

# Forest of Dean District Local Plan Second Preferred Option July 2022



**Forest of Dean**  
— DISTRICT COUNCIL —

# Contents

<b>1. Introduction</b>	<b>3</b>
<b>2. Background</b>	<b>4</b>
<b>3. The Strategy</b>	<b>10</b>
<b>The Strategy Overview</b>	<b>10</b>
<b>An enhanced role for Lydney</b>	<b>10</b>
<b>Newent</b>	<b>12</b>
<b>Major villages and towns</b>	<b>13</b>
<b>Beachley</b>	<b>14</b>
<b>Villages</b>	<b>14</b>
<b>4. Overall</b>	<b>16</b>
<b>Tackling climate change</b>	<b>16</b>
<b>Improving and Protecting the Environment</b>	<b>17</b>
<b>Design</b>	<b>17</b>
<b>5. Approach</b>	<b>19</b>
<b>Assessment of Strategy - Plan Vision</b>	<b>19</b>
<b>Scale and distribution of housing</b>	<b>21</b>
<b>General policies proposed</b>	<b>23</b>
<b>6. Useful Links</b>	<b>26</b>
<b>7. Survey questions</b>	<b>27</b>

## 1. Introduction

**1.1** This document sets out the revised (draft) strategy for the Forest of Dean District (FODD) Local Plan. The plan review commenced with a consultation on issues and options in 2019 and another on a preferred strategy in 2020. Following that consultation the strategy has been reviewed and this revised (2022) version sets out the overall approach for the Local Plan (LP) for the period 2021-41.

**1.2** In its broadest sense the LP strategy for the FoDD is to meet the needs of the area in the best way possible that achieves the LP's aims and objectives. These include general aims and objectives (eg reduce the impact of climate change) and the more specific (enhance the role of Lydney as a town serving the FoDD).

**1.3** The strategy is a comprehensive document intended to demonstrate how the LP will reconcile the delivery of the required levels of change with the characteristics of the area concerned. A LP must do this in a manner that delivers national and local objectives or contributes to them in respect of the environment, the economy and overall sustainability. It should demonstrate how by the end of the plan period the area will have changed as a result of the LP and how these changes will implement the overall aims and objectives. For a strategy or a plan to succeed it must be shown to be able to do this through evidence provided. There are likely to be alternative approaches open to a LP including different options for which the identification of individual sites for change but there are also some important national and local parameters within which a suitable strategy must sit.

**1.4** In 2019 issues and options for the LP were set out without any preference being expressed and views sought. This was followed by a consultation in relation to a (then) preferred option. Although aspects of that have been revised, resulting in important differences in the preferred pattern of development, much of the strategy remains. What has changed is the emphasis on locations and the weighting given to some of the key proposals. The LP still seeks to achieve a balance between accommodating development and conservation and is intended to further the environmental and climate change aspirations of the FoDDC.

**1.5** The strategy places an emphasis on the continued evolution of Lydney as a focal point for the FoDD, drawing on new development to be allocated and other policies in support. It recognises constraints and opportunities elsewhere and proposes further change in the form of new development including Newent and the regeneration of Beachley camp.

**1.6** This version of the revised strategy has been endorsed and supported by the Council but it remains a consultation document subject to changes which may arise as a result of the consultation or for other reasons. It sets out the context for the draft LP which will be prepared in accord with it and will be reviewed after the consultation.

**1.7** Following this strategy and consultation on it, the next stage for the LP will be the preparation of a draft Plan, probably in mid 2023, and then further consultation. After this another version will be published and comments sought before it along with the FoDDC's responses to these comments are submitted for examination together with evidence as required to support the LP.

FoDDC July 2022.

