well be required to stabilise ground, leading to extra expense. They then submit viability challenges which have led to loss of affordable housing allocations to policy. This has happened recently in Coleford and needs to be avoided. Public transport: The only town with rail access is Lydney, for sustainable longer trip public transport. Generally public transport in the Forest is a major constraint.

**Gloucestershire Constabulary** - The volume of houses proposed over the coming years is likely to outweigh the number of employment opportunities in the Forest of Dean District, as a result commuting is likely to place more burden on the key routes leading out of the district (A40, A48). The existing road network through the Forest of Dean which offer scenic drives for tourists can cause delays for local traffic and the emergency services. In addition to historic mining, either free mining or commercial mining through the Forest, the geology can be unpredictable creating features like the Scowles at Bream and around Coleford, or extensive cave networks with entrances throughout the area.

**GCC** - recommend the historic environment is included The “Historic Environment” comprises much more than scheduled monuments and can be heritage assets which are designated or non-designated. The NPPF definition of “Historic Environment” is: All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora. There are several references to mitigating harm to receptors (e.g., paragraph numbers 10.53 and 11.10) but these do not include the historic environment. Example positive or negative effects for each option are not provided for the historic environment. Paragraph 10.45 for Option 3 does reference potential negative harm but seems to implicitly suggest that the only harm would be to the built historic environment. There is no recognition that different components of the historic environment exist and can be found not only within or on the edge of settlement, but anywhere. GCC officers welcome the reference to accessibility – it needs to further clarify that this includes access walking wheeling, cycling and by public transport as well as private vehicles. DfT’s new connectivity tool is helpful in this respect. This is required to deliver not only Sustainable Development but also development, which is inclusive and healthy.

**GWT** - Largely agree with the constraints. Agricultural land grade is not mentioned as a constraint. There are some areas of grade 1 and 2 agricultural land in the district at Tutshill/Sedbury and in Leadon Vale including around Newent. As a nature organisation we also recognise the need to produce food and so do not advocate land use change on these areas but better integration of biodiversity into food production. We do not believe development should occur on these highest grade soils.

**Hartpury Parish Council** - Transport is also a basic constraint. There is a pinch point at Over roundabout for any traffic from the FoD to Gloucester or Cheltenham, not only the A48, but also the A40, A417 and B4215. Recently the A417 has flooded at Maisemore most years, for a number of days. This is not mentioned. The proximity of large scale development in adjacent authorities (primarily Ashleworth and Maisemore) adds to transport problems.

**Herefordshire Council** - This is set out in the NPPF as well as accompanying Planning Practice Guidance.

**Historic England** - National policy emphasises that sustainable development means that local plans should be prepared to provide for development need whilst protecting designated heritage assets and their setting (and other heritage assets of archaeological interest which are demonstrably of equivalent significance to scheduled monuments). Section 9.9 is titled Designated Sites but there is no reference to designated heritage assets. We would encourage inclusion of designated heritage assets as an important consideration (constraint and opportunity) to accord with national policy (para 11 NPPF).

**Home Builders Federation** - agree that brownfield and greenfield sites will be needed to meet the housing requirement of the Forest of Dean. - would observe that policy constraints are different to environmental and geographical factors- such as areas of high risk of flooding of subsidence. - would request the Council provides more information on how the Forest of Dean Plan will interact and relate to the Gloucestershire Local Nature Recovery Strategy (LNRS). The Local Nature Recovery Strategy should also be a key piece of evidence that underpins the Local Plan identifying opportunities for nature recovery. The LNRS is not intended to be a block to development but to help identify where development can support nature recovery. There is a need for careful consideration of how all the policies in the Plan interact together to ensure that development remain viable and deliverable. Care may be needed to ensure any layering of multiple policies and requirements onto a single site does not become unduly burdensome.

**Huntley Parish Council** - There are only 2 routes in and out of the Forest - A40 and A48. Any expansion of settlements will add traffic onto these routes. Any incident on either road can cause major disruption. There has to be a point where these roads can take no more traffic.

**Littledean Parish Council** - The Parish Council would ask that infrastructure and sustainability be major considerations. New developments in areas that lack essential services like schools, doctors, and utilities should have these services created and provided prior to any houses being sold and lived in to avoid additional burden on surrounding villages, there must be a clear, plan for funding in place to provide infrastructure with the planning applications. No developments should impact on the rural aspect of areas and communities. Agricultural land should be protected for any agricultural purposes.

**Lydney Town Council** - recognise the basic constraints identified by FoDDC. These are highlighted as primary constraints that limit Lydney being capable of accommodating significantly greater amounts of development than already allocated, committed and identified for potential allocation in the 2024 Reg 18 Local Plan (see para 7.7). LNP2 policies and evidence base identifies local issues and constraints that should be considered alongside basic strategic level constraints.

**Maisemore Parish Council** - My understanding is that many brownfield sites in the district are unattractive to potential developers owing to clean up costs. Given the supply constraints I would like to see this matter given serious thought. FoDDC should seek funding from central government and insurers of the former occupants of such sites to help cover the clean up costs. This could help in the provision of a great many housing sites.

**Natural England** - NE recognises that capacity for future change may be limited if the options use only development around existing settlements, especially if key characteristics of the area are to be retained; while maintaining protections and considerations for proximal protected sites and associated biodiversity. We appreciate the finite capacity for housing around existing settlements.

**Newent Town Council** - Agree

**Pauntley Parish Council** There is a need for a fuller awareness of local challenges posed by a blanket approach to housing numbers proposed by the current administration based solely on HM Government targets. Examples of constraints must include: lack of employment opportunities, flooding, environmental pollution, traffic levels and the ability of existing roads to cope with substantially higher numbers of road vehicles, noise pollution, the lack of any existing infrastructure and general unwillingness for developers to consider protection of the green belt, protection of ancient settlements

**Pendock Parish Council** - All constraints listed are relevant to varying degrees especially flooding. Three should be added. The proven ability to provide local services with certainty where required for sustainable development. The second is close proximity or easy access involving sustainable public transport to the main employment opportunities. Thirdly, the avoidance or minimisation of the use of the 'Best and Most Versatile' (BMV) land

**Redmarley Parish Council** - The District Council should be aware of all constraints to development, and these should be considered fairly and accurately in both the Sustainability Assessment and Local Plan Options Document. The basis of this question suggests that the District Council is not aware of all the constraints in the District and thus has failed to accurately consider all alternatives to the preferred option.

**Redmarley NDP Group** Agree that constraints such as flooding are essential, but Section 9 should be expanded to reflect wider sustainability, governance, and infrastructure challenges, including:

Transport Infrastructure Limitations – Sites requiring substantial new road capacity or public transport provision, without committed funding or realistic delivery timescales, should be considered unsuitable for large-scale growth.

Proximity to Administrative Boundaries – Large developments near or straddling local authority boundaries risk uncontrolled expansion by neighbouring authorities and may result in fragmented or inconsistent service provision.

Lack of Existing Services – Sites without access to essential services (schools, healthcare, retail, public transport, broadband, water, and electricity) within walking or cycling distance should be treated as heavily constrained unless there is a fully funded, deliverable plan to provide them from the outset.

Loss of Best and Most Versatile Agricultural Land – Avoid development on Grades 1–3a farmland to protect food security and preserve the rural environment.

Landscape and Character Impact – Prevent development that would cause substantial harm to rural character, particularly in transition areas between districts.

Cumulative Impact of Dispersed Growth – Where development could trigger further unplanned growth in neighbouring areas, this cumulative effect should be treated as a constraint.

Climate Commitments and Flood Risk – Any major development must be consistent with the Council's net zero commitments, avoid creating car-dependent communities, and fully assess downstream flood risk and water supply capacity.

These additional constraints would help ensure new development is genuinely sustainable, adequately serviced, and compatible with maintaining the district's rural character.

**Rudford & Highleadon Parish Council** - agree with the constraints identified. The council has one additional constraint which should be added. The best and most versatile farmland should be protected for future food supply. Development should only take place on the least productive land, that is graded 4 or 5.

**Severn Trent Water** - Management of surface water is an important feature of new development as the increased coverage of impermeable area on a site can increase the rainwater flowing off the site. The introduction of these flows to the public sewerage system can increase the risk of flooding for existing residents. It is therefore vital that surface water flows are managed sustainably, avoiding connections into the foul or combined sewerage system and where possible directed back into the natural water systems. suggested policy wording

**Sport England** - we agree with the list of basic constraints listed, and therefore development should be avoided in these areas

**Staunton (Glos) Parish Council** - We agree with these basic constraints and do not wish to remove any of them.

**Strategic Local Plan Authorities** - FoDD is proposing an approach whereby areas falling within Flood Zones 2 be excluded from consideration for most new development. Whilst the SLP authorities acknowledge FoDD's precautionary stance, they recommend adopting an evidence-led approach in line with the NPPF. This approach would enable a comprehensive evaluation of potential sustainable development opportunities within Flood Zone 2 areas. Where proposals satisfy the requirements of the Sequential Test and, where applicable, the Exception Test, alongside robust site-specific flood risk assessments, development could proceed with appropriate safeguards in place to ensure communities remain protected from flood risk.

**Tidenham Parish Council** - Section 9 already mentions that land options for development are becoming exhausted (section 9.5) and there are already pinch points at Gloucester and Tutshill/Sedbury (section 9.17). Yet it is stated that there are constraints in all areas except Tutshill/Sedbury and developments in this general area (section 7.31 ). Those that know the Tutshill/Sedbury area will testify there are already severe constraints with the infrastructure, especially the A48 and roads serving the M48. Despite a number of recent developments both in the Tutshill/Sedbury and Chepstow areas, there are further developments being considered this side and on the other side of the Welsh border. Any development along the A48 corridor, including in Lydney and Monmouthshire, exacerbates traffic difficulties at the Tutshill/Chepstow pinch point which happen at any time of the day or week. Further development on either side of the border requires a bypass to be considered or the potential reconstruction of the railway bridge across the River Severn. There are two areas of flooding concern in the Tutshill/Sedbury area - Elmdale on the River Wye and at Beachley, this having been given as a reason for recently refusing a planning application for the further development of the park home settlement on Beachley Road.

**Upleadon Parish Council** - New development should not be on best and most versatile land.

**West Dean Parish Council** - We agree with the constraints listed in Section 9. We would like to provide some additional clarity and reference others not so mentioned. We feel the position of the Statutory Forest is not given enough importance within the document. Large expansion of the population that will follow the enforced number of homes (beyond that needed for local need) will place enormous strain on the Forest, its flora and fauna as it will become a playground and leisure area for a much larger population. There is also the danger of the accelerated erosion of the Forest's heritage and traditions. Although all areas move with the times, we should try to resist such erosion and offer protection to something that is unique in Britain. Although the Coleford Neighbourhood Plan is mentioned in several places other NP's (Forest Edge South, Berry Hill et al) are not given due credence. What is also somewhat glossed over is the poor road provision and lack of public transport. We have mentioned these in our answer to Q2 so

will not repeat them here. There is another aspect which we feel should be included and one that is often dismissed as a technical issue and not a planning one – that of proper sewage networks and treatment plants. With the Wye and the Leadon both suffering heavy pollution as it is there are also other parts – such as the Slaughter Cave systems and redundant mines being used for sewage overflow as well as water and flood controls, which is making matters worse. Therefore, proper waste facilities must form part of the Plan.

**Westbury-on-Severn Parish Council** - The Parish Council do not want to see a lot of open countryside development. Some Parishes would welcome appropriate additional housing on appropriate sites. The PC are in full agreement that sites that have been given permission should be built on before further sites are pursued.

**Wye Valley and Malvern Hills National Landscape Teams** - It is essential constraints are fully taken into account in identifying housing growth locations. The Housing and Economic Land Availability Assessment PPG, paragraph 002 states that plan-making bodies should consider constraints when assessing the suitability, availability and achievability of sites and broad locations. NPPF para. 189 requires that "great weight" is given to conserving and enhancing landscape and scenic beauty of National Landscapes. Section 85 of the Countryside and Rights of Way Act (2000) states that in exercising or performing any functions in relation to, or so as to affect, land in an AONB "a relevant authority must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty." This includes land outside the National Landscape if it affects the designated area. As well as the designated areas themselves, the broader areas that form the setting of the .... and .... need to be included as a constraint. What comprises the setting is dependent on scale, location and type of development. The .... Partnership has published a Position Statement on Development and Land Use Change in the Setting of the ....

"<https://www.malvern-hills-nl.org.uk/wp-content/uploads/2024/06/2024-MHNL-Position-Statement-on-Setting-FINAL.pdf>"

Given the unique environmental and landscape constraints within the FOOD, a district-wide constraints and capacity study, or an updated landscape sensitivity and capacity study should form part of the evidence base. The localised landscape assessments for candidate sites in the evidence base do not adequately consider wider landscape sensitivity and capacity to convincingly evidence strategic growth choices. Examples of such studies are those commissioned as part of the evidence for the South Worcestershire Development Plan Review (SWDPR) for the Cotswolds and Malvern Hills National Landscapes <https://www.swdevelopmentplan.org/swdp-review/swdp-review-evidence-base?view=article&id=578&catid=31>. including the settings of National Landscapes, risks allocations being found unsound at Examination.

### Question 3 - Draft Officer Response

**4.30** Across the Forest of Dean District (FoDD) there are a variety of constraints on development as well as opportunities. The constraints include those mentioned in the options consultation document such as designated areas such as the Malvern Hills and Wye Valley National landscapes and the Statutory Forest within which major development is not appropriate though smaller local change may be beneficial.

**4.31** There are a great variety of statutory and non statutory designated sites in the FoDD. The district also benefits from several priority habitats, which include ancient and native woodland, wood pasture and parkland with veteran trees, lowland meadows, and traditional orchards." Both International and nationally important sites of ecological importance (eg. Special Areas of Conservation (SAC's), Special Protection Areas (SPAs), Ramsar sites and Ancient Monuments) are spread throughout the FODD. The main areas

where ecological designations are concentrated are the Wye Valley, close to the Severn Estuary and the Forest of Dean itself. Nationally important sites are in effect absolute constraints and would rule out development of them or where it would be likely to have an adverse effect on them.

**4.32** Areas at risk from flooding are also largely excluded from development and many respondents expressed concerns about specific local flooding issues, especially around the Churcham and Redmarley and Hartpury areas. Flooding and surface water matters are covered by policies in the NPPF and the new Environment Agency Flood Risk Maps issued in Spring 2025.

**4.33** Digital access is generally acceptable in the FoDD, however there are differences between the various areas.

**4.34** Many representations highlight the need to safeguard agricultural land from development and highlight the fact that one or more of the strategic sites may involve the loss of good quality land. These are both important factors in considering the allocation of sites but as with all considerations must be balanced against others. The loss of agricultural land may be reduced by the use of previously developed land and less productive land and this is recognised by the LP as it is being drafted. In making allocations land for GI, flood storage, and other uses will be needed along with provision for the BNG (biodiversity net gain) The LP has to seek an overall balance in providing for the future needs that are identified and in doing so must ensure that it does its utmost to ensure a sustainable long term pattern of development. Whatever land take is required must be justified and prudent and previously developed land should be used fully.

**4.35** Some responses highlight the loss of “Green Belt” when referring to possible development proposals. This is a term which is associated with the statutorily defined areas that surround or adjoin some of the major settlements in the country. It does not apply to the FODD though the points made (usually objection to the loss of an area of countryside/ agricultural/ rural landscape to built development) are noted.

**4.36** A number of representations highlight the effect of development on climate change. It is agreed that an important part of the context of the LP is the climate change agenda, the policies of the Local Plan are being developed along with the climate change team to address these important issues.

**4.37** Transport was another issue that was highlighted along with infrastructure constraints, particularly regarding road networks that are already at capacity and the limited public transport options across the district. In addition accessibility to services, community needs, school capacity, GP capacity were mentioned. We are still at an early stage in identifying the particular infrastructure requirements for potential allocations (education, healthcare, highways etc). Officers are preparing an Infrastructure Delivery Plan (IDP) and as the Local Plan makes further progress, each of the allocations will be subject to a more detailed assessment and evaluation.

**4.38** With regard to concerns over the proximity to administrative boundaries. The Council will continue to regularly engage with neighbouring authorities under the Duty to Cooperate requirement to ensure that cross border strategic matters are discussed.

## Question 4

Question 4 which received 225 written comments, asked about the Sustainability appraisal

*The document is accompanied by the Sustainability Appraisal 'Further Interim Report for the Local Plan Options to Deliver the Additional Housing Requirement' which is cross-referenced in Sections 10 and 11.*

*Do you agree with the Sustainability Appraisal methodology and the outcomes for each of the Options? If not, please give your reasons why'*

**4.39** This consultation on the Sustainability Appraisal (SA) for the Forest of Dean Local Plan has generated significant feedback, with respondents expressing diverse views about the methodology and outcomes. The majority of respondents expressed concerns about the SA methodology, particularly regarding its transparency, weighting of criteria, and perceived bias toward certain options (especially Option 4 - New Settlements). Many questioned how trade-offs between conflicting objectives were resolved and felt the SA gave too much weight to housing numbers while not adequately considering environmental impacts, biodiversity, and heritage. There were also substantial concerns about infrastructure delivery feasibility and the impact of new settlements on rural character and car dependency.

A significant number of respondents specifically questioned the SA's apparent favorability toward Option 4 (New Settlements) despite previously identifying sites like Glynchbrook as unsuitable in earlier assessments. Those supporting the SA methodology generally appreciated its structured approach and agreed with the conclusion that a combination of existing settlement expansion and new settlements (Option 6) represents the most sustainable approach. Professional stakeholders provided more technical critiques of specific objective assessments and the evidence base supporting the SA's conclusions.

## Keys Themes

1. **Transparency and Methodology Concerns** - Many respondents criticised the lack of transparency in how sustainability criteria were weighted and how conflicting objectives were balanced. The methodology was described as "not readily transparent," with unclear scoring mechanisms that made it difficult to understand how conclusions were reached. As one respondent noted: "It does not make clear how each objective is weighted relative to the others, or how conflicting results are reconciled to reach an overall conclusion." Several respondents felt the methodology appeared designed to favor predetermined outcomes rather than objectively assessing options. Other felt that the methodology was good but there needs to be intense scrutiny of the consistency and balance applied.
2. **Perceived Bias Toward Option 4** - A significant number of respondents believed the SA showed undue preference toward Option 4 (New Settlements) despite substantial concerns about its sustainability. Many pointed to contradictions with previous assessments, particularly regarding the Glynchbrook site, which was previously deemed unsuitable but now appears favored. Respondents questioned: "How can a site that was unsuitable in July 2024 become suitable just because housing targets have increased?" The apparent shift without clear justification undermined confidence in the assessment's objectivity.
3. **Environmental Impact and Biodiversity Concerns** - Many respondents felt the SA gave insufficient weight to environmental considerations, biodiversity, and landscape impacts. There was particular concern about the permanent loss of agricultural land, wildlife habitats, and rural character. Several respondents expressed surprise that a Green Party-led council would appear to favor large greenfield developments. As one stated: "This appraisal lends too much weight on housing numbers and shows little regard for the biodiversity or heritage of the area."
4. **Infrastructure and Services Viability**- Respondents questioned the assumption that new settlements would successfully deliver required infrastructure and services. Many cited examples of developments where promised infrastructure was delayed or never materialised. Concerns were

raised about the "wishful thinking" nature of assuming services would be delivered without proof of funding or viability assessment. As one respondent stated: "The requirement for major new infrastructure from scratch, with serious viability risks if funding is delayed."

5. **Car Dependency and Climate Impact** - Many respondents challenged the SA's assessment of transport sustainability, particularly regarding new settlements. They argued that new settlements, especially those near the M50 (Glynchbrook), would increase car dependency and undermine climate targets. One respondent noted: "Increased car dependency for decades, undermining climate targets." Several questioned how the SA could consider such developments sustainable given their likely reliance on private vehicles.
6. **Support for Combined Approach** - Some respondents, particularly professional stakeholders and developers, supported the SA's conclusion that a combination of existing settlement expansion and new settlements (Option 6) represents the most sustainable approach. They agreed that existing settlements alone couldn't accommodate all required growth, and that new settlements offer opportunities for comprehensively planned sustainable communities. As one stated: "Option 6 can allow some quicker wins in terms of housing delivery using existing settlements and services, but also allows the creation of well-planned new communities for the medium/longer term."
7. **Evidence Base and Data Concerns** - Several respondents, particularly those with professional backgrounds, criticised the limited evidence base supporting the SA's conclusions. They noted the absence of traffic impact assessments, housing needs analysis for specific locations, and detailed environmental studies. As one respondent stated: "The SA is based on too much subjective opinion and not enough data. There is no housing needs analysis demonstrating that new development on the scale of a new settlement is needed."
8. **Alternative Options Assessment** - Some respondents suggested the SA didn't adequately explore all reasonable alternatives or combinations of options. Several argued for greater consideration of brownfield sites, expansion of existing settlements, or more balanced distribution of growth. Some professional stakeholders questioned whether Option 5 (development in adjoining authorities) was properly assessed given the context of local government reorganization and cross-boundary opportunities.
9. **Technical Compliance Concerns** - A small number of respondents, mainly professional stakeholders, raised concerns about the SA's compliance with regulatory requirements and best practice. Issues included the need to update SA objectives to reflect current national policy, the absence of dedicated transport and accessibility objectives, and the need for more robust monitoring frameworks.

## **Statutory consultee responses**

**Churcham Parish Council** - We do not agree with the Sustainability Appraisal methodology for the reason that there are a lot of assertions made in the methodology with no supporting evidence to back up the assertions stated, therefore they remain conjecture. Also many of the statements are contradictory so it was difficult to deduce what was the exact line of thinking or strategy we are being asked to comment on. As an example on point 8 (To maintain and improve air quality) Options 2 & 3 marked as red state: Development and traffic generation causes air quality issues through increased traffic congestion. Less potential to select sites with improved opportunities to travel by public transport. Option 4 marked as neutral states: Development and traffic generation causes air quality issues through increased traffic congestion. However, opportunities through master-planning to create opportunities to travel by public transport. Where is the evidence to make this assertion? It is equally valid that the combined traffic of a

new settlement will cause much greater and concentrated congestion on arterial roads especially in a traffic jam situation which will have a greater impact on air quality since it is concentrated. The scale of any new settlement would require substantial public transport which unless figures are provided as to the scale then the statements made in the table are purely opinion with no apparent substance so we conclude it is not a valid methodology.

**Coleford Town Council**- The essence of the methodology is justified and outcomes explained in terms of sustainability. Climate change and applicability to land use planning is recognised, especially in a rural environment with some market towns, rather than an urban setting. The role of mitigation is important to underline as this will refine and enforce the balance between development and landscape and maintain the services which work well for the residents/businesses.

**Corse Parish Council** - The Parish Council disagree with the methodology and conclusions of the Sustainability Appraisal (SA) as the SA scored based on a list of objectives but fails to clarify the weighting and also appears to unfairly favour Option 4 despite its sustainability and delivery risks.

**GCC**- The response is constructively critical of the Sustainability Appraisal methodology regarding heritage assets while offering positive acknowledgment of certain aspects and providing detailed alternative approaches. The respondent appreciates the inclusion of heritage in the vision and SA objectives but identifies significant methodological flaws in how heritage impacts are assessed. They provide substantive evidence from Historic England guidance to support their critique and offer a detailed alternative assessment framework. Positive recognition of heritage inclusion

**Gloucestershire Wildlife Trust** - Option 1 is viewed as neutral against sustainability objective Point 7 (biodiversity, fauna, and flora) due to the proximity of many settlements to protected or ecologically linked sites. Impacts would need to be assessed individually, and some allocations may be unsuitable if mitigation isn't possible.

There are concerns about the consistency and specificity of site appraisals, particularly in the SHELAA. The current biodiversity assessment is too general, combining green infrastructure and landscape elements. A separate biodiversity category is recommended to better identify constraints and enhancement opportunities, including references to the Local Nature Recovery Strategy (LNRS) and relevant enhancement measures.

Option 4 is supported for Point 7, as it allows for selecting low-impact sites where biodiversity enhancements can be effectively masterplanned.

**Hartpury Parish Council** - Hartpury Parish Council disagrees with both the Sustainability Appraisal methodology and its outcomes across the options. Option 1: The disadvantages are grossly overstated Option 2: The advantages are overstated. It is not clear how this option would enable employment to be distributed. Option 3: We agree that it is not sustainable, and would not deliver the number of homes required Option 4: We disagree with the advantages, some of which are very dubious, and some of the others could also apply to Option 1. The disadvantages must surely outweigh the advantages. Option 5 is not realistic. Option 6 is discussed later.

**Herefordshire CC** - The SA is accompanying the consultation plan and comments in this response should be considered with respect to the SA also.

**Littledean Parish Council** - The Parish Council feels that the methodology and questionnaire appears to unfairly favour option 4.

**Lydney Town Council** - LTC has not conducted a detailed review of the draft Forest of Dean District Council (FoDDC) Local Plan Sustainability Appraisal (SA), but acknowledges its purpose is to promote sustainable development by integrating environmental, social, and economic factors into planning policy. It notes the SA complies with Section 19 of the Planning and Compulsory Purchase Act 2004 and is an ongoing process throughout the Local Plan's development, including examination. LTC considers the 12 SA objectives to be a sound foundation for assessing and guiding sustainable development across the district.

**Maisemore Parish Council**- I do not feel suitable qualified to pass comment.

**Newent Town Council** - In theory, yes. In practice, commercial-led development rarely delivers all the infrastructure needed. Planning regulations at present are not strong enough to compel its provision at appropriate stages of larger developments and government funding to support some of this infrastructure is not generally available for new settlements of the size envisaged in this draft Plan.

**Pendock Parish Council**- The Sustainability Appraisal should be more explicit and have strong statements about close links to existing infrastructure, services, employment opportunities and sustainable public transport. Car borne travel as a consequence of new development should be explicitly minimised through locating all new development close to the existing public transport network, infrastructure, local services and employment opportunities. Failure to do this will undermine the sustainability policies of the Local Plan

**Pauntley Parish Council**- The response expresses strong criticism of the Local Plan document and the Sustainability Appraisal methodologies. The respondent believes the documents are deliberately complex, misleading, and designed to favor predetermined outcomes. Key Themes: Accessibility and Transparency

**Redmarley Parish Council** - The Sustainability Assessment does not independently and impartially test all reasonable alternatives to the District Councils predetermined preferred option. The District Council does not give a fair and accurate assessment of each Option and instead steers its assessment into making the preferred option (Options 1 & 4 combined) seem like the most sustainable option, whereas in reality it is not. The District Council should publish a full, fair and accurate sustainability assessment where it assesses all Options independent of any predetermined outcome.

**Rudford & Highleadon Parish Council** - agrees. The constraints around the market towns should be revisited to ensure that they are solid constraints.

**SLP Authorities** - The Sustainability Appraisal (SA) indicates that **Options 2 and 3** have very limited potential to mitigate negative impacts. In contrast, **Options 1 and 4** show more positive effects, although neither can deliver the full scale of development alone. **Option 4** is noted for its potential to enable cross-border cooperation.

**Sport England**- We agree with the Sustainability Appraisal

**Staunton (Glos) Parish Council**- We agree with the sustainability appraisal methodology for option 1 due to the existing infrastructure.

**Westbury Parish Council**- The Parish Council is not in favour of new settlements based on the fact that the necessary infrastructure is not in place to satisfactorily service any new settlements.

