

Local Plan 2021-2041 Preferred Option Consultation Overview 1 July 2022

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1 . Introduction

1 Introduction

1.1 This paper is intended to provide an overview of the responses received from the FoDDC LP Preferred Option consultation which ended in January 2021. The actual responses received are published separately at

<https://fdean-consult.objective.co.uk/portal/planning/plan41/po/lppo>. Both documents inform the LP and in particular the next stage of the process which in this case has been to reconsider some elements of the 2020 Preferred Option and carry out a further consultation based on a revised strategy. Following that and the consideration of any response, there will follow a draft LP which will then be the subject of further consultation. The draft LP will be followed by another version of the LP which will be published and submitted for examination and again this will be open to comment. The examination is conducted by a Planning Inspector or Inspectors appointed by the Secretary of State and should ultimately enable a final version of the LP to be adopted which will contain any changes recommended by the Inspector.

1.2 As the LP progresses the process becomes more formal and evidence in support of the LP continues to be prepared and updated. At the stage of seeking a strategy (and exploring and reviewing a preferred option) there was sufficient evidence to support the preference expressed in 2020 and again in 2022 in support of the revised strategy but much more is needed to substantiate any policies and proposals as the LP moves on. It particular it will be necessary to consider the potential sites themselves and any options.

2 . Context- purpose of the exercise

2 Context- purpose of the exercise

2.1 In compiling a Local Plan it is appropriate to include consultation at its formative stages as well as when it becomes a more formal and complete document. In 2019 key issues and general options were the subject of a consultation exercise and from that and the emerging evidence a suggested preferred spatial option was proposed and then endorsed by Cabinet and Council in October 2020. Since the consultation ended a further review has taken place and a revised (Second preferred Option) has been made available for consultation. This itself is able to be changed and will be reviewed as additional evidence is taken into account and the full version of a draft plan is assembled. The additional evidence includes representations received and supporting information as well as more detailed studies into transport, flooding, ecology, landscape etc. Overall the LP must deliver a sound spatial strategy and detailed plan for the FoDD and do so in a manner that addresses (helps to enact) the FoDDC's wider corporate aims including in particular those which protect and enhance the environment and move to fulfil the climate change objectives. The LP must be capable of being adopted and therefore meeting the wider government requirements and balance the needs for development, conservation and sustainability.

2.2 *Note; As is usual during the preparation of a plan, the context is subject to change. In this case not only were evidence gathering and behaviour patterns affected by the covid pandemic but government are seeking to change the plan making system. The government advice is to continue to prepare plans according to the current regulations, and that is therefore the present course of action. In addition the usual factors apply such as the likelihood of more up to date and different information becoming available during the gestation of the LP. Of particular note may be the publication of more up to date population figures, new forecasts and economic projections. The LP will need to consider all these as it evolves and may as a result need to be amended. Changes to the plan making system overall could require a more fundamental review of any emerging LP.*

3 . Context- plan stage

3 Context- plan stage

Issues

3.1 The key issues for the LP are how to balance conservation with the need to accommodate change in a sustainable manner. This means providing a plan which makes the best contribution it can to carbon reduction and biodiversity protection and enhancement. It will need to promote spatial solutions to allow more sustainable transport, support the overall reduction in travel and bring environmental enhancement overall. The first preferred option for the LP was based on a view that the continued reliance on a strategy that simply expects existing settlements to be developed further is not sustainable in the long term nor is it likely to deliver the best climate change performance. The second option looks to concentrate development to help achieve a sustainable pattern. Environmental constraints are being taken into account in reaching this conclusion and the examination of these and experience with current allocated sites supports this case.

3.2 Much of the new development the LP will support will be needed to accommodate the additional housing necessary in the FoDD. The LP takes as its starting point the government's figure that suggests 372 dwellings per year will need to be found over the 20 year plan period (total 7440). This methodology is now built into the national guidance. Although the figure is expressed by government as a minimum, consideration of likely employment growth (which could create additional housing requirements does not suggest it should be increased). National forecasts from ONS (Office of National Statistics) suggest that provision at this level may exceed the number of households likely to form or locate in the FoDD. This latter point is the subject of discussion outside the LP process but for the present the emerging LP adopts the methods strongly recommended in the NPPF. For the FoDD it appears that the current methodology provides for a figure that is larger than the need arising from the current population or the likely migration into the area. This exceedance is the result of application of the government's approach geared to increased housing provision over the country and is likely to be advocated by an Inspector at a plan examination.

3.3 The LP will seek to provide for services and employment alongside its housing allocations. It will need to demonstrate how infrastructure can be provided or is available. Most importantly for the larger allocations it will need to show how sustainable transport infrastructure is able to provide for new development and where possible improve any current problems. The location of new development as well as its overall pattern can have a major impact on the ability to provide sustainable transport and economically viable infrastructure.

Summary of first preferred option (2020)

3.4 The 2020 preferred option was very much a blended one with the expectation of continuity as existing committed sites are developed, and in the case of Lydney in particular this suggested a period of 10 years over which existing allocated and permitted sites would be completed. Existing commitments were expected to be retained in the new LP and would be shown as allocations, or sites under construction. Beyond these it identified a requirement for new sites to be identified at existing settlements simply to reflect their needs. This meant identifying land for new development at larger villages and towns in a manner that best meets the environmental and sustainability requirements of the LP. These provisions would not

3 . Context- plan stage

support the entire needs of the FoDD and in order to do so land at Beachley (previously developed land currently occupied by the MoD) and at Newent in the form of a new urban extension was to be identified. These actions would have delivered about 73% of the new housing and related development needed by 2041, in and around existing settlements. The remaining 27% or so was then suggested in the 2020 preferred option to be provided by the development of a new settlement, likely to be constructed from 2030 onwards and able to accommodate about 2000 dwellings by 2041 and then maybe an additional 2000 beyond that.

3.5 Existing and newly proposed sites will maximise the use of previously developed land but this is unlikely to provide more than 20% of the total needs. The remainder will need to be covered from new undeveloped sites.

3.6 The 2020 preferred option is generally in accord with government guidance, although some comments received during the consultation consider it is not. It would support existing settlements with almost three quarters of new development in and around these and establish a spatial strategy more able to deliver in the long term. More fundamentally it could address climate change and especially the need for transport and travel changes. It is considered able to achieve the necessary balance between protection and safeguarding of the environment and providing for the required scale of development. Importantly the ability of larger allocated development sites to provide for their needs and offer scope for strategic GI, habitat creation and carbon offsetting by planting is considered an advantage over a more diffuse model of development allocations.

3.7 Some of the comments received during the 2020 consultation exercise took full account of the preferred option being one that looks to support existing settlements as well as promoting a new one. There are many that, understandably concentrate their comments on the NS element of the proposal and on one potential general location. Many responses express a preference for a strategy that uses existing settlements and previously developed land to the maximum. The preferred option of 2020 does maximise the use of previously developed land but has a “cap” on the capacity of existing settlements in order to recognise their environmental constraints and to allow for the emergence of a longer term spatial solution which includes a NS in a suitable location.

4 . Nature of responses

4 Nature of responses

4.1 Comments were sought in relation to the proposed option as endorsed by Council in October 2020. This option was supported by some information which will eventually build to a full evidence base but is not yet complete. While there was sufficient evidence to support promotion of the broad strategy and the principles on which it is based, much more will be needed in relation to any specific allocations and also to support some of the LP's general policies.

4.2 The consultation exercise sought comments on the proposed strategy and supporting material making clear that responses about the overall strategy as well as those concerning potential sites that may be identified were welcome. Although the LP was at the stage of looking at strategic matters and an overall approach for the LP, many representations focussed on one particular locality. Some proposed or opposed particular small sites that may be allocated. This is helpful in formulating the draft LP and in particular the more detailed settlement maps and narrative which it will include. Much comment was received about the overall strategy and in some cases alternatives were suggested to the approach and to key elements of it.

4.3 The consultation involved seeking views from individuals and organisations, and included service providers such as water companies, travel companies (eg Stagecoach) as well as neighbouring LAs, parish councils and amenity bodies. It included any who have asked to be contacted previously as well as a list of bodies and organisations in a standing list of interested groups. All neighbouring planning authorities, all FoDDC Councillors and parish clerks were contacted, as were any individuals, groups and bodies who have asked to be kept informed of the LP process and are on the Councils database. These number in excess of 1600.

4.4 In addition to those on the contact list, wide ranging publicity was given to the consultation and it was "live" from 22nd October to 29th January, which is a greatly extended period largely in recognition of the pandemic. The relevant papers were available prior to the Cabinet meeting of 8th October. Publicity using local newspapers as well as social media and the Councils own website was used, and individual parish councils were provided with material and asked to help give further publicity. One additional notable use of social media in relation to one issue (the possibility of a new settlement in the east of the FoDD) produced a large group response.