## 2. Background

**2.1** Like many other documents a LP cannot be seen in isolation either as a planning tool or as a policy document owned by the Council. It will form the major part of the development plan for the area (alongside Neighbourhood Development Plans and Minerals and Waste Plans). It is also one of the principal ways through which some of the FoDDC's wider aims and objectives are able to be realised. It must be both in step with these and deliver what it can in the form of policies and proposals to achieve them. For it to be as effective as possible it also relies on and supports other actions and policies of the council. These include regeneration initiatives, provision for leisure and the development of sites where the Council are owners and/ or development partners as well as the wider health and community agendas.

**2.2** This strategy sets the overall approach for a LP which will provide planning policies and proposals for the FoDD for the period to 2041. Although the LP will be reviewed regularly during that time this version looks forward for the whole period using available information and its proposals will be expected to be implemented over the whole of that time. It takes account of the current context and describes the way in which the Council consider the LP should guide the development of the area.

**2.3** Although the context in which a LP needs to be developed is constantly changing with new legislation guidance and more local shifts in policy, some important anchors remain, such as the area's settlement pattern, its landscape, areas vulnerable to flooding, various protected sites and the basic transport network. These will have a major impact on any LP strategy and have been taken into account.

**2.4** The strategy is the overall approach of the LP but it is the spatial allocations that are likely to be the most controversial element. This is especially true in respect of the larger sites identified for development.

**2.5** The strategy draws on the past work especially the LP vision and objectives. These remain as below and the strategy should be evaluated against them:

Table 1 Local Plan Vision and Objectives

Key point from vision	Principal matter(s) raised
<p><b>Deliver Carbon neutrality through strategies and plans</b></p> <p><b>The district is actively engaged in pursuing a low carbon future and new development is designed to support this and adapt to climate change</b></p> <p><b>(Climate emergency, 2018, and related targets)</b></p>	<p><b>There is an overarching need to ensure that LP meets its requirements in a manner that helps achieve carbon neutrality.</b></p> <p>LP to prioritise and promote sustainable future- and demonstrate that it is doing so against benchmarks</p>
<p>In 2041 younger people are more likely to want stay in the district with good access to education employment and housing</p>	<p>Housing availability, type and total supply,</p> <p>Access to educational opportunities</p>

## Background 2

Key point from vision	Principal matter(s) raised
	Range and availability of employment, Attractive environment and recreation/ community facilities
The needs of an ageing population have also been incorporated into the design {delivery} of new development	Housing availability, type and supply Access to facilities and services
It is a place where healthy lifestyles are an everyday part of living and working in the district.	Design of inclusive development and its environment Accessible recreation space Walk/ cycle provision and location of development
The implementation of sustainable development enhances the quality life for residents and visitors alike	Improve access to facilities/ reduce need to travel Approve long term enduring designs and plans Development that takes place is future proof and sustainable
The diverse landscapes and heritage of the area is so distinctive that it is recognised nationally and internationally	The importance of protection and enhancement of the landscapes Policies that support conservation and development that is compatible.
A thriving tourism market is underpinned by a high quality natural and built environment	Need for robust conservation policies Allocations that maintain and improve the quality of the environment
The lack of affordable housing has been addressed through imaginative and sustainable ways providing an appropriate range of tenures which support local communities, services and facilities	Delivery of affordable housing Affordable housing to address local need Affordable housing in locations which benefit from and support local services
The area has resilient and diverse employment opportunities with strong links to good local schools embracing in particular industries of the future	Range of employment and educational opportunities Need for policies to deliver and support diverse economic opportunities.

## 2 Background

Key point from vision	Principal matter(s) raised
	Enable employment change for example to more IT based and additional homeworking
The district is better connected through improved transport, digital and mobile data connections which reduce the need to travel and provide a distinctive local offer	<p>Policies that make allocations and guide development to sustainable locations-</p> <p>Enable service provision in an efficient manner</p>
The Forest of Dean is known as an amazing place to start and grow business	<p>Quality of environment</p> <p>Physical support for new business,</p> <p>Sustainable locations and a range of sites/ premises supported by policies</p> <p>Policies to support enterprise</p>

**2.6** The issues that accompany the overall vision were tested in 2019 through a consultation exercise which broadly endorsed them and also introduced a number of spatial options. These have been the subject of much subsequent discussion and consideration and will need to be tested further both in the form of the overall approach, the policies and the component (candidate) sites in the emerging LP.