**West Dean Parish Council-** Mainly – yes. However, housing need should be based on proper projections of local need that reflects local population, local demographics and planned growth linked to employment. We totally reject the spurious imposition of national targets based on central algorithms best suited to an urban society. The sustainability approach must be brownfield sites first and should also be open to sites within existing settlement boundaries being re-designated to allow housing for local need to be provided, such as the potential offered with the International Timber site in Parkend.

**Wych Avon DC -** We suggest that the sustainability appraisal and site assessments continue to consider climate resilience, biodiversity enhancement, and opportunities for active travel and public transport.

**Wye Valley and Malvern Hills National Landscape Teams -** We are in broad agreement with the outcomes for '6. To protect and enhance the landscape'.

#### **Question 4- Draft Officer Response**

**4.40** The Sustainability Appraisal (SA) has been carried out by assessing the options in a consistent and comparable manner. It is recognised that some of the results of SA can be subjective, however, they have been checked by several professional officers as well as a qualified Environmental Consultant who has acted as a 'critical friend' for the SA. The SA has been carried out in a transparent manner where the methodology and all SA outcomes that are available have been published.

**4.41** Every attempt has been made to ensure that scoring mechanisms are consistent (using the RAG ratings and scorings) however, it is recognised that there may be disagreement by different parties over the final conclusions. Where considered appropriate, the SA methodology can be strengthened to ensure that it is clearer how scores are interpreted.

**4.42** The SA is carried out using the SA Objective Framework against which to assess criteria. Trade-offs between conflicting objectives have been resolved by considering and weighing up the frequency and severity of likely negative effects against the frequency and intensity of likely positive effects and thereby making a professional conclusion. Often the conclusion will set out where 'trade-offs' could be made and how mitigation could improve the overall sustainability of an option.

**4.43** It is noted that some people have commented on there being too much weight given to housing numbers while not adequately considering environmental impacts, biodiversity and heritage. It is recognised that the purpose of this particular consultation and therefore the options assessed for this Interim SA has been to find the most sustainable strategy to accommodate the significant uplift in housing and therefore housing has taken a pivotal role. Even so, the strategy and the SA must and does take into account other types of development and also assesses environmental impacts on different options for development. Without that it will not conform to the SEA regulations.

**4.44** Concerns about infrastructure delivery and impacts of new settlements are recognised as well as the need for updated evidence. The SA will clearly take into account any future evidence documents, such as Infrastructure Delivery Plan, Transport Modelling, Strategic Flood Risk Assessments, Housing and Economic Needs Assessment, Viability Assessments, etc. as soon as the results of these become available. The SA is an iterative process and will therefore continue to be updated to reflect information gathered and public comments received until submission of the local plan.

**4.45** With regards to the perceived favourability towards Option 4 (New Settlements), it is confirmed that each Option has been carried out systematically and without bias. No Option has been ‘favoured’ above another or ‘pre-determined’. Each has been considered using the same SA Objective Framework. It is recognised that some individual new settlement sites, such as Glynchbrook do not have a favourable outcome in the sites assessment (as published in the draft local plan 2024). The reason for this is because every potential development site (of whatever size or location) has been assessed against current sustainability criteria without taking into account how a new settlement could be masterplanned and brought forward with the necessary infrastructure. Clearly, any large development site in the open countryside would not currently be a sustainable option without any consideration of creating/improving the infrastructure/services in the right places/scale in order to formulate a self-sustaining settlement. The Option 4 assessment of this current Interim SA, however, does acknowledge that measures such as masterplanning and sufficient funding into infrastructure requirements can make a huge difference to the sustainability performance of developments on a larger scale, particularly in a more remote location.

**4.46** The comments which give examples of where the promise of infrastructure has been delayed or never materialised in the past are acknowledged and this is naturally a very serious matter. However, the SA can only take into account the likely effects of options and if/how any negative effects could be mitigated. The potential for investment/funding for necessary infrastructure is a real possibility (albeit sometimes difficult to bring about at the most appropriate point in time), but nevertheless, it is something which should still be considered. It will be down the Council and developers to ensure that the necessary infrastructure is brought forward at the right time.

**4.47** All relevant environmental considerations have been taken into account in the Options assessments. However, it should also be noted that the SA of Options is at a high strategic level. Once the strategy has been agreed on, the SA will continue to assess both potential development sites and planning policies and that is the point where much more detailed information will be used to make the most appropriate sustainable decisions with regards to impact on the environment/landscape. Furthermore, the next iteration of the SA will include alternative options such as brownfield development and assessments of development around the existing towns/villages.

**4.48** Car dependency is pivotal to sustainability, carbon management and climate impact as a whole. The SA gathers information to consider whether certain types of development will likely increase car dependency or whether there are mitigating factors which could reduce it. Active travel and public transport potential is therefore one method of reducing car dependency and therefore the necessary infrastructure and services to ensure it must be provided. As such, any option which includes a new settlement must take this into account and masterplan/ integrate the necessary infrastructure and services to allow good levels of self-sufficiency so that out-commuting is kept as low as possible.

**4.49** All comments include technical advice/critique will be taken into account and where considered appropriate the SA will be amended accordingly. Equally, every attempt will be made to ensure that the SA is robust and complies with the regulatory requirements and best practice.

## **Question 5**

**4.50** Question 5 received 243 written comments asked about the constraints and opportunities at settlements.

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

## **Keys Themes**

1. **Prioritise Development in Existing Settlements:** Many respondents strongly favor focusing development on existing towns and villages rather than creating new settlements. They argue that existing settlements already have infrastructure, services, and community identity that can be built upon. Respondents specifically mention opportunities for brownfield regeneration, urban densification, and targeted expansion that could accommodate growth while supporting existing town centres and services.
2. **Infrastructure and Services Concerns:** Respondents emphasise that current infrastructure (roads, schools, healthcare, sewage systems) is already strained in many areas. There are concerns that additional housing without corresponding infrastructure improvements would worsen congestion, reduce service quality, and harm community wellbeing. Several responses note that infrastructure should be delivered before or alongside housing development, not afterward.
3. **Environmental Protection and Constraints:** Protection of the natural environment is a significant concern, with respondents highlighting the need to preserve the Forest of Dean's unique character, biodiversity, and ecological corridors. There are specific concerns about wildlife habitats, flood risk areas, and the preservation of high-grade agricultural land. The best and most versatile farm land should be added as constraint. Some respondents question whether environmental constraints are being applied consistently across all settlements.
4. **Brownfield First Approach:** There is strong support for prioritising development on brownfield sites, redundant industrial land, and underutilised urban areas before considering greenfield development. Respondents see this as both environmentally responsible and potentially beneficial for regeneration of town centers and existing communities.
5. **Opposition to Glynchbrook/Lowbands New Settlement:** Opposition to any new settlement near Lowbands is evident, with concerns about high infrastructure costs, harm to the historic Chartist settlement, damage to rural character, and creating car-dependent communities. Respondents question the deliverability and sustainability of such a development.
6. **Opposition to Churcham New Settlement:** Opposition to any new settlement in the Churcham area, with concerns about infrastructure costs, transport disruption to the road network, length of time for development to take place and flooding.
7. **Lydney as a Focus for Development:** Several respondents identify Lydney as having greater potential for sustainable development due to its railway station, A48 access, and existing services. However, others note that Lydney has already seen significant development without corresponding infrastructure improvements and has flooding constraints to the east. A railway bridge connecting Lydney railway station with the Bristol side would solve the bottlenecks at each end of the A48. (could also be used by pedestrians & cyclists). Many of the residents in the newer housing in Lydney are car commuters to Cardiff or Bristol. Many of these on the outer estates in Lydney travel by car even to commute via Lydney railway station, such is the distance away. A shuttle service to & from the station from outer Lydney, ideally publicly funded, free at point of use & continuous would link Lydney residents to the big cities & also facilitate tourism inward to attractions like Lydney harbour. Commuters would start to use the railway to commute as natural & this development would exploit the existing asset of the railway station to a larger extent & at the same time relieve the at times excessive traffic pressure on A48

8. **Balanced Distribution of Growth:** Some respondents favor distributing growth proportionately across settlements rather than concentrating it in a few locations. This approach is seen as fairer and potentially less disruptive to any single community, while supporting services and housing needs across the district.
9. **Community Character and Heritage:** Preservation of local character, heritage assets, and community identity is important to many respondents. This includes protection of conservation areas, historic settlements (particularly the Chartist settlement at Lowbands), and the distinctive character of Forest towns and villages.
10. **Challenge Housing Targets:** Several respondents question the government's housing targets for the Forest of Dean, suggesting they are unrealistic given the district's constraints. Some call for the council to push back against these targets rather than accommodating them through potentially harmful development patterns.
11. **Transport and Connectivity:** Respondents highlight the importance of locating development where sustainable transport options are available or can be improved. The value of Lydney's railway station is noted, as are concerns about increased car dependency, congestion on the A48 and A40, and the need for improved public transport services. -

## **Statutory consultee responses**

**Churcham Parish Council** - Given the pressure placed on the Forest of Dean by the 82% uplift in housing the policy surrounding restricting growth at Coleford makes no sense since being a major town it is a sustainable location that does not appear to be impacted by flooding and is well connected to other towns and major villages. The consultation document states: 'to promote a larger scale of change in Coleford there would need to be a change in the protection of the landscape around the town itself. This would not be compatible with the present planning policies in either the FoD Allocations Plan, Draft Local Plan 2024 or the Town Council in their NDP. Why are other areas subject to change when Coleford is not? None of the present planning policies are set in tablets of stone, the Draft Local Plan 2024 is being revisited and the NDP must align with the Local Plan. Other areas could make similar arguments that their landscape is protected and any future change outside the Draft Local Plan 2024 is not compatible with future planning either. Not including Coleford to accommodate future growth given its sustainability runs the risk of being seen as inconsistent or worse a political decision. Similarly the narrative around Bream: Bream with a population of around 3500 is the next largest settlement. Its edge of Forest location is however a constraint. Additional land with potential for new housing is limited without major changes to the current policy approach. Existing commitments are also limited in extent, because of the constraints (primarily due to about two thirds of the settlement being within the Forest boundary). This will limit both the short and long term potential despite the size of the settlement and its relatively sustainable nature due to relatively good accessibility and its service base. This statement does not appear valid given that land to South and West of Bream would appear not to be constrained by statutory forest . Bream being an existing large village is a sustainable location that should not be written off in this way. Given Mitcheldean's status of a major employment hub it has always felt like a town that failed to develop properly and sustain a vibrant centre despite having historic warehouse buildings and other components that could contribute to the ambience and feel of the village. Again a key factor in this is it lacks critical mass and inward investment which can only come from future growth in housing that serves the employment hub in tandem with gentrification which creates a functioning high street and attracts new businesses.

**CPRE** - We have proposed identification of some additional constraints in responding to Q3. We agree with the broad conclusions about the relative scope for the main settlements to absorb new development, but we re-iterate that BMV land should be identified as a constraint, to reflect the current NPPF (paragraph 187b and footnote 65).

**Coleford NDP Group** - 10.16 refers to a new development in Berry Hill, but this is actually in Coleford Parish, not West Dean. The section 106 monies obtained through that are planned to be used at Five Acres (outside the NDP area, but used mainly by residents inside the NDP area). There is a further opportunity in partnership with Five Acres School to upgrade the running track to be the one for the Forest, and work hard to find funding for and deliver a new swimming pool to replace the one removed. Coleford is the only Forest town without one. Coleford's Community Regeneration Plan must be considered within the LP, and the outcomes of the Citizen Vision. CNE2, The Green Ring around Coleford is a key policy, and a principal element of the CNDP. Within the Review, there may be some flexibility to encourage gradual growth to future-proof and sustain the character of Coleford, but this is at an early stage currently. Brownfield sites should be taken as the earliest opportunities. Should one or more new settlements be proposed, it could take the form of a larger Garden Communities - less dense so look more rural, have modern infrastructure and services, but mitigate impact on landscape. The size needs to balance the needs of that community v the impact on landscape and character. Lydney has the major advantage of the A48 with linkages to Chepstow and the now free Severn Bridge and Gloucester, as well as the sole railway station in the Forest. Is there scope for a new smaller Bridge, or a new railway station to ease the Gloucester entry and create a self-sustaining new settlement? Two suggestions were mooted in the 2019 consultation near Chaxhill (A48) and Churcham (A40). While the former had an ambitious, if long term, new bridge and route to the industrial south Gloucester and M5 transport links, both suggested new rail stations and a possible Park and Ride scheme in conjunction with GC, where sustainability was at the heart. Near Chepstow, Sedbury/Tutshill and Beachley are constrained by the Welsh boundary, but boundaries like this must be worked around in masterplanning. Local Authorities should be working together to address such, and this can be part of the Government's intentions to promote cross boundary cooperation, for instance looking at another Severn bridge. Some larger villages may find some additional housing would conserve local services with extra footfall; the loss of schools and GP surgeries could be reversed. There are small brownfield opportunities, or possibly less need for exception sites. Lifetime homes allow a further opportunity, so that people do not need to move as they are getting older, simply review their existing property, and can stay in the location they have chosen.

**Coleford Town Council** - The new development in Berry Hill, is in Coleford Parish, not West Dean. £400,000 of the Section 106 monies apposite to this development at Forest Grove has been allocated to Five Acres, and yet Coleford TC has been excluded throughout design and value engineering. There is a real opportunity in partnership with Five Acres School to provide a regenerated running track and a new swimming pool. The Community Regeneration Plan is significant in the current Review. Whilst in Coleford there is a desire for consistent growth, there is also a need to keep the different identities of surrounding settlements and respect the designated natural environments. The Green Ring policy still applies in principle. There may be some flexibility within, and around the edge of settlements to give gradual growth to future-proof and sustain the character of Coleford.

Cinderford can use the investment in infrastructure in the Northern Quarter and industrial development, and in the new Hospital. These allow for flexibility in employment growth and some new housing within the restraints mentioned. Some brownfield sites and employment sites are still available.

Should a new settlement be proposed near the M50, there would be new infrastructure which could lead to increased opportunities in Newent as the main local service centre. A larger new settlement should follow the lines of Garden Communities - less density so look more rural, have modern infrastructure and services, but mitigate impact on landscape. a second settlement could be considered, with a new transport hub. That would mean working on master-planning and infrastructure delivery in advance at same time as delivering expansion around the towns. Need for 5 yr land supply to be defined and kept to. Build out should take into consideration the existing planning permissions which have not been constructed, their location, and land banking.

Lydney has the major advantage of the A48 with linkages to Chepstow and the now free Severn Bridge and Gloucester, as well as the sole railway station in the Forest. In view of problems with the Severn Tunnel, this might be improved too. Carefully managing the build out in Lydney would give flexibility within the whole LP period.

Sedbury/Tutshill and Beachley are all near to and function within the sphere of influence of Chepstow-over the Welsh border. Boundaries should not affect planning. Services from Chepstow e.g. Chepstow Hospital and outpatients would be more effective with cross border populations. Health and Local Authorities in planning should be working together to address such. Given the situation which occurred at Ashchurch and MOD decisions, the Beachley numbers need an alternative strategy B in place.

Villages: Bream, Mitcheldean and other larger villages may find some additional housing would conserve local services with extra footfall; the loss of schools and GP surgeries could be reversed. What is happening with redundant care homes e.g. Townsend House in Mitcheldean? Links with health and planning need study and planning. There are brownfield opportunities.

Lifetime homes allow a further opportunity, given the higher proportion of older population in 2021. Policy CH2 on new development includes aim of 10% accessible homes. This could be relevant everywhere in the Forest. Overall smaller windfall schemes may be more significant throughout the Forest as developments up to 5 are more regularly and promptly constructed, compared to large developments.

**Corse Parish Council** - appreciate that existing settlements have both constraints and opportunities, but feel that the potential of these areas is underestimated, opportunities for growth within existing towns should be considered first. This should include regeneration of brownfield sites and any under or unused industrial land, supporting the local shops and services, improving amenities and businesses to provide employment and allow for greater choice for residents. Public transport should be improved to increase the service provided. The Parish Council suggest that this approach would improve the community for all.

**GCC-** There is no reference in the constraints and opportunities to the current levels of bus service provision or the relationship of settlements to the express- bus network set out in the Bus Service Improvement Plan (BSIP) 2024. Being located on a current frequent bus service or Express bus route is an opportunity. Being located where there is infrequent or no public transport should be viewed as a constraint. This should be set out clearly in this section.

**GWT-** See summary of Settlement constraints in our response to the 2021 and 2022 consultations Cinderford, Newnham and Littledean- note ecological constraints to Newnham on Severn and Cinderford/Littledean related to Bat SAC greater horseshoe maternity roost at Littledean Hall, Tutshill/Sedbury - concerned about cumulative and in combination impacts on the nearby SAC maternity roost and functionally linked roosts (including impacts of additional development in Chepstow

(Monmouthshire) and the approved development of Dayhouse quarry, plus planning applications for Livox quarry (Monmouthshire), access to main freshwater source (Dayhouse quarry). Constraint of the National landscape and high grade agricultural land. Compensatory suitable habitat and ecological resource enhancements (e.g. freshwater source) should be required from any development in this area. High grade 2 agricultural land already within allocation footprint. Cumulative and in combination impacts on the adjacent SACs and zones of influence, must be fully assessed within any future and current development. Such impacts can only satisfactorily be assessed if baseline have been recorded and impact monitoring and data interpretation takes place. Sewage system capacity and prevention unwanted storm discharges into the rivers, or eruption of drains on land due to exceedance of capacity, need to be factored into development. SuDs provide water storage and slowing capacity, but should also be used as a biodiversity enhancement opportunity, not just a hole for storing water. Mitigation strategy is needed for the Wye Valley and Forest of Dean Bat Sites SAC and should be developed in collaboration with Monmouthshire and Stroud, enabling resource secured through s106 to be invested in mitigation and compensatory habitat and ecological resources.

**Hartpury Parish Council-** The constraints on the market towns have been overstated, and the sustainability of Lydney Train Station needs to be emphasised.

**Herefordshire Council -** The "Duty to Cooperate" was introduced by the Localism Act 2011. It requires local planning authorities to engage constructively and actively with neighbouring authorities and other bodies when preparing their Local Plans. The purpose of this duty is to ensure that strategic issues, like the need for new housing or infrastructure, are addressed in a coordinated way across a functional economic or housing market area. The duty should ensure that strategic issues, like the need for new housing or infrastructure, are addressed in a coordinated way across a functional economic or housing market area. It is not a "duty to agree," but an obligation to make every effort to secure the necessary cooperation. The consultation does highlight through the suggested options, the possibility of developments close to the Herefordshire boundary and acknowledges that some allocations may potentially straddle administrative borders. In such circumstances, it will be critical to ensure coordinated plan-making and infrastructure delivery between our authorities. We welcome further discussion on how such matters will be addressed. This would require a timeline that both authorities could work to, to look at the potential for growth along the Herefordshire/Forest of Dean boundary.

**Historic England -** When considering locations for new allocations it will be important to ensure the setting of your conservation areas and historic settlements and their settings are fully considered. Conversely, to fully explore all potential opportunities within built up areas (sustainable locations) we would encourage reference to an up to date Brownfield Land Register and to the Forest of Dean Conservation Area Project (FoD/HE commission 2025) that seeks to illustrate potential development led regeneration and growth opportunities.

**Home Builders Federation -** Do not comment on individual sites and allocations. We have provided some comments on the general approach to the spatial strategy, and these are not repeated here. As we are supportive of Councils doing all they can to support increased delivery of housing in their area, and mindful of the historic under-delivery in the wider Bristol City Region area. would support a higher housing requirement for Forest of Dean. In our view it is essential that the housing requirement is established before any consideration is given to land supply issues, including any policy restrictions.

**Lydney Town Council-** Whilst LTC recognises that new housing is required it expresses significant fundamental concern at the harm the required increased amount of housing could cause the FoDD area and Lydney. It is also concerned infrastructure serving the town is already insufficient for current needs, with resulting issues being well-known constraints and negative impacts on Lydney. LNP and the emerging LNP2 has identified the international, national and locally valued assets that must be protected as part of a sustainable pattern of development. These include locally valued wildlife corridors, heritage assets and character that is recorded in the Lydney Character Statement and Design Code which was produced with LNP2.

**Traffic and Transport** It is recognised that Lydney is connected to the trunk road and main line rail network and has a bypass. However road travel linking Chepstow and Gloucester, particularly during morning and evening rush-hours sees severe congestion.

Air quality, HGV and congestion issues also adversely impact the quality of environment and attractiveness of Lydney town centre. NP & LNP2 (Reg 14) LYD TRANS policies set the expectations of all development before support can be given. This includes addressing congestion and safety and optimising the attractiveness and take-up of active and sustainable travel and public transport.

**Town Centre & Air Quality** -Lydney town centre experiences air quality management issues as a result of traffic volumes and congestion. Any strategic growth must secure removal of existing air quality issues to improve the health of town centre residents and visitors and increase the attractiveness of the town centre. LNP2 has produced a Lydney Town Centre Master Plan. This document should inform a programme of Lydney town centre investment linked to the production of the FoDDC infrastructure Delivery Plan.

**Water Management and Sewage** -Land to the east of Lydney is a flood plain, plus sewerage and drainage systems are not coping with the existing housing and improvements are required — discharging into the River Severn is not an ecological solution.

**Burial sites** -Lydney Town Council, as a Burial Authority, may not have sufficient sites to have burials within Lydney. Burial sites are urgently required, over housing requirements.

**Crime Prevention & Police** -There are further concerns regarding the increase in housing and the support from Neighbourhood Policing, which is altering. It is perceived that there are fewer physical police available and with the increase in housing and no increase in policing, there will be further issues linked to anti-social behaviour and crime.

**Education** -There is no 6th Form Provision in Lydney at present. This is an important component of addressing sustainable development within the town, increasing education opportunities and reducing car travel.

**Health** - GP surgery provision must be increased to meet the needs of a larger and aging population.

**Conservation and Local Distinctiveness** - Whilst LTC recognise that housing and economic development will continue at Lydney, the amount of new development raises concern for the character and distinctiveness of Lydney. Growth will only be supported where it protects Lydney's designated and locally valued heritage assets including the harbour regeneration and Lydney's distinct character and relationship with the Forest of Dean, River Severn.

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**Littledean Parish Council** - There is an understanding that settlements already in place should be explored so that these can be explored for their full potential for additional housing within reason and to enhance/improve the services already provided. The council would like to see existing local shops and amenities better supported and encouraged to grow for the communities they serve helping to provide employment and improved transport.

**Maisemore Parish Council** - Further potential for development exists in most, if not all, existing settlements. In many this may be key to their future viability and prosperity.

**Natural England** NE appreciates with the major constraints outlined and also the opportunities, for example marrying up services between village settlements that are close to one another and enabling Green Infrastructure principles to work harder alongside retrofitting active travel routes and joined up mobility strategies across the area. We also agree that there can be significant gains from BNG, GI, Climate resilience from following this option.

**Littledean Parish Council** - There is an understanding that settlements already in place should be explored so that these can be explored for their full potential for additional housing within reason and to enhance/improve the services already provided. The council would like to see existing local shops and amenities better supported and encouraged to grow for the communities they serve helping to provide employment and improved transport.

**Newent Town Council** - is concerned, we have a number of comments: What is meant by 'protect the centre'? We do not want the historic town centre to become a museum but rather a thriving focus of retail, community and leisure activities. Clarification is needed of the 'landscape constraints to the west'. Is this related to receptor sensitivity, the aquifer, or topography? Quality of agricultural land around the town - we have the largest concentration of Grade I agricultural land in the county. 'Additional change' is mentioned. This is not quantified in any way unlike the references to some other locations. However, in I 0.20 it is stated that there is only limited scope for development in the other towns apart from Lydney. The Lydney v Newent proposals seem to be underplayed. While Lydney clearly has the greater potential, Newent is left with an open-ended option for development.

**Pauntley Parish Council** - The entire questionnaire is based upon a CONCEPT of one or more new settlements. As such, we are perplexed at the inclusion of a reference to "The main settlements listed above", since there is no apparent such listing. As such, this is a major and overriding constraint to any attempt at imposing Option 4 on the electorate.

**Pendock Parish Council** - The constraints associated with the main settlements appear quite accurate and recognisable. However, they should not be regarded as sacrosanct when considered in the context of the unprecedented new development targets associated with the new Local Plan and the likely wider negative effects across the District of other Plan options. To maintain the rurality of the Forest of Dean District, the further development of the existing main settlements, particularly Lydney is by far the 'least worst' of all the strategic options being considered and the most sustainable. To maximise this position and minimise the detrimental effect elsewhere in the District, serious consideration should be given to a more relaxed approach to most of the constraints associated with the main settlements other than flooding.

**Redmarley Parish Council** - The District Council should be looking to regenerate brownfield land, including that of redundant industrial and under utilised land. The District Council provides no concrete evidence to support the majority of conclusions that it makes within the document regarding the constraints

of the main settlements and appears to effectively cherry pick the negatives in an attempt to steer the reader towards agreeing with the District Council predetermined approach. It is well held that the District Council is expected to provide a full and accurate assessment of the constraints and opportunities at the main settlements.

**Redmarley NDP Group** - Agree that main settlements each have a mix of constraints and opportunities, but I believe there is greater potential within our existing settlements than is currently reflected. These opportunities should be explored more fully before considering large-scale new developments in remote locations and where they are considered must be based on need rather than politics. Opportunities for main settlements include: Targeted regeneration of brownfield, redundant industrial, and under-utilised land. Strengthening existing centres by supporting shops, services, and community facilities. Improving retail and leisure offers, for example attracting larger supermarkets and national pub chains, bringing jobs and consumer choice. Public transport integration, improving connectivity and service frequency. Shared infrastructure investment, benefiting existing residents and new developments. Energy efficiency and retrofit programmes to reduce emissions. Supporting local employment by locating housing near existing job centres. Community-led growth with smaller-scale extensions shaped in partnership with residents. Extending existing settlements in this way supports community cohesion and avoids the social risks of creating entirely new, commuter-led communities with little local identity.

**Rudford & Highleadon Parish Council** - There are additional constraints for Newent. The road network will not be able to support more development. The M50 north and south on and off junction is poorly designed, substandard and dangerous with both sets of vehicles sharing the same ramp with no division of lanes. Tewkesbury District Council is allowing development of land opposite 2 Mile Lane in Highnam. This will add extra congestion pressure to B4215 is already heavily congested, and then the subsequent junction with the A40 at Over. The views towards May Hill and the Malvern Hills from the Newent area should also be preserved.

**Severn Trent** - Once you have locations for potential sites please send over GIS files that we can overlay onto our networks maps and check the associated wastewater treatment works for capacity, as well as any local water source constraints. Where site allocations are available, we can provide a high-level assessment of the impact on the existing network. Where issues are identified, we will look to undertake hydraulic sewer modelling to better understand the risk and where there is sufficient confidence that a development will be built, we will look to undertake an improvement scheme to provide capacity.

**Sport England** - Agree this should be explored further including the possibility in certain areas for low rise housing.

**Staunton (Glos) Parish Council** - There are still significant opportunities for growth and development within the town of Lydney. This will be supported uniquely by the existing transport system i.e rail travel.

**Strategic Local Plan** - In line with NPPF requirements, land should be used as efficiently as possible. This could include exploring opportunities for urban concentration and densification in urban areas. In addition, higher-density development may be appropriate in certain rural settlements, where it can be sensitively integrated. This approach would help to optimise land use, support sustainable growth, and further help meet housing needs across the district, whilst reducing the need for greenfield sites.