4.5 The purpose of the consultation exercise is to inform the LP process and the responses are themselves evidence to be taken into account as the plan evolves. They cover a wide range of issues from fundamental disagreement with the whole strategy to technical advice and also comments in support.

4.6 About 436 Responses from individuals or bodies were received and the nature of these is considered below: they include 848 representations from 436 contributing consultees and these comprised 322 comments from 80 organisations and 526 comments from 355 individuals and included responses from:

4 . Nature of responses

4.7 15 Specific consultees such as water companies, Historic England, and the Environment Agency, Gloucestershire County Council and 4 adjoining authorities Monmouthshire, Joint Core Strategy (Tewkesbury Borough, Gloucester City and Cheltenham), S Worcs and Herefordshire.

20 parish councils (incl joint Parish group and Newent NDP group)

8 Local groups or local representatives of national groups/Trusts/organisations

6 national groups/Trusts/organisations

7 House builders/ developers

1 housing Association (HARP)

7 Agents (eg planning consultants acting for clients)

9 Local businesses

3 others including collective responses from the Six Parish Action Group.

4.8 Amongst the responses were many relating to the possible development of a NS (new settlement). Many of these linked to the possibility that it could be located in the Churcham area. Included in these responses was a petition with over 6150 entries (at the time a copy was submitted). Some of the material received highlighted a particular site which has been suggested to the FoDDC through the SHLAA process. This is a proposal on behalf of a landowner suggesting a new settlement could be developed in the area of Highnam/ Churcham straddling the FoDD/ Tewkesbury border. It is a proposal that the FoDDC are aware of and along with other LP options must be evaluated as the LP progresses. This evaluation will need to consider major issues such as transport, landscape, flood risk, as well as the fit with any overall strategy that is decided for the draft LP. The strategy itself will be reviewed as part of the LP process and in the light of this and subsequent consultation. The concept of a NS and the potential of a broad location close to the A40 and A48 were two features of the preferred option which were endorsed by the FoDDC in October 2020 but the revised 2022 strategy does not support such an approach.

4.9 By far the largest number of responses by subject were from individuals and expressed opposition to the development of a new settlement usually referred to as potentially in the Churcham/ Huntley area. The material supporting the consultation referred only to a general preferred location being supported by the Council (Cabinet 8th October and Full Council 15th October) as having some potential to be considered further. The general area close to the A40/ A48 was referred to in this connection and could include a development in the area of Churcham (Parish). Collective responses from Parish Councils (Huntley, Churcham, Highnam, Minsterworth, Westbury and Blaisdon) were received as well as from individual Parishes and individuals in the wider area. For information Churcham Parish (of 1309ha) extends almost to the A48 in the south includes land north of the A40 and occupies land between Huntley and Highnam Woods.

4.10 Responses from prospective developers or on their behalf included some in favour of large sites either in support of the preferred option and/ or sites which they consider fall within its scope or suggesting alternatives. Some (relatively few) individuals also suggested alternative strategies with major development at specific locations while many more advocated a strategy that dispersed the development required over a wider area, many seeking dispersal to existing towns and villages and also separately taking issue with the overall number.

4 . Nature of responses

4.11 Responses have been received from many locations in the FoDDC in response to the consultation, though by far the largest number relate to the possible development in the Churcham area. Other locations referred to as well as alternative areas for development are the towns, Tutshill/ Sedbury and Beachley, and other major villages such as Mitcheldean and Newnham.

5 . Themes of responses

5 Themes of responses

5.1 In considering the responses, there are several important considerations. Clearly the sheer weight or numbers of responses is an important aspect and this can highlight both local and wider district wide issues. Inevitably responses are likely to concentrate on the more controversial elements of the LP and on areas where major change is suggested. Views as to the appropriateness of the strategy, and alternative proposals for sites or themes were contained in some responses, and some took issue with the scale of development that is considered necessary to provide for. The alternative most proposed was one of dispersal of development to varying degrees but essentially presented as an option that could “spread the load”, seeing new development as a load on existing communities and possibly focussing less on the potential advantages that planned development can bring. This dispersal option was considered as the preferred option was developed and also at the stage of the Issues and Options consultation in 2019.

5.2 There is an important distinction to be drawn between the preferred option which seeks to provide for the continued development of settlements in keeping with their requirements and the strategy of dispersal where the total needs of the FoDD would be allocated on sites able to accommodate the development concerned but not necessarily in a manner that would best support the individual settlements or the wider LP climate change and related transport agendas. This is why the dispersal option is considered to be the closest to a “do nothing”. If it is to meet the current requirement the dispersal strategy might need to include relatively large allocations at smaller villages, or sites being identified that would affect a locally protected landscape. While such sites could be developed, the key question is what they do for the overall strategy and are they the best option for the LP and longer term? As well as newly identified sites the LP will continue to support existing commitments, especially those which have planning consent and these alone make up a substantial body of sites able to meet 40% of the need for housing land. These largely reflect the existing settlement pattern and will be reviewed to ensure continued availability.

5.3 Many responses highlight perceived shortcomings of certain aspects of the strategy as proposed. These all require investigation and often relate to essential considerations, such as the risk that a site proposed for development will flood, or that existing transport/travel networks are inadequate. Some constraints may be absolute (flood risk, nationally protected SSSI etc) while others need to be balanced against other factors in evaluating a certain site (use of good quality agricultural land for example). In other cases improvements may be taken into account such as the ability to make better transport connections and improve access for a variety of means of travel. All of the potential large allocations will need some form of further evaluation in the LP process and candidate sites may as a result be discounted, modified or remain as proposed with refinement as necessary to support their allocation. Specific proposals received as part of this consultation will need to be evaluated in the same manner as are the many sites previously drawn to the attention of the FoDDC under previous consultations such as the SHLAA/ SHELAA. (<https://www.fdean.gov.uk/planning-and-building/planning-policy/strategic-housing-land-availability-assessment/>)

5 . Themes of responses

5.4 The perceived advantages of locating new development in a particular manner were highlighted in many responses, often to suggest for example that development at existing settlements can benefit these supporting their economy and use existing transport facilities. Equally some highlighted the advantage of being able to provide services and use new or enhanced transport facilities by developing new sites in well connected or well connectable locations. Opportunities and the need for biodiversity net gain, GI and Building With Nature (BWN) were also referenced and are essential considerations for a LP and its supporting material such as the Sustainability Appraisal (SA). Further information is available from the evidence base which is an area that will be added to during the LP process. <https://www.fdean.gov.uk/planning-and-building/planning-policy/our-current-local-plan/local-plan-evidence-base/>

Consultation timing

5.5 A large number of representations highlighted the pandemic and the attendant restrictions as reason to lengthen or defer the consultation.

5.6 The 2020 preferred option consultation is part of an informal process intended to provide evidence against which to prepare a formal draft plan. It is the second LP consultation, following one devoted to the basic issues and options in 2019. This did raise the possibility of options that included a new settlement or settlements and from that and other material was developed the FoDDC's preferred option of October 2020. This was the subject of a consultation from 22nd October to 29th January. The exercise was publicised as widely as possible under the circumstances and the FoDDC is grateful for further publicity given by individual parish councils, individuals and interest groups. The overall response is large and the range of comments equally wide.

5.7 The present government requirement was to have a LP in place by 2023 and this was a very tight timetable, since delayed by the pandemic and the longer period of consultation. It has also been affected by the incorporation of a further (second) preferred option and its evolution. The LP process is now likely to take at least until 2024. There will be three additional opportunities for consultation including engagement with the examination under an independent Planning Inspector acting for the Secretary of State. Although some suggestions to pause the LP were made at the time of the consultation, it was at all stages considered preferable to proceed with the LP. This is in tune with current government advice including that in respect of proposed reforms to the LP system that are presently under consideration.

Decision making has pre emptied consultation

5.8 Some representations suggest that the decision had already been made to follow a particular course (the preferred option). The LP was the subject of consultation at the formative stage of the issues and options and again at the stage when a first preferred option was published. The former sought to establish the subject areas and possible approaches that were to be considered and the subsequent preferred option was itself open to extensive consultation. It has now been revised following that consultation.

5 . Themes of responses

Impact of pandemic on LP content

5.9 In addition to comments about the impact on the consultation process, representations were received that the changes in behaviour observed as a result of the pandemic need to be properly accounted for and that these could affect the content of the LP. It is agreed that the LP should consider potential long term changes such travel behaviour and home working though it will need evidence in support. Currently it is not known how behaviour may change on a permanent basis but it is desirable that the LP should enable some of the observed changes to become long term where they are considered constructive. Examples of this include more home working (to an extent) and increased active travel. The less desirable consequences of the pandemic will also need to be considered, such as changes in town centres due to closure of shops and the decline in use of public transport.