**2.7** The requirements of the LP remain broadly as they were in 2019 when the prescribed method of establishing housing need suggested a figure of 7440 new dwellings needing to be provided for over the period to 2041. This figure is one that is updated annually but the current calculation (2021/22) results in a very similar requirement. There remains a need for a range of employment opportunities for the existing and incoming population. Housing that is genuinely affordable remains a priority. The LP must demonstrate that its policies and proposals are achievable and will address the above aims and objectives.

**2.8** Spatial options were the main focus of the preferred option consultation in late 2020 which was extended to January 2021. This took the form of a strategy which proposed the allocation of a New Settlement intended to provide about 27% of the housing requirements of the LP and which would be located where it could enable more sustainable travel solutions to be implemented. It was envisaged that it would provide for development in the latter part of the LP period and that the ultimate form of the settlement would be realised beyond 2041. It was suggested that the location would be best in the area close to where the A40 and A48 meet, that is within active travel range of Gloucester and possibly in the area of Churcham (Parish).

**2.9** Although the new settlement was the single most controversial element of the spatial strategy of 2020 it is important to see it in perspective. In terms of housing numbers, about 47% of the total was to be met on sites that were allocated and/ or permitted. A further 27% would then be provided in and around existing settlements and the same at the new settlement. Any plan strategy will incorporate existing committed sites, provided they are regarded as appropriate and able to deliver. All of these will be reviewed although those with planning permission will almost certainly continue

## Background 2

to be regarded as commitments. With the current (high) rate of building, and the elapsed time, the level of existing sites available to be taken into the new LP has reduced. It remains high at about 3000 dwellings or some 40% of the whole. Up to 40% of the housing allocations required of the new LP are therefore known sites many of which currently have planning permission. This is of benefit to the new LP as these sites that are already known will be able to be implemented early in the plan period. Some of the larger ones which are presently under construction will continue to contribute for several more years.

**2.10** The LP provides for development up to 2041 and for some continuity beyond. A long term view of the potential availability of each site is therefore appropriate, and phasing of their delivery may be considered. Although it is vital for a plan to demonstrate that sufficient land is available throughout the plan period this is especially important for the first five year period. Some sites that are allocated and some which have had permission have been identified for a number of years have yet to be developed. In deciding whether to include these in the new LP it is necessary to consider whether they are still appropriate to allocate (i.e. is it reasonable to assume that they will be developed over the plan period). Some so called opportunity sites may also be allocated but not counted against the LP requirement. This is the case in the existing LP where there is a wish to flag a potential development opportunity but not the level of confidence that it will be realised.

**2.11** The best use should be made of previously developed land which means that the LP should highlight suitable sites and provide appropriate guidance. The largest single site of this nature is the army camp at Beachley and this is considered suitable for a mixed use development with about 600 dwellings being accommodated on about 20ha out of the total land area within the camp of about 54ha. A site of this size forms a significant part of the LP strategy. It is a complex site and there are many issues to address in order that it can be satisfactorily developed but the land is likely to become available and it is suitable for re use. Traffic and travel as well as ecology are amongst the main issues to be considered along with any limitations imposed by the presence of the Severn Bridge.

**2.12** The aims and objectives of the LP require it to provide a degree of continuity and support for a variety of settlements as well as development proposals that are generally in proportion with the settlements concerned. Provision for change in this manner can be relatively sustainable, especially in the case of the larger and better serviced towns and villages. A range of allocations in towns and villages is therefore proposed. These are in line with the LP's objectives but are also a result of the strategy which relies on using the reasonable capacity of existing settlements. "Reasonable" in this context means making allocations in locations that are broadly sustainable and can support improved sustainable transport connections and environmental improvements. It is not a strategy that exploits the ultimate capacity of settlements but it does highlight the fact that the step beyond the LP as it is currently proposed (i.e. this strategy) would stretch some of these severely with inevitable compromises. This ultimate capacity issue is one reason why the previous new settlement approach was considered.