**Tidenham Parish Council** - Agree with the constraints especially the Tutshill/Sedbury infrastructure. This section does not mention the potential development of the MOD site at Beachley, proposed elsewhere

in the document. If this site were to be developed in the future, there are serious constraints regarding access roads and potential future flooding.

**Upleadon Parish Council** - In view of the large number of houses required, some of these constraints will need to be reviewed.

**West Dean Parish Council** - Agree with most of what is contained in this section. However, the extant local neighbourhood plans are not made enough of as these have a legal standing. For our own Parish the Berry Hill and Forest Edge South must be referenced, especially as these impact on the use of existing settlements. If local housing need is held uppermost in planning for additional housing so that young families, and a rapidly aging population are properly catered for (with adequate storage, home working and amenity space for families and sheltered or specifically designed accommodation for elderly residents close to public transport) then this would help preserve the local villages, and areas within the District's towns, characteristics. In West Dean, (covering a lot of the statutory Forest and its fringes) the spatial layouts and the local vernacular which contribute to its heritage, should be offered protection and urban design solutions with greatly increased density resisted.

**Westbury-on-Severn Parish Council** - Further investigation on developments around the existing main settlements and proportional development around existing villages with an emphasise on affordable housing.

**Wych Avon District Council** - Housing Strategy and Growth Options - This represents a substantial challenge and we commend your authority for exploring a range of strategic options to meet this need. We support the principle of a "most sustainable combination of options," particularly the emphasis on selectively planned growth at existing settlements and considering the potential for a new settlement, where new infrastructure provision is appropriate and deliverable. Combining these approaches logically addresses concerns about meeting the required quantum of housing over the plan period and is likely to ensure a more long-term strategy for existing settlements as available sites would not be exhausted entirely in the short-term. Additionally, the intention to deliver an approximate 80% of the additional 6,600 homes in a new settlement is sensible as to avoid inundating infrastructure and services around the majority of the "forest ring" settlements, which are already physically constrained by landscape factors as well as outstanding housing commitments. MHDC and WDC look forward to learning more about how the proposed new settlement could look as the plan progresses. We also encourage continued engagement with neighbouring authorities under the Duty to Cooperate, especially regarding Option 5, which proposes negotiated redistribution of development. This will be essential to ensure that cross-boundary impacts are appropriately managed and that housing delivery is coordinated regionally.

II. Employment Land and Economic Development It is important that employment land provision aligns with housing growth to support balanced communities and reduce the need for out-commuting. Therefore, it is our hope that these allocations will continue to be considered as options for such uses in the latest development strategy and that the planning of these allocations will be carefully considered in conjunction with housing development within the proposed settlements and surrounding areas.

Opportunities for strategic employment sites near transport corridors (e.g., A40/A48) should be explored further, particularly where they complement nearby areas that are being considered for housing growth and regional economic strategies. This will ensure coherent development in sustainable locations and will contribute meaningfully to supporting a "complementary relationship between all forest towns".

We welcome the Council's commitment to preparing an Infrastructure Delivery Plan (IDP) and undertaking detailed assessments of infrastructure needs as the Local Plan progresses. Given the scale of proposed growth, it is critical that infrastructure - is planned and delivered in a timely and coordinated manner.

## Question 5 - Draft Officer Response

### Summary

**4.51** The consultation responses regarding Section 10 - Scope for Development in Towns and Villages show a range of views on how the Forest of Dean District should accommodate future housing needs. There is significant concern about infrastructure capacity, environmental protection, and community character. Many respondents favor prioritising development in existing settlements through brownfield regeneration, targeted growth, and infrastructure improvements over new settlements. Lydney is suggested as a potential focus for sustainable development due to its railway station and existing services. Respondents express opposition to a new settlement at Glynchbrook/Lowbands and Churcham area, citing infrastructure costs, environmental impacts, and threats to the historic Chartist settlement. Overall, there is a preference for distributed, proportionate growth that respects local character while addressing housing needs. These will all be considered when selecting site allocations and through the Sustainability Appraisal when assessing the suitability of sites.

## Question 6

**4.52** Overall, Question 6 received 279 written comments inquired on which options would be supported

*Which option or options (described in Section 10) would you support (please say why and please do suggest general or specific locations that should be considered for new development)?*

## Keys Themes

1. Support for Option 1: Selective planned expansion of existing settlements: Many respondents favour expanding existing towns and larger villages where infrastructure, services, and transport links already exist. This is seen as the most sustainable approach that could help revitalise existing communities, particularly the main towns of Lydney, Coleford, Cinderford, and Newent. Supporters note that this option allows for phased development, makes efficient use of existing resources, and maintains the rural character of the Forest of Dean. Option 1 is asserted to be the only logical and deliverable option that should be taken forward. Locating additional housing adjacent to the main towns makes the most sense both in terms of sustainability and community benefit."
2. Support for Option 2 : Distribution across existing settlements: A significant number of respondents support sharing housing development across all existing settlements in a proportionate manner. They argue this would help sustain smaller rural communities, support local services, and allow families to remain in their home villages.
3. Option 1 and 2 combined: This approach has been suggested the most, suggesting, this would be the most sustainable, if development can take place near to existing services and so spread the load rather

than relying on the main towns to absorb huge numbers of new dwellings, or creating large new settlements in the countryside with no facilities.

4. One response showed preference to using a combination of employment and housing in the main forest towns. The remaining allocation would be spread around the remaining 43 parishes of the district, but this would be a mixed-use model where employment/housing/greenspace/work from home/community assets for nursery and later life care are included. This approach would increase sustainability of areas around the district and provide support for communities that need support.
5. **Opposition to Option 4: New settlements:** There is opposition to creating new settlements, particularly at proposed locations like Churcham and Glynchbrook. Concerns include loss of agricultural land, environmental damage, inadequate infrastructure, increased traffic on already congested roads, lack of public transport, and the long timeframe needed to deliver such developments. Many respondents view this option as unsustainable and detrimental to the character of the Forest of Dean. Some feel the Sustainability Appraisal is seriously flawed and reads like it has been written to fit a pre-determined preference for new settlements."
6. **Support for combined Options 1 and 4:** Some respondents recognise that the scale of housing required may necessitate a combined approach of expanding existing settlements (Option 1) while also developing one or more new settlements (Option 4). This is often presented as a compromise to meet the increased housing targets, though some suggest the balance should favor Option 1 with a smaller proportion allocated to new settlements. It is suggested due to the volume of housing being imposed on the district there is no option but a new settlement in addition to option 1 – planned expansion of existing settlements – as a hybrid option."
7. **Prioritization of brownfield sites:** Many respondents emphasise the importance of prioritising brownfield and previously developed land before building on greenfield sites. There are calls to identify redundant industrial sites, underutilised land, and vacant properties that could be redeveloped before expanding into rural areas or agricultural land especially those within or adjacent to settlements that already have capacity in transport, education, healthcare, broadband, water, and electricity."
8. **Concerns about infrastructure and services:** Across all options, respondents express significant concerns about infrastructure capacity, including roads, public transport, healthcare, schools, water supply, and sewage treatment. Many emphasise that any development must include provisions for improving infrastructure and services, with some suggesting that infrastructure should be delivered before or alongside housing rather than afterward.
9. **Protection of agricultural land and rural character:** Concerns about the loss of productive agricultural land and the distinctive rural character of the Forest of Dean are prominent. Many respondents highlight the importance of food security and the environmental value of existing farmland and woodlands, arguing against large-scale development on greenfield sites.
10. **Questioning of housing targets:** A number of respondents question the validity of the increased housing targets set by the government. Some suggest the council should challenge these figures rather than accepting them, arguing that they are disproportionate to actual local need and population growth.
11. **Specific location preferences:** Several respondents highlight specific locations they consider suitable for development. Lydney is frequently mentioned as having potential for further growth due to its railway station and existing infrastructure. Other locations mentioned include areas around Cinderford, Churcham, Coleford, and Newent and also the smaller settlements. It is worth noting that many

respondents used Question 6 to emphasise their specific objection to a new settlement anticipating specific locations particularly at Churcham, Glynchbrook.

12. There were many hybrid options suggested and they are listed below with the number of respondents who expressed a preference:

<b>Option</b>	<b>Respondent preference</b>
Option 1	51
Option 2	14
Option 3	3
Option 4	18
Option 5	1
Option 1&4	40
Option 1&2	78
Option 1&3	2
Option 1&5	2
Option 1&2&3	3
Option 1&2&4	1
Option 1&2&3&4	3
Option 2&3	1
Option 2&4	2
Option 3&4	2
Option 3&5	1
Option 1&2&3&5	1
Option 1&4&5	4
Option 1&2&5	4
Objecting to Churcham	12
Objecting to Glynchbrook	24
Brownfield sites first	20
Specifically objecting to NS or Option 4	42

### **Statutory consultee responses**

**Blaisdon PC** -Blaisdon is now subject to a significant new development at Blaisdon Hall, which is expected to increase the number of permanent residents by anywhere from 50 to 70. This rise in population is already a significant burden on the Village. Any new development would be both unnecessary in relation to FODDC targets and would only exacerbate a recognised problem. Any further development will exacerbate the existing problems of a lack of local employment, inadequate drainage, limited shops, and poor road accessibility, and must take into account the seasonal flooding that engulfs Blaisdon. Any new development is likely to exacerbate the existing problems of traffic congestion and limited parking in the

Village. Any new homes must have both safe and easy access to a road that neither blocks nor endangers other drivers. Blaisdon and its surroundings are classed as a conservation area. This adds a layer of complexity to any new development and should be adhered to to protect the environment. The overall scenic value of the Forest of Dean area should also be maintained.

**Churcham Parish Council** - We would support options 1 and 2. The major towns require critical mass and inward investment to thrive, this can only come from expansion and policies to attract and encourage businesses to locate to those towns so they are vibrant and sustaining. This will help alleviate the hollowing out of the town centres that has been afflicting Forest towns and make them a viable alternative to commuting to larger shopping areas outside the FoD district. Similar to the towns the large villages are sustainable locations that equally need growth on a smaller scale to the towns to provide homes for family members of locals who want to stay within the village but also to provide the growth required to attract businesses who can provide local employment thus supporting the vibrancy needed whereby there are village shops and recreational facilities that are both viable and self-sustaining. Smaller villages equally have housing and employment needs also so modest growth across all villages would again help family members stay within villages and service local needs. The other options are not supported since they are either not planned or as in the case of Option 4 as it has been described in the consultation document would only service areas outside the Forest of Dean and fails to create a plan to enhance the economy of the whole FoD and grow small businesses in the right place to best serve the local economy and to create and sustain vibrant communities.

**CPRE** - Would support a combination of options 1 and 4 as the least damaging of the five options. A new housing target of over 13,000 new homes by 2043 will destroy the Council's net zero ambitions as set out in the "Climate Change Strategy and Action Plan 2022-25." We also believe that, in imposing these targets on the Council, the UK Government might be in contravention of its legally binding targets as set out in the Climate Change Act of 2008 and as amended in 2019 by forcing a council to adopt a plan that necessarily must worsen its climate performance: Employment capacity is weak, so residents commute out; Job density is low; Signals of out-commuting; An increase in a population of around 31,000 suggesting further out commuting; pressure on road pinchpoints and undermining net zero targets. Suggested mitigation like cycle lanes and park-and-ride schemes are logistically poor fits—especially during wet, dark British winters. • A new rail station would help lessen car traffic, New bridges at Gloucester and Chepstow would alleviate the pollution

All rural districts suffer from high-levels of car commuting because of dispersed settlement patterns and lack of public transport. Low job density and constraints in the Forest of Dean, particularly leaving the Forest through the pinch-points at Gloucester and Chepstow, exacerbate this problem. A quick carbon footprint calculation based on an average 44km round-trip commute for the increased population suggests that, based on all petrol cars, a potential increase in carbon emissions of up to 20kt/year; psychological and social impacts of increase travel times; Employment land allocated in the present development plan has not been taken up with vacant units at Lydney; new employment is not being generated in the Forest of Dean at a scale that is keeping pace with the rate of house building. Carbon impacts: The formula ignores transport emissions and mode share. In rural districts where car dependence is high, this risks systematically higher transport emissions per new dwelling versus urban centres.

A proposed 40% population increase by 2043 threatens these sensitive landscapes and designations. Flood risk: There are substantial areas of the Forest of Dean District which are vulnerable to flooding, including flash flooding. New development in such areas can exacerbate the consequences of flooding due to an

increase in impervious surfaces. Loss of best and most versatile farmland: Notwithstanding the limited area of land that has so far been subject to detailed ALC surveys, there is a considerable area of highly productive agricultural land, particularly in the north of the district. Sewage disposal and water supplies are becoming increasingly problematic

**Coleford NDP Group** -Option 1 as part of the answer – with option 4, a mix of extending existing settlements and one or more new settlements is seen as the preferred option. It is crucial that any new settlement is seen as being self-supporting in the long term, but also has space and capacity in infrastructure for future-proofing. Along the M50 there has already been interest from Developers in a new settlement. National Government is seriously looking at garden communities as style design which is more conducive to rural surroundings with a lower density but infrastructure to support key services locally.. It would also concur with the Biosphere ethos.

**Coleford Town Council** Option 1 as part of the answer – with option, a mix of extending existing settlements and one or more new settlements is seen as the preferred option. Along the M50 there has already been interest from Developers in a new settlement. National Government is seriously looking at garden communities as style design which is more conducive to rural surroundings with a lower density but infrastructure to support key services locally. This would work for the residents of the place, and mitigate impact on the landscape. It would also concur with the Biosphere ethos. The other alternative is nearer toward Gloucester along the A48, possibly working with Tewkesbury to provide a small settlement on the railway line, where park and ride would also mitigate transport problems into Gloucester City. A new style transport hub would give impetus for service provision for local residents.

**Corse Parish Council** - would prefer a hybrid of Options 1 and 2, to focus any growth within the existing main settlements and to enable support of modest, carefully planned extensions to smaller communities where they are sustainable. This uses and makes the best of the current infrastructure and allows for a phased, manageable delivery of any improvements needed.

**Dymock Parish Council** - support the FoDDC in its choice of Options 1 and 4. The target of 13,200 new homes is an unrealistic and unwarranted figure that will eventually and fundamentally change the nature of the Forest of Dean. However, while this figure has been challenged by FoDDC with the government, there is no doubt that historically, successive governments have not provided anything like the new housing requirement for the indigenous population alone, nor, as dealt with above, migrants. Even at the FoDDC's original Local Plan levels ((7260 new homes by 2023), it is arguable that a more radical approach to the issue warranted a new settlement(s). Without a new settlement(s), the policy of expanding existing conurbations and larger villages would lead to the character and inherent qualities of all key population centres in the Forest of Dean being compromised irrevocably. Regeneration of the major towns in the District is however both welcome and needed; but it is a question of scale. It is also worth noting that the 'Brownfield Sites' bank currently registered in the FoDDC area is minimal to the point of near irrelevance. The benefit of a new settlement(s) is that: All infrastructure can be planned and created to so provide a community that in character and services, is not lacking, from day one. Inconvenience is restricted to one geographical area and it might be suggested that the physical construction will be more efficiently completed as the site is more than likely to be located on Green or Grey Belt land. From the point above, the cost of construction per dwelling would be appealing to the developer/volume builder and hopefully reflected in the cheaper price (to the consumer). NOT selecting a new settlement(s) Option would lead to protracted and excessive development of the District's major conurbations far beyond the capacity that still allows for these conurbations to retain their integral character. A new settlement(s) provides planners and

developers to explore more readily innovative construction techniques and designs, on a major scale, that will more accurately match the aspirations of potential homeowners – eg apartments/flats. The scale (£) of any new settlement(s) suggests that the FoDDC can negotiate more confidently with the developer over the ‘must haves’ as integral elements of the settlement(s). DPC reserves the right to withdraw its support at any point in the future process based on the specifics of Options 1 and 4. Our response should not be construed as explicit approval of the Glynchbrook proposal.

**GCC-**Option 1 is likely to be the best option to deliver Sustainable Development from a transport point of view with option 4 being the next option if the right location can be found and the challenges of delivering services and facilities (including public transport) from the outset and in perpetuity addressed.

**GWT-** GWT favours Option 4: Planned New Settlement, though such a settlement should be located in one of the less environmentally sensitive areas. The Nature Recovery Network and LNRS mapping do show some areas to the north of the district that are currently of lower biodiversity value, and where there is access to major road infrastructure. Specific locations would have to be assessed and GI carefully planned to keep recreation pressures away from valuable wildlife sites and incorporate enhances nature connectivity. New settlements provide the opportunity to design housing that delivers for today’s needs without taking up excessive land area, for example, smaller footprint taller (e.g. 3 story) housing similar to the Georgian core we see in towns around the FoD and neighbouring areas, but with better energy efficiency. Realistically, if 13000 homes do have to be delivered over the plan period, it is unlikely that this will be achievable in one new settlement. More than one may be required or combined with an element of Selective planned expansion of existing settlements (Option 1). With the proximity of many existing settlements, to protected sites, or land functionally linked with those protected sites, we are not as certain on the positivity of the assessment of option 1 against point 7. To conserve and enhance biodiversity, fauna and flora. This would have to be assessed on an allocation by allocation basis

**Hartpury Parish Council** - Option 1 is the only logical option that should be taken forward. The extra housing adjacent to the main towns would be important to help with their regeneration. It would build on the existing community spirit, so important for younger residents to ensure these towns don't become "ghost" towns, with no reason to visit them.

**Herefordshire Council** - Each option will have an impact on Herefordshire in some capacity due the boundary and due to the proximity of larger settlements to this boundary. Herefordshire timetable is approximately 18 months behind Forest of Dean and will be following the new LURA system. This raises a particular issue where potential growth may come forward in locations close to our boundary if the Forest of Dean plan is adopted before our strategy is finalised.

Option 1 focuses on expanding the most sustainable existing settlements With Newent and Mitcheldean’s proximity to the border, there is the potential of some impact on Herefordshire in terms of areas South East of Ledbury and Ross on Wye with this option. Growth in Newent especially, could add pressure on B4215/M50 routes and cross-border services. The Tutshill/Sedbury expansion could also increase commuting to Hereford via A466.

Option 2, which spreads new housing and mixed-use development across every settlement holds the risk of putting pressure on small rural communities without adequate services and in turn border hamlets in the Wye Valley could potentially see disproportionate growth, adding rural traffic into Herefordshire and could also put pressure on services (GP, schools) in the villages closest to them.

Option 3, which is a capacity-led approach which would see development allowed wherever sites are available up to environmental or physical limits, which could lead to sporadic growth in areas such as edge of Ledbury and impact the National Landscape/AONB etc. This option also may add unplanned pressure on Herefordshire's infrastructure if sites near the border come forward without coordinated transport or service planning.

Option 4, which is the creation of one or more large, master-planned settlements, would predominantly impact Herefordshire if an allocation sits near the M50/A40 corridor, as this could significantly increase cross-border commuting/pressure on services and infrastructure. However, this option offers good potential for shared infrastructure projects benefiting both counties if coordinated and Herefordshire Council would want to be involved in any discussions regarding plans for this.

Option 5 highlights the potential of sharing the Forest of Dean's housing requirement with adjoining authorities, however, does highlight that 'this option is likely to be discounted as there is currently no evidence from duty to co-operate discussion with adjoining authorities that this is required, given that the surrounding authority areas themselves are constrained or are under greater pressure for development sites'. We would like to reiterate that Herefordshire will be unable to accommodate any growth pertaining to that required in the Forest of Dean as Herefordshire is under similar pressures to deliver an increased number of housing in line with the new mandatory targets.

**Huntley Parish Council** - Option 1 is supported. There are many villages not mentioned in this draft that have potential development land near by that is recorded in the SHLAA. The SHLAA should be reviewed with the objective of identifying other villages that could sustain some new development. For example Huntley is nearly surrounded by land recorded in the SHLAA. One or two of these parcels of land could be developed. Option 2 is also supported. All towns and villages are capable of some growth, even if only a few dwellings. Every area will take some of the required additional housing rather than over develop certain towns and villages.

**Littledean Parish Council** - would prefer a hybrid of Options 1 and 4, for growth in the existing main settlements to enable the further development of services such as shops, schools and employment, with a view to a new settlement provided services are considered and installed prior to housing becoming available for living in.

**Lydney Town Council**- support the prioritisation of FoDD Local Plan Option 1 (Selective planned expansion of existing settlement(s)) and Option 4: Planned New Settlement(s). Recognise the role Lydney has within the forest towns and the fundamental sustainability of linking balanced growth with existing, enhanced and new infrastructure, economic opportunity and community facilities. It therefore accepts option 4 is consistent with this approach. However this is on the basis that additional levels of growth are concluded as sustainable through the SA and that the FoDDC IDP is produced and links any development to delivery of infrastructure that simultaneously addresses existing shortfalls and increased demands. It is also only considered supportable when growth is in conformity with LNP/LNP2 policies. It also only supports option 1 where growth at Lydney is coordinated with delivery of necessary infrastructure as discussed above. The FoDDC paper has recognised Lydney has already been considered to be near its limits of capacity and noted a need to combine options for growth. It sees that the development of a new settlement in a sustainable location provides the potential to meet the required increased delivery of housing growth towards end of and well beyond the Local Plan 20 year period. This can assist in reducing the pressure for further development at Lydney beyond that concluded as maximised through this Local Plan process. However, it questions how the significant planning and master planning resources needed to

bring a new settlement forward will be secured without a strategic delivery partnership that includes working with agencies and councils beyond FoDDC in a strategic approach.

**Maisemore Parish Council** - Strongly support Option 2.

**Natural England** - We would encourage you to explore the Nature Cities and Towns initiative alongside NE's Green Infrastructure Standards in creating improved liveable spaces for all. Furthermore, any incursions into the Green Belt then these sites should consider carefully how it can accommodate high quality nature, not only to meet nature targets but also to promote better social wellbeing for residents. We would promote the use of green belt where it is bereft of wildlife, a low producer of food and limited access to adjacent town populations.

Option 2: NE do not support an option that would lead to significant change in smaller settlements that would cause the wider environment to be harmed as outlined by the SA.

Option 3: NE do not support this option as it is likely to impact the most sensitive landscapes in the area amounting to zero mitigation measures to protect the nature of these areas; climate resilience will be compromised via greater movements from vehicle travel.

Option 4: recognises that there are some potential opportunities afforded from beginning a new settlement in an appropriate area of the LPA. For example, making the greenbelt work much harder for high quality useable multi-functional green infrastructure that has a long-term vision in mind. We do not support new settlements that would exacerbate the climate resilience and net zero targets of the LPA area. We would not expect any of these new population centres to be sited within Impact Risk Zones (IRZ) of protected sites. We recognise that larger allocations have a better chance of providing meaningful high quality Green Infrastructure at high % thresholds (up to 50%). Any GI would need to draw upon NE Green Infrastructure standards and framework. In addition, we would agree/expect that there would be a need to create significant new local green space connected via extensive wider public rights of way to ensure that the residents of any new settlement do not find themselves isolated in a rural landscape. There should be significant provision for residents to be able to access the local natural world from their doorstep.

Before NE would be happy with any new proposals, NE would expect to see significant modelling and extended evidence gathering in order to understand the potential impacts on local, extra-local and regional protected site features and other non statutory nature sites, We would be particularly interested to see a benchmark or tipping point of no return for potential damage on any local protected sites beyond any reliable mitigation measures that can be seen.

Option 5: No Comment other than the need for the LPAs involved to consider in combination effects of new development that may have an impact upon local and extra local protected sites and species.

**Newent Town Council** - Agree that a combination of Options 1 and 4 seems the best way forward but with the following provisos: Infrastructure must be delivered alongside new development. Previous experience gives us serious doubts that there will be any real prospect of increased health provision, community buildings, retail opportunities, sewage treatment capacity, highways management or public transport provision. Masterplanning is essential with the whole town in mind not just the new development.. It has been stated as necessary in the previous draft plan. What will this look like and who will be responsible for it? We are not in favour of more than one new settlement. There would be a risk of not reaching a critical number of dwellings to achieve the necessary viability for infrastructure. Also at risk would be the 'five year housing land supply' as new settlements take much longer to build out than other developments, putting the district at risk of speculative development from volume developers.

**Pauntley Parish Council** - Option 1: Selective planned expansion of existing settlements, including Lydney with existing public transport links and Cinderford with various brownfield sites already crying out for development. A sensible non-specified option would be to challenge the need to fulfil government targets based solely on a revised mathematical calculation for the entire country which takes no account of the unique nature of specific areas whose future it is seeking to determine. An Option 6 would be to reject government targets as unworkable on the basis that the doubling of existing, albeit already highly challenging targets appears to have been proposed based on some very ill-conceived logic about the proposed numbers of people entering the UK (legally or illegally) and / or a 40% increase in the birth rate over the plan period.

**Pendock Parish Council** - A combination of primarily Option 1 and to a lesser extent Option 2 is supported by the Parish Council for sustainability reasons. Support cannot be given for a new settlement in the north of the District ie Option 4, as this will not be a sustainable Local Plan option. The northern area of the District is too geographically peripheral and remote to serve the needs of the District, is defined by small villages and scattered settlements with no major settlement, has few local services, little infrastructure, in most parts no public transport and a road pattern largely consisting of narrow single carriageway country lanes. If a new settlement has to be considered, it must meet the Local Plan's sustainability principles and therefore must be more appropriately located to meet the District needs, in reasonable proximity to employment opportunities and have sustainable public transport options.

**Redmarley NDP Group** - Support a combination of Options 1 and 2, directing growth towards existing main settlements and modest, well-planned extensions to smaller settlements where sustainable. This makes best use of existing infrastructure and allows improvements to be delivered in manageable phases. Do not support Option 4, the large new settlement, for reasons set out in my responses to Questions 3, 4, and 7. In particular, the Sustainability Appraisal is seriously flawed and reads like it has been written to fit a pre-determined preference for new settlements. I am surprised the Council is asking for suggestions for new sites at this late stage. If it is still possible to include and properly assess them, I would suggest prioritising brownfield, redundant industrial, and under-utilised land within or adjacent to settlements that already have capacity in transport, education, healthcare, broadband, water, and electricity.

**Redmarley Parish Council** - support Option 1 in combination with Option 5. Option 1 is the most sustainable of the options due to the expansion of existing settlements and use of existing infrastructure. The existing settlements and allocation of strategic housing sites at Lydney, Beachley (MOD), Newent, Coleford and Cinderford and other housing sites in the south of the Forest, can indeed support the number of houses required for the plan period. The strategic approach (Option 1) is supported by a robust evidence base and Sustainability Appraisal, and it is difficult to understand why the District Council is willing to dispose of six years' thorough work. The locations most suitable for further development are Lydney (the only town in the Forest of Dean with a railway station), Cinderford, Newent and Coleford. The District Council clearly wishes to retain the physical separation between Coleford and its neighbouring settlements however the area between Coleford and Berry Hill could provide upwards of 2,000 homes at an appropriate DPH. Lydney could accommodate upwards of nearly 5,000 homes, which could in turn bring investment into the railway station and the town centre. The expansion and infill of existing large main settlements is much more sustainable than developing new major settlements, which will likely take 40 plus years to complete and are unlikely to deliver appropriate infrastructure and/or affordable housing that the District Council has failed to provide over the last ten years. Should it not be possible to support the number of dwellings required for the plan period through Option 1, then the Parish Council believe that Option 5

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should be selected. It is noted that there has been no documented Duty to Cooperate engagement on any matter throughout the process, and the District Council should be prepared to fully evidence that it has been having Duty to Cooperate conversations with neighbouring authorities.