Housing delivery assessment of LP requirement

5.10 Representations from individuals and organisations including for example CPRE expressed the view that the MCHLG (as it then was, now LUCHC, Dept of Levelling up Housing and Communities) standard method of calculating housing “need” is not appropriate, leading to excessive provision.

5.11 The current basis for setting housing delivery is the government’s standard method by which the need for housing is apportioned across the various planning authorities. It uses a dated forecast (2014) for household projections and then applies an adjustment designed to address the relative affordability of housing (average sale prices) when set against average workplace earnings. This method is well understood, though not universally supported and delivers what is termed a minimum requirement. A LP is obliged to use it as a starting point or make the case through the LP process that this is not the correct method. It is considered that despite the flaws in the standard method that it is the base that should be used for the evolving LP and that there would be little to be gained from challenge through the LP system. Its use has however been questioned outside the LP process including by the FoDDC through representations to government and will continue to be debated elsewhere. Additional evidence is being gathered to enable FoDDC to better understand housing requirements for the area. It may be that the aged (2014) base for the housing forecasts will have to be replaced, probably during the gestation of this LP, but that decision would be for government. The current calculation does change over time as information on relative affordability changes, but being tied to the 2014 household forecasts does not for example take account of the latest demographic trends. The standard method currently (early 2022) suggests a requirement very similar to that calculated in 2020. Although FoDDC remain concerned about this method it is considered wise to continue with its application but note the possibility that government may itself change the methodology.

Delivery of Affordable housing

5.12 A number of representations highlight the need for affordable housing and the importance of providing for the needs of the FoDD.

5 . Themes of responses

5.13 The standard method of housing “need” prescribed by government is intended to increase supply in areas where affordable housing is needed most. It is however based on a mechanism intended to address purchase prices and does little to address the overwhelming need for affordable housing for rent in the FoDD. The cost of housing is affected by supply but also by many other factors such as the availability of finance, which has a great influence on prices the market can support. Whilst there is a need for some of the housing products that are encouraged by government it is considered that there is insufficient emphasis on some key areas which should address the shortages reflected in the FoDDC waiting list and evidence from housing surveys. These highlight the need for housing for rent at a cost those in need can pay.

Loss of agricultural land/ availability of previously developed land

5.14 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.

5.15 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 the case of the former the LP will seek to maximise the use of such land and while able to offer some scope the extent of available brownfield land is not sufficient to meet more than a relatively small proportion (less than 20%) of the total need. The ecological value of land (which may be in agricultural use or previously developed) must also be taken into account. In considering the overall balance the development of good agricultural land is likely to continue to be necessary. Wherever development takes place, there will need to be improvements in biodiversity and provision of GI. In addition, major sites are likely to be allocated so as to include substantial undeveloped areas as open space and possibly tree planting for amenity and carbon reduction. Some land currently in agricultural use within allocations is therefore likely to remain undeveloped and make a positive contribution to ecology, recreation and possibly flood storage and climate change (carbon offsetting). The LP is likely to require a substantial portion of major allocations to remain undeveloped for these and other related purposes. This is likely to be specified in the LP proposals for each site.

5.16 In making allocations land for GI, flood storage, and other uses will be needed along with provision for the BNG (biodiversity net gain) which will be a legal requirement. In order to achieve BNG, there will need to be measurable improvements in biodiversity when development takes place. This may change the use of some undeveloped land into uses that may be less productive but more ecologically valuable, for example supporting nature recovery. 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.

5.17 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 including areas in the

5 . Themes of responses

Gloucester/ Cheltenham area. 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) remain relevant.

Climate change

5.18 A very important part of the context of the LP is the climate change agenda, not only the FoDDC's declared emergency and the 2030 target but also the wider national and international moves. A number of representations highlight this and the importance of the issue is agreed. Some suggest that the LP strategy will be in conflict with achieving the necessary carbon reduction.

5.19 The FoDDC consider that prompt action is essential and that the needs of the FoDD must be served through policies and proposals that focus on achieving carbon neutrality as rapidly as possible. It is not an option for the LP to not provide for the needs of the area. The LP has a major part to play in choice of sites and in the nature of development proposed. Both the proposed locations for development and the manner in which they are intended to be developed must ensure that the LP provides the best solutions it can. If a LP were to be prepared that did not meet the identified requirements then it would not be able to be adopted. It would then risk either being modified in a manner that did not provide the most sustainable solution or in the case of no plan, a situation where the "presumption in favour of development" would apply. This could result in development in locations not supported by the FoDDC and which may not necessarily be the most appropriate to address climate change.

5.20 The broad LP strategy currently proposed in 2020 was considered able to address the climate issues involved, provide the opportunity to plan for the longer term and seek more sustainable construction and development locations.

5.21 A number of representations quite correctly point out that new development will require resources (eg raw materials) and will have an impact on carbon emissions. The LP cannot avoid proposing new development but must ensure it is efficient and well located especially where it can use sustainable transport connections or create them. An appropriate choice of materials and location for new development will enable the best choice to be made. Policies in the LP will be needed to help achieve the most sustainable solutions.

Flood risk

5.22 Many comments were received about flood risk often drawing attention to recent events and the trend of more extreme events coupled with rising sea levels. While there are varying types of flood risk, it is one area the LP would regard as absolute constraint. No new built development should be allocated where there is identified risk and this should take account of future climate change that may increase the areas at risk. New development must also be able to demonstrate that it does not add risk to other areas. Mitigation may be required as well as avoidance of some areas. Developments that improve watercourses (eg attenuating potential storm flows), and use sustainable drainage techniques will be essential.

5 . Themes of responses

5.23 General guidance in the form of flood risk mapping is widely available and the preferred option was framed taking account of this and additional evaluation will be required whatever allocations for the LP are made. The standard source for information is the Environment Agency (EA) which provides extensive on line resources with mapping to reflect flood risk from rivers and coast, flood risk from surface water and a variety of scales of risk such as the possible frequency of the risks concerned. The EA also keep information about the extent of flood events. Information such as Shoreline Management Plans provide further guidance, in relation to defences and strategies. There are other sources of information both anecdotal about actual flooding and modelled projections of possible future events and rises in sea level. The LP must take the evidence into account and make allocations that are able to be safe. Some of the future modelling shows dramatic changes especially as a result of sea level changes. This must be considered in making allocations along with the additional and more detailed flood risk information that needs to be assembled.

6 . Source of responses

6 Source of responses

6.1 The summaries below highlight the key points made by various named bodies.

Responses from specific consultees (2020 consultation)

Please see <https://fdean-consult.objective.co.uk/portal/planning/plan41/po/lppo> for actual material received or <https://www.fdean.gov.uk/planning-and-building/planning-policy/developing-our-new-local-plan/>

Department For Education, DFE

6.2 The DFE point out that the consideration of options against their likely viability is essential as is the use of s106 contributions to support new infrastructure and potential sites. The LP will it is agreed need to take account of this when sites are considered for allocation. The FoDDC's viability study is available for use as part of the site selection process in providing guidance about the potential contributions that sites of varying type and location may be able to afford.

<https://www.fdean.gov.uk/media/0ewl3r1a/fod-viability-final-report-only.pdf>

Natural England, NE

6.3 Comments were received drawing attention to the importance of protecting sites and habitats. Especially important areas such as the Severn Estuary and the Wye Valley woodlands were referred to emphasising the importance of functionally linked areas. It is considered by NE that the importance of these and other protected sites should be made more clear. Bat species and their protection are especially important. Overall the LP must consider and provide for BNG and further advice is offered. Air pollution and quality need to be addressed.

6.4 Note: NE are one of the key consultees (along with the EA, and Historic England) that must support or endorse the LP.

Historic England,

6.5 Comment generally on the issues and note the current approach as one is informed by the relevant heritage issues.

Highways England, HE (now National Highways)

6.6 Comment that there will be a need for comprehensive evidence in relation to the LP strategy and are unable to comment at this stage, and in the absence of more detail. Although National Highways are only responsible for the A40 and Motorways in the FoDD some developments may have an impact on roads outside the area. The LP will need to demonstrate how its development proposals can be accommodated in relation to the highway network whether HE managed or local (GCC).

6 . Source of responses

Environment agency, EA

6.7 A response from the EA has been received which highlights the need for continuing dialogue which is being established. Overall the response welcomes and emphasises the need for climate change to be an urgent priority to be addressed, and the need for an approach to reflect this priority is agreed. The strategy and detail of the LP should ensure that it does its utmost in this regard. Comments looking towards evidence that the LP will require are noted and agreed, the FoDDC are engaged with the EA to discuss this area, and welcome any guidance and additional material from EA and the LLFA.

6.8 More general comments about water cycle studies, and site assessments are also noted and welcome for further discussion.

6.9 The EA observe that a more concentrated form of development is likely to perform better in respect of sustainable travel than one of dispersal and this is agreed.