**2.13** The first district wide plan (1996) did not make any major allocations anywhere in the district as it did not need to do so. The next, the LP of 2005, introduced major development in Lydney. With about 36% of the new planned housing growth guided to the town. This was a reflection of opportunities and capacity, following an express wish to promote the town within the FoDD hierarchy. Sites for housing identified under that plan have now come forward and along with additional land allocated and permitted make up the major changes expected in the future or currently taking place. The current sites have delivered about 729 dwellings since 2015. There were (March 2022) about a further 1134 dwellings covered by permissions and allocations, with over 450 on sites that have detailed permission. Although it varies, the annual delivery from Lydney is now around 140, from several different outlets (developers) and this could be expected to continue at this level if the economic

## 2 Background

climate remains as it currently is (May 2022). Alongside the allocation of land for housing the 2005 LP and the subsequent 2018 Allocations Plan (AP) identified extensive areas for employment uses. While there is a current planning application for one large employment site and some incremental expansion has taken place, there are two large sites (7.5 and 18ha net capacity) which are allocated for employment and remain undeveloped. Some changes have taken place in the town centre, notably a discount supermarket now being built.

**2.14** Development rates elsewhere in the FoDD have shown notable upturns in the past five years, but with marked geographical differences. There is considerable activity in Newent and in large sites at Coleford as well as at Tutshill/ Sedbury (which adjoins Chepstow). In contrast development in Cinderford has been very slow, though this is partly a reflection of the nature of the sites that are available.

**2.15** The FoDDC has a long history of promoting the regeneration of its district and especially Cinderford. Local Plans have supported this since their inception and have delivered considerable changes over time. More recently specific projects have been directed through the council's regeneration activities and have delivered more major benefits including the newly built Further Education College (which retained an FE presence in the FoDD and delivered an exceptional new building). There is currently a major programme under the levelling up programme involving land near Coleford, at Hartpury College and Cinderford. Major improvements are underway at Lydney Harbour and along its approaches. Past plans have recognised the limitations of land availability in areas such as Cinderford but also the case for directing investment where it is most needed. An important part of the LP strategy will be to offer continued support for the regeneration plans and projects in the area through general policy as well as site specific proposals.

**2.16** The outgoing Allocations Plan and Core Strategy together with the Cinderford Northern Quarter Area Action Plan have strategies which promote the complementary relationship between the forest towns. This meant recognising the relative lack of land at Cinderford, against its needs for regeneration priorities, the allocation of land at Lydney in recognition of the greater supply and better viability as well as shaping policies around the landscape constraints in and around Coleford. These characteristics remain and one option for the new LP is to continue these strands of policy. The three towns and their immediate hinterlands can continue to benefit from a strategy that recognises their complementary nature and the scale of opportunities. Although Newent is away from the Forest core, it too can take opportunities to provide additional development in a manner that can benefit the present town and its surroundings.

**2.17** The vision and objectives for the LP remain relevant, though with increased emphasis on ecology and climate. It is necessary to derive a strategy that will be able to be delivered and can provide for a more sustainable future. This shapes the options that are available but also increases the chances that the LP when examined will be found to be sound.

**2.18** Options that were referred to in past consultations included one that was the closest to a "do nothing" where development would be allowed to take place in a variety of locations where land was available. In contrast was the option which included a new settlement. In between there is the approach where larger and more sustainable locations were identified but without a New Settlement. All three would have involved a range of sites across a range of villages and towns with the new settlement option still retaining over 70% of the planned change in and around existing towns and villages. One area where the new settlement option differed from others is that it was considered capable of establishing a much longer term basis for development beyond the LP period. There is a likelihood that larger more strategic options may be able to support larger more strategic provision



## Background 2

of services, open space and transport opportunities. They will need but should be able to deliver greater environmental benefits providing for example biodiversity gain and should also better support local renewable energy provision.