**Rudford & Highleadon Parish Council** - support Option 1, especially development at Lydney where additional development could lead to an enhanced rail network and investment in the area by large supermarkets and businesses. Consider other villages that could sustain small developments without considerable investment in new services The parish council does not agree with the combination of Option 1 and 4 and request that Option 4 is excluded.

**St Briavels Parish Council** - SBPC supports the preferred option put forward in the consultation document ie that the additional housing and related development requirements for FoDD be met through a combination of Options 1 and 4.

**SHWAPC** - From the perspective of affordable housing delivery, the SHWAPC acknowledges that there is merit in all Options 1 to 4 as they all offer viable routes for the delivery of affordable housing. Each option presents unique advantages and potential contributions to addressing housing need across the area, whether through the efficient use of land, alignment with existing infrastructure, or the ability to respond flexibly to local housing demands. As such, the SHWAPC recognises the importance of considering all four options within a balanced strategy to maximise affordable housing outcomes and ensure long-term sustainability.

The SHWAPC does not support Option 5 (Negotiated agreement that some development will be passed to adjoining authorities) given the risk that the local housing need (which should include a mix of housing types and sizes, including affordable housing) for the FoD may not be met by the neighbouring authority(ies). It would also not adequately support the needs of existing rural communities and services in the FoD. This option therefore overlooks the importance of sustaining smaller rural settlements.

**Staunton (Glos) Parish Council**- Agree with option 1 due to the existing infrastructure.

**Strategic Local Plan** In support of FoDD's ambition to achieve zero carbon by 2030, the SLP authorities endorse options 4 and 6 as the most effective for delivering this meaningful change. These options prioritise development in locations with access to sustainable transport modes and proximity to services and facilities, or in areas where such infrastructure can be planned in a sustainable manner. This approach aligns with the vision and objectives and will positively contribute to long-term climate resilience.

**Tidenham Parish Council** -Given the number of houses being demanded, the Parish Council considers the only option to be a mix of options, particularly options 1 Selective planned expansion of existing settlement(s) and 4 Planned new settlement(s). Other options especially those near the Tutshill / Sedbury area are not viable given the current infrastructure restrictions • A48 and access to the M48, health with dependency on Aneurin Bevan, very few local shops, etc.

**Upleadon Parish Council** - A combination of options will need to be considered, including general distribution and maximum change.

**West Dean Parish Council** - We are more open to the adoption of the existing plan linked with the consideration of a new settlement because of the constraints of the Statutory Forest any new settlement would need to be placed either at the North of the District or close to Chepstow, However – the need to provide for proper infrastructure (employment, daily living needs, medical etc.) that covers a wider

spectrum than just transport links must be considered carefully, significant economic cost would be incurred in overcoming the risks to the local environment. There is also the possibility of land lost to food production to be considered as well as the landscape considerations on the Statutory Forest, the Wye Valley, SSSI's, the Severn RAMSAR and the wider impact on the Cotswold escarpment and the Melvern's. Support a survey of redundant business premises within existing settlements highlighting the potential for mixed use (business and housing mixed) development, small scale business parks (although much is needed to be done to attract industry into the area) and improvements to transport networks – including active travel – to aid access into and out of the District's area. In our own Parish area, would welcome consideration of the Pin Factory site in Whitecroft (identified in the FES NP) and the International Timber site in Parkend (subject to proper re-allocation and local canvassing). Valley Road in Cinderford is a major employment area and more could be done to develop the redundant sites in that area for business or mixed-use development.

**Westbury-on-Severn Parish Council** - The one town in the forest that should be looked at is Lydney as it has a rail station, a main road and closer to Bristol.

**Wye Valley and Malvern Hills National Landscape Teams** - Option 1 - Selective expansion. This would be supported if focused on the most sustainable, least constrained settlements outside the National Landscapes and their settings, and the magnitude of change to National Landscape receptors can be low and manageable. Option 4 - New Settlement(s). This would be supported for locations that would not impact on the National Landscapes and their settings. NPPF Para. 189 states that the scale and extent of development within protected landscapes should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas. Landscape capacity studies for at least the environs of the National Landscapes would assist with located new settlements in the least sensitive locations. Paragraph 10.49 in the consultation document states that there are areas in the eastern and northern parts of the district that are less affected by constraints, with the north being generally related to the M50. However, the only large sites in the SHLAA Annual Reports in this M50 northern area are in close proximity to the .... Development here is likely to create significant landscape harm, including to the .... and its setting and would not be in accordance with the .... Management Plan, particularly Policy PL?. This is reflected in the Sustainability Appraisal (SA) of Development Sites which concluded the site would be unlikely to meet the SA criteria based on the landscape harm and proximity to the .... . A new settlement here would therefore not be supported.

## Question 6 - Draft Officer Response

**4.53** The consultation responses regarding Section 10 Options show diverse views on the best approach for meeting the Forest of Dean's increased housing targets. Many respondents support a combination of Options 1 (selective planned expansion of existing settlements) and Option 2 (general distribution of housing around all existing settlements), citing benefits of utilising existing infrastructure, services, and transport links while allowing for phased, manageable development.

**4.54** There is support for and also opposition to Option 4 (planned new settlements), with concerns about infrastructure costs, environmental impact, loss of agricultural land, increased flood risk, social infrastructure and increased traffic congestion. Most objections to option 4 were accompanying the support for options 1 and 2. However, some respondents recognise that the scale of required housing may necessitate a combination of options 1 and 4, particularly if designed sustainably with appropriate infrastructure delivered upfront.

**4.55** The opposition and support for a new settlement is noted in the responses, as well as other strategy proposals. The current strategy is being reviewed and the Council is considering all options available for a revised strategy. The Options Consultation 2025 suggests that a combination of Option 1 and Option 4 (Option 6 in the Sustainability Appraisal) is the most sustainable option. Therefore 2 of the proposed options have been assessed through the Sustainability process. These were a combination of options 1 and 2 and Also a combination of Options 1, 2 and 3. Option 5 has not been assessed as the Council expects to meet it's own housing needs in line with the NPPF. The sustainability appraisal assessment of these options, along with option 6 for comparison are set out below:

## Sustainability Appraisal of Proposed Options

### Significance Key to Sustainability Appraisal Framework

Symbol	Meaning	Sustainability Effect
++	Very positive	Development encouraged; would require no or very little mitigation and could offer betterments to existing sustainability issues
+	Positive	No sustainability constraints and development acceptable; mitigation possible
0	Neutral	Negligible effects or not applicable; little or no change to existing situation
-	Negative	Potential sustainability issues; mitigation and/or negotiation might be possible
--	Very negative	Problematical & improbable due to unknown sustainability issues; mitigation difficult/expensive/impossible.

**Option 6: Combination of Option 1 (Selective planned expansion of existing settlement(s)) and Option 4 (Planned New Settlement(s))**

Sustainability Appraisal Objective	Option 6: Combination of Option 1 (Selective planned expansion of existing settlement(s)) and Option 4 (Planned New Settlement(s))
<p><b>1. To improve the health and well-being of the populations and reduce inequalities in health.</b></p>	<p style="text-align: center;"><b>++</b></p> <ul style="list-style-type: none"> <li>· There would be existing health facilities nearby as well as newly planned ones.</li> <li>· Can also promote/support healthy living and reduce inequalities more readily because of better selection of more sustainable sites as well as masterplanning for the new settlement element.</li> <li>· More potential to better design out crime and risks of accidents.</li> <li>· Better potential to design a scheme which includes active travel routes (for healthy living).</li> </ul>
<p><b>2. To meet local housing needs, by ensuring everyone has the opportunity to live in a decent sustainably constructed and affordable home.</b></p>	<p style="text-align: center;"><b>++</b></p> <ul style="list-style-type: none"> <li>· Can plan to deliver the necessary housing numbers on a larger scale, incl. affordable and provide a mix of housing types and sizes to better meet the needs of different sectors of the community and thus reduce inequalities.</li> </ul>
<p><b>3. To provide accessible community services, recreation and leisure facilities.</b></p>	<p style="text-align: center;"><b>+</b></p> <ul style="list-style-type: none"> <li>· Can plan to deliver the services in sustainable locations, and/or to take advantage of existing facilities nearby, and reduce dependence on the car. Better potential for schemes to be designed so the key services are more easily accessible through the use of public transport.</li> </ul>
<p><b>4. To facilitate the development of academic and vocational skills.</b></p>	<p style="text-align: center;"><b>+</b></p> <ul style="list-style-type: none"> <li>· Can plan to deliver the educational services required and/or improve access to existing educational facilities.</li> </ul>
<p><b>5. To create a more vibrant and sustainable local economy.</b></p>	<p style="text-align: center;"><b>+</b></p> <ul style="list-style-type: none"> <li>· Can plan to deliver the services. Can include home- working. Increased potential for providing and increased range of employment opportunities, including higher paid and professional.</li> </ul>
<p><b>6. To protect and enhance the landscape.</b></p>	<p style="text-align: center;"><b>-</b></p> <ul style="list-style-type: none"> <li>· Sites may be in countryside locations, however, effect can be mitigated through high- quality design and landscaping with the aim of protecting landscape value</li> <li>· Good quality agricultural land (BMVL) may be negatively impacted.</li> </ul>
<p><b>7. To conserve and enhance biodiversity, flora and fauna.</b></p>	<p style="text-align: center;"><b>+</b></p> <ul style="list-style-type: none"> <li>· Can plan to reduce and mitigate any impacts supporting no net loss to biodiversity and promoting biodiversity net gain. Opportunities to create</li> </ul>

	greater net gain and green infrastructure, strengthening connectivity between wildlife habitats.
<b>8. To maintain and improve air quality.</b>	<p style="text-align: center;"><b>0</b></p> <ul style="list-style-type: none"> <li>· Development and traffic generation causes air quality issues through increased traffic congestion</li> <li>· However, opportunities through masterplanning to create opportunities to travel by public transport.</li> </ul>
<b>9. To maintain and improve water quality and to achieve sustainable water resources management.</b>	<p style="text-align: center;"><b>0</b></p> <ul style="list-style-type: none"> <li>· This is dependent on the measures taken for each individual site, but has potential to ensure development has the ability to conserve water resources, increase water efficiency and improve water quality as much as possible.</li> </ul>
<b>10. To reduce carbon emissions that cause climate change and to achieve net zero.</b>	<p style="text-align: center;"><b>+</b></p> <ul style="list-style-type: none"> <li>· Some opportunity for small and large scale strategic carbon offset measures.</li> <li>· Can ensure housing is sustainably constructed with low/zero carbon emissions through the implementation of high-quality design and planning policy/design guidance</li> <li>· Masterplanning for new settlement element allows for large-scale design for energy conservation and efficiency through high quality design and can introduce measures such as large-scale net zero heating/cooling systems (not having to plug into existing services).</li> <li>· Can also ensure housing is sustainably constructed with low/zero carbon emissions through the implementation of high-quality design and planning policy/guidance.</li> <li>· The Selected Planned Expansion element provides some scope for planned local small-scale measures to support energy conservation and energy efficient design to reduce effects of climate change</li> </ul>
<b>11. To reduce waste generation and achieve sustainable management of waste.</b>	<p style="text-align: center;"><b>-</b></p> <ul style="list-style-type: none"> <li>· Development will always result in waste generation. However, both small-scale and large-scale measures could be implemented through masterplanning (new settlement element), planning policy and design guidance to reduce waste generation and achieve better sustainable management of it.</li> </ul>
<b>12. To safeguard historical and cultural assets.</b>	<p style="text-align: center;"><b>0</b></p> <ul style="list-style-type: none"> <li>· Potential to avoid development close to heritage assets, thus maintaining cultural and historical assets.</li> </ul>

### **Option 6: Combination of Option 1 (Selective planned expansion of existing settlement(s)) and Option 4 (Planned New Settlement(s))**

The option of a combination of Selective Planned Expansion of existing settlements and Planned New Settlement(s), provides the benefits of both of the options and gives greater scope to avoid, reduce and

mitigate potential environmental, social and economic harm. The findings of the strategic SA may be summarised as follows:

**The positive effects of this combination of options includes:**

The ability to select development of appropriate scale in the most sustainable locations, taking advantage of the facilities nearby such as education, health, retail and recreation as well as the infrastructure which is already in place in the larger towns/villages, without exceeding the capacity or cohesion of those settlements, but instead encouraging business and an increased range of employment opportunities, all with synergistic long-term positive effects on SA Nos. 3,4 &5. High quality design will ensure better active travel options (for healthy living) whilst also designing out crime and risks of accidents (positive effects on SA objective No.1).

Whilst at the same time, designing a new settlement(s) can provide a longer-term sustainable strategy to provide the necessary housing/mixed development along with infrastructure and services in a larger-scale manner. Master planning could ensure that sites would be in closer proximity to health and educational services (or new ones created within the new settlement(s)), larger housing numbers can be provided (including affordable housing, wider mixes of housing better able to meet needs of different sectors, and helping to reduce health inequalities with positive effects for SA Nos 1, 2 and 3.

There is a larger scope to reduce or mitigate negative impacts to biodiversity and to create large swathes of green infrastructure, strengthening connectivity for habitats and species with potential major positive effects in the longer term for SA objective No 7.

Positive effects would also include wider scale carbon reduction measures (through high quality construction methods and possibly a district heating system) with positive effects for net zero objectives and SA No10 that could be cumulative in the longer term. The combination of both options also allows the Local Plan to continue to support the role and functions of exiting settlements without overly pressuring them from even further large housing allocations, than if Option 1 were chosen alone.

**The negative effects of this combination of options include:**

It is recognised that initially the introduction of development on greenfield land (often open countryside) has an immediate damaging impact on the local landscape, however, new settlements have the potential to be designed so that masterplans and design coding ensure that the new settlement is of high quality. Impacts on traffic generation, congestion and air quality, can be mitigated in part by considering connectivity, improving public transport (less dependency on the private car) and increase active travel potential (more positively effecting SA Nos. 1, and 3), and home-working options when selecting sustainable locations for development. Waste generation and impacts on water quality are negative effects of all types of development in all locations, however mitigation could include the provision of a wider-scale sustainable management plan right from the design stage (thus having a more positive effect on SA Nos 9 and 11).

**Summary**

Given that the sustainability effects of this combined option are generally positive, and mitigation measures can go a significant way to improve any potential negative effects this is considered to be the Most Sustainable Option and is therefore the SA's favoured option above the other options tested. Furthermore, from a planning point of view, this option has the best opportunity to provide the local housing need (and associated development) across the whole plan period and beyond.

## Sustainability Appraisal of Option 1 and 2

Sustainability Appraisal Objective	Combination of Option 1 & Option 2 (in part) (Selective planned expansion of existing settlement(s)) and General distribution of housing around all existing settlements (planned sharing of the housing numbers across all settlements))
<b>1. To improve the health and well-being of the populations and reduce inequalities in health.</b>	<p style="text-align: center;"><b>0</b></p> <p>Mixed outcome. Some sites would be near existing health services (under Option 1 selection), however, others (particularly at the numerous smaller more rural settlements) would not be in close proximity. For the Option 2 element (distribution) there would be less potential to select most sustainable sites, to design/connect up active travel routes (for healthy living) or to masterplan and therefore less opportunity to design out crime and risk of accidents.</p>
<b>2. To meet local housing needs, by ensuring everyone has the opportunity to live in a decent sustainably constructed and affordable home.</b>	<p style="text-align: center;"><b>0</b></p> <p>Mixed Outcome. Housing numbers could be accommodated across the district, however, owing to the fact that many of the housing locations would be small sites (distributed under Option 2 element), this may not provide as many affordable housing units as larger sites or provide a sufficient mix of housing types and sizes to reduce inequalities. Nevertheless, it would allow some smaller scale of development across the smaller villages which may create vibrancy and provide housing for local people.</p>
<b>3. To provide accessible community services, recreation and leisure facilities.</b>	<p style="text-align: center;"><b>0</b></p> <p>Mixed outcome. Some sites (Option 1) would be near existing facilities to take advantage of them and reduce dependence on the car (or increase use of public transport). However, others (particularly at the numerous smaller more rural settlements under Option 2 distribution) would not be in close proximity. Less scope for planning delivery of such facilities.</p>
<b>4. To facilitate the development of academic and vocational skills.</b>	<p style="text-align: center;"><b>0</b></p> <p>Mixed outcome. Some sites would be near existing educational facilities (Option 1 element), however, others (particularly at the numerous smaller more rural settlements for Option 2 distribution) would not be in close proximity. Less scope for planning delivery of such facilities and for improving access to them.</p>
<b>5. To create a more vibrant and sustainable local economy.</b>	<p style="text-align: center;"><b>0</b></p> <p>Mixed outcome. Development may support existing services or potentially create new businesses, but this is highly dependent on the location and the developer. Some potential for providing an increased range of employment opportunities, including higher paid and professional (under Option 1 element).</p>

<p><b>6. To protect and enhance the landscape.</b></p>	<p style="text-align: center;"><b>0</b></p> <p>Mixed outcome. Under the Option 1 element there is the potential to avoid sites (particularly the larger strategic sites) which have the most impact on the landscape. Furthermore, this element of the option would allow for the promotion of high quality design to protect/enhance the landscape and also have potential to avoid the sites which have the highest agricultural land quality value.</p> <p>However, the sites selected under Option 2, are likely to be the smaller more rural sites, therefore having a more potential to cause harm to landscape, dependent on the size and scale of development.</p>
<p><b>7. To conserve and enhance biodiversity, flora and fauna.</b></p>	<p style="text-align: center;"><b>+0</b></p> <p>Mixed Outcome. Some opportunity to reduce and mitigate impacts supporting no net loss to biodiversity and promoting biodiversity net gain and GI for sites selected under Option 1.</p> <p>However, sites selected under Option 2 (distribution) will offer little opportunity to reduce wide-scale impacts on biodiversity and have less ability to plan/design for GI.</p>
<p><b>8. To maintain and improve air quality.</b></p>	<p style="text-align: center;"><b>0/-</b></p> <p>Mixed outcome. Development and traffic generation causes air quality issues through increased traffic and congestion. However, potential to select sites (under Option 1) with improved opportunities to travel by public transport.</p> <p>However, those sites selected under Option 2 have less potential to improve opportunities to travel by public transport or reduce congestion.</p>
<p><b>9. To maintain and improve water quality and to achieve sustainable water resources management.</b></p>	<p style="text-align: center;"><b>0</b></p> <p>This is dependent on the measures taken for each individual site, but has potential to ensure development has the ability to conserve water resources, increase water efficiency and improve water quality as much as possible.</p>
<p><b>10. To reduce carbon emissions that cause climate change and to achieve net zero.</b></p>	<p style="text-align: center;"><b>0</b></p> <p>Limited opportunity for large scale strategic carbon offset measures, but some scope for planned local small-scale measures to support energy conservation and energy efficient design to reduce effects of climate change (can ensure housing is sustainably constructed with low/zero carbon emissions through the implementation of high quality design and planning policy/design guidance).</p>
<p><b>11. To reduce waste generation and achieve sustainable management of waste.</b></p>	<p style="text-align: center;"><b>-</b></p> <p>Development will always result in waste generation. Small-scale measures could be implemented through planning policy and design guidance to reduce waste generation and achieve better sustainable management of it, but this is mainly developer-led.</p>

<b>I 2. To safeguard historical and cultural assets.</b>	<b>0</b>  Mixed outcome. Some sites may be closer to heritage assets than others, depending on the settlement, but generally less opportunity to avoid harmful development in some cases, thus maintaining cultural and historical assets.
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**Combination of Option 1 (Selective planned expansion of existing settlement(s)) and Option 2 (General distribution of housing around all existing settlements (planned sharing of the housing numbers across all settlements))**

It could be argued that Options 1 and 2 are mutually exclusive and therefore by enacting either of these options, it would result in the other being unable to come into play.

However, after further consideration, there may be some scope for only part of each of the individual options to be combined. For example, the Option 1 element could provide a large portion of development for the strategic sites selected from the most sustainable towns and larger settlements. Any left-over housing numbers which have not been provided for using Option 1 could then be subject to Option 2, i.e. a sharing/distribution of the remaining housing numbers across the other settlements in the District (namely the medium to smaller settlements).

**The positive effects (in sustainability terms) of this combination of options include:**

Mainly, this option results in neutral SA impacts. This option results in a mixture of positive results from the elements which are from Option 1, whilst balancing the more negative impacts of general distribution across the smaller settlements. This combination of options provides the ability to select development of appropriate scale in the most sustainable locations for the larger strategic sites, taking advantage of the facilities nearby such as education, health, retail and recreation as well as the infrastructure which is already in place in the larger towns/villages, without overburdening those settlements, but instead encouraging business and an increased range of employment opportunities, all with a long-term cumulative positive effect on SA Nos. 1, 3, 4 & 5.

Sites selected under Option 1 can also provide a mix of housing types and sizes to better meet the needs of different sectors and reduce inequalities as well as designing out crime, which are positive effects for SA No. 2. Whereas those sites selected under Option 2 conditions, which are dispersed around smaller more rural sites, have less potential to provide as many affordable housing units or a mix of housing types. Nevertheless, it would allow some smaller scale of development across the smaller villages which may create vibrancy and provide housing for local people and reduce inequalities. As such, this combination of options can have long-term positive effects for SA No. 2.

Again, the sites selected under Option 1 and potentially some of those under Option 2 have potential to reduce dependency on the private car, encouraging use of public transport and active travel, and introducing low/zero carbon off-set measures, all of which have long-term positive effects on SA No. 1 for healthy living along with SA Nos. 3, 4 and 10.

Such an option can also promote biodiversity net gain and be designed to strengthen connectivity for wildlife habitat and create GI in particular for the sites which are selected under Option 1 (namely the larger strategic sites) which is a positive effect on SA No. 7.

**The negative effects (in sustainability terms) of this combination of options include:**

The scale of the existing settlement and the various constraints (such as Statutory Forest, Flooding, protected Ecology, etc.) that apply suggests that there will be restrictions in terms of the capacity available at many of the existing settlements. Additional pressure would be put on infrastructure, and where that is already weak, this could become unsustainable. Traffic generation and congestion would cause additional air quality issues and development would of course leads to waste generation with only limited opportunities for sustainable waste management, which are negative effects on SA Nos. 8 and 11.

Some of the many smaller and rural settlements in the district would be significantly changed by an increase in development (under Option 2 element) which would be out of scale and character and not supported by any infrastructure, services (health, education, employment, retail), public transport or active travel choices. In the case of the sites dispersed over the smaller rural settlements this would not ensure that housing is in close proximity to services, or facilities to either improve health, academic skills or to support the local economy. There is also likely to be lack of employment or social facilities in those Option 2 locations and would result in a higher dependency on private transport, all having a long-term cumulative negative effects on SA Nos. 1, 3, 4 and 5. These smaller rural settlement sites would also result in fewer opportunities to support energy efficiency to reduce effects of climate change (carbon dependency) whilst simultaneously making it difficult to conserve biodiversity or provide biodiversity net gain (BNG) or promote green infrastructure (GI), both causing negative effects on SA Nos. 7 and 10.

**Summary**

Overall, some of the negative effects of this combination of options could however be mitigated, firstly by selecting the larger and most strategic sites under the Option 1 element. Furthermore, the provision of improved infrastructure (and funding for it), the design of schemes to create active travel routes for healthy living (positive effect on SA No. 1) and improved public transport to reduce traffic generation and to improve carbon offset (positive effects for SA Nos. 3 and 10) could be accommodated across sites selected under Option 1 and to a more limited extent, those under Option 2. This combination of options is able to deliver a larger quantum of development than Option 1 alone. And by being a combination, some of the negative effects of Option 2 can be off-set by the best selection of sustainable sites under Option 1. However, it may also be a combination of options that would not ensure a longer-term sustainable strategy because the existing capacity would be exhausted.

**Sustainability Appraisal of Option 1, 2 and 3**

<p><b>Sustainability Appraisal Objective:</b></p>	<p><b>Combination of Options 1, 2 and 3 (in part) (Selective planned expansion of existing settlement(s)), General distribution of housing around all existing settlements (planned sharing of the housing numbers across all settlements) and Maximum incremental change to the extent of absolute constraints)</b></p>
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<p><b>1. To improve the health and well-being of the populations and reduce inequalities in health.</b></p>	<p style="text-align: center;"><b>0</b></p> <p>Mixed outcome. Some sites would be near existing health services (under Option 1 selection), however, others (particularly at the numerous smaller more rural settlements) would not be in close proximity. For the Option 2 element (distribution) there would be less potential to select most sustainable sites, to design/connect up active travel routes (for healthy living) or to masterplan and therefore less opportunity to design out crime and risk of accidents.</p>
<p><b>2. To meet local housing needs, by ensuring everyone has the opportunity to live in a decent sustainably constructed and affordable home.</b></p>	<p style="text-align: center;"><b>+/0</b></p> <p>Mixed Outcome. Housing numbers could be accommodated across the district, particularly if some of the settlements were developed to the extent of absolute constraints. It would allow some smaller scale of development across the smaller villages which may create vibrancy and provide housing for local people.</p> <p>However, many of the housing locations would be small sites (distributed under Option 2 element), and this may not provide as many affordable housing units as larger sites or provide a sufficient mix of housing types and sizes to reduce inequalities in those areas</p>
<p><b>3. To provide accessible community services, recreation and leisure facilities.</b></p>	<p style="text-align: center;"><b>0</b></p> <p>Mixed outcome. Some sites (Option 1 and to a degree a limited number of sites under Option 3) would be near existing facilities to take advantage of them and reduce dependence on the car (or increase use of public transport). However, others (particularly at the numerous smaller more rural settlements under Option 2 distribution) would not be in close proximity. Less scope for planning delivery of such facilities.</p>
<p><b>4. To facilitate the development of academic and vocational skills.</b></p>	<p style="text-align: center;"><b>0</b></p> <p>Mixed outcome. Some sites would be near existing educational facilities (Option 1 element and to some degree a limited number of sites under Option 3), however, others (particularly at the numerous smaller more rural settlements for Option 2 distribution) would not be in close proximity. Less scope for planning delivery of such facilities and for improving access to them.</p>
<p><b>5. To create a more vibrant and sustainable local economy.</b></p>	<p style="text-align: center;"><b>0</b></p> <p>Mixed outcome. Development may support existing services or potentially create new businesses, but this is highly dependent on the location and the developer. Some potential for providing an increased range of employment opportunities, including higher paid and professional (under Option 1 element and to a limited degree those sites selected under Option 3).</p>
<p><b>6. To protect and enhance the landscape.</b></p>	<p style="text-align: center;"><b>0/-</b></p> <p>Mixed outcome. Under the Option 1 element there is the potential to avoid sites (particularly the larger strategic sites) which have the most</p>

	<p>impact on the landscape. Furthermore, this element of the option would allow for the promotion of high quality design to protect/enhance the landscape and also have potential to avoid the sites which have the highest agricultural land quality value.</p> <p>However, the sites selected under Option 2, are likely to be the smaller more rural sites, therefore having a more potential to cause harm to landscape, dependent on the size and scale of development.</p>
	<p>Furthermore, sites selected under Option 3 (to extent of absolute constraints) are much more likely to have negative effects on the landscape, by way of cumulative development where landscape is sensitive.</p>
<p><b>7. To conserve and enhance biodiversity, flora and fauna.</b></p>	<p style="text-align: center;"><b>+/0</b></p> <p>Mixed Outcome: Some opportunity to reduce and mitigate impacts supporting no net loss to biodiversity and promoting biodiversity net gain and GI for sites selected under Option 1.</p> <p>However, sites selected under Option 2 (distribution) will offer little opportunity to reduce wide-scale impacts on biodiversity and have less ability to plan/design for GI.</p> <p>Furthermore, development to the extent of absolute constraints (Option 3) can result in harm or further pressure on biodiversity and the potential to provide GI.</p>
<p><b>8. To maintain and improve air quality.</b></p>	<p style="text-align: center;"><b>0/-</b></p> <p>Mixed outcome. Development and traffic generation causes air quality issues through increased traffic and congestion. However, potential to select sites (under Option 1) with improved opportunities to travel by public transport.</p> <p>However, those sites selected under Option 2 and/or 3 have less potential to improve opportunities to travel by public transport or reduce congestion.</p>
<p><b>9. To maintain and improve water quality and to achieve sustainable water resources management.</b></p>	<p style="text-align: center;"><b>0</b></p> <p>This is dependent on the measures taken for each individual site, but has potential to ensure development has the ability to conserve water resources, increase water efficiency and improve water quality as much as possible.</p>
<p><b>10. To reduce carbon emissions that cause climate change and to achieve net zero.</b></p>	<p style="text-align: center;"><b>0/-</b></p> <p>Limited opportunity for large scale strategic carbon offset measures, but some scope for planned local small-scale measures to support energy conservation and energy efficient design to reduce effects of climate change (can ensure housing is sustainably constructed with low/zero carbon emissions through the implementation of high quality design and planning policy/design guidance).</p>

	However, the sites selected under Option 3 have a little or no planned approach to how development will include strategic and local carbon offset to support energy conservation and reduce vulnerability to climate change.
<b>I1. To reduce waste generation and achieve sustainable management of waste.</b>	-/-
	Development will always result in waste generation. Small-scale measures could be implemented through planning policy and design guidance to reduce waste generation and achieve better sustainable management of it, but this is mainly developer-led.
	For sites which are selected under Option 3, there is more of a lack of strategic management of development, and therefore less chance of implementing sustainable measures for reducing waste generation and achieving sustainable management.
<b>I2. To safeguard historical and cultural assets.</b>	0/-
	Mixed outcome. Some sites may be closer to heritage assets than others, depending on the settlement, but generally less opportunity to avoid harmful development in some cases, thus maintaining cultural and historical assets.
	Sites selected under Option 3 could be closer to and cause further harm or put more pressure to heritage assets.