Coal Authority

6.10 The Coal Authority highlights the need to take account of the mining legacy in the FoDD and consult and take appropriate steps in respect of any potential risks.

Responses from Local authorities, District, Unitary and County Councils

Gloucestershire County Council

6.11 Some general points are made in addition to more specific comments in relation to some named locations. Comments are made from several standpoints, including transport, education and flood risk. General points include:

- New development must provide transport choice and reduce the need for travel by private car.
- Incremental development will lead to an impact on the transport network, and be difficult to mitigate.
- Expansion of existing settlements must consider ease of access to facilities, including travel, consider sustainable travel.
- New settlements need to be of sufficient scale and be designed with sustainable transport needs in mind, focus growth and enable public transport (which may require subsidy).
- Specific comment is provided in respect of Beachley, Newent, a potential location near Highnam, and the basic transport considerations are set out including the need to ensure sustainable travel. Modelling of travel patterns will be required. Any new settlement would need to be well served by facilities that reduce the need to travel.
- The high level nature of the document is noted and agreed, and comments on the principles of development welcome, noting that there may be high threshold (number of dwellings) at which a new settlement becomes able to support a transport interchange. The potential advantages as set out with regard to transport are noted and individual comments broadly agreed by FoDDC. The way in which incremental expansion may be difficult to mitigate is one reason for the LP seeking some concentration of new development. The response notes possible issues arising from urban extensions,

6 . Source of responses

illustrates matters that would need to be addressed under such an approach and suggests there may be more suitable alternatives.

- GCC point out the relatively high threshold at which a NS may become an attractive option, and refer to some potential advantages. These also highlight the need for careful planning and phasing and the need for for any NS to be designed with multi mode transport as an integral part.
- The use of existing networks and routes, suitably enhanced, is an advantage.

Comments are made in respect of the strategic options as below:

6.12 Comments about the sustainability of Beachley highlight the two key challenges which are transport connectivity in proposing development at this location, alongside ecology. The LP is likely to identify this location for development as it is likely to become vacant and would represent a large previously developed site. The owners have engaged consultants and are addressing these matters on the basis of providing additional material to aid the LP process. The on going “Chepstow Study” and initiatives such as the Wye valley Greenway are referred to in the response. Concern is expressed for the ease of access from potential major development at Beachley to its surroundings and this is shared by FoDDC.

6.13 The overall resilience of the transport network around Newent is an issue also highlighted and agreed as one matter to be addressed. Some considerations of how this may be addressed are included in the response which also highlights some of the wider issues that may affect any major development in the north of the district (not necessarily Newent). Equally some potential is recognised, for example to connect development by active travel networks. The issues to be addressed are agreed as is the principle that developer contributions to improve sustainable travel are likely to be essential.

6.14 Under the sub heading “Highnam”, comments are made about the potential for a transport interchange recognising thresholds for such provision. The need to demonstrate how a new settlement could be accommodated should one be proposed in this area is recognised and agreed. It is agreed that the LP would not be able to propose major development in this general location unless it could be part of a sustainable travel network. As part of any work to support such an allocation in the event one is made, it is agreed that considerable study of the existing network will be needed. Existing users of the A40/ A48 should be able to benefit from any improvements/ interchange created.

6.15 Overall the response makes clear the need to extensive transport modelling and emphasises the need to address sustainable travel, modal shift and the ability of new development to support these.

6.16 Comments in respect of biodiversity and flood risk are noted, the latter being the subject of current dialogue with the LLFA and EA. Comments in respect of individual settlements which are provided are welcome especially in connection with flood risk.

6.17 The comments in respect of the provision of education are noted and provide useful context. An illustrative application showing the broad current situation across the FoDD is provided.

6 . Source of responses

6.18 Comments in respect of libraries are noted and it is agreed that new development should be able to be access and may need to contribute to this service.

6.19 Overall the FoDD welcome the response and look to further dialogue with GCC in respect of the issues covered and any other matters of joint concern.

6.20 Comments in relation to minerals and waste highlight the need to refer to resource efficiency, and that the options document should set out the need for mineral safeguarding. In addition, waste reduction should be a theme within the LP. These are agreed areas in which the LP itself will need to comment making clear the role of the MLP as well as the waste planning role of the GCC.

Neighbouring Planning authorities

JCS (Joint Core Strategy), now Joint Strategic Plan Authorities Tewkesbury, Gloucester City and Cheltenham- JCS

6.21 General support is given for the approach of identifying options and recent engagement is welcomed as is its continuation. The JCS is aware of the possible option of a new settlement in the area served by the A40/ A48. They consider it may be a logical and sustainable option. This must if pursued be considered sustainable. Active travel, a reduction in the need to travel and the use of public transport will be needed. Any New Settlement should be “somewhat” self sufficient, with on-site facilities, and provide opportunity for a high standard of design and help address climate change. The JCS will continue to engage with FoDDC. The new impending GTAA (Gypsy and Traveller Accommodation Assessment) and existing local shortfall in provision in Gloucester City is also noted.

Herefordshire Council

6.22 Confirm they have no comments at this stage

South Worcestershire Councils

6.23 General support is given for the principles in the preferred option, and for the need for sustainable transport connections. It is also noted that it is unlikely any FoDDC needs will be expected to be met in S Worcs, nor the reverse.

Monmouthshire

6.24 Highlight the current co operation in respect of the Chepstow area and particularly the transport study. Other common interests are also referred to (eg regional planning and common rail route). The possible development at Beachley is referred to and the need for sustainable transport solutions is emphasised.

6 . Source of responses

Parish Councils (PC)

6.25 Responses have been received from 15 PCs on an individual basis and also from a group of six providing a collective response. The group response includes Churcham PC who have also responded individually as have Huntley and Westbury. The individual points made are detailed in the schedule and in the consultation document.

6.26 Overall the most notable responses are from those PCs commenting on the possible new settlement (NS) and potential locations in the area of Huntley or Churcham. The councils within and close to the areas referred to did not support the concept for a variety of reasons. These include the transport implications of any development which it is considered would make the existing problems worse, the risk of flooding or causing flooding elsewhere, the loss of agricultural land, the loss of the rural landscape and threats to wildlife/ ecology. The need for the development concerned is questioned and the strategy of including a NS in the LP is questioned with some preference for a more even (dispersed) spread of new development.

6.27 Comments are made about the consultation being affected by the pandemic, and not affording sufficient opportunity to reply.

Group of six PCs (Blaisdon, Churcham, Huntley, Westbury Highnam, Minsterworth)

6.28 A joint response from six PCs has been received, strongly opposed to the preferred option. The parishes concerned are all those that consider they could be most affected by one possible version of the preferred option. Broadly the option is not considered justified, is said to be ineffective and is thought it is unlikely to be sustainable. There are considered to be issues about implementation and the “duty to co operate”. There is concern for the lack of explanation, and impacts on the natural environment, the local economy (lack of a sustainable approach for the FoDDC), and that any NS could function as suburb of Gloucester being of little benefit to the FODD. The representation acknowledges that the status of the option represents a “testing of the water” stage in the LP. This is broadly the case and although the preferred option is based on evidence, a great deal more will be needed to support the LP as it evolves.

6.29 The representation does not consider the case for a NS well made nor is there considered to be adequate support for the contention that the capacities of existing settlements reduce scope for an option based solely around existing settlements (it is worth commenting that the preferred option seeking to distribute about 7440 new dwellings over the FoDD would see about 73% of these in and around existing settlements and about 27% in a NS). Comments are made about some of the sites suggested by third parties and recorded in the SHLAA process. These need to be evaluated as part of the LP process but at this stage they are simply sites that are considered to have potential for development by those proposing them as agreed by the “panel” who support the study. Comments about these third party sites are however helpful as they will all need to be evaluated as the LP evolves.

6.30 The representation refers to a number of important considerations including flood risk, recent flood events, avoidance of protected sites such as AoNB, and traffic and travel. Also considered important is what is considered a loss of an opportunity for new development

6 . Source of responses

to support the existing FoDD settlements which are said to be in need of such support. This last point is an important one best addressed by reference back to the preferred option as proposed in 2020 which envisaged about 73% of all allocated development in and around existing towns and villages and 27% at a NS.

6.31 The representation from the six parishes is supported by a note drawing attention to legal requirements and the lack of evidence. This note does refer to a landowner proposed site which will be evaluated but which is not and may never be part of the LP. The points made do refer to necessary requirements and considerations for a LP but which are generally expected at a later more formal stage. For clarification, FoDDC and neighbouring planning authorities are in regular contact in respect of common issues.