**2.19** In early 2021 with the completion of the preferred option consultation, the responses to the exercise started to be considered and some potential alternative approaches were evaluated. These included a further look at the possibility of a measure of "dispersal" with the new settlement not being part of the strategy. The main settlements (villages and towns) were re considered. The broad constraints and opportunities were discussed and a strategy based on these was formed. It looks to increase the role of Lydney in a manner that will support a wider hinterland while taking advantage of opportunities elsewhere where they can bring benefits to the FoDD.

**2.20** A strategy for a new LP must look forward to the likely situation at the end of or at least well into the plan period. It should be suitable when proposed and also appear likely to remain so during the plan period taking account of changes that are considered likely. Changes in national policy and legislation will for example introduce stricter building standards seeking lower energy consumption, and greater biodiversity and the need for improved flood resilience is already having an impact on plans and proposals. The LP needs to be aspirational and quite ambitious if it is to meet its aims and objectives. It is a means of making provision for the future needs of the area in a manner that will support the FoDD in 2041, so must anticipate some changes as well as helping to make them. One important example is with transport. At present transport contributes the largest percentage of carbon emissions (over and above the use/ construction of buildings). Emissions must be reduced under both national and the more ambitious FoDDC targets. As a consequence the LP will need to plan for greater use of public transport as well as for an overall reduction in travel. Even though the current provision of public transport is not ideal and has been hard hit by the pandemic, new development must be located so that it can support improvements. It must encourage and support more sustainable patterns of travel, even if the means to achieve them need further development. Put more simply development locations must support the routes and interchanges that exist and can be improved. Locations where active travel can be promoted should be given priority in plan allocations.

**2.21** Any LP strategy will need to demonstrate that it is deliverable, and provide evidence to support this claim. It is required to ensure that a proportion of sites for housing are small (under 1ha), that overall the LP maximises the use of previously developed land and will support the area's needs over the plan period. A variety of sites are needed in any LP with a range of likely delivery times. A geographical spread is also desirable within the constraints that exist.

### 3. The Strategy

**3.1** The revised LP strategy has been drafted following a period of review. It is prepared as a draft for consultation and is capable of forming the basis for a sustainable LP which will provide guidance for the development of the entire district. The strategy provides a direction for the LP and sets its overall approach as well as identifying the main spatial elements which will be taken forward in its proposals.

**3.2** The strategy now proposed includes the following development themes:

- Major development at Lydney to support an enhanced role as a focal point for the FoDD. This will include the realisation of existing commitments and mixed development on new land beyond them as well as making better connections to nearby communities - The town itself will accommodate at least 33% of the new development proposed in the LP in a location presently accommodating about 14% of the current FoDD population.
- Development of land at Newent to support a mixed use site, to include improvements to circulation and transport and complimentary facilities to the centre.
- Redevelopment for mixed uses and regeneration of land at Beachley Camp.
- Supporting and sustainable mixed use developments at major villages and towns and at selected villages

**3.3** Underlying these will be the following:

- Ensuring that the LP policies and proposals do the optimum to address climate change within the strategy proposed
- Environmental protection and promotion of additional GI, supporting biodiversity and nature recovery
- Promotion of Lydney as the largest of the forest towns, increased employment retail and supporting services. Improving access to the town and support for nearby settlements
- Support for the towns and villages taking advantage of the existing networks and reinforcing or creating new sustainable transport and travel opportunities
- Guidance for rural areas to support their economic and environmental contribution
- Achieving a high standard of sustainable design

**3.4** The key features of the strategy are outlined below, though at this stage detailed allocations have not been decided. There will be a need to support the strategy and subsequent LP with further evidence yet to be compiled and which may influence the evolution of the strategy and LP itself.