**Combination of Option 1 (Selective planned expansion of existing settlement(s)), Option 2 (General distribution of housing around all existing settlements (planned sharing of the housing numbers across all settlements) and Option 3 (maximum incremental change to the extent of absolute constraints)**

It could be argued that Options 1, 2 and 3 are mutually exclusive and therefore by enacting any one of those options, it would result in the others being unable to come into play.

However, after further consideration, there may be some scope for only part of each of the individual options to be combined. For example, the Option 1 element could provide a large portion of development for the strategic sites selected from the most sustainable towns and larger settlements. Any left-over housing numbers which have not been provided for using Option 1 could then be subject to Option 2, i.e. a sharing/distribution of the remaining housing numbers across the other settlements in the District (namely the medium to smaller settlements). Finally, Option 3 could come into play in this scenario by allowing some of the aforementioned settlements (whether large or small) to be developed to their ultimate capacity.

**The positive effects (in sustainability terms) of this combination of options include:**

Mainly, this option results in neutral SA impacts, rather than positive ones. This option results in a mixture of positive results from the elements which are from Option 1 and to a limited extent those under Option 3, whilst balancing the more negative impacts of general distribution across the smaller settlements. This combination of options provides the ability to select development of appropriate scale in the most sustainable locations for the larger strategic sites, taking advantage of the facilities nearby such as education, health,

retail and recreation as well as the infrastructure which are already in place in the larger towns/villages, without overburdening those settlements, but instead encouraging business and an increased range of employment opportunities, all with a long-term cumulative positive effect on SA Nos. 1, 3, 4 & 5.

Sites selecting under Option 1 and to some degree those under Option 3 can also provide a mix of housing types and sizes to better meet the needs of different sectors and reduce inequalities as well as designing out crime, which are positive effects for SA No. 2. Whereas those under Option 2 which are dispersed around smaller more rural sites have less potential to provide as many affordable housing units or a mix of housing types. Nevertheless, it would allow for some smaller scale development across the smaller villages which may create vibrancy and provide housing for local people and reducing inequalities. As such, this combination of options can have long-term positive effects for SA No. 2.

Again, the sites selected under Option 1 and potentially a more limited number of those under Option 2 and 3 have potential to reduce dependency on the private car, encouraging use of public transport and active travel, and introducing low/zero carbon off-set measures, all of which have long-term positive effects on SA No. 1 for healthy living along with SA Nos. 3, 4 and 10.

Such an option can also promote biodiversity net gain and be designed to strengthen connectivity for wildlife habitat and create GI in particular for the sites which are selected under Option 1 (namely the larger strategic sites) which is a positive effect on SA No. 7.

**The negative effects (in sustainability terms) of this combination of options include:**

The scale of the existing settlement and the various constraints (such as Statutory Forest, Flooding, protected Ecology, etc.) that apply suggests that there will be restrictions in terms of the capacity available at many of the existing settlements. Additional pressure would be put on infrastructure, and where that is already weak, this could become unsustainable. Traffic generation and congestion would cause additional air quality issues and development would of course lead to waste generation with only limited opportunities for sustainable waste management, which are negative effects on SA Nos. 8 and 11.

Some of the many smaller and rural settlements in the district would be significantly changed by an increase in development (under Option 2 element) which would be out of scale and character and not supported by any infrastructure, services (health, education, employment, retail), public transport or active travel choices. In the case of the sites dispersed over the smaller rural settlements it would not ensure that housing is in close proximity to services, or facilities to either improve health, academic skills or to support the local economy. There is also likely to be lack of employment or social facilities in those Option 2 locations and would be a higher dependency on private transport, all having a long-term cumulative negative effects on SA Nos. 1, 3, 4 and 5. These smaller rural settlement sites and any settlements which are developed to the extent of absolute constraints (under Option 3 element) would also result in fewer opportunities to support energy efficiency to reduce effects of climate change (carbon dependency) whilst simultaneously making it difficult to conserve biodiversity or provide biodiversity net gain (BNG) or promote green infrastructure (GI), both causing negative effects on SA Nos. 7 and 10. Sites selected under Option 3, i.e. development that could take place to the absolute constraints of the settlement, are more likely to be located in the more sensitive landscape areas with limited or no scope for mitigation measures, not protecting the landscape or areas of landscape value, having negative effects on SA No. 6. Similarly, those sites selected under Option 3 are more likely to be in close proximity to heritage, thereby not always maintaining cultural and historical assets with little chance of mitigation, having long-term negative effects on SA Nos. 11 and 12.

## Summary

Overall, some of the negative effects of this combination of options could however be mitigated, firstly by selecting the larger and most strategic sites under the Option 1 element. Furthermore, the provision of improved infrastructure (and funding for it), the design of schemes to create active travel routes for healthy living (positive effect on SA No. 1) and improved public transport to reduce traffic generation and to improve carbon offset (positive effects for SA Nos. 3 and 10) could be accommodated across sites selected under Option 1 and to a more limited extent, those under Option 2 and Option 3. This combination of options is able to deliver a larger quantum of development than Option 1, 2 or 1 and 2 alone. And by being a combination, some of the negative effects of Options 2 and 3 can be off-set by the best selection of sustainable sites under Option 1. However, it may also be a combination of options that would not ensure a longer-term sustainable strategy because the existing capacity would be depleted.

## Sustainability Appraisal Assessment of the Advantages and Disadvantages of the 3 options

Option	Advantages	Disadvantages
Combination of Option 1 & Option 2 (in part) (Selective planned expansion of existing settlement(s)) and General distribution of housing around all existing settlements (planned sharing of the housing numbers across all settlements))	<ul style="list-style-type: none"> <li>• allows settlements best suited to change to be identified, particularly for the larger strategic sites;</li> <li>• enables LP policy to support selected locations, and for example, regeneration policies;</li> <li>• should support development in most sustainable current location(s) with some scope for sharing infrastructure, particularly for the larger strategic sites;</li> <li>• will allow a wider range of sites in terms of locations and sizes - provides for continuity;</li> <li>• can allow or result in a phased approach over the plan period;</li> <li>• or the sharing of development over the Option 2 element (smaller more rural settlements) each settlement takes their share (no Nimbyism);</li> <li>• benefits of housing and employment are dispersed more equally across the district.</li> </ul>	<ul style="list-style-type: none"> <li>• could force allocations that have adverse impacts, particularly for those sites selected under Option 2;</li> <li>• scope likely to be limited by lack of capacity in/around existing settlements;</li> <li>• choice of locations for development may be more driven by availability of land than being the most supportive of the LP strategy overall;</li> <li>• may stretch infrastructure by relying on existing provision;</li> <li>• the sites selected under the Option 2 element (dispersal) may not work towards/allow overall LP strategic approach;</li> <li>• would not address climate change and sustainable transport improvements well for the sites selected under Option 2 (smaller, more rural locations);</li> <li>• unlikely to support major infrastructure improvements or provision for those sites selected under Option 2;</li> <li>• dispersed development likely to be less energy efficient for those sites selected under Option 2;</li> <li>• may result in development in locations selected under Option 2, where adverse impacts occur, especially on character and landscape;</li> <li>• dispersed smaller sites element of this option would not provide same level of affordable housing or S106 contributions;</li> </ul>
Combination of Options 1, 2 and 3 (in part) (Selective planned expansion of existing	<ul style="list-style-type: none"> <li>• allows settlements best suited to change to be identified, particularly for the larger strategic sites;</li> <li>• enables LP policy to support selected locations, and for example, regeneration policies;</li> </ul>	<ul style="list-style-type: none"> <li>• could force allocations that have adverse impacts, particularly for those sites selected under Options 2 and 3;</li> </ul>

Option	Advantages	Disadvantages
settlement(s)), General distribution of housing around all existing settlements (planned sharing of the housing numbers across all settlements) and Maximum incremental change to the extent of absolute constraints)	<ul style="list-style-type: none"> <li>• has potential to support development in most sustainable current location(s) with some scope for sharing infrastructure, particularly for the larger strategic sites;</li> <li>• will allow a wider range of sites in terms of locations and sizes – capacity will be greater using the Option 3 element, thus provides for more continuity and flexibility;</li> <li>• can allow or result in a phased approach over the plan period;</li> <li>• for the sharing of development over the Option 2 element (smaller more rural settlements) each settlement takes their share (no Nimbyism);</li> <li>• benefits of housing and employment are dispersed more equally across the district.</li> </ul>	<ul style="list-style-type: none"> <li>• choice of locations for development may be more driven by availability of land than being the most supportive of the LP strategy overall;</li> <li>• may stretch infrastructure by relying on existing provision;</li> <li>• the sites selected under the Option 2 element (dispersal) and Option 3 (to extent of absolute constraints) may not work towards/allow overall LP strategic approach;</li> <li>• would not address climate change and sustainable transport improvements well for the sites selected under Options 2 (smaller rural settlements) &amp; potentially Option 3;</li> <li>• unlikely to support major infrastructure improvements or provision for those sites selected under Option 2 and potentially Option 3;</li> <li>• dispersed development likely to be less energy efficient for those sites selected under Option 2 and Option 3;</li> <li>• may result in development in locations selected under Options 2 &amp; 3, where adverse impacts occur, especially on character and landscape;</li> <li>• dispersed smaller sites element of this option would not provide same level of affordable housing or S106 contributions;</li> </ul>
Option 6: Combination of Option 1 (Selective planned expansion of existing settlement(s)) and Option 4 and Planned New Settlement(s))	<ul style="list-style-type: none"> <li>• allows an overall strategy to promote more sustainable development;</li> <li>• will allow range of sites in terms of locations and sizes - provides for continuity;</li> <li>• better prospect of deliverability throughout the plan period;</li> <li>• can provide for a long-term strategy for this plan and beyond;</li> <li>• infrastructure, employment and services can be designed in, whilst also taking advantage of existing infrastructure in larger more sustainable existing settlements;</li> <li>• may offer scope for cooperation with other authorities, especially cross border;</li> <li>• allows settlements best suited to change to be identified;</li> <li>• should support development in most sustainable current location(s) with some scope for sharing infrastructure;</li> <li>• can allow or result in a phased approach over the plan period.</li> </ul>	<ul style="list-style-type: none"> <li>• new settlement aspect may be locally unpopular;</li> <li>• new settlement in particular requires very extensive and detailed supporting evidence;</li> <li>• new settlement will require major infrastructure - must be viable;</li> <li>• could have wider impact on rural landscape.</li> </ul>

**4.56** A new settlement will have advantages for the long term delivery of sustainable development in the Forest of Dean District coupled with enabling Local Plan policies to support development at selected sustainable locations at the towns and other villages. It will allow for a greater range of sites in terms of locations and sizes and provides for continuity and allowing for a phased approach over the plan period

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and beyond. Supporting employment, infrastructure and services can be designed to the appropriate scale. A strategy with out new settlement(s) may saturate existing existing towns and villages beyond their capacity to support the development. Although a new settlement can still not provide the appropriate amount of development without development at the towns and other sustainable large and smaller village locations. this will support the smaller villages as suggested in many of the comments received.

**4.57** We will look at garden communities suggested through the consultation as a form of design which is more conducive to rural surroundings with a lower density but infrastructure to support key services locally.

**4.58** Suggestions are put forward that brownfield sites should be prioritised before greenfield development, and several respondents question the overall housing targets imposed by government. However, there is limited brownfield land within the district and therefore it is not possible to accommodate the higher 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).

**4.59** Specific locations mentioned in the comments received for potential development include expansion around Lydney (which benefits from rail connections), Cinderford, Churcham, Coleford, and Newent, while concerns are raised about proposed new settlements at locations such as Churcham and Glynchbrook. All these sites will be evaluate through the Sustainability Appraisal and Local Plan site selection process.

**4.60** Many comments relate to the choice of a new settlement and the possible location in the areas of Churcham or Glynchbrook. The option consultation does not favour or discount any specific location, but it is clear some respondents oppose any potential development in these specific areas and these comments are noted.

**4.61** Any Preferred Strategy will be further refined as new evidence comes forward such as transport work and housing and economic needs assessment. These will be accompanied by further statutory body comment and public consultation during the remaining Regulation 18 and 19 stages of Local Plan production.

**4.62** Representations highlight the issue of flood risk and correctly point out the absolute nature of the constraint. Climate change, current risk from river and coastal flooding and potential surface water flooding need to be accounted for. The Local Plan will also be subject to and informed by a SFRA and a SFRA Level 2. A flood risk assessment will be needed of areas of search for major development which may be allocated in the Local Plan.

**4.63** Most responses refer to the effects of the developments on ecology and biodiversity. Developments will be carefully reviewed and considered when sustainable development is proposed to ensure that the protection and enhancement of biodiversity is secured.

**4.64** Transport and travel are highlighted in many representations especially in connection with current problems on the A48/ A40 especially at either end of the FoDD. These need to be addressed with or without new development which may depend on these routes. New development of the scale needed by the Local Plan will likely impact on these existing problems wherever it takes place and a more sustainable pattern of travel together with a reduction of the need to travel is essential. It is important to understand the local roads and rail network and how they are supported by proposals in the Gloucestershire Transport Plan. To support this we are undertaking transport modelling work.

**4.65** 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.

**4.66** Transport evidence, Viability evidence and Infrastructure delivery plan are all being worked on. The Local Housing and Economic Needs Assessment is being updated to inform the development of the Local Plan, to provide up to date housing and economic analysis. The Council will continue to work with the County Council and Parish /town Council to bring forward sites for employment uses. The SHELAA call for sites consultation is undertaken yearly and is an important part of the evidence for the Local Plan.

**4.67** Policy LP2 in the Draft Local Plan is focused on how we mitigate to prevent or reduce emissions, where as Policy LP3 is focused on adaptation and how we adjust to the current and future implications of Climate Change. We will work with the climate team to review the requirements of LP2 and LP3 to ensure they are complementary and effectively address climate change mitigation and/or adaptation as relevant for each section.

**4.68** Many representations in favour of specific sites seek a strategy which allows for the allocation of development at specific existing settlements. Therefore there is some support for option 1 or 2 or 3. The sites submitted will be assessed by the SA through the Plan process and in the light of a revised strategy.

**4.69** A number of points are noted in responses made to support specific sites around the district including those at Glynchbrook and Churcham and in particular the need to fully evaluate proposals, to co-operate with adjoining authorities. This approach is supported as is the general principle that as a Local Plan evolves it requires progressively more supporting evidence. The development of the SA (sustainability appraisal) will continue to be refined alongside a detailed evaluation of potential sites as the draft plan develops. The SA process will be expected to have an effect on the LP guiding the selection of sites and the nature of its policies.

**4.70** The Council regularly engages with neighbouring authorities under the Duty to Cooperate legislation and will continue to do so.

## **Conclusions**

**4.71** The most debated element of the options consultation is the proposal of a new settlement(s). The Local Plan has to balance the impacts and opportunities taking into account any mitigation or advantages they may bring. It is considered that a well located new settlement could potentially take advantage of sustainable travel options, be on an established transport axis which it could support and provide Green Infrastructure, and new planting and other extensive green space. Against this it was considered likely that it would involve the loss of a considerable area of land to agriculture, would change the landscape from predominately rural to urban and could if services were not provided in step lead to unsustainable travel patterns. The intention is to support the new settlement with development that would be concentrated at the more sustainable locations.

**4.72** A new settlement(s) offers the opportunity for a more sustainable long term form of development than providing the same level of development in another way either dispersed or shared development would be likely to adversely affect the locations in which the development is proposed and possibly in areas that do not have the supporting services , facilities and infrastructure or sufficient development to attract them.

## Question 7

**4.73** Overall, question7 received 248 written comments and asked for suggestions of alternative options.

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

## Keys Themes

1. **Opposition to New Settlements (Option 4):** Many respondents strongly opposed Option 4, citing concerns about high costs, environmental damage, long lead times for infrastructure delivery, and unsustainable car dependency. The Glynchbrook site was particularly criticised for its location near the Malvern Hills, poor transport links, flood risk, and loss of agricultural land. Churcham was similarly criticised due to flooding concerns and infrastructure limitations.
2. **Support for Existing Settlement Expansion (Options 1 & 2):** Respondents broadly favored Options 1 and 2 as the most sustainable approaches, as they utilise existing infrastructure, support town regeneration, and maintain community character. Lydney was mentioned as a suitable location due to its rail connections, while Cinderford and Coleford were also identified as appropriate locations for expansion.
3. **Brownfield First Approach:** Many respondents advocated for prioritising brownfield site development before considering greenfield locations. This included suggestions to repurpose empty buildings, retrofit existing properties, and redevelop derelict sites to minimize environmental impact and make efficient use of previously developed land.
4. **Infrastructure and Service Concerns:** Respondents emphasised that any development must be accompanied by appropriate infrastructure improvements, including roads, public transport, healthcare facilities, schools, drainage and utilities. Many expressed concerns that current infrastructure is already strained and questioned whether new settlements would receive adequate services and that all routes should be substantially upgraded. Necessary highway improvements will make housing developments in the area expensive. there is a need to encourage employment in the district
5. **Environmental and Agricultural Land Protection:** Significant concerns were raised about the loss of productive agricultural land, particularly in relation to the Glynchbrook and Churcham proposals. Respondents highlighted the importance of food security, biodiversity protection, and preserving the rural character of the Forest of Dean.
6. **Transport and Sustainability :** Respondents emphasised the need for development to be located near existing transport links, particularly rail connections. Many pointed out that new settlements would increase car dependency, contrary to climate goals, while development near Lydney could leverage its rail station.

7. Flood Risk Concerns: Several respondents highlighted flood risks in proposed development areas, particularly at Churcham and the A40/A48 corridor, noting recent flooding events and climate change predictions that suggest these risks will increase. Sewage & water systems need a very significant overhaul as well as expansion.

8. Alternative Approaches: Respondents suggested several alternative approaches, including: favouring development near railway station at Lydney, retrofit-first policies for existing buildings, community-led housing projects, and proportionate growth in villages with appropriate services. Need to obtain assurances from Network Rail to upgrade their services. Suggested areas for development include Lydney, Coleford, Cinderford, Newent, Bream and Mitcheldean.

9. Concerns were raised over the deliverability of Beachley Barracks.

10. Consideration of making new and individual dwellings “self reliant” in design would be advisable eg new houses to have built in grey water storages as standard design, would spare the water supply problems.

11. Questioning Housing Targets: Some respondents questioned the validity of the increased housing targets and suggested the Council should challenge these figures, similar to approaches taken by other local authorities.

## **Statutory consultee responses**

**Blaisdon Parish Council** - Blaisdon is already going to experience a significant residential increase via the completion of the Blaisdon Hall retirement home. The above will already add significant population pressure to the Village. i.e. jobs, water, etc. There is a yearly flooding problem that new houses will either add to or experience. Blaisdon's one and narrow main road cannot accommodate more traffic. Blaisdon already has significant restrictions on new builds from conservation areas.

**CPRE** We consider that there are substantial difficulties with all identified options and we can offer no other options which we would see as better. We consider that the housing allocation is unreasonably high and that 'I+4' is simply the least bad.

**Coleford NDP Group** - Brownfield sites take priority, and should stretch down into windfall level where, instead of one building perhaps 2/ 3 new ones could be sited. This calculation multiplied by the large potential number of sites would increase the total, allow people to stay in their local vicinity, and not radically affect character. Where large sites have been constructed the landscape management is clearly required in Planning Applications, but does not always work as effectively in practice. The provision of LEAPs and LAPs is not matched by adequate equipment, and allotments are often difficult to get. Increased density in new development is already happening, but such green spaces are therefore of greater value.

**Coleford Town Council** - Brownfield sites take priority, and should stretch down into windfall level where, instead of one building perhaps 2/ 3 new ones could be sited. This calculation multiplied by the large potential number of sites would increase the total, allow people to stay in their local vicinity, and not radically affect character. Increased density in new development is already happening, but the related amenity space for individual properties is sometimes below the required level. The provision of LEAPs and LAPs is not matched by adequate equipment as it gets more expensive. Whilst economies of scale favour larger numbers in developments, there may be more scope for medium size developments in terms of site sizes.

**Churcham Parish Council** - The Churcham area is notorious for serious flooding and much lies in a category 3 flood zone so is certainly not less affected. The east of the Forest of Dean from Highnam roundabout Birdwood on the A40 and from Highnam to approximately Chaxhill on the A48 is low lying, close to the River Severn and regularly floods. These flood events are becoming more regular and severe, in line with scientific predictions on global warming. Last year the A417 at Maisemore also flooded and was closed so no passable road links existed. Another factor that compounds the flooding problem is the ground in the region is composed of a dense clay that water cannot permeate through easily thus making the area particularly prone to flash flooding. Much of Churcham and Minsterworth serve as a flood plain for the river and its tributaries, a rise of this magnitude in sea level will mean existing flood plains will increase in size and the increased precipitation, as we are starting to see now will flood the area on a regular basis, as typified over the last 5 years. It was also the case that much of what has flooded was outside the designated Category 2 & 3 flood zone. Groundwater levels have already started to change. Any new settlement will obviously displace water making flooding events more severe and water run-off making flash flooding more acute also. Given the geography, geology and flooding events It is more the case that FODDC should be focused on trying to protect the existing region and the residents from flooding and devising evacuation plans to cope with the events that will be a near certainty in the future, certainly not suggesting that such an area is less affected from constraints. The Environment Agency has released the new National Flood Risk Assessment (NaFRA2) and 27 August 2025 with an added a layer called Flood Zones plus climate change It purportedly shows how the combined extent of Flood Zones 2 and 3 could increase with climate change over the next century.

**Corse Parish Council** -The Parish Council would like to see the focus on Options 1 and 2 as the most sustainable approach concentrating growth in areas that already have services and infrastructure. Large new settlements can take years to provide the promised facilities, resulting in low initial delivery of much needed services.

**GWT**- The Nature Recovery Network mapping (now incorporated into the Local Nature Recovery Strategy mapping) indicates that the least biodiverse areas of the Forest of Dean District are areas in the north of the district. This is largely because of the land use history which is of more intensive farming due to the better quality soils. In terms of avoiding damage to biodiversity and opportunities for enhancing biodiversity as part of green infrastructure this area provides the best opportunity, however this must be balanced with the loss of good quality agricultural land, and the grade 1 and 2 land in this area should be avoided. The constraints in the FoD district from the rich and nationally/internationally significant biodiversity, quality agricultural land and difficulties of road access due to the level of isolation and flood zones created by the rivers, do not appear to have been taken into account by the government when making the new housing allocations. We would support the district council in pushing back against the housing numbers that they have been allocated, which equate to area of housing 2 to 3 times the size of Chepstow by 2043.

**Hartpury Parish Council**- Transport for isolated new communities is particularly unsustainable, relying primarily on cars to get to the main employment centres. As mentioned above, there is a train station at Lydney, with 2 trains an hour to Gloucester at peak times. As a rural community, Hartpury Parish Council are against the use of prime farmland for use for new developments, (as proposed for option 4). The effects on wildlife and the environment in general e.g. car based transport, mean this cannot be seen in any way as a "green" solution.

**Herefordshire Council** - With further engagement via Duty to Cooperate, there could be opportunities for Herefordshire and the Forest of Dean District Council to explore jointly, sustainable cross boundary

sites to ensure that the necessary infrastructure can be delivered. Meetings to explore these options need to be held.

**Historic England** - It may be that a mix of several options provides an appropriate approach. Your evidence base, including an objective understanding of what is historically sensitive and important within the district can help to provide a robust and informed portfolio of sites to deliver sustainable development that accords with national policy and safeguards the area's important locally distinctive character.

**Home Builders Federation** - Do not comment on individual sites and allocations. We have provided some comments on the general approach to the spatial strategy, and these are not repeated here. We would however be very concerned about an approach to export housing needs of the Forest of Dean elsewhere. National Planning Policy and Guidance is clear that Councils should seek to meet their own needs in full wherever possible. Experience has shown that seeking to require neighbouring authorities to plan for unmet needs of their neighbours has been problematic and of very limited success. The significant uptick in housing delivery across the country that is expected by this Government will simply not occur if every LPA seeks to export their increased housing requirement elsewhere.

**Huntley Parish Council** - Options 3 and 5 are not supported. A combination of Option 1 and 2 is preferred as everywhere in the Forest will take some of the additional housing. This combination is preferred to the combination of Option 1 and 4.

**Littledean Parish Council** - The Parish Council feel that the consideration of general locations is best placed with the FoDDC Planning Dept.

**Lydney Town Council**- LTC do not consider other options to be the basis of sustainable development and would create increased issues in delivery of needed regeneration and infrastructure at Lydney. Matters relating to the preferred options are addressed in responses above and below.