Parish Councils making individual representations- Alvington, Dymock, Hartpury, Coleford, Newent, Huntley, Littledean, Longhope, Mitcheldean, Rudford and Highleadon, Staunton Corse, Tidenham, Upleadon, West Dean, Longhope PC

6.32 Several councils favour a dispersal approach to development (eg Littledean, Corse) with some (eg Staunton/ Corse) stating opposition to a NS. Some highlight the need for a balanced approach reflecting constraints and taking full account of infrastructure needs and accessibility. Specific possibilities are questioned by the councils involved, for example development at Beachley is not supported by Tidenham. The individual comments received from each of the above are included in the schedule. (go to <https://fdean-consult.objective.co.uk/portal/planning/plan41/po/lppo> and enter the name in the box “who said what” on the top right of the page)

Gloucestershire Wildlife Trust

6.33 It is acknowledged that the LP places emphasis on the natural environment while seeking to provide for the future development needs of the FoDD. The representation highlights the potential to provide enhancements to the natural environment which are considered and agreed by FoDDC as essential as is the ability and need to address carbon emissions. Although the development will inevitably bring considerable demands on resources GWT consider there is scope for a planned option which will perform considerably better than either a “no plan” situation or one where the strategy is simply to accommodate change where it is demanded. They agree that many of the most constrained areas of the FODD are in the west and around the FoD but also noted that these are not the only sites of great value. Overall the LP must deliver BNG.

6.34 The NRN (nature recovery network) demonstrates where there may be opportunities for improvement, some of which may be aided by development nearby. Strategic allocations will be expected to include large open areas whether for GI, drainage (SUDs) planting for carbon offsetting or to provide for nature recovery.

6.35 Welcome clarification in respect of BNG is provided by the GWT as are comments about the interrelationship of ecology and the landscape.

6 . Source of responses

6.36 The less constrained nature of areas around Newent as referred to is broadly agreed, likewise it is agreed that there are real issues in relation to water quality in various areas including in the Leadon.

6.37 Site specific comments in relation to various settlements are all noted and will together with further dialogue inform the LP as it progresses and sites are identified. Constraints are noted as well as opportunities that are referred to. These consider the broad issues at a number of settlements which will be especially relevant if allocations are considered in the areas concerned. Overall the way in which there are major limitations on potential development is noted and this is seen as supporting the general strategy while flagging possible areas of concern. Areas where there may be particular concerns due to protected sites such as Walmore Common or the Severn Estuary are highlighted.

6.38 In terms of the particular comments on location, the trust's concerns for the potential development at Beachley and near Highnam are noted. The GWT support the strategy of a NS and offers support to further assess potential allocations

6.39 The need for a long term plan to deliver environmental improvements is noted and agreed

Woodland trust

6.40 Comments were received highlighting the importance of the BNG and Nature Recovery Areas. In addition the need for protection of habitats is referred to in connection with the potential ecological value of previously developed sites.

6.41 The comments underline some of the main considerations for the LP, especially regarding improvements and protection of natural features but also the principle of providing for future and existing residents. The importance of GI is also highlighted in the representation and agreed.

CPRE

6.42 It is contended by CPRE that the LP focusses too much on the government housing target, which FoDDC should question or risk a failure to achieve the overall vision for the LP. Questions are raised about the process of consultation, and the limited evidence on which the strategy seems to be based. A new rail station for example is not considered practical. Overall the preferred option is considered too free to advocate a NS which would use good agricultural land. The LP should address employment led development.

6.43 While the FoDDC aims contained in the Core Strategy and later visions are still those that underpin the new LP, It is however necessary for a LP to meet the requirements as set out by government in terms of housing supply and provision for services jobs etc. These needs are set by various means including the "standard" housing need formula. This sets a level of provision across the country and for each LPA which seems to exceed the projections of households made by ONS. Provision over this level is sought by government as is a pattern of distribution over the country that relates to the measure of affordability that is used by the formula.

6 . Source of responses

6.44 While the FoDDC has made representations about this and does not agree it is the best method to derive housing requirement, it recognises that a LP must use this method as a starting point to deliver what is defined as a minimum housing requirement unless an exceptional case for departure can be made. It is considered very unlikely that such a case would succeed at examination although the FoDDC has made representations to government outside the LP process. The current “standard method” is driven by a national policy intended to increase housing supply.

6.45 Although now it is planned to depart from the 2020 preferred option, it remains one that could deliver the presently identified needs in a sustainable manner. It can offer a long term means of accommodating change. The consultation in 2019 related to the overall objectives and potential options for the LP. In 2020 further consideration by FoDDC led to the endorsement of a general approach and this was the subject of the recent consultation. The 2019 exercise gave the opportunity to debate the general approaches suggested as did the 2020 exercise but with additional detail and against the then FoDDC preference for one particular spatial option.

6.46 It is accepted that there is a great deal of further research needed whatever options the LP adopts. The 2020 option was however based on an examination of the main constraints and opportunities as well as the capacity of the present settlements to absorb change. As a consequence and coupled with the need for planned development to be sustainable, the option of a new settlement close to the east of the district was examined in broad terms. Existing transport problems would need to be fully addressed and areas prone to flooding would need to be avoided by built development. While largely agricultural, new GI and areas of planting will need to be established. In its favour, some areas close to major centres may be able to use active travel, and both the A40 and A48 are on public transport routes which could be improved and supported by greater patronage. It is agreed that a new rail station is likely to be very expensive but the potential of a convenient access to the rail network remains an advantage in the long term.

6.47 The CPRE representation makes some clear points about the economy of the FODD and also the nature of the housing market. The likely demand for housing from changes (growth) in the economy will not require additional housing according to the county wide economic needs assessment (ENA). The LP has to derive a strategy that delivers the quantum of development required (by government). Land to accommodate the required level of development is in short supply and heavily constrained especially in the west of the FoDD and in the area of the FoD itself. Any option must be tested in its own right but also against alternatives, most notably that of adding to the existing settlement pattern.

6.48 The FoDDC support many of the principles behind this representation, especially the need to make optimum use of land.

6 . Source of responses

Mark Murphy-Glos Constabulary

6.49 Principally comments that the strategy needs further development in order to comment, indicating the need for inclusive well planned developments well connected and provided for in terms of services and other facilities. The comments overall emphasise the need for new development to be well located and served by transport and the necessary facilities. Comments made also highlight the current A40/ A48 and other road congestion.

Sport England

6.50 Emphasis the need for new development to provide for its needs and support active design.

Utility Companies

6.51 Overall the utility companies are required to provide for the needs that arise, however the water companies in particular stress the need to ensure that they can plan ahead where new infrastructure is needed and that is especially true for large developments such as any NS that may be contemplated. It is accepted by FoDDC that there will need to be advance planning for infrastructure and that any allocation for major development will need to be planned well in advance to allow for the necessary investment. Advice is also offered about conservation of water and encouraging sustainable development.

Transport operators

Stagecoach

6.52 This response comments on the wider context for the LP as well as its emerging strategy. FoDDC agree that the ability to adapt construct and use transport networks is central to decisions to locate new development if the required emissions reductions are to be achieved. This is underlined by transport being the largest contributor to greenhouse gas emissions. Comments about the JCS and its evolution are noted. In terms of a broad area strategy it must be the case that areas west of Gloucester are considered as options for development. Support (recognition) that the standard methodology for calculating housing “need” is noted.

6.53 The need for transport which is more sustainable is agreed almost universally and a spatial plan which supports this objective is vital. Public transport, active travel and an overall reduction in the need to travel will be the areas that need to be addressed and enabling an effective bus network is an essential part. Comments on the importance of the existing major routes (eg A40/ A48 and B4215 from Newent) are noted as are those highlighting the congestion which occurs. Stagecoach broadly support for a plan led development option which includes the A40/ A48 convergence is noted as is a preference for a new settlement option against one of relative dispersal.

6.54 Comments about timing and deliverability are noted, including general support for the approach set out.

6 . Source of responses

6.55 The company express concern in respect of Beachley, where the FoDDC have to consider an alternative use on a very large (for FoDD) previously developed site. It is not intended that the LP must assume any previously developed site is sustainable, and an example of one that is less so would be Stowfield near Lydbrook. However Beachley Camp is close to Sedbury and Tutshill and cannot be ignored in the LP. Its location in terms of access and designated areas of ecological importance are the principal constraints and must be addressed in any development proposal. It is appreciated that from a bus operator point of view the site could be difficult to service and uneconomic especially with the current highway infrastructure.

6.56 In respect of Newent, the response offers support for the strategy and it is agreed that any major development must be planned in a way to enable effective public transport. Without this possibility, the LP may not endorse any major development proposal.

6.57 Comments on individual settlements are noted and are welcome as the LP options for allocation are refined. The representation rightly draws attention to various real constraints and also opportunities and it is clear that the LP will need to achieve a balance taking accessibility and public transport into account. Points about the accessibility for individual sites to existing public transport routes are welcome. Some development options below the major strategic level will potentially use the A40/ A48 for travel, which could support services. The strong preference by Stagecoach for the location of major development in the east of this corridor is noted.