## The Strategy Overview

### An enhanced role for Lydney

- **An enhanced role for Lydney featuring additional growth and improved facilities** to accommodate over 33% of new development in a location presently accommodating about 14% of the current FoDD population

**3.5** Within the FoDD there is no one dominant centre. The three Forest towns have to some degree competed with and complemented one another over a long period. Past LPs have sought to develop their complementary relationship in order to support their well being. In terms of development

## The Strategy 3

opportunities, these are greatest at Lydney where there is already a substantial level of activity, much greater than either Coleford or Cinderford. This reflects both the scope for change and the general economic environment. The LP seeks to encourage sustainable change in a manner that best achieves its aims and objectives and the strategy is to promote development in the best existing locations in order to deliver them. This means guiding a greater scale of change to Lydney. It is a suitable location to accommodate this and more importantly is well located to benefit the wider FoDD as well as enabling the town itself to offer a more self contained range of quality services. The scale of development which will be promoted will see over 33% of the LP's allocations at Lydney and this will include housing, employment and supporting services.

**3.6** Lydney is well located within the FoDD and already offers a good range of services and amenities. It is close to some of the largest villages in the district some of which are easily accessible by a variety of means. There is scope for additional development to support the town, providing it can benefit from improvements to the present travel facilities. The LP strategy is to encourage additional mixed development so that it can in turn support an enhanced role for the town as a centre within the FoDD. Better connections to nearby settlements and their own future development will be encouraged in order to support the town and wider linkages (such as rail and other public transport) must also be improved. The LP strategy recognises the need for additional development to support the enhanced role of the town, however the allocation of and support for this is only part of the strategy. Improved connections, services and environment will all be necessary in order to implement the strategy, and these will both support Lydney and benefit the wider area. A thriving centre, good recreation opportunities and an attractive and distinctive environment are necessary to ensure the town can do what is required by the LP strategy and ensure it is perceived as a good location for living, working and visiting.

**3.7** The previous LP identified Lydney as a location for major development as did that of 2005. The new LP continues this as a strategy with allocations envisaged for about 1300 new dwellings in addition to 1100 currently committed which will be expected to be implemented. The new LP will support Lydney as a town catering for a wider catchment and able to take better advantage of its location and potential. At present the town supports about 120 -150 housing completions per year so a further 2400 can be expected to be implemented over, between 15 and 17 years at the current rate of building. It appears that sites capable of supporting this level of development can be identified and that there is scope for the employment and other uses that will be needed.

**3.8** The land use proposals may represent the ultimate capacity for a town where the centre and other facilities remain reasonably accessible especially by walking. Some sites previously identified for employment may need to become mixed use in order to see the realisation of housing on the scale suggested. This proposal requires a masterplan for its implementation and integral to that will be extensive green areas for recreation and biodiversity, as well as allocations for employment and community uses. The influence of the Estuary must be considered along with protected sites elsewhere. Some of the town is vulnerable to flooding and part is within a catchment susceptible to rapid rises in water levels and flash flooding from the River Lyd. Landscape, land ownership and the location and influence of protected sites together with areas of forest do bring constraints that must be considered and will influence the plan.

**3.9** Of the three forest towns Lydney has the greatest potential and is the most accessible. It has in recent years shown it can attract major (developer) investment and the LP will channel this and other actions to support an increased role for the town to serve the district including both the settlements in close proximity and those further afield. Like all areas it is however vulnerable to changes in the wider economic climate. The current east of Lydney development was allocated in 2005 and did not commence until 2014 partly because of a global recession. For the strategy to be

## 3 The Strategy

successful a mix of development is needed. Most will generate returns for developers and contribute to the infrastructure and other development that will be necessary. The development will need to support educational provision and better transport services as well as recreation and open space provision. The delivery of affordable housing is a priority and this will be necessary as part of the new housing expected throughout the LP period.