**Monmouthshire County Council** - -Not yet at the preferred option stage, paragraph 11.2 recognises that an appropriate sustainable response to meeting the identified housing need would be a combination of Option 1 'selective planned expansion around the most sustainable existing settlements' and Option 4 'the development of one (or more) sustainable new settlements'. It is recognised within this paragraph that options to develop land surrounding existing settlements and towns, as well as the infrastructure that can support them including highways, drainage and services are becoming exhausted. MCC supports the development of a new settlement(s) in the north of the FoD to accommodate the majority of its housing requirement over the Plan period. It is noted that no decision has been made on the location of allocations and that a further request for sites has been made, and it will be at the next stage of the plan process where a preferred option is identified, along with a revised strategy. Paragraph 6.2 does, however, recognise that Lydney remains the largest centre in the FoD with the most potential for development. The reference to constraints relating to the A48 at Chepstow in paragraph 7.4 is welcomed. Recognition of the relationship of Tutshill/Sedbury and Beachley to Chepstow in paragraphs 7.18 to 7.22 is also welcomed, including reference to the area experiencing considerable current housebuilding both sides of the border and issues associated with the A48 pinch point and focus of discussions about how possible solutions to benefit both Monmouthshire and Gloucestershire, as well as the wider areas may be implemented. When considering the options for future development, it is essential that careful consideration is given to the impact of any allocations on Chepstow and surrounding areas, including with regard to the highway network, air quality and infrastructure. There is an existing commuter flow of residents from the south of the FoD along the A48 through Chepstow onto Junction 2 of the M48 as they seek access to Bristol, Newport, Cardiff and

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beyond. This traffic flow adds to congestion on the A48 and the A466 as it approaches the M48. Additional development between Lydney and Chepstow will exacerbate existing traffic issues in Chepstow, with particular concerns at High beech roundabout and associated air quality impacts. As such, we consider that future development proposals should be focused in the Gloucester travel to work area. MCC request to be kept informed of transport modelling/assessments associated with any future relevant development proposals in proximity to Chepstow and surrounding areas to ensure there is no adverse impact on the strategic transport network or air quality. Future transport modelling/assessments demonstrate that proposed development would impact on Chepstow and surrounding areas' highway network and air quality, MCC will expect the FoD Local Plan to include measures to mitigate the increase in congestion around Chepstow, through a comprehensive and funded package of transport improvements that avoids aggravating existing problems. This could include a new transport corridor from Lydney across the River Severn to Sharpness. This could be a combined road, rail and Active Travel link from new development in the FoD to the Gloucester/Bristol rail route and to the M5.

**Natural England** - Encourage the introduction of more innovative multi-occupational houses that reduce footprint and urban sprawl - but meet the needs of numbers of individual units being built for different demographic groups. These kinds of properties would need to be of high quality and be clever and thoughtfully designed, in order to attract the British mindset of single-house dwellers. A sense of privacy and tranquillity between the immediate in property residence would need to be pioneered or researched from elsewhere. This has been done in part in Denmark. The Danish are developing new approaches in urban settings - Future-Proof Housing: What We Can Learn from Denmark's Neighbourhoods for Generations Competition - The Luxury Of Ageing! Another example is from Germany, whom have a strong tradition of multi-family housing (Merhfamilienhauser) which has influenced a lean toward creating Houses of Multiple Occupation (HMOs) whereby non-related individuals live alongside one another. Within the UK, the 'Remanence Effect', whereby shrinking/ageing families often remain in large homes leading to under occupation creates a mis-match in available housing and the growth of the local younger population. The older population can only be encouraged to downsize in their local area if a perceived house design and an equitable location is matched.

Agree that a combination of Options 1 and 4 seems the best way forward but with the following provisos: Infrastructure must be delivered alongside new development. Previous experience gives us serious doubts that there will be any real prospect of increased health provision, community buildings, retail opportunities, sewage treatment capacity, highways management or public transport provision. Masterplanning is essential with the whole town in mind not just the new development.. It has been stated as necessary in the previous draft plan. What will this look like and who will be responsible for it? We are not in favour of more than one new settlement. There would be a risk of not reaching a critical number of dwellings to achieve the necessary viability for infrastructure. Also at risk would be the 'five year housing land supply' as new settlements take much longer to build out than other developments, putting the district at risk of speculative development from volume developers.

**Pauntley Parish Council** - An Option 6 would seem to represent the most common sense approach, rather than just blindly following an ill-thought-out government edict.

**Pendock Parish Council** - Option 1 – this is the most sustainable option in terms of access to existing services but with less emphasis on each set of constraints to maximise sustainable development.

Option 2 – there may be some merit in this option but only with a clear statement of new housing numbers for each settlement to identify possible locally supported new development site opportunities.

Option 3 – this option does not adequately address the important requirement for sustainability and should not be pursued.

Option 4 – as mentioned above, the only sustainable location for this has to be reasonably central, ideally with the scope for a train service and in reasonable proximity to the main employment areas. A new settlement site in the geographically peripheral and remote very rural north of the District is not sustainable as north of Newent is defined by small villages and scattered settlements, has few local services, little infrastructure, in most parts no public transport and a rural road system which is largely made up of narrow single carriageways.

Option 5 – this might be feasible for a A40/A48 new settlement partly in the Tewkesbury District and as it could assist the Local Plan requirements of both Districts and it could lend itself to a larger new settlement than 3,000 homes to make it more sustainable.

**Redmarley Parish Council** -The Options Document and Interim Sustainability Appraisal appear to considerably downplay Options 2, 3 and 5. Both documents characterise these options as more constrained without providing any evidence to substantiate these assertions. The Sustainability Appraisal also fails to fairly assess any of the alternatives, show how the alternatives were weighted or indeed how certain negative impacts are considered acceptable or can be mitigated. The imbalance presented in both documents suggest that the District Council has treated Option 4 more favourably than the other Options. It is well held that a Sustainability Appraisal must genuinely and reasonable consider all alternatives and thus utilising an unfair interim SA to justify a favoured option could be open to challenge. Furthermore, there is no Infrastructure Delivery Plan to complement this consultation. This suggests that the District Council have not been able to accurately assess what infrastructure is needed to deliver its predetermined approach in the preferred option (Option 1 and Option 4 combined). Additionally, the Infrastructure Delivery Plan is not expected to be completed until Summer 2026 which is after the Option Selection and Site Selection process.

**Redmarley NDP Group** - My comments above and particularly these related to the Sustainability Appraisal make my views clear.

**Rudford & Highleadon Parish Council** - Further development in Lydney could bring significant investment in the rail network. This will reduce the amount of commuter traffic on the roads.

**Severn Trent** - See DWMP Technical Summary ‘assessing Sustainable Accommodation of Future Growth’ for information on assessing potential opportunities to accommodate future connection of surface water from new developments.

**SWHAPC** highlights the benefits of Option 2 (general distribution of housing around all settlements) as it would help to facilitate the delivery of affordable housing across a wide range of locations, including rural areas that are often overlooked. Well-planned housing growth in rural areas can provide market and much needed affordable housing alongside new employment opportunities and improved infrastructure. This is needed in order to sustain existing local services and facilities in rural communities and make rural housing more affordable for younger generations. Through enabling some growth in smaller settlements, Option 2 may help to sustain rural communities and support the retention of vital local services such as post offices, village shops, and primary schools.

**Strategic Local Plan Authorities** - Note that whilst FoDD frequently mention that commuting patterns highlight the eastern area's connection to Gloucester and Cheltenham, there is limited reference to any potential cross boundary strategic opportunities around this area. Churcham / Highham is a location being

promoted by developers as a new settlement opportunity, and the SLP authorities consider this area's strategic position could merit further consideration within the new spatial strategy. The SLP authorities are keen to explore the potential of this cross-boundary location. It could have the potential to play a significant role in helping to deliver both FoDD and SLP authorities' longterm vision and objectives. Given the extended lead-in times typically required to bring forward such proposals - including land ownership negotiations, equalisation agreements and viability testing, sustained and timely dialogue through a DTC will be critical. If the location is subsequently identified as a viable opportunity, ongoing sustained and collaborative engagement at this stage will provide the necessary lead-in time for land assembly, the commissioning of technical studies, and collaboration with infrastructure providers. This early coordination will help support a masterplanned approach to delivery, led by the respective local authorities.

**Tidenham Parish Council** - has a good understanding there is a need for local affordable housing, but building more executive style housing will attract further relocation from more expensive areas (Bristol, Cardiff, etc) with no transfer or incremental employment, all of which increases the burden on infrastructure. The imposition of the NPPF requirement for additional housing is particularly difficult in the FoD area which is restricted in many areas by physical features and the protected Forest area. None of the options sufficiently address the 'liveability' of developments. In the Tutshill/Sedbury area there are very few employment opportunities, few shops, few school places (Gloucestershire education figures do not take into account those pupils attending the local schools who live over the border in Monmouthshire), limited GP accessibility and no dentist as just some examples.

**West Dean Parish Council** - We are concerned by the emerging plan, re-iterated in this consultation, of the linking of Whitecroft/Pillowell/ Yorkley as a single entity. We appreciate that the linear development of these villages has all but eroded the physical distinction between them; but each has its own identity, facilities, cultural and community activity, Pillowell also has the position of being a conservation area and Yorkley has its local distinct area. The linking of these three together is disingenuous. The numbers of second homes and empty homes as well as those being let as holiday accommodation all have a detrimental effect of local housing supply. We would welcome robust measures (as allowed by Government legislation) being applied to bring these under control. We also recommend further consideration of the West Dean's submission to District (a year ago) of a Tourist Levy being implemented to raise funds for infrastructure support that would benefit both local inhabitants and visitors alike.

**Westbury-on-Severn Parish Council** Every route out of the Forest suffers problems with congestion. Lydney is the most sustainable. Will need major investment.

**Wye Valley and Malvern Hills National Landscape Teams** - Option 2 carries a high risk of harm to landscape. There is a risk of widespread cumulative harm from many small/medium schemes across sensitive villages and locations within or near to the National Landscapes. These are likely to be weakly masterplanned, intensify lighting, traffic and suburbanising edge character. Option 3 also carries a high risk of harm to landscape, as identified in the SA. Allocations would be made on whatever capacity remains rather than the least sensitive locations. This poses a very high risk to the National Landscapes and their settings. Option 4 - as stated in Q6, new large settlements in the setting of the National Landscapes that are likely to result in significant harm would not be supported, especially the Glynchbrook site that has been included in the SHLAA. Large settlements sited near National Landscapes are likely to fail NPPF para. 189.

## **Question 7 - Draft Officer Response**

**4.74** The consultation responses regarding Section 10 Options expressed various opinions on how the Forest of Dean District Council should address its increased housing requirement. Most respondents again expressed concerns about Option 4 (new settlements), citing infrastructure challenges, environmental impacts, and sustainability issues. Options 1 and 2 (focusing on existing settlements and their expansion) received the most support as being more sustainable approaches that utilise existing infrastructure. Many respondents emphasised the importance of prioritising brownfield site development before considering greenfield locations. Specific concerns were raised about proposed new settlement locations, particularly at Glynchbrook and Churcham, due to flooding risks, poor transport links, and loss of agricultural land. Several respondents suggested alternative approaches, including retrofitting existing properties, smaller-scale developments in appropriate villages, and development along transport corridors.

**4.75** The Council will undertake Heritage Impact assessments of relevant sites to assess the impact of a proposed development on a heritage asset and propose any mitigation measure to reduce or offset that harm.

**4.76** Comments regarding housing type are noted and 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. This is certainly a matter which will be considered in more detail and policies will be reviewed/revised where appropriate to reflect this.

**4.77** Many comments highlighted the answers already covered in Question 6, responses to these are in draft officer response to Question 6 above. comments to the Sustainability Appraisal are covered in Question 4.

## **Question 8**

**4.78** Overall, Question 8 received 247 written comments, asking whether the most sustainable options was support.

*Do you feel the 'most sustainable combination of options' (a combination of Option 1 and Option 4 set out in Section 11) is an appropriate approach, are there any changes that you could suggest?*

### **Key themes:**

#### **Support for Option 1 (Existing Settlements)**

There is broad support for Option 1 as part of the strategy:

- Leverages existing infrastructure, services, and transport links
- More sustainable than building entirely new settlements
- Can deliver housing more quickly to meet immediate needs
- Supports regeneration of existing towns and communities
- Reduces need for car dependency

## Support for Combined Approach Option 1 and Option 4

Some respondents supported the combined approach of Options 1 and 4:

- Recognition that housing targets require significant new development
- Belief that properly planned new settlements could be sustainable
- View that this approach balances immediate and long-term needs
- Opportunity for comprehensive planning and infrastructure
- Allows for both expansion of existing settlements as well as planned new settlement(s) over the longer term.
- Able to plan and deliver necessary infrastructure, services, and employment opportunities
- retaining the character of existing towns/villages through more modest expansions.

## Opposition to Option 4 (New Settlement)

Many respondents strongly oppose Option 4, citing:

- Permanent loss of productive agricultural land and countryside.
- Lack of existing infrastructure, services and sustainable transport links for new settlements and high costs to develop it.
- Concerns about flooding, particularly at specific sites of Glynchbrook and Churcham area.
- Environmental impact and biodiversity loss and sustainability issues with greenfield development.
- Impact on heritage sites, particularly Chartist settlements.
- Long delivery timescales that won't address immediate housing needs.
- Skepticism that promised amenities and facilities would materialise.
- Expansion near boundaries could lead to uncoordinated growth and impact neighboring areas.
- Concerns about "overpromising and underdelivering" on affordable housing and community facility provision
- Historical examples of new settlements failing to deliver promised amenities
- Worries about viability assessments being used to reduce commitments later
- Long lead times before any housing is actually delivered

Concerns about traffic and transport implications:

- Existing congestion on key routes (A417, A40, A48, M50)
- Inadequate rural road network to support large new developments
- Lack of public transport options leading to car dependency
- Safety concerns regarding increased traffic on country lanes

## Alternative Combinations Proposed

Many respondents suggested different combinations:

- Option 1 + Option 2 (existing settlements + limited growth in villages)
- Option 1 + Option 3 (existing settlements + dispersed growth)
- Options 1 + 2 + 3 (comprehensive approach using existing settlements)
- Option 3 (Dispersed growth) instead, in order to meet housing needs through expansions of existing settlements of varying sizes where infrastructure already exists or can be upgraded incrementally.
- Develop in following order Existing towns, large villages and then assess the viability of the smaller villages
- Prioritise brownfield sites redevelopment opportunities before any greenfield development

## Process and Consultation Concerns

Some respondents criticised the consultation process:

- Question wording seen as leading or biased toward Options 1 and 4
- Lack of detailed information about potential new settlement locations
- Insufficient evidence supporting the sustainability claims
- Concerns about predetermined decisions

## **Statutory consultee responses**

**CPRE** Agree as per question 6

**Churcham Parish Council** - No! Given that the consultation option for a new settlement references land located ~to the west the A40,A48 entertaining a new settlement on the periphery of the Forest of Dean is a terrible option for sustainability. The proximity of Gloucester to the location of a new settlement means that it effectively becomes a commuter estate of Gloucester and will serve only Gloucester and regions to the east. It has long been known that a very high proportion of the eastern residents of the Forest of Dean work in the Gloucester-Cheltenham region or use motorway access at Junction 11 or 11a. This reality has meant the A40 at Over Farm is one of the Counties most congested roads, the geography and rivers constrain traffic which means at peak times traffic is regularly backed up on the A40 and A48 for several kilometres. This congestion can occur at any time of the day because the roads are over capacity meaning any minor event can cause huge tailbacks. Adding to this congestion by building a new settlement resulting in thousands of new journeys at the most congested part of the road network. Work patterns has largely returned to pre-pandemic times. The 3 mile queues have returned on the A40 and A48 to Gloucester. Increased public transport does not solve the problem because these jobs are dispersed over a wide area so public transport is not a realistic option. The sheer number of busses per hour that would be unrealistic and unaffordable. The Forest of Dean is a unique environment that has the potential to be prosperous and a great place to live. It has the combination of historic towns and villages that are surrounded by nature and a diverse natural environment. A number of shifts were happening before Covid 19 impacted the country, as it was the case that the growth in employment is being driven by small and medium sized enterprises many of these in the technology sector attracting high skilled employees which find that by being located in more rural areas where they are not only nice places to work but also promote a healthier fulfilling lifestyle they are able to recruit more easily those high skilled professionals. Smaller employment sites appealing to technology or other knowledge based companies located across the Forest is a strategy that will help promote internal investment. Another shift however is that such professionals are looking to live in towns and villages that have an established community and historical sense of place with a public house, local shops and a mix of house types from all periods in history. Housing and employment planning fosters this small scale development in established communities together with employment facilities. The impact of a new settlement on the already congested A40 and A48 at one of its critical pinch points will deter companies from locating in the Forest of Dean A self-contained new settlement where houses, employment and shopping will be co-located will not result in a wave of commuting to employment sites further afield. The amount of land needed to create 3000 jobs would be enormous and it would need to accommodate a wide range of professions. Similarly the proximity to a new settlement of extensive supermarket and shopping facilities in Gloucester will be an obvious draw which means shopping facilities further into the Forest that are already struggling to be viable miss out and are more likely to close which further impacts existing communities who don't have the proximity to Gloucester. An alternative most sustainable option is based on a combination of Options 1 and 2 incorporating other ideas that pull together models that reinforce sustainability and increase viability for the FoD. We believe mix use Improves sustainability and reduces the need for travel, supports local economies, provides a range of housing needs integrated into existing environments and services, creates

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a sense of communities around historic centres and boosts the welfare of occupants. We have in the district the main forest towns which are the central to the economic wellbeing of the district, these all have industrial sites and housing that should be developed as we all recognise increased transport out of the district is not sustainable from an economic or environmental basis. Lydney has the only train station in the district for the services to be enhanced and frequency improved the only way is to increase the viability and critical mass of the serving area. There is employment land and brown field sites to be developed but we need a town of a size and economic draw to act as a counterweight to those who travel outside the FoD for shopping, employment and services. If a strategy of growth in line with this goal over the time period in the town was implemented together with growth in the other three towns and Mitcheldean which benefits from a large employment site this would likely leave a remainder of the housing requirement of approximately 2600 homes spread between the 43 remaining large and small villages. It is important that these are mixed use for sustainability and tailored to enhance village facilities and employment.

**Coleford NDP Group** - YES, this allows for the time to plan and construct in the whole LP period. It allows for retention of character, infrastructure improvement/installation and some future proofing.

**Coleford Town Council** - YES, this allows for the time to plan and construct in the whole LP period. It allows for retention of character, infrastructure improvement/installation and some future proofing.

**Corse Parish Council** - No a large new settlement (Option 4) is not considered appropriate by the Parish Council as this would result in the loss of countryside and significant changes to the character of the area. The focus should be on Option 1 supplemented by Option 3, this would ensure that development remains within the appropriate limits, and that essential services are in place before new homes are occupied.

**GCC**- Please see Transport Planning officers' response to Q6 above.

**GWT**- Option 1 as recognition that housing still need to be supplied in the short term, using areas that have already been thoroughly scoped in terms of ecological impacts would be best, instead of assessing new small-medium sites. Option 1 is unlikely to be able to provide full housing need in combination with sustainable development due to constraints of existing settlement locations. Option 4 used as the primary mid-long term strategy. Identification of one or two large sites allows for the comprehensive assessment and masterplanning of environmental impacts/improvements alongside other needs. Some locations with current low biodiversity baseline could provide an ecological benefit. An element of Option 5 could be used as a supplementary mid-long term solution. Obviously protects FoD to a degree however there is a danger of 'exporting' ecological impacts across the county and neighbouring counties. Also, needs to consider that 'the environment doesn't have totally fixed borders' and so could still create 'downstream' impacts in the FoDD. As such, development outside of the district could be looked at as a 'co-development' joined up environmental consideration.

**Hartpury Parish Council**- This is not the most sustainable solution as proposed. Option 1 is the most sustainable, and option 4 should not be considered. Option 1 gives ready access to all local services, and extra population will assist in keeping these viable. As you are probably aware, the new "Town" of Poundbury that King Charles initiated is not a new development in open countryside. It is a new suburb of Dorchester, filling in the gap up to the Dorchester bypass. It used on all the existing services offered by the town, transport, utilities, shops, schools etc. Both the proposed locations for new developments in Option 4 are greenfield sites, with no services of any sort, and no transport except for cars.

**Herefordshire Council** - Herefordshire are suggesting more cross boundary co-ordination with the Forest of Dean in terms of plans and timeline, then this would need to be considered in any combined option.

**Historic England** - Applying proportionate evidence will provide greater confidence that this is the appropriate approach or whether a variation needs to be deployed. We hope Historic England's guidance and advice on the preparation of heritage evidence to inform site allocations can help in this respect. I hope our response and further constructive involvement can support you in the preparation of a robust and effective local plan that can accommodate the uplift in housing need.

**Home Builders Federation** - Would expect the Plan to provide for a range and choice of sites over the Plan period to ensure the housing requirement is met in full. We do not comment on individual sites and allocations. We have provided some comments on the general approach to the spatial strategy, and these are not repeated here.

**Huntley Parish Council** - Prefer a combination of Option 1 and 2

**Littledean Parish Council** - Option 1 would ensure that development is appropriate and that essential services are already in place and can be improved prior to homes becoming occupied and would provide some of the necessary housing on a quicker timescale. Option 4 would take longer to build/provide and would be more costly with creating the new services but would provide the opportunity for education, medical provision, shops, employment and entertainment with inbuilt public services and links. The new development will have an impact on the surrounding countryside and could significantly alter the character of the area and the Parish Council would seek assurances that this will be minimised at every possible opportunity.

**Lydney Town Council**- Taking account of the additional housing requirement now imposed by government and the major constraints which exist within the Forest of Dean District Council the LTC Regeneration Committee unanimously resolved to approve Options 1 & 4. This conclusion is subject to matters set out above. Furthermore development and SA of emerging preferred options and the amount and distribution of growth at Lydney has not been presented or fully considered. It will be the subject of further representation from LTC in due course. The opinion does not infer that LTC agrees that the proposed increase in housing delivery represents a sustainable or deliverable approach to development of the FoDDC area or Lydney. Which ever option is pursued, LTC consider the required amount of housing led growth will cause harm to the town, its natural environment, relationship with the rural environment and the surrounding agricultural economy.

**Maisemore Parish Council** - Option 4 is an abomination. Any Green Party led administration to seek a new settlement in either of the two locations being touted is at odds with what they are supposed to stand for and will be electorally devastating. The transport ramifications of either single settlement were explored back in 2021. People who live along the A40/A48 and A417 corridors are extremely worried about any significant increase in peak time traffic flows and the consequences thereof.

**Natural England** - See other questions for comment.

**Newent Town Council** - support Options 1 & 4 but without the option of more than one new settlement within this Plan period.

**Pauntley Parish Council** - Following extensive consultation within our own community and neighbouring communities, our view is that Option 4 should be discounted and should not be relied upon to blindly follow hurriedly produced national government projections that have been pro-rated across the board with no regard to local circumstances, need or suitability and with no regard to the environment. Option 4 has not been defined in any specific detail other than the vaguest of terms. Brownfield sites appear to have been discounted on the basis of clear up costs and low land values. This is borne out by reference to 4.3 of the Strategic Housing and Employment Land Availability Assessment 2024 (SHELAA) which references taking into account the views of builders, developers, registered providers, agents and others involved in the housing and economic delivery. The impact of putting such decisions in the hands of parties motivated by profit rather than the environment means that the most lucrative sites are invariably considered in preference to those that could benefit the local community and the environment. Cleaning up of contaminated land on brownfield sites where land is already not being utilised should always be the first port of call, and profitability of landowners and developers very much of a secondary consideration. Option 4's blanket reference to one of more new development provides no details whatsoever about any such development, whereas FoDDC councillors have been discussing both locations openly, but without providing that information as part of this consultation process. This leaves the public with no mechanism for making an informed decision. Accordingly, Option 4 should be withdrawn immediately. Option 4 is not a suitable solution under any circumstances and should be discounted. The government target seeking to be imposed locally is not appropriate for the Forest of Dean District Council locality and needs to be challenged in the strongest possible terms. Option 1 is a suitable vehicle for developing additional housing requirements with existing infrastructure.

**Pendock Parish Council** - A combination of options is 1 and 4 is not the most sustainable option if a northern District new settlement is proposed. A combination of primarily Option 1 and to a lesser extent Option 2 is supported by the Parish Council for the sustainability reasons given above.

**Redmarley Parish Council** - strongly opposes the District Council's predetermined strategy proposed as Options 1 & 4 combined. The District Council has failed to provide adequate evidence to substantiate that a combination of Option 1 and Option 4 is the most sustainable approach. The Sustainability Appraisal, by the District Council's own admission, is incomplete, and appears to steer the outcome rather than impartially test reasonable alternatives. It should also be noted that the District Council has failed to evidence any Duty to Cooperate engagement given the cross-boundary implications that new settlements would have. Option 4 also falters on numerous paragraphs of the National Planning Policy framework as set out below. Paragraph 8 of the National Planning Policy Framework (NPPF) sets out three interdependent objectives for sustainable development: economic, social, and environmental. It is clear from the Options Document and the Interim Sustainability Assessment that new settlements are being planned in relatively isolated locations on the extremities of the district, generally related to the areas around the M50 and the A40/A48, as outlined in paragraph 10.49 of the Options Document. New settlements in such isolated locations will inevitably take years to develop, which could leave early residents without adequate facilities such as healthcare, education, and transport. This is a position already acknowledged by the District Council in paragraph 3.20 of the Interim Sustainability Assessment. Paragraph 8(b) of the NPPF requires strong, vibrant and healthy communities with accessible services that reflect current and future needs, and it is difficult to see how this requirement could be met through this option.

Paragraph 10.54 states, it is recognised that initially the introduction of development on greenfield land, confirming that these new settlements will be built on greenfield sites. Paragraph 8(c) of the NPPF requires

plans to protect and enhance the natural environment, improve biodiversity, use natural resources prudently, and mitigate and adapt to climate change. The loss of high quality agricultural and greenfield land will permanently remove productive farmland, contrary to paragraph 187(b) of the NPPF. Furthermore, the Local Plan Options Document acknowledges significant impacts on the surrounding landscape, conflicting not only with paragraph 8(c) but also with paragraphs 187(a) and 188 of the NPPF. The document also states, impacts in terms of traffic generation can be planned more effectively to connect to more public transport networks, yet it is difficult to see how this can be evidenced without an accurate sustainability assessment of all proposed sites and the production of an Infrastructure Delivery Plan. In more rural locations, it is unlikely that existing public transport options will be available. Paragraphs 10.50 and 10.51 discuss significant degree of congestion in relation to the A40/A48 and present congestion issues on A48, suggesting that most sites under this option will be dependent on private cars, thus conflicting with paragraph 8(c) of the NPPF. The substantial construction of new roads, utilities, and public facilities is also unlikely to be carbon neutral, conflicting with the proactive approach to mitigating climate change set out in paragraph 162 of the NPPF. It is therefore difficult to see how the publication of a further sustainability assessment or the Infrastructure Delivery Plan could adequately address the constraints outlined above. Paragraph 124 of the NPPF requires policies to make effective use of land whilst safeguarding the environment. Option 4 consumes large areas of greenfield land as shown in paragraph 10.54 of Options Document.