Collective response and petition- from six parishes group and endorsed by others.

6.58 There is a great deal of material submitted in this representation including a narrative of extensive consultation carried out and a petition that then contained 6155 signatures. The 2020 preferred option does indicate that a new settlement may have advantages for the long term delivery of sustainable development in the FoDD. This representation relates to that choice and the possible location in the area of Churcham. The preferred option consultation does not favour or discount any specific location. From the submission it is clear that many individuals have commented and the overwhelming majority oppose the potential location for major development. The large number of signatories is noted, and taken into account alongside the range of points made (reasons for opposition to the possible scheme). Inevitable with a response of this scale the petition contains signatories across a wide range of locations. This underlines the degree of concern for the proposal and may also reflect the nature of the petition (via social media). Concern is expressed in relation to transport, continued economic viability of the FoDD and especially the towns which are said to lack investment, increased flood risk, loss of agricultural land, lack of use of previously developed land, physical and social infrastructure and the local setting and historic qualities of Churcham. It is agreed that the pandemic brought with it less than ideal conditions for a consultation exercise, but the period for consultation was extended from October 22 to January 29, a period of 14 weeks as opposed to the usual six, eight or 12. Additional publicity was provided by the local Parish Council group and also by the Council. Extensive media coverage also occurred. FoDDC consider that the issue had wide publicity and the representations raise a wide range of points. Ultimately should the issue remain one at the LP examination stage (either by way

6 . Source of responses

of a third party representation or as part of the LP being examined, there will be an opportunity to make further representations) but there will also be additional opportunities to comment at the draft plan and publication stages.

6.59 Comments made about the process of preparing a Local Plan are noted and also some concerning the way in which potential sites may be drawn to the attention of the Council. This usually is by two separate processes.

6.60 The first is a call for sites usually taking place on an annual basis by which potential sites for development are tendered then briefly reviewed before becoming entries in a register of land if they considered to be potentially able to be developed. This (Strategic Housing Land Availability Assessment, (SHLAA)) delivers sites that could be developed but may or may not comply with planning policy. They are one source of potential sites and form a record of landowner/ developer interests. Reference to the FoDDC register will show many sites recorded since 2008 and it will be noted that many have not been allocated nor developed and many are in locations not considered suitable. The actual representations vary from simple notifications to more lengthy reports submitted by or on behalf of landowners/ potential developers. One major site which came to the notice of the FoDDC in March 2020 includes part of Churcham parish and also Highnam and was submitted by Robert Hitchins. Like all submissions for SHLAA the site and details are published. Any Local Plan representations made as part of the consultation exercises are separate from SHLAA. <https://www.fdean.gov.uk/planning-and-building/planning-policy/strategic-housing-land-availability-assessment/>

6.61 The second main way in which sites may be tendered is by submission at a LP consultation stage and there are a variety of sites submitted as part of this consultation. These and other suggestions made as part of the process will all be considered as the LP evolves and may only finally be resolved at the adoption stage. Until the adoption of a LP its contents are not fixed although at an earlier stage (draft LP) the content would be expected to be supported by those preparing it. The present situation is however that following consideration of issues and options in 2019 and a preferred option in 2020 the contents of the LP are not fixed although the broad requirements are. No decision as to the identification of sites has been made although a preferred option was identified in 2020 and a second (revised) preferred option has been approved for consultation (August/ September 2022) following a review. All will be further reviewed and may be changed before the draft LP is prepared. The preparation of the LP for the FoDDC involves a number of stages each of which is discussed by the Council and then is the subject of consultation before the next step:

- Issues and options- basic subject areas and general options for delivery including the principles of distribution of development- concluded 2019
- Preferred option- a preferred spatial strategy with generalised locations derived from the further consideration of the issues and options- consultation 2020, this has been reviewed and a second preferred option derived.
- Draft Plan- a full but draft plan to deliver the strategy as agreed following consultation and in the light of any further evidence

6 . Source of responses

- Submission to the Secretary of State- of a plan which takes account of additional evidence and previous consultation submitted after being published and comments invited
- Examination, modifications and adoption. Independent examination of the fitness for purpose of the LP, and incorporation of any necessary changes.

6.62 Notes: the LP process is currently subject to review by government, the above is based on the present system but it may be subject to change.

6.63 Although set out in a series of stages, the FoDDC welcome dialogue throughout the LP process with interested parties.

6.64 The October 2020 Preferred Option is one that expects to deliver a strategy that is intended to support a reduction in carbon emissions from a sustainable pattern of development when judged against alternatives that would provide for the same level of change. It enables about 7440 new dwellings to be developed over 20 years. Under this proposed option, the distribution of these and the accompanying services and employment would broadly follow existing settlements with the exception of a new settlement to accommodate about 2000 dwellings by 2041 (27% of the total). New development at Newent, redevelopment of Beachley and the continuation of growth at Lydney would add about 2600 new dwellings (35% of the 7440). The remainder would have been met from smaller additional sites and existing permissions and allocations. This strategy was not yet fixed but represented the option endorsed by the Council on 15th October 2020. Accompanying it would be policies to support employment, services, biodiversity, carbon reduction and conservation.

6.65 The next stages in the LP have involved both a re consideration of the preferred option, elements within it and the development of much additional evidence. Several subject areas will be the subject of major study, including transport infrastructure, flooding, and landscape. Evidence gathering will be a continuous process up to and including the LP examination, expected in 2023. A second preferred option is being taken forward in 2022.

6.66 In October 2020 the FoDDC sought views on the preferred option, whether in support or opposition and in respect of any suggested changes including additional sites to be considered for development as well as comments in respect of areas that should not be considered. Extensive publicity was given. The FoDDC contact directly many interested parties and received a wide range of representations. Those received have now been made available in full. The additional publicity and material used by this response (the communication group) is noted and all representations welcome.

6.67 The concerns raised about the impact of the possible development to the east of the main centres in the FoDD are noted. It is agreed that it will potentially affect the remainder of the district, albeit with the remaining 73% of new housing development in and around existing centres as well as new employment etc in proportion and in a variety of locations. Importantly the towns are all supported by the strategy with continuation of the Cinderford NQ initiatives, development at Newent and Lydney as well as Coleford.

6.68 It is inevitable that new previously undeveloped land will be required for the LP, although as much previously developed land as possible will be identified and promoted for new uses. This may contribute 12-1400 dwellings and other uses at best but much of it is

6 . Source of responses

already included in the land presently identified for development as allocations or sites with permission. There is still a need for land for about 4000 new dwellings to be identified. Land in agricultural use will therefore be needed. Even with some of the allocated land devoted to “green “ uses (open space, tree planting and GI for example), there will be a net loss of productive land in some areas. The ecological value of land not built on will need to be enhanced under BNG and this is expected to be an integral part of any development especially larger sites.

6.69 The issue of how the overall (housing) development requirements of a LP are derived are a matter of concern and the FoDDC has made representations to government accordingly. These suggest that the scale of new development in the government provided standard calculation is too great especially when seen across the country. The LP however needs to defer to the government figure and provide for it unless it makes and ultimately gains the support of the LP Inspector otherwise.

6.70 Flood risk is a major consideration and new building cannot take place in areas at risk or likely to be so having regard to the impact of climate change. This would preclude large areas from development though they may be within areas allocated for planting or GI or to be used as drainage features. Maps of existing flood risk are available and some information is contained in the FoDDC’s constraints map made available during the consultation.

6.71 Protected landscapes abound in the FoDD as do areas protected for their ecological value. Both should be free of development as should areas of influence of the protected ecological areas. In a complementary manner opportunities for nature enhancement should be taken in the form of supporting nature recovery areas which can be supported in connection with development allocations as GI etc. A study of the constraints shows them to be distributed in most areas of the FoDD though heavily slanted towards the west and south, and along the Severn and Wye valleys. Highnam Woods is an important site requiring protection, and may be able to benefit from better connectivity to other sites of ecological value.

6.72 Transport and travel must change as part of carbon reduction and the LP will need to encourage a reduction in travel, a modal shift and the increased use of active travel. New development should be in easy reach of facilities and able to use a public transport network as well as contribute to its enhancement or creation. Whether or not a new settlement is created in the Churcham area much additional loading onto the A40 and A48 could result from almost any LP strategy. This underlines the importance of addressing the problems that currently exist as well as ensuring that new development can provide for its needs. The A40 and the A48 serve Lydney, Cinderford and other centres and the resilience of these routes is important for all the district.

6.73 In view of the fact that the LP does not propose development in a specific location in the area of Churcham it is harder to comment on its local impacts, however the principles of protecting historical assets including landscapes is an important one which the LP should comply with.