**3.10** At present Lydney has a population of about 11000, and will grow to 15 - 16000 under the strategy. It is within 4km of another 7000 or so residents in villages to the north and southwest. This proximity means that there is the potential to improve the links between these settlements and Lydney, something which should support the town's services. Other connections such as any that bring greater use of the station should feature in the LP as should the continuing support for the regeneration of the harbour area which has so far brought real benefits to the town and wider district and will continue to do so.

**3.11** Past Local Plans have emphasised the complementary relationship between the forest towns and have sought to ensure that the competition between them is not to their detriment (hence identification of regeneration opportunities at Cinderford for example). They have also acknowledged the physical constraints of each and must continue to do so. The new LP must ensure that its overall strategy continues to balance these themes.

### Question 1

#### Lydney

Do you agree with the Council's approach for enhancing the role of Lydney featuring additional growth and improved facilities?

### Newent

- **Development of land at Newent - Additional mixed development in support of improved connections and facilities**

**3.12** The emerging LP included the possibility of significant new development at Newent in both its issues and options phase and in the 2020 preferred option. This recognised the potential for change mainly to the south east of the town on condition that it could provide improved access and support the centre as well as providing for better, wider transport connections. This proposal remains part of the revised strategy although the scale of any proposal is not yet fixed. It could accommodate about 600 new dwellings or possibly more and would include substantial green infrastructure, areas for improved biodiversity and recreation, employment and community facilities to accompany the new housing. Connections to the canal and its protected route and new and existing cycle routes would be expected.

## The Strategy 3

**3.13** Any change of this nature at Newent would need to demonstrate it would deliver both the development allocated and integrate with the existing town while providing the key benefits referred to above. It would be expected that an overall masterplan would be needed to ensure delivery would be in keeping with the wishes of the LP especially in respect of encouraging a more sustainable self contained settlement.

### Question 2

#### Newent

Do you agree with the Council's approach for the development of Land at Newent?

## Major villages and towns

- **Supporting mixed use developments at major villages and towns**

**3.14** The LP must provide for the entire FoDD in keeping with its aims and objectives as well as being in accord with the broad context set by the NPPF and other guidance as well as the Council's own corporate policies. The LP has a role in supporting some of these, and especially the various regeneration and community initiatives. Housing delivery (especially affordable housing) and support for the economy are particularly important and are also areas where the LP can have a direct impact. Identifying sites at larger and better connected villages and towns is likely to be generally sustainable and is one reason why Lydney and Newent feature above. Cinderford and Coleford along with the largest villages also merit support and are suitable locations for change. They have considerable need for affordable housing, and the continued identification and promotion of opportunities is a necessary part of the LP.

**3.15** Coleford and Cinderford in particular are physically constrained and are not able to accommodate large scale peripheral development. The LP strategy must recognise this but equally Cinderford has a long history of the promotion of regeneration and public investment (necessary in the absence of market interest) which has been necessary to address the economic and other inequalities that exist. Basic indicators such as relative deprivation cannot be ignored and the LP strategy will include sites for promotion, environmental improvements, and allocations. Previously developed land and its promotion will continue alongside the LP's identification of additional appropriate opportunities.

**3.16** The major villages in the FoDD include Tutshill/ Sedbury, Bream and Mitcheldean as well as Drybrook, Newnham, Lydbrook and Yorkley/ Pillowell/ Whitecroft. Some of these have good service base and are well connected. Some are physically constrained by the forest boundary for example. Overall these larger villages do present opportunities for change and new development in keeping with their locations. All have an identifiable local housing need and can benefit from a degree of change. The LP strategy is to make allocations in these locations.

## 3 The Strategy

### Question 3

#### Supporting mixed use development at major villages and towns

Do you agree with the Council's approach of supporting mixed use development at major villages and towns?