Prioritising brownfield regeneration along with investment into new, or upgrading existing, infrastructure and optimisation of capacity in existing settlements is likely to be more compliant with paragraph 125(c) of the NPPF which promotes redevelopment in sustainable locations. The District Council should also be supporting opportunities to redevelop contaminated or unstable land in towns such as Cinderford, in line with their obligations under the NPPF. A new settlement would require significant new infrastructure both on and off site. This includes the remodelling of major roads to suit new traffic flows and would likely result in significant and unacceptable disruption to current residents and commuters. Paragraph 10.53 of the Local Plan Options document states larger housing numbers can be provided (including affordable housing, wider mixes of housing better able to meet the needs of different sectors). From previous cases where new settlements have been built, it is clear that this is not the case and due to the high cost of providing infrastructure and housing, combined with further external pressures, development has been slow and adequate infrastructure simply does not exist or is not built quick enough to accommodate a sudden increase in population. Cases show that the average houses built per year between inclusion in the local plan and completion (or up to where current planning permission allows) is 64.5. For at least 3,000 homes, the delivery time would be approximately 46 years, potentially failing to take into account investment in infrastructure, which could reasonably increase the figure to in excess of 50 years. Paragraph 115(a) of the NPPF states in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that, sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location. The extremities of the District are areas less served by current public transport. The majority of current bus services are located to the central and southern areas of the Forest, whilst a rail line runs from Chepstow to Gloucester with intermediate station at Lydney. Paragraph 10.49 of the Local Plan Options document makes a suggestion to sites of new settlements, and it is clear that there are sites mentioned that have significant constraints and would fail to comply with paragraph 115(a) of the NPPF due to the lack of available public transport. Furthermore, attempts to integrate public transport into new settlements is likely to be difficult given the unwillingness of bus operators to keep existing routes, never mind being allocated new routes.

Paragraph 187 of the NPPF requires sites to recognise the intrinsic character and beauty of the countryside however it is clear from the Local Plan Options document that Option 4 would permanently alter rural landscape character, fragment habitats and reduce biodiversity. Paragraph 10.53 claims that there is greater opportunity to reduce or mitigate negative impacts to biodiversity and to create large swathes of green infrastructure, strengthening connectivity for habitats and species however given the length of delivery as discussed above, it is difficult to see how any mitigation can prevent the disturbance of wildlife for a lengthy period. This is likely to lead to wildlife avoiding the area or moving away and as such may have to travel further to reach food or compete with others for resources. Furthermore, pollutants released during construction phase(s) can be significantly harmful to wildlife. This is likely to be exacerbated when construction takes place next to a watercourse, especially in a flood prone area, as the ground pollutants such as oil and other heavy metals, are likely to be pushed downstream and affect a wide range of wildlife. This is also far more likely to happen on a larger development, rather than on smaller sites. It is unlikely that Option 4 would be able to meet the obligations defined under paragraph 187 of the NPPF. .... firmly rejects the preferred option of the District Council as set out in the Local Plan Options document. It is clear that Option 4 cannot meet the sustainability objectives set out in the Sustainability Assessment, and neither is it able to meet the obligations set out under the National Planning Policy Framework. Redmarley Parish Council suggests that the most sustainable approach is that of Option 1 and if necessary, Option 5. It should be noted that the LPA should be able to demonstrate that it is continuing to hold duty to cooperate conversations with adjoining authorities.

**Redmarley NDP Group** - While Option 1 is appropriate, Option 4 is not. A large new settlement would cause permanent countryside loss, major character change, and uncoordinated expansion risk near boundaries, particularly at Redmarley. Large new settlements also tend to overpromise and underdeliver on affordable housing and community facilities, with viability assessments later used to reduce commitments. See SA comments. The Council should focus on Option 1 and replace Option 4 with incremental growth of existing settlements (Option 3) up to environmental and infrastructure limits, with services in place before occupation.

**Rudford & Highleadon Parish Council** - The parish council does not agree that a combination of Option 1 and Option 4 is an appropriate approach. We request that this option is removed as well as Option 4 on its own.

**SWHAPC** - We understand that the Council currently favours a combination of selective planned expansion of existing settlements as well as planned new settlement(s) in order to avoid, reduce and mitigate potential environmental, social and economic harm. The SWHAPC does not oppose this view in principle, but raises support for Option 2 in line with our comments provided at Question 7.

**Sport England** - Seems logical.

**St Briavels Parish Council** - supports the conclusion that a combination of Options 1) and 4) is the most appropriate and sustainable approach to meeting the FoDD development requirements over the extended Local Plan period to 2043 and beyond.

**Staunton (Glos) Parish Council** - We do not support this combination of options, as we do not support option 4.

**Strategic Local Plan Authorities**- The SLP authorities note that the key challenge is managing the anticipated scale of growth and change over the plan period in a way that supports long-term sustainability

objectives. A combined approach using options 1 and 4 (new option 6) offers a strong foundation to achieving this. However, it will be critical to identify a sufficient number of smaller sites in addition to strategic opportunities to enable early delivery, maintain momentum, and ensure compliance with the NPPF's (para 68) requirement for small site allocations.

**Tidenham Parish Council** - Yes

**Upleadon Parish Council** - A combination of Option 1 and 2 is preferable to us.

**West Dean Parish Council** - We reluctantly agree with the proposal of Option 1 and 4 in combination but only as a solution of an imposed target being applied by central government that must be vigorously resisted.

**Westbury-on-Severn Parish Council** - Option 1 only

**Wye Valley and Malvern Hills National Landscape Teams** - Yes we would agree that plan-led new settlement(s) away from the National Landscapes and their settings (Option 4), combined with tightly-targeted expansion (Option 1) of the most sustainable, least-sensitive settlements seems an appropriate approach. Dispersal-led options (Options 2-3) present the greatest risk of cumulative harm to the National Landscapes.

## **Question 8 - Draft Officer Response**

**4.79** The responses to Question 8 regarding the "most sustainable combination of options" (Option 1 and Option 4) show division among respondents. Many oppose the combination, particularly Option 4 (new settlement), citing concerns about infrastructure limitations, environmental impact, and loss of agricultural land. Many of the points raised have been addresses in questions 4, 6, and 7. In creating resilient self contained communities providing employment will be a key factor.

**4.80** In summary, while some saw merits in the Option 1 + 4 combination, the majority voiced concerns around the viability, sustainability and impacts of new settlements, preferring an approach centered on modest, incremental growth in existing communities supported by current or upgraded infrastructure.

**4.81** Those supporting the combination believe it offers the best approach to meeting housing targets while allowing for proper planning and infrastructure development. Several respondents suggested alternative combinations, particularly Options 1 and 2 or Options 1, 2, and 3, which they felt would better leverage existing settlements and infrastructure while causing less environmental harm. There are concerns about the sustainability claims made for Option 4, with many questioning whether a new settlement would deliver promised facilities and services or simply become a car-dependent commuter town.

**4.82** The most debated element of the options consultation is the proposal of a new settlement(s). The Local Plan has to balance the impacts and opportunities taking into account any mitigation or advantages they may bring. It is considered that a well located new settlement could potentially take advantage of sustainable travel options, be on an established transport axis which it could support and provide Green Infrastructure, and new planting and other extensive green space. Against this it was considered likely that it would involve the loss of a considerable area of land to agriculture, would change the landscape from predominately rural to urban and could if services were not provided in step lead to unsustainable travel

patterns. The intention is to support the new settlement with development that would be concentrated at the more sustainable locations.

**4.83** A new settlement(s) offers the opportunity for a more sustainable long term form of development than providing the same level of development in another way either dispersed or shared development would be likely to adversely affect the locations in which the development is proposed and possibly in areas that do not have the supporting services , facilities and infrastructure or sufficient development to attract them.

## Question 9

**4.84** Overall, Question 9 received 190 written comments , asking for any further comments on the strategy

*Are there any further comments you wish to make about the strategy that have not been covered by other questions?*

## Key themes

1. Preference for dispersed development over new settlements: This was a common theme, with many respondents stating that new development should be located where there are already existing services and infrastructure like schools, healthcare facilities, shops, public transport, etc. This is seen as the most sustainable approach to reduce the need for travel, supports existing communities, makes efficient use of existing investment, and avoids overburdening communities while waiting for new services and avoids creating car-dependent communities, if housing is disconnected from transport and employment.
2. Calls for a brownfield-first approach and aligning with the government's policies on regenerating urban areas. This avoid increasing flood risk through greenfield development, overloading existing infrastructure capacity, and economic impacts if housing outpaces local job creation.
3. Rural villages and dispersed growth: Some responses highlighted the role of smaller villages in accommodating proportionate growth to maintain vitality, support local services, and provide housing choices, especially through small/medium sites.
4. Community cohesion - Expanding existing settlements rather than isolated new towns is seen as better for maintaining community identities and local economic benefits.
5. Capacity constraints in existing settlements: Support for new settlement as it was acknowledged that while focusing growth in existing towns/villages is preferred, there are capacity constraints, and expansion may only deliver a certain level of development before being overwhelmed.
6. Ensuring any new housing is supported by infrastructure like transport, roads, utilities, schools, healthcare and is located near employment to reduce commuting and are addressed before any major development.
7. Infrastructure delivery and viability: Several respondents also supported the idea of locating development where new services and infrastructure can be provided alongside the housing. This included planning for new settlements with integrated services, facilities, and employment opportunities.

8. Concerns were raised about the challenges of delivering promised infrastructure alongside new development, and services failing to materialise or lagging behind housing delivery, affecting viability.
9. Sustainability and environmental impact: Many responses emphasised the importance of minimising environmental impacts, protecting greenfield/productive agricultural land, reducing car dependency and emissions, impact on biodiversity and rural character and aligning with sustainability principles outlined in the NPPF. Concerns over Increasing flood risk through greenfield development, overloading existing infrastructure capacity, and economic impacts if housing outpaces local job creation.
10. Protect ancient woodland, SSSIs, RAMSAR sites or special conservation areas.
11. Different housing options could impact equalities, with dispersed development across all settlements potentially marginalising smaller communities, while concentrating growth in towns may improve access to services for all. Affordable and adaptable housing for young families and older residents was highlighted as a need.
12. Aligning with local needs - Questioning whether the housing increase is justified based on local population projections and economic conditions and asking for evidence it is needed. Lack of clarity on where the additional population will work and the need for job creation to avoid increased commuting and emissions.
13. Targets which nearly double housing in rural areas while almost entirely removing the need for growth in urban areas over 20 years must be flawed. There should be a concerted and unified country wide action to challenge the concept behind the targets.
14. It was suggested that new settlements across the nation are failing to meet the expectations of the residents. The planned facilities are not materialising and these settlements are described as soulless and affecting mental health.
15. Process concern: Rushed timescale for consultation and failure to fully assess all alternatives.

## **Statutory consultee responses**

**Churcham Parish Council** - In reference to the quote: It is recognised that initially the introduction of development on greenfield land (often open countryside) has an immediate damaging impact on the local landscape, however, new settlements have the potential to be designed so that masterplans and design coding ensure that the new settlement is of high quality. Similarly, impacts in terms of traffic generation can be planned more effectively to connect to more public transport networks and to provide a high level of active travel options with longer term positive effects on SA objectives Nos. 3 and 1 through supporting healthy living. We see no examples within a 30km radius of where this is the case. The reality is that developers exert considerable pressure on Councils to build affordable housing in high density 3 or 4 story blocks and to maximise profitability with the rest of the development so favour large sites. This does not respect the local landscape and only contributes to the appearance of urban sprawl, thus referring back to the report link in the question 8 reply which concluded. All settlements but one failed to provide access to amenities with safe walking and cycling routes and a railway station within a mile of all new homes. Residents in one garden village may have to walk up to seven miles to buy a pint of milk None of the 20 settlements would provide all-week bus services to all households through the day. Cycle routes from the garden villages into nearby towns would often be long and dangerous. One author, Jenny Raggett, said: Garden villages were put forward as an alternative to characterless estates but they may well end up with more tarmac than garden.

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**CPRE** - We believe that the housing allocation imposed by Government does not recognise the extent of major constraints within the District, including the substantial area of the Statutory Forest and the Crown Estate area covered by the tidal R Severn. We would advocate that the District Council should try to achieve a reduction in housing numbers, as far as it has opportunities to do so.

**Coleford NDP Group** - Central Government does not take into consideration the rate of change which has the threat of diminishing the landscape and nature of rural areas. It stems from urban areas. The Forest of Dean is unique and that must be kept at the heart by its local council(s) and not sacrificed to generic change. Housing is important here too, but affordable housing is being reduced in proportion by challenges of Developers, both at appeal and in viability terms. It is about the right type and nature of housing not just numbers.

**Coleford Town Council** This is a requirement by central Government which does not take into consideration the rate of change which has the threat of diminishing the landscape and nature of rural areas. It stems from urban theory. The Forest of Dean is unique and that must be kept at the heart by its local council(s) and not sacrificed to generic change. Housing is important here too, but affordable housing is being reduced in proportion by challenges of Developers, both at appeal and in viability terms. It is about the right type and nature of housing not just numbers.

**Corse Parish Council** - feel that the process is being rushed and that consideration should be given to the fact that concerns have been raised regarding all alternatives being fully assessed and the 40% housing increase runs the risk of not reflecting true local demand in all areas. It is felt that growth should be focused in existing settlements and along transport corridors, with a brownfield-first approach and strong infrastructure planning, not with large, new remote settlements

**Gloucestershire Constabulary** - The National Government can make changes quickly to meet their requirements, yet local government require long time frames to adjust.

**GCC**- In accordance with the NPPF, any strategic development option must demonstrate at examination, a robust methodology to site selection that can be justified as sustainable in Historic Environment terms. Towards this, the local plan may consider building upon any existing related heritage assessments undertaken

Climate Change & Air Quality GCC officers are supportive of approaches to Sustainable Development that promote active travel and a modal shift to public transport from private vehicle use. Officers understand from the district's Sustainability Appraisal Further Interim Report, that option 6 (combination of expanding the existing settlement and building on greenfield land) would provide the best environmental benefit. Should option 6 be adopted, officers would like to see maximum carbon mitigation, that goes above current legislation (including the Future Homes Standard) to help ensure Gloucestershire County meets its net zero target of 2045.

Transport sector, that makes up 34% of Gloucestershire's emissions, GCC officers would like to see the below aspects to be evidenced: • Exploration of car clubs within development, • Provision for secure cycle storage along with showers, lockers, changing rooms, and dry room facilities in residential, mixed use and business developments, • Priority parking for car sharers, • Sufficient home office space. • Prioritising active travel and public transport.

Ecology Any options will need to consider the Gloucestershire Local Nature Recovery Strategy.

Health GCC strongly advocate a housing strategy and design principles that embed healthy placemaking and work towards addressing the wider determinants of health. The scale of growth required for the Forest of Dean — 13,200 homes by 2043— is an opportunity to consider how this can be delivered in a way that promotes physical and mental wellbeing, reduces health inequalities, and supports sustainable communities.

Health focused design codes, the use of health data (e.g. JSNA) and requirements for Health Impact Assessments should be required for all strategic allocation sites.

GCC officers are unable to comment on the impact of any potential allocations on the capacity of the highway network at this stage. Modelling will be required to determine this and any potential mitigation issues. However, there are several highway pinch points that already experience congestion and where any additional growth may worsen existing conditions.

Strategic Planning: GCC officers acknowledge that a variety of additional information that would serve as evidence to decide upon exact locations and settlements for development is currently being undertaken by the district council. This includes Forest of Dean’s infrastructure delivery plan, viability study on developer obligations, and call for sites. Officers would be able to offer further inputs, once these materials are ready. However, from the Options and Sustainable Appraisal (SA) documents provided as part of the consultation, and GCC officer comments above, option 1, option 4, and option 6 (i.e., combination of options 1 and 4) are preferable for further exploration.

Presumably in option 1, the planned expansion of existing settlements would include Cinderford, Lydney, and Coleford. These settlements align with GCC’s long-term vision for improvements in public mass transit (see Fig. 1 for BSIP routes that connect key settlements) – thus GCC officers have highlighted it to be desirable from a transport point of view. Regarding option 2 on expanding all settlements, the underlying assumption seems to be that there will be funding to deliver the necessary infrastructure. This may not be the case. The same risk is posed in option 3 where incremental growth may not allow sufficient funding (or value capture) for infrastructure and service improvements. From an infrastructure viability perspective options 2 & 3 do not seem practical, especially since many of the in the Forest of Dean District are currently operating services under high subsidies.

Developer contributions are sought through Section 106 (S106) Agreement that is essentially a ring-fenced value capture mechanism. While offsite investments can be secured through S106 to address pinch-points such as junction improvements in Chepstow or Over, the total cost required towards these improvements may be more than what can be secured from new developments that qualify for contributions. Avoiding a dispersed pattern of settlement growth is generally beneficial for service delivery.

Option 4 on exploring a “new settlement” can offer the opportunity to keep development compact and efficient. In addition, as GCC officers have highlighted, this can allow to incorporate sustainable principles right from the start, without having to deal with legacy issues, unlike in the existing major settlements.

“New growth centre” must also be connected to public transport or align with the long-term strategy. Apart from settlements identified in option 1, Newent is one settlement that has a planned bus service improvement, and at first glance may offer a relatively less restrictive environmental landscape.

One issue identified in the Sustainability Appraisal is the conflict between development and agricultural land. However, as per data available from Natural England, a vast majority of land in Forest of Dean is

Grade 3 i.e., good to moderate – but not very good (grade 2) or excellent quality (grade 1). A more detailed analysis may reveal potentials without having to compromise on high quality agricultural land.

While option 5 can alleviate development pressure from the district itself, it also means a missed opportunity for attracting economic growth. For businesses to invest in Forest of Dean, and for skilled workers to reside here, a thriving land market (including that of affordable housing) supported by adequate infrastructures would likely be needed. The lack of development also means lower capital gains to meet the district's growing infrastructure needs.

Based on the above, GCC officers broadly support the district council's view of option 6 (or the combination of options 1 and 4) to be more sustainable than others.

**GWT-** Given the scale of development proposed in this local plan and the significance of the FoD for horseshoe bats including the SAC designations, the council should prepare a Bat SAC mitigation strategy (as has already been done for the Severn Estuary). We suggest this should be done in partnership with Monmouthshire Council and Stroud District Council given the functional links for the SAC with the Monmouthshire SAC sites and the Stroud district Woodchester Mansion site which is used as a maternity roost by horseshoe bats that hibernate in the Forest of Dean. Including the mitigation strategy in policy would enable critical locations outside of the SAC curtilage to be identified, and enhanced through s106 to safeguard the future of the population.

Carbon neutrality – should not be considered in isolation from ecological impacts.

Climate Emergency: The council declared a Climate Emergency in December 2018, making it a pioneer in the UK for rural councils.

Nature Emergency: In 2020, the council also declared a Nature Emergency. The two are intertwined and should not be considered separately. Within the Rurality & Equality Assessment, it would be valuable to include a consideration of how GI can be embedded into settlements for both human and ecological resilience (e.g. health benefits, flood alleviation, connectivity, climate adaptation).

**Hartpury Parish Council-** Hartpury Parish Council believe the consultation has not been developed in an equitable manner, weighing up the pros and cons equally, and it seems to have been structured to produce one only answer. There is also no mention of the type/size of the housing envisaged. It may seem obvious, but 2 and 3 bedroom semis and terraced houses require a lot less land than large 4/5 bedroom detached houses. This should be covered in the options document.

**Lydney Town Council-** Considering a Strategic (Forest Wide/Unitary) Approach. In the context of potential changes to district councils, LTC (Regeneration Committee) considered a joint Forest wide approach across councils, to ascertain if further 'weight' could be provided to respond strategically to the housing requirement issues, linking directly to Gloucestershire County Council or a new unitary council following devolution (if FoDDC ceases to exist).

**Pauntley Parish Council -** The rationale behind recommending Option 4 has not been properly articulated, other than as a means to hit government targets. The details, although actively being considered by councillors who are seeking to recommend two specific sites for the new development, have not been articulated to the public as part of this exercise. In fact, one of the sites has been excluded from within FoDDC's own current Strategic Housing and Economic Land Availability Assessment (SHELAA), despite subsequently being openly discussed as a frontrunner for development by councillors. The strategy being recommended for adoption is fundamentally flawed as the public is not being consulted on specific options but on vague concepts that belie the underlying discussions that have been taking place remotely from the

people affected by these unworkable recommendations. The concept of a new development is not spelled out in any modicum of detail anywhere within the Local Plan and any accompanying guidance. Opinions have been articulated by councillors, although not as part of this process, and decisions being recommended based on those opinions, but without any apparent rationale other than achieving government targets.

**Pendock Parish Council** - The Forest of Dean Local Plan states that all new development must be sustainable and bring a new positive impact on the environmental, social and economic conditions of the area through design, location and use. Proximity to essential services and access to public transport are key factors. This policy rules out a new settlement in the north of the District which is extremely rural in nature, has little and in most cases no access to public transport, no infrastructure, very few essential local services and a rural road system which is largely made up of narrow single carriageways. The NPPF states that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives. These are economic, environmental and social. The economic objective is to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure. A new settlement in the north of the District at a juncture between Gloucestershire, Herefordshire and Worcester is inappropriate given its excessive distance in all directions to existing main settlements, its dearth of infrastructure, local services and public transport and its extremely rural nature based on small villages and scattered settlements which extend well into the immediately adjoining counties. This new settlement option is too rural and geographically remote to achieve this objective.

**Redmarley NDP Group** - The process appears rushed, with late calls for sites raising concerns about whether all alternatives have been fairly assessed. The provided documentation provides evidence of this as does the lack of needs analysis and impact assessments. The housing increase is based on a central government formula which is unlikely to reflect local demand or constraints. The council should test this figure thoroughly before accepting it. Existing, although outdated analysis, shows there is not a need to develop on the scale suggested by a new settlement. Incremental growth to existing settlements allows for future government changes of direction and is more politically flexible. It is unclear where the additional population will work. Without local job creation, out-commuting, congestion, and emissions will rise. Infrastructure needs — including schools, healthcare, roads, public transport, broadband, water, and utilities — must be addressed in advance of development and a delivery plan developed. Final position: Growth should be focused within existing settlements and along transport corridors, with a brownfield-first approach and strong infrastructure planning. Large, remote new settlements like Option 4 should be excluded. Represent the needs of the Forest of dean residents please. Option four certainly does not.

**Rudford & Highleadon Parish Council** - The Forest of Dean District Council should challenge the Government over the housing targets. The target for the Forest of Dean is an increase of 35% over 15 years but the expected housing need growth is less than 10%

**Sport England** - There is a need to update your built facilities strategy and your playing pitch strategy. We can assist you in this work.

**Strategic Local Plan Authorities** - The SLP authorities acknowledge that, at present, no formal agreements exist through the DTC to explore any cross-boundary solutions to meeting housing needs arising within FoDD and the SLP area. The SLP authorities are keen to explore the initiation of meaningful

dialogue around the potential for any cross-boundary opportunities. Given evidence around commuting patterns this could be focused around the Churcham / Highnam area. It should be determined if this location offers a strategic opportunity with potential to deliver mutual benefits for both areas and whether it could contribute positively to long-term sustainability objectives. The SLP authorities note that FoDD are preparing an IDP - and as the Local Plan makes further progress, each of the allocations will be subject to a more detailed assessment. The SLP authorities welcome the early opportunity for discussions on any potential cross boundary opportunities and would be keen to explore how any site specific IDP's and other evidence (notably transport education, healthcare) might be produced jointly around such opportunities. The SLP authorities also agree that at this scale a masterplan approach with early leadership would ensure that any future new cross border opportunities can be planned to deliver the services and facilities required to ensure self-containment and future sustainability.

**Tidenham Parish Council** - In conclusion of our responses to the questionnaire it may be useful to highlight Tidenham Parish Council's (TPC's) main views on the need for house building in the area. TPC is in favour of developing suitable land in the parish where there is a guarantee that appropriate infrastructure will be in place when the first residents arrive. Under "Infrastructure" where sufficient school places available are indicated, the intake from students residing in Wales i.e. Chepstow town is taken into account when allocating student numbers by GCC, specifically to Wyedean School. TPC would expect guarantees that there will be enough opportunity for new residents to register with a GP. Over the next years, and with FoDDC financial support, there should be an increased economic activity build up in the main settlements of Tutshill and Sedbury.

TPC would expect that the FoDDC policy of "active travel" is fully implemented in developing new estates whereby they are not isolated from the core settlements of Tutshill and Sedbury and be in danger of developing into ghettos of the future. Good bus connections between the new settlements and the "old" parish should be in place. In TPC's opinion it is not good enough to admit that there is a traffic "pinch point" on Hardwick Hill and not propose solutions to this challenge for residents in Tidenham Parish (and further afield!). TPC proposes that local authorities review the option of a bridge over the Severn in the county of Gloucestershire. May be by using the foundations of the damaged previous rail way bridge. It would be short sighted and a pipe dream to expect that car use will decline considerably over the next years particularly taking into account the governmental drive to encourage drivers to change to EV's. TPC, with GRCC, has undertaken a "Housing Needs Survey" which showed that there is a need for housing for "downsizers" e.g. residents exchanging a larger house for a smaller residence e.g. bungalows or apartments suitable for seniors. There is also a need for accommodation for young people. In TPC's opinion the last new estates show only little evidence of being of a high architectural quality and seem to be built as "off the shelf" plans. TPC would encourage FoDDC to require more innovative house building.

**West Dean Parish Council** - This consultation, with its closed sessions, over-reliance on internet and social media access to information is not supportive of true local democracy. There should have been (and it's not too late, we hope) proper dissemination of information via a range of sources - as not everyone uses electronic media. There should be road shows open to the public BEFORE final decisions are made. Overall, we are very disappointed with the approach that's been adopted. Decisions are being made that will decide the future of a unique part of the country, in areas that have distinct and special characteristics, and without proper local consultation. This will end up being resented and rejected by the local population and will leave their elected representatives in a difficult place with regard to trust and respect.

## **Question 9 - Draft Officer Response**

**4.85** Question 9 asked for any further comments on the strategy. As in previous questions many of the responses reemphasised previous comments. They reflect a general consensus that sustainable development should prioritise locations with existing services and infrastructure or where new services can be realistically and viably provided. However existing settlements have infrastructure capacity constraints, and a balanced approach may be needed, including dispersed growth in villages and potentially new settlements. The key is to minimise environmental impact, reduce car dependency, support local economies, and ensure timely delivery of infrastructure to avoid overburdening communities. Striking this balance while meeting housing needs is seen as a significant challenge for the Local Plan and can be addressed through Local Plan general policies.

**4.86** The consultation responses reveal public concern about the scale, location, and sustainability of proposed housing growth in the Forest of Dean. There is clear preference for focusing development on existing settlements with infrastructure, protecting the district's unique rural character, and ensuring development is proportionate to genuine local needs. The Council faces significant challenges in balancing government housing targets with local constraints and community preferences. Many respondents urged the council to challenge the housing targets and take a more measured, evidence-based approach that prioritises infrastructure delivery, environmental protection, and community needs over numerical targets.

**4.87** Again, there were a wide range of views expressed on the housing strategy options. Many respondents raised concerns about Option 4 (a new settlement) being unsustainable due to lack of existing infrastructure, increased car dependency, environmental damage, and being disconnected from employment opportunities. There was more support for Options 1 (expanding existing settlements) and 2 (distribution across all settlements) as more sustainable approaches that could leverage existing infrastructure and services. However, some felt Option 2 risked unsustainable locations. It is acknowledged that alternative options have been submitted and these are discussed in responses to question 6 above. Similarly comments on Issues and constraints have been discussed in Question 3.

**4.88** Several respondents questioned the need for the housing increase imposed by central government, suggesting it does not reflect local demand. It is noted that there is opposition to the new Standard method and the subsequent housing requirement. The government has indicated that Plan making should proceed. The Council Leader has written to the government expressing their concern over the housing numbers.