6 . Source of responses

6.74 Many (all) landscapes in the FoDD are sensitive to change and there is a need to fully consider the potential impact of development proposals and any potential for enhancement. The next part of the LP process will do this while seeking to provide for a draft LP which delivers the required mix of development and conservation in a manner that best addresses climate change and the need for a long term sustainable strategy.

6.75 The FoDDC welcome further engagement with all parties especially in relation to developing the most suitable strategy and detail for the forthcoming draft LP. Following a review of these and other representations and information the FoDDC have proposed a second preferred option which does not include a NS. It will be subject to further testing as the LP evolves.

BOBA (Beachley old Boys Association)

6.76 This representation seeks an alternative use for Beachley Camp but initially concentrates on the site being said to be unsuitable and unnecessary as a location for new housing. It is considered by FoDDC that the site offers a major opportunity for the development of a previously developed site, and the current preferred option would identify it for a mixed form of development principally housing with a suggestion of providing about 600 new dwellings. Support for this in the form of representations on behalf of the landowner (MoD) have been received. However an alternative use could be considered. The preferred option advocates a mixed form of development which could include employment, community uses and others. Any use of the site will need to take account of the travel requirements and must show how these can be provided for. Especially important will be the possible impact of new development on the congestion in the Chepstow area, and the way in which active travel and public transport can be encouraged.

6.77 It is considered that the preferred option offers the best alternative for the site, and it is emphasised that the proposal is to allocate the site for a mixed form of use which could accommodate an amount of community uses and could (probably should) potentially use existing buildings which may be retained as focal points. Alternatively an alternative use could be proposed which the LP could support subject to evidence that it is able to be delivered. This would mean the LP would need to show how the housing suggested for the site under the preferred option could be provided for, and justify a different use for what is the largest potential redevelopment site in the district.

Development proposals from or by landowners

General themes in support of specific sites

6.78 A number of general points are noted in responses made to support specific sites, highlighting the importance of some of the stages of the LP process and in particular the need to fully evaluate proposals, to co-operate and be seen to co-operate with adjoining authorities and to have a strategy with the likely flexibility to ensure it can deliver what is necessary. This approach is supported as is the general principle that as a LP evolves it requires progressively more supporting evidence. As one example although the development

6 . Source of responses

of the SA (sustainability appraisal) has begun it will 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.

6.79 Many representations in favour of specific sites seek a strategy which allows for the allocation of development at existing settlements. Some support the broad hierarchy of settlements though not all. The evaluation so far suggests that some of the tendered sites are potentially suitable for development while others are not and in some cases may not fit well with the emerging LP. Large sites in small or relatively small villages with limited transport connections would be unlikely to perform well for example.

6.80 The 2020 preferred option is a blended strategy in which one major component was a new settlement. Looking at the figures (based on the government defined minimum to support 372 dwellings pa) from the standard method of housing requirement it is suggested in the option that the new settlement would accommodate about 27% of the need (2000 within the plan period), leaving 73 % at or near existing settlements. This would have included the build out of the allocations at Lydney, development at Newent and the redevelopment for mixed uses of Beachley Camp. Below this level the preferred option expected some "continuity allocations" at major villages and towns which included Tutshill/ Sedbury, Mitcheldean, Bream, Newnham and others. The broad environmental considerations set out in the supporting material apply and will limit the potential of some areas but the intent was a strategy that makes proportionate allocations at the larger villages and towns while also promoting four strategic locations. Looking at deliverability and timing, various relevant points were noted and appreciated. A NS would have been unlikely to contribute any dwelling completions in the first half of the plan period. Similarly the redevelopment at Beachley is currently only planned to commence following the departure of the present users by 2029. This further supports the principle of adopting a range of allocations including the re affirmation of the current expansion at Lydney. The same situation applies to any other strategy in that the LP needs to provide for a range of development over the whole period at the rate envisaged by the calculated need.

6.81 Many of the possible sites are in the process of being evaluated. Overall as a normal part of the process it is helpful to receive representations advocating the identification of particular sites at this stage. The LP itself will need to evaluate their suitability in respect of transport, landscape, environment etc through SA and other means. It will take account of all specific proposals and how well they may fit the general LP strategy. It must consider alternatives, and variations in respect of sites proposed through this (options consultation) process, through SHELAA together with any other candidate sites (for example proposed by FoDDC or previously evaluated but not allocated for another plan). The consideration of sites following the consultation may may:

- Lead to the identification of a site or sites that has been proposed as part of the LP process and/ or SHLAA
- Lead to the identification of other suitable site or sites
- Cause a particular proposal or suggested site to be discounted
- It is also necessary to continue to evaluate the strategy itself and at this stage it could be retained, or changed. Any changes would need to be able to ensure that a suitable (sound) LP could be delivered.

6 . Source of responses

Potential strategic site(s) including New Settlements

6.82 Representations were received as part of the 2020 exercise in support of potential major development areas which might be identified in the LP. Apart from confirming continuing interest, these provide additional information for evaluation alongside the FoDDC's own considerations. The comments below relate to the submissions received and their relationship to the preferred option of October 2020. Their relationship to the second preferred option of 2022 may be different. Some may fall to be considered at the LP Examination and all will need to be the subject of further assessment.

Robert Hitchins, Avoca

6.83 In 2020 as the result of a "call for sites" through the SHELAA process a suggestion was received from Robert Hitchins that relates to a possible new settlement in the vicinity of Highnam/ Churcham. This has been supplemented by some additional material as part of the options consultation. In particular further information supporting transport, viability and the overall scheme has been received. The proposal relates to a scheme considered suitable for inclusion in the LP by the potential developer, but was neither supported or opposed by the FoDDC at the 2020 preferred option stage.

6.84 The proposal as submitted would sit in both Tewkesbury and FoDDC districts at a point where the A40 and A48 meet. This is the broad location which the options paper considered may have merit. The scale of development suggested is generally in accord with the needs as presently understood. The submitted material is welcome but has yet to be tested, and both the general location and this particular suggestion would need to be further evaluated. As part of the LP it is necessary to examine alternatives (including single large development locations) and alternative strategies as well as the advantages and disadvantages of the broad preferred option.

6.85 The proposed site is shown in a location where it would be close to Gloucester (about 6km to the city centre), is close to major transport routes and generally clear of flood risk.

6.86 As referenced in the options paper any major allocation in the east of the FoDD would need to demonstrate it could be accommodated in terms of the transport network, as well as being clear of flood risk, and able to deliver environmental benefits including GI, BNG, and protection of existing sites.

6.87 While some aspects of a scheme of this nature could be in accord with the first preferred option, it is not true of the second preferred option which is subject of consultation in 2022.

Black Box,

6.88 Additional material has been received in support of a potential NS in the north of the district close to the M50/ A417. This is a site suggested which would be a major strategic location and is advocated on behalf of the landowner(s). The proposal related to an area of about 113ha and is being evaluated against other alternatives and in respect of any constraints and/ or opportunities it may offer.

6 . Source of responses

6.89 This proposal like that above would represent a departure from the second preferred option but in terms of the location was also at variance with the 2020 consultation. Like all potential sites it is still subject to consideration.

Newent strategic site

6.90 The preferred option seeks a strategic allocation at Newent and this is supported by some representations from potential developers. A number of individuals also support the principle and some oppose it. Overall the preferred option of 2020 identifies the potential for major development at Newent as does the second preferred option of 2022. It needs further evaluation as to its potential to be included in the LP chiefly in respect of its ability to integrate with the remainder of the town and use and deliver sustainable transport.

Beachley strategic site Avison Young

6.91 On behalf of the landowner (MoD) a range of material has been received in support of a possible development of Beachley Camp. This will need further evaluation as part of the LP process but it illustrates the current intent of the landowner and provides material against which the FoDDC can evaluate the potential of the site using its own evidence and knowledge.

Sites suggested at towns.

6.92 Additional sites at the towns including the potential allocation at Newent and the continuation of promotion of development at Lydney in keeping with the current high level of commitments have been suggested. The actual material received is contained in the consultation part of the website. Some of the key themes are referred to below.

Coleford.

6.93 Several sites have been suggested as potential development allocations at Coleford and in the surrounding area. All will be evaluated against the LP requirements which under the preferred option would support a modest increase over the current level of allocations. There are currently a number of undeveloped sites at Coleford which are identified in the LP as well as some not presently allocated which will need to be evaluated under the LP strategy. Both the 2020 and the 2022 strategies recognised only limited additional scope in and around Coleford beyond the commitments identified in the current LP.

Lydney Allaston

6.94 Several representations seeking additional development around Lydney have been received. The 2020 preferred option suggests that a limited increase in the current scale of planned development may be appropriate. Possibilities include the intensification for housing of the site which has planning permission at Allaston, and some sites not currently identified. All will be evaluated in detail for the LP against the chosen option. There is considered to be some limited potential for additional development to be accommodated within the land which has consent at Allaston. Lydney currently has a high level of commitments sufficient to

6 . Source of responses

support the current rate of building for maybe eight to 10 years. Whilst under the revised 2022 option, new (additional sites) will be identified under the LP this may not necessarily increase the rate of delivery.