**4.89** With regard to the timing of the consultation, the Government has been clear that plan making is to proceed and the timetable, Local Development Scheme (LDS), was prepared in response to a request from MHCLG to submit the Local Development Scheme by March 2025. The timetable was approved by Full Council in February 2025 and the Plan is proceeding in accordance with the timetable. The timetable can be viewed in Section 1 of this document. Paragraph 78 of the NPPF places further emphasis on the Council to deliver the required need. Therefore, the combination of an older local plan with outdated housing policies, along with a current housing land supply of 1.93 years (as calculated up to 31st December 2024), leaves the Council exposed to speculative development and planning by appeal which could be in less sustainable or even unsustainable locations, and lacking quality of design. In response to these very real concerns, the Council agreed to review the development strategy within the timetable proposed.

## **Question 10**

**4.90** Overall, Question 10 received 191 written comments. responding to the following question.

*The questions posed in this document may be used as a basis for responses. However, the purpose of this consultation is to obtain a wide range of responses covering any subject that is relevant to the new Local Plan strategy. If you have any additional points you wish to raise, please do so. There will be further opportunities for comments on a revised Draft Local Plan however if you have any additional points or suggestions you wish to raise now, please do so.*

## Key themes

1. Consultation Process Concerns - Many respondents criticised the consultation process as rushed, poorly timed (during summer holidays), and inaccessible. The technical language, complex format, and difficulty navigating the online platform were seen as barriers to meaningful participation. Several suggested the process was deliberately designed to minimise public input. Several respondents called for planning documents to be more accessible, with plain English summaries, better visuals, and consideration for those with limited digital access or literacy.
2. Opposition to Government Housing Targets - Strong resistance to the increased housing targets imposed by central government was expressed, with many urging the Council to challenge these figures as inappropriate for the rural Forest of Dean area. Respondents questioned the methodology and evidence behind the targets.
3. Preference for Existing Settlement Development - Many respondents favored focusing development on existing settlements (Option 1) and brownfield sites rather than creating new settlements. This was seen as more sustainable, making better use of existing infrastructure and preserving rural character.
4. Opposition to Glynchbrook/New Settlement - Specific opposition to the any development near "Glynchbrook" new settlement near Redmarley/Lowbands was expressed, with concerns about flooding, traffic congestion, environmental damage, and impact on the historic Chartist settlement.
5. Infrastructure and Service Concerns - Respondents emphasised the need for adequate infrastructure (roads, schools, healthcare, utilities) to be delivered before or alongside housing development, with concerns that existing services are already stretched
6. Environmental Protection and Sustainability - Concerns were expressed about environmental impacts, loss of agricultural land, and threats to biodiversity. Many called for stronger protection of natural assets and consideration of climate change. and calls for stronger protection of heritage and conservation areas.

## Statutory consultee responses

### Beachley Old Boys Association

- Lack of Engagement by LPA: BOBA has made multiple submissions during public consultations, but the Local Planning Authority (LPA) has not responded or engaged. Elected members of Forest of Dean District Council (FoDDC) appear unaware of BOBA's interest, and it has not been referenced in housing allocation reports or Local Plan presentations.

- **Beachley Camp Not Considered in Key Planning Documents:** The site is absent from the Allocations Plan Inspector's Report and the Duty to Co-operate assessment, despite its reliance on Welsh infrastructure (Chepstow) similar to Tutshill and Sedbury.
- **Housing Land Supply Issues:** The December change in Local Housing Need (LHN) calculations should not affect gross land availability. FoDDC's failure to meet annual housing targets has led to a growing buffer requirement. The current supply is only 1.9 years, far below the required 5 years, which has influenced appeal decisions.
- **Planning Policy Conflict:** Beachley Camp is not allocated for housing in the adopted Local Plan. A planning application for 600–800 homes would conflict with the June 2018 Inspector's Report and core policies, likely resulting in refusal.
- **Ownership and Proposed Use:** The site is publicly owned by the Ministry of Defence (MOD), identified as surplus and part of the Public Land for Housing programme. BOBA submitted a compliant alternative use proposal in 2018, which scored highly on sustainability and climate criteria.
- **Environmental Concerns:** Due to its location between two protected river sites, a full Habitat Regulations Assessment (HRA) is required at the plan-making stage. BOBA is unaware of any such assessment being completed or published.
- **BOBA urges the Council to reject any allocation of Beachley Camp for housing under Section 20(7A) of the 2004 Act, citing non-compliance with the National Planning Policy Framework (NPPF), the adopted Local Plan, and public consultation requirements.**

**CPRE** largely welcomed the original draft Local Plan (May 2024) and supported its emphasis 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. Addressing the climate emergency is one of the greatest challenges facing the countryside as seen in 2025 with prolonged drought, heavy rain and flooding, poor crop yields leading to higher food prices and ever-increasing pressure on nature. So, while we supported the plan, our research demonstrated the environmental and climate related risks around the housing target of around 7000 new homes by 2043. The revised housing targets issued by the government under the new standard method exacerbate those risks and seriously jeopardise the social, environmental and net zero ambitions of the plan. We were pleased to see that the Leader of the Council had written to the Deputy Prime Minister to raise concerns about those targets. His arguments centred on constraints within our rural district, but we believe a stronger argument relates to the impact of increased development on carbon emissions.

**Churcham Parish Council** - The consultation document is very technical and references previous consultations and planning policy. As such it requires a fair degree of knowledge around planning matters in order to answer the open questions posed in the consultation document, for instance knowing what Sustainable actually means in all of its dimensions. We do not feel that the consultation document is pitched at a level to allow the majority of our parishioners to provide short but meaningful answers to very expansive questions. Similarly we have received repeated complaints from the public that the response period for such an important consultation was too short and many of their friends and neighbours were on holiday since the consultation period is over the traditional holiday period. Similarly many complained they would not be able to attend the Local Plan in person events owing either to existing holiday commitments together with the fact they were all scheduled for work day afternoons where many will be at work. Those who had responded to previous Local Plan consultations also highlighted that the response period on these previous consultations was significantly longer and had been the subject to extensions. It should also be noted that on the 3rd September representatives from Huntley, Churcham, Westbury,

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Highnam and Minsterworth Parish Councils met to discuss the consultation document with the aim to make a joint response that was planning policy technically focused commensurate with the expansive questions asked in the consultation. This obviously takes time so we would like to reserve the right to supplement this response with any joint response at a later date given the depth of analysis needed and the timing over the summer holiday period when this consultation was published.

**Cinderford Town Council** - Cinderford Town Councillors have considered the Local Plan Options and believe there is a limited impact on Cinderford due to the statutory Forest and request prioritising redevelopment on the Engelhard and Listers site in Cinderford at the first opportunity.

**Coleford NDP Group** - Regeneration leads to growth in many ways: rethinking the way critical spaces work will allow flexibility in living and planning. Coleford's Regeneration Plan needs to be studied and discussed in this regard.

**Coleford Town Council** - objects to the National Government's approximate doubling of the housing requirement following the recalculation, as it will negate future-proofing; a consistent and regular growth to support services/ employment must be balanced with retaining the green spaces, landscape and character. This principle is intrinsic in good Planning. Following the line of the NPPF paragraphs P187- 201, "Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)" The Forest of Dean is a National Forest Park, includes part of Wye Valley National Landscape and 1832 Statutory Forest. We can't lose the essence of its identity; indeed, its character is based on the landscape, industrial archaeology and culture. Planning should be sustaining this and enabling forward-looking development in character. We value landscape, are looking to potential Biosphere status, and to effect climate actions to decrease carbon capture, which will enhance sustainability. If we lose significant green areas to housing, needed though that may be, those areas are lost forever. Balance is key. Regeneration leads to growth in many ways: rethinking the way critical spaces work will allow flexibility in living and planning. Coleford's Regeneration Plan needs to be studied and discussed in this regard.

**Department for Education** - The new housing need formula as set out in the National Planning Policy Framework (NPPF) will significantly impact the number of new homes planned and delivered over the plan period. This growth will need to be supported by relevant social infrastructure, including schools. DfE are interested in ensuring the planning policies and site allocations in your emerging plan support the effective delivery of education provision. Whilst many schools are operated by Local Authorities or Academy Trusts, DfE oversee rebuilding projects such as the School Rebuilding Programme and RAAC remediation, alongside delivering new schools. The Secretary of State in many cases is the freeholder of education land.

**Dwr Cymru Welsh Water** The impact of new housing on our water and sewerage 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. We welcome early dialogue regarding the options as each of the options being considered will have a different impact on our assets. We aim to ensure that sufficient infrastructure exists for domestic development, and we seek to address deficiencies through capital investment in our AMP.

Once sites are identified we will be able to advise whether there is sufficient capacity within the existing water and sewerage networks to accommodate the growth proposed. Hydraulic Modelling Assessments (HMAs) may be required to determine an adequate point of connection to our network and developers

would be expected to fund the investigations. We recommend that this is undertaken during pre-planning stages however it can also be secured by planning conditions when necessary. The findings of a hydraulic modelling assessment would identify the extent of any necessary reinforcement to the network which can be requisitioned through the provisions of the Water Industry Act 1991 (as amended).

The capability of Welsh Water's infrastructure to service future employment allocations will be assessed when the potential demand on our infrastructure is known. Should any proposal require to discharge trade effluent into the public sewer then the consent of the statutory sewerage undertaker is required (Section 118 Water Industry Act 1991).

**Gloucestershire Constabulary** - Any development in the Forest of Dean District should be including design features which reduce crime and ASB. The adopted Core Strategy offers a brief mention of crime prevention, the Draft Local Plan offers very little information on the subject, while the Residential Design Guide offers some consideration based on a version of the Crime and Disorder Act 1994 before it obtained Royal Assent. Since then numerous national planning guidance documents offers consistent Crime Prevention advice and means to design out crime across the District. Designing out crime effectively requires early engagement between the developers, Planning Authority and Designing Out Crime Officer (DOCO) in order to ensure a holistic inclusion of Crime Prevention through Environmental Design (CPTED) in each proposed development. In the last 10 years of crime Gloucestershire Constabulary have received 62,382 calls relating to ASB and crimes within the Forest of Dean. This equates to an average 1975 ASB calls and 3695 Crimes each year, with the highest concentration occurring in Cinderford, Coleford, Lydney and Newent.

**Hartpury Parish Council**- Hartpury Parish Council regret the timescale that has been imposed for this consultation, and that it is over the summer holiday period, so many people will not have been able to give it full consideration. Key decisions may be made that, in hindsight, may well prove to be incorrect. Concerning the targets, we are happy to have new houses in Hartpury to meet the growth requirements of our village, but we believe FoDDC should be taking a stronger line and pushing back against the new requirements set by Government.

**Herefordshire Council** - Policy areas - As policy options are not included at this stage, and with reference made to the anticipated National Development Management Policies (NDMP), we would highlight the importance of early engagement on draft local policy approaches given the range of shared issues between our authorities, including:

- Gypsy and Traveller provision, where both authorities are currently without allocations; joint working may be beneficial in exploring the identification of sites that would meet the needs of both local planning authorities.
- Nutrient neutrality and water quality in relation to the River Wye SAC, where consistent approaches across boundaries are essential. A small area of the River Wye SAC Catchment falls within the Forest of Dean (near Redbrook) and therefore, with the SAC being in both our administrative areas, it may be that a separate policy or reference regarding this issue should be included within the Forest of Dean Local Plan.
- Welsh Water capacity, where it has been highlighted that there is insufficient capacity to service several proposed developments in Herefordshire. They have stated that no reinforcement works are planned within their current Capital Investment Programme (AMP8 2025-2030). Welsh Water have recently objected to a development in Ross on Wye, which we understand is related to an issue at the reservoir

and the ability to get this water to customers from the reservoir at Deep Deen / Mitcheldean. We need to ensure that discussions regarding water supply are open at the start and during the process of allocation as the increased demand may adversely affect Welsh Waters service to existing customers. Welsh Water have confirmed that this position is going to continue whilst a scheme to resolve the matter is progressed / developed.

There is also an opportunity for us to ensure consistent policy approaches to certain strategic cross boundary issues e.g. in relation to the Hereford and Gloucester Canal.

We also note the reference to the FODD being a candidate UNESCO Biosphere and that formal designation will be sought during the development of the plan. The designation of either part or all the district area as a biosphere reserve might have implications for Herefordshire depending on where the boundary is drawn including any buffer and transition zones. We look forward to being kept informed about this work as it progresses.

**Home Builders Federation** - The BNG Planning Practice Guidance from DLUHC (now MHCLG) and the DEFRA BNG Guidance. - note that this represents a lot of new information that the Council will need work through and consider the implications of, in order to ensure that any policy on Biodiversity Net Gain policy complies with the latest policy and guidance. It should also be noted that the PPG is clear that there is no need for individual Local Plans to repeat national BNG guidance. therefore suggest that detailed information, assessments and analysis around BNG, and Viability (for BNG and viability more generally) will be needed to support the Forest of Dean Plan. - are of the view that Councils should not deviate from the Government's requirement for 10% biodiversity net gain as set out in the Environment Act.

Whole Plan viability testing is an important part of the plan-making process. However, as noted in PPG (ID: 10-003-20180724) assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable. • would therefore request that flexibility should be included within any affordable housing, because whole plan viability assessments use methodologies that test typologies of sites, and not the detailed circumstances of individual sites. Any affordable housing policy must be considered within the context of the other policy asks that the Plan is making. Would request that the whole plan viability study also specifically models different types of housing within its scenarios testing.

- members experience to date suggests that any scheme that needed to rely on statutory credits would become unviable.
- suggest that the Council should be mindful of the cumulative impact and costs of the policies it is seeking to bring in. Where a site-specific viability argument is needed it is often affordable housing that is reduced as a result.
- therefore support flexibility in the application of policy requirements in case of viability and deliverable issues and caution against other policies in the Plan that further increase the burden on developments and may end up resulting in less affordable housing being delivered. would also welcome the opportunity to review and comment on the infrastructure delivery plan. This should also feed into the whole plan viability assessment.

**National Grid** - Currently there are no known new infrastructure interactions within the area, however demand for electricity is expected to rise as the way NGET power our homes, businesses and transport changes.

**National Highways** - Our response to the previous Regulation 18 consultation dated 14 August 2024 set out that, in accordance with NPPF, all plans and policies should be underpinned by relevant and up-to-date evidence. On the basis Forest of Dean is required to revise its housing strategy as a result of changes to housing need calculation, National Highways recognises that work to develop the transport evidence base for the emerging Plan remains at an early stage. To support the Local Plan at Examination a robust evidence base will be required including an Infrastructure Delivery Plan (IDP) which identifies any highway and transport infrastructure necessary to accommodate Plan growth and address any severe and/or unacceptable safety impacts on the SRN. This evidence base must conform with both the NPPF and DfT Circular 01/2022.

National Highways needs to understand the proposed spatial strategy and the likely impact of the draft Plan's growth on the operation of the SRN. Accordingly, the evidence base will need to consider the current performance of the SRN within the Forest of Dean District and, where relevant, in neighbouring authority areas. Several SRN junctions on the A40 trunk road are already constrained at peak periods, including sections of the A40 around Highnam. In this context, the impact of the growth proposed at Highnam is likely to require more detailed assessment and the identification of appropriate mitigation measures to ensure that development does not compromise the safety of the SRN or its ability to perform its primary function of enabling the long-distance movement of people and goods, which is essential for supporting economic growth. The response sets out the transport evidence supporting the emerging Plan that needs to be considered.

**Network Rail** have previously commented on the Forest of Dean local plan regarding the allocated site at Lydney Station for mixed use development (Policy LP. 71). The Lydney site has previously undergone master planning for a mixed-use scheme, which concluded that the proposed development option was not financially viable. Given these findings, we recommend that the site allocated under Policy LP71 be deallocated from the local plan or amended to allow for more flexible uses, as it is not feasible to deliver a policy-compliant scheme. In the interim temporary uses of the site are recommended.

**Newent Town Council** - The questionnaire is far too complex for the average resident to understand and complete. It is written from the planners', not the public's point of view. Could AI not have been engaged to produce a simplified version with a simplified handout? We recognise the time constraints but there must be better ways to engage the public, especially those who could not attend the drop-in events.

**Pauntley Parish Council** - The adoption of dramatically revised government targets should not be taken without suitable consideration as to the reliability of the underlying data and local need for the dramatic changes being proposed. Proposing a blanket acceptance of revised targets based on a pro-rata share-out of national targets is not an appropriate vehicle to be used for deciding when to concrete over the green belt purely to ensure compliance with the national government which has imposed these requirements, based upon its own national housing agenda.

**Pendock Parish Council** - Greater consideration should be given to significant development to the south of the District by addressing the congestion issue north of Chepstow. This can meet the sustainability tests associated with local services, public transport and employment. Any brownfield sites not already allocated in the Local Plan should be given priority for development.

**Redmarley Parish Council** - Concerns regarding the consultation process. The current Public Consultation process, scheduled for a statutory minimum period of six weeks, raises significant concerns regarding its accessibility and fairness. The District Council has opted to conduct this consultation during

the summer holiday period - a time when many residents are likely to be away or otherwise unable to participate fully. This timing severely limits public engagement and undermines the inclusivity of the process. Furthermore, the Equality and Rurality Impact Assessment, published alongside the Consultation Document, explicitly acknowledges that the proposed measures will have a high impact on the general public. In light of this recognition, the decision to proceed with the consultation during a period of reduced public availability is particularly troubling and calls into question the District Council's commitment to meaningful public involvement. Predetermination in choice of Option 1 & Option 4.

The District Council appears to have made a predetermined decision in identifying Options 1&4 as the most sustainable approach. In making this conclusion, the District Council relies on an Interim Sustainability Appraisal which by its own admission is not final. This interim SA does not fully discuss all alternatives and does not provide any information to show how the alternatives have been weighted. The interim SA does not provide consultees with adequate information to assess Option 4 fairly. Based on the information available, the District Council has also failed to undertake an Infrastructure Delivery Plan, Habitat Regulation Assessment nor has published any methodology used to select sites. Without providing this information, consultees cannot be expected to provide an informed response and thus undermines the consultation process. The District Council has also failed to fairly and accurately assess all the Options discussed in the Options Document, in fact this Document characterises Options 2,3 & 5 as having significant constraints, without providing any evidence as to why these Options would be less deliverable or less sustainable than the preferred Option. The treatment of Options 2,3 & 5 in the Options Document appears to steer the reader into agreeing that Options 1 & 4 are the most sustainable and deliverable when, in fact, the District Council has failed to discuss all the Options with openness and transparency. The District Council's attempts to promote Option 4 as the most sustainable option without publishing an Infrastructure Delivery Plan is contrary to National Planning Policy and further demonstrates bias towards Option 4. It is clear that the District Council has failed to show that the all Options have been appraised on equal terms and thus risks the plan being found unsound by an Inspector or indeed renders it liable to legal challenge.

**SWHAPC** - As the affordability crisis continues and with many households priced out of homeownership, housing associations have a vital role in providing much needed affordable homes for the community. We would like to see the Local Plan recognise the role of housing associations in providing affordable housing in the FoD. 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 instances where the housing association is not the actual developer of the affordable homes. Early engagement enables housing associations to have an active role in the planning and design of developments to ensure that development addresses local housing needs and meets the management requirements of the SWHAPC.

**Sport England** - there is a need to update your built facilities strategy and your playing pitch strategy. We can assist you in this work.

**Staunton (Glos) Parish Council** - We feel that it is of extreme importance that our heritage settlements i.e chartist settlements of Staunton, Corse and Lowbands are protected as well as ensuring our conservation areas are acknowledged which is currently happening with Historic England recognising Snigs End as at risk . All of which form the make up of this unique region of Gloucestershire.

**Strategic Local Plan** - The LURA introduced NDMP's that are intended to replace generic policies contained in local and neighbourhood plans. The intention was that NDMP's would be published for consultation in March 2025, but as this has not taken place the SLP authorities would welcome clarification

on how FoDD intends to advance any necessary Development Management policies during the interim period.

**The Canal and River Trust** - The Trust have no waterways, assets or land interests within the area covered by the document as such, we have no comment to make. You may wish to consult the Herefordshire & Gloucestershire Canal Trust who are restoring a canal within the plan area.

**Westbury-on-Severn Parish Council** - The Parish Council feel this consultation has been badly timed due to the summer holidays as many people being away and also Parish Council's do not generally during the month of August.

**Wych Avon District Council** - We appreciate the comprehensive and transparent approach your authority has taken in revisiting the spatial strategy in light of the revised National Planning Policy Framework (NPPF, December 2024) and the significant uplift in national housing need. Malvern Hills (MHDC) and Wychavon (WDC) District Councils are committed to engaging further on the statutory Forest of Dean Local Plan consultations and are committed to ongoing collaboration as part of our joint requirements under the Duty to Co-operate.

We encourage early engagement with infrastructure providers and neighbouring authorities to ensure that cumulative impacts are addressed and that funding mechanisms (e.g., developer contributions, government grants) are identified to support effective delivery of necessary infrastructure and services across the district.

**Climate Change and Sustainability** We support the Council's ambition to align the Local Plan with its climate change commitments, including the target of carbon neutrality by 2030. The integration of sustainability principles into site selection, building design and use, and infrastructure planning is commendable.

**Wye Valley and Malvern Hills National Landscape Teams** - We would encourage and FODDC Local Plan Officers to engage with the National Landscape Teams early on in revising the Draft Local Plan so that we may help to ensure policies that could impact the National Landscapes are sound. A dedicated policy for the National Landscapes is currently omitted from the Draft Local Plan. We would be able to assist with developing a dedicated policy based on wider best practice and examples from other National Landscapes, as well as recent experience with other LPAs. The recent examination into the South Worcestershire Development Plan (SWDPR), coupled with the knowledge that almost all Local Planning Authorities are being asked to significantly scale-up house-building, has accelerated discussions and the search for solutions. Natural England believes that a 'Strategic Solution' is needed to resolve the issue of damage to the Malvern Hills SSSI. As a result of the examination and a Statement of Common Ground with Natural England, a major modification to the emerging Green Infrastructure policy (SWDPR 07) has been made to the draft plan which relates specifically to mitigating recreation impacts on the Malvern Hills SSSI. Opportunities for Areas of Informal Recreation (AIRS) will be sought to relieve pressure on existing vulnerable areas of Green Infrastructure such as the Malvern Hills SSSI, or where there are limited opportunities for informal recreation in the surrounding area. A dedicated policy for the National Landscapes in the Local Plan would provide clarity, ensure soundness, and align with neighbouring authorities. We would therefore welcome the opportunity to liaise with FODDC policy officers during the process of revising the Draft Local Plan.

**The SWCs** - are committed to further discussions as both the Forest of Dean Local Plan and SWDP Review progress to comply with on-going requirements associated with the Duty to Co-operate process and to work together collaboratively to address and raise cross-boundary issues.

## Question 10 - Draft Officer Response

**4.91** The comments made are noted and reiterate comments made through the previous questions.

- Consultation Process Concerns - these have been addressed in responses to Questions 6, 7, 8 and 9. The consultation was conducted in compliance with the Local Development Scheme and Statement of Community Involvement both approved by Council. Two leaflets/handouts were produced, these were sent to all Parish and Town Councils and given to every person who attended the consultation events. The first summarised the purpose Local Plan and its process, the second explained in simplified terms the options consultation. 7 events were held across the District where planning Officers and other Council Officers from Sustainable Economy, Ecology, Climate and Development Management teams were present to explain the consultation and answer any questions.
- Opposition to Government Housing Targets - these have been addressed in responses to Question 9.
- Preference for Existing Settlement Development - these have been addressed in responses to Questions 4 and 6. The scope for selective expansion is severely limited by the primary constraints affecting several of the larger settlements including towns. It would also allow for the completion of existing committed development such as at Lydney. This can only take place at a rate which can be supported by the market for new dwellings. Smaller site allocations throughout the District and existing committed sites will provide supply in the early years of the plan period.
- Opposition to Glynchbrook/New Settlement - these have been addressed in responses to Questions 4 and 6. A strategy based on existing settlements alone would be unlikely to perform as well as in conjunction with a new community. It would not enable the concentration of infrastructure, and the selection of the site or sites would risk being dependent on existing transport networks. The transport issues are being assessed and will be reported on. A new settlement strategy should be able to provide growth over the plan period.
- Infrastructure and Service Concerns - these have been addressed in responses to Questions 4, 5, 6, and 7. The Council will continue to work with infrastructure providers and Duty to Cooperate bodies. A strategy based on existing settlements alone would not enable the concentration of infrastructure, and the selection of the site or sites would risk being dependent on existing transport networks. The transport aspects are being analysed and will be reported on.
- The Local Plan will be amended in light of any NDMP publication.
- 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.

## 5 Next Steps

**5.1** The next stage will be for Council to agree a revised strategy for the Local Plan. This will take place in November 2025. The decision to favour one option or another will be made in the light of consultation responses received and the issues described above.

**5.2** The Draft Local Plan 2024 will be reviewed in the light of the new strategy and any new potential additional sites will be assessed by the Sustainability Appraisal. A revised version of the Draft Local Plan will then be developed based on the agreed preferred strategy, the Draft Local Plan consultation undertaken in 2024 and ongoing duty to cooperate discussions.

**5.3** A Regulation 18 Revised Draft Local Plan will, following approval by Full Council, be subject to further consultation early in 2026.

### Local Plan Timetable

Milestone and explanation of milestone	Date/Expected date
<b>Potential Issues and Options consultation</b> The Issues and Options consultation represented the first public consultation stage in the update process, this is a non-statutory stage of consultation.	Autumn 2019 - Completed
<b>Preferred Options Consultations</b> The Preferred Option and Second Preferred options sought views on the options evaluation of possible alternatives, potential sites and policies.	Winter 2021 - Completed Autumn 2022 - Completed
<b>Consultation on Draft Local Plan (Regulation 18)</b> This statutory stage includes a six week consultation on a draft Plan, which will set out the Council's preferred strategy for accommodating future growth. Comments made at this stage will help to shape the next stage of the Plan	Summer 2024 - Completed
<b>Consultation on Revised Strategy and Preferred Options (Regulation 18)</b> This involves a six week consultation on revised preferred options, in light of the government's revisions to the National Planning Policy Framework (NPPF) December 2024 and standard method housing figure.	Summer 2025 - Completed
<b>Consultation on Revised Draft Local Plan (Regulation 18)</b> This includes a six week consultation on a revised draft Plan, which will set out the Council's revised preferred strategy for accommodating future growth. Comments made at this stage will help to shape the next stage of the Plan.	Winter 2025
<b>Publication of Submission Draft Local Plan (Regulation 19)</b> This involves the publication of the Plan in a form which the Council believes to be sound and which it intends to submit for examination. This stage includes a further six week consultation period. Comments must specifically relate to the legal compliance and soundness of the plan.	Summer 2026
<b>Submission (Regulation 22)</b> This is when the plan is submitted by the Council to the Secretary of State. The evidence base and the representations made during the Submission Plan consultation are also provided to the Secretary of State. The Examination of the Local Plan starts at this point	Autumn 2026
<b>Examination and Main Modifications</b> The examination involves an independent Planning Inspector testing the plan for legal compliance and soundness. This process includes an examination in public when public hearings are held.	Winter 2026/2027
<b>Adoption</b> The final stage in the process is the formal adoption of the Plan by the Council. Once adopted it forms part of the development plan for the area and will guide future development.	Spring 2027