Newent

6.95 In addition to the suggested strategic site at Newent, it is considered appropriate to consider scope for modest additional development within the town and also to acknowledge the current development underway.

Villages Mitcheldean Netherend, Tutshill, Sedbury, Yorkley, Littledean, Staunton Corse, Staunton Coleford, Longhope, Bream, Hartpur

6.96 The continuation of development at the larger villages was expected by the 2020 strategy, where existing constraints allow and where a level of services and transport connectivity exists. This is likely to support allocations at a number of major villages and some limited allocations at others in keeping with their scale and location. Comments received include those in favour and those not in favour of development in various locations .The broad guidance used to inform the preferred option set the context for these allocations with an emphasis on their being sustainable. In addition to the confirmation of existing committed sites where they are considered to be developable new land is likely to be identified under the preferred option in some of the larger villages. The 2022 strategy would require an increased level of development in the villages over that envisaged in the previous consultation.

7 . Next steps

7 Next steps

Next steps

7.1 It is important that as the LP is prepared appropriate evidence is available to support it. Following the 2020/21 consultation, the Preferred Option was reviewed both in the light of the representations received and other evidence now available. As a result a second preferred option was derived and this now forms the basis for consideration of how the LP should be taken forward. While this is the strategy currently supported by FoDDC for consultation, it remains subject to further testing and evolution before a version of the LP which can be examined is prepared.

7.2 Overall the continued evolution of existing settlements was supported by the representations received in 2020/ 21. This is not the same as to say that individual sites that would deliver this are or are not supported. Representations opposing certain potential developments can be expected when specific proposals are made. This is most apparent when a departure from an established pattern is proposed such as would occur if a NS were to be proposed.

7.3 Most comment was received in relation to a possible NS and especially in respect of the possible location in the Churcham area. Some comments were received in support though by far the greatest number were opposed. While this shows the strength of feeling it also reflects the nature of the major development that is being considered. A development of this nature does not feature in the second preferred strategy.

7.4 As a policy tool the LP must deliver and be seen to deliver the best it can in support of carbon reduction and provision for a sustainable future. The FoDDC's corporate aims and the widely shared climate emergency require action through LPs and any strategy would need to be justified in terms of its likely performance in respect of climate change. A strategy which includes a NS and one which features a dispersal of development are likely to perform very differently. The nearest to a "do nothing" plan whereby development is permitted across a range of suitable locations without seeking to concentrate or optimise its potential is unlikely to be truly sustainable. This is sometimes seen as "spreading the load" and certainly may do so both in terms of possibly using existing infrastructure capacity but also in avoiding any potential for development to make a positive contribution through strategic GI or supporting and enabling transport improvements etc.

7.5 The emerging LP strategy needs to be reviewed in its context, and although there is an important stage of considering individual sites the first step must be to review the overall approach. After that the elements of the proposed option can be considered, and in particular the major features. First among these is the principle of and then the potential location of any NS. In 2020 the principle was supported by Council but that is no longer the case. The need to protect sites and landscapes and the other constraints in the FoDD remains. Other elements of the 2020 strategy remain in that for 2022 and Beachley, the potential at Newent as well as the continuation of Lydney (and now with additional focus on the town) as a strategic location are important elements. In addition the principle of making other allocations in proportion to the capabilities and size of other settlements remains.

7 . Next steps

7.6 Beachley is potentially by far the largest previously developed site likely to come available in the FoDD. Many representations draw attention to the need to use such land where available and government policy supports this. Further evidence will be vital in support of the sustainability of this as a location but the principle of re use is a strong point in favour of an allocation. Its location suggests that it will need to be well connected by transport links not relying on the private car, and that active travel and public transport will need to be available. A good level of services including accessible schooling and facilities providing for day to day needs will also be necessary.

7.7 A study of protected sites and landscapes viewed alongside some support for the development (providing it can address existing connectivity and transport issues) suggests that development at Newent is a valid course of action. There are existing services but these would need to be supported and supplemented. It is clear from the options paper and from subsequent responses that a less sustainable incremental form of development would not be acceptable.

7.8 The 2020 strategy in respect of Lydney was largely a matter of using existing commitments. It is now proposed that an increased emphasis be placed on the town, seeking to enhance its role in supporting the wider district. Overall, development that supports the existing economy and towns and villages was strongly supported in the 2020 responses overall and would almost certainly favour Lydney as a development location.

7.9 The most controversial element of the preferred option was the NS. The option which was proposed to accommodate about 27% of the total development needs of the LP in one NS was proposed for two main complementary reasons. The first is that the NS offers a first step towards a more sustainable long term form of development and the second is that the option of providing for the same level of development in another way would be likely to adversely affect the locations in which it was proposed. This is a reflection of the relative lack of capacity in and around existing FoDD settlements. LP proposals always reflect a balance of impacts and opportunities taking into account any mitigation or advantages they may bring. It was considered that a well located NS could potentially take advantage of sustainable travel options, be on an established transport axis which it could support and provide GI, 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 being increased. Overall and following review the LP is now intended to adopt a strategy which does not include a NS but would have a degree of concentration of development at the more sustainable locations.

7.10 Many 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. A flood risk assessment will be needed of areas of search for major development which may be allocated in the LP. The evidence available at present suggests some areas are precluded from being able to accommodate built development but that others are not. Some studies of future risk show large areas of land and major settlements (eg part of Gloucester, Newport, Lydney) vulnerable to risk over time and as a result of sea level rise. These will need to be taken into account

7 . Next steps

albeit in the context of any potential mitigation and also the future shoreline management strategies which may apply. The potential vulnerability of the A40, A48 and the railway between Gloucester and Chepstow will need to be assessed.

7.11 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 LP 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. Any significant development will have to address these matters and major schemes will need to do so comprehensively making clear how they will look after their requirements. Some may be able to do so in a manner that takes advantage of existing infrastructure or is able to share such provision.

7.12 The above issues will be considerations for the LP and alternative locations will need to be further evaluated.

7.13 Ultimately it is necessary for the FoDDC to submit a LP for examination that it considers to be sound, and that means one capable of implementation but also one able to deliver against local and wider objectives both in respect of sustainable development, (emphasising the need to act on the ecological and climate emergencies) and shared planning goals.

8 . Further information

8 Further information

All representations are accessible from the consultation material on the FoDDC website. <https://fdean-consult.objective.co.uk/portal/planning/plan41/po/lppo> (read document and view contents, then select comments and if required pdfs of these).

Some sites are also the subject of representations as part of the SHLAA process. This is also accessible via

<https://www.fdean.gov.uk/media/5cbaim/strategic-housing-and-economic-land-availability-assessment-2021-report.pdf> and then for a plan by selecting one of the sites from the schedule in the written report.

Current Local Plan evidence base (documents are added progressively)

<https://www.fdean.gov.uk/planning-and-building/planning-policy/our-current-local-plan/local-plan-evidence-base/>

Local Plan pages

<https://www.fdean.gov.uk/planning-and-building/planning-policy/developing-our-new-local-plan/>

9 . Glossary

9 Glossary

AoNB	Area of Outstanding Natural Beauty
BNG	Biodiversity Net gain
BWN	Building with nature
CPRE	Council for the Protection of Rural England
DFE	Department for Education
EA	Environment Agency
ENA	Economic Needs Assessment- study to inform LP economic requirements
FoD	Forest of Dean (ie statutory forest)
FoDD	Forest of Dean District
FoDDC	Forest of Dean District Council
GCC	Gloucestershire County Council
GI	Green Infrastructure
GWT	Gloucestershire Wildlife Trust
HE	Highways England, now National Highways
JCS	Joint Core Strategy now Joint Strategic Plan, for Gloucester, Cheltenham and Tewkesbury Districts part of Stroud
LHNA	Local Housing Needs Assessment Consideration of housing needs based on overall requirement
LLFA	Lead Local Flood Authority, GCC
LP	Local Plan
LPA	Local Planning Authority
LUCHC	Dept of Levelling up Housing and Communities was MCHLG
MLP	Minerals Local Plan prepared by GCC in Glos.
MoD	Ministry of Defence
NE	Natural England

9 . Glossary

NRN	Nature Recovery Network
NS	New Settlement
ONS	Office of national Statistics
PC	Parish Council
SA	Sustainability Appraisal
SHELAA	Strategic Housing and Employment Land Availability Assessment (prepared from call for sites)
SHLAA	Strategic Housing Land Availability Assessment (prepared from call for sites- interchangeable with SHELAA)
SUDs	Sustainable Urban Drainage