## Beachley

- **Redevelopment for mixed uses of land at Beachley**

**3.17** It is expected that the current MoD site at Beachley will become vacant during the plan period, and that it will be available for redevelopment during its mid or later part. As a previously developed site the LP should give priority to providing for its continued beneficial use. The site is capable of accommodating about 600 dwellings and other supporting development as well as employment or other uses as part of its regeneration. The location at the southern tip of a peninsular and directly below the old Severn Bridge is challenging and there is a need to demonstrate transport/ travel arising from the new development can be satisfactorily accommodated. The development proposed should be to a degree self contained with day to day needs being provided for on site along with suitable public transport opportunities. The land at Beachley it is being promoted on behalf of the owners and a jointly arrived at masterplan and LP allocation which sets out the requirements of the site is the preferable approach, given its brownfield status and availability.

### Question 4

#### Redevelopment for mixed uses of land at Beachley

Do you support the Council's approach for redevelopment for mixed uses of land at Beachley?

## Villages

- **Sustainable development at selected villages**

**3.18** In addition to the generally larger scale development proposed at the largest villages (taking account of their constraints), some sites are expected to be allocated for development including housing at suitable locations elsewhere. These will involve a few villages where there are suitable facilities including access to the transport network. These allocations will support their localities but are also a consequence of the approach of meeting the LPs needs in and around existing settlements.

## The Strategy 3

A dispersed model of allocations is likely to be the least sustainable approach and the village locations promoted must be well connected for current and future transport in order to ensure that this LP keeps to its objectives.

### **Question 5**

#### **Sustainable development at villages**

Do you support the Council's approach for sustainable development at villages?

## 4. Overall

- ensuring that the LP policies and proposals do the optimum to address climate change
- environmental protection and promotion of additional GI, supporting biodiversity and nature recovery
- achieving a high standard of sustainable design

**4.1** There are a great many environmental requirements, as well as social and economic elements that the LP can provide for or help achieve positive outcomes in respect of. These include conservation objectives, support for the economy and community facilities. Although the headlines in a LP are likely to be about the numbers of new dwellings to be provided, the delivery of improved conservation and design, better resilience, adaptation to climate change and low carbon solutions are just as important (possibly more so). The LP strategy must emphasise these and demonstrate why the location of new development it proposes is appropriate. Larger development allocations in the right place are for example more likely to be able to support strategic green infrastructure. Although sites when allocated and developed will need to be the subject of detailed environmental assessment, they are also assessed at a strategic level and adverse impacts or the risk of adverse impacts needs to be avoided. This is best done by careful location and the use of an appropriate strategy.

**4.2** While the headlines and especially the major elements of the spatial approach are outlined above, the overall LP strategy must facilitate some major changes in order to deliver its environmental and climate objectives. While there may be some options on where allocations for development are made, the following will need to be addressed by LP policies. The need to address these issues is a given but there is some flexibility as to how.

### Tackling climate change

- **ensuring that the LP policies and proposals do the optimum to address climate change**

**4.3** The LP strategy is to incorporate measures which are compatible with the FoDDC's declared climate emergency and its 2030 net zero target. These must be the best that can be achieved within the strategy proposed. Building performance and needs will be addressed principally through construction, use and transport. New buildings yet to be constructed will contribute to this to a varying degree depending on the prevailing building regulations or other construction requirements. They will however make a similar contribution wherever they are located except in respect of transport. The carbon implications due to differing transport demands arising from location are very significant and this is something the LP can (and must) influence. Dependence on private transport will always result in greater emissions and use of resources. The LP spatial strategy addresses this in proposing a suitable distribution of new development concentrating on better serviced and larger settlements. It seeks to avoid the need for travel where possible and after that ensure that it guides change to areas that will be served as much as possible by active and public transport. Policies within the LP will support encourage and where possible for example require more sustainable construction, better



designed and orientated buildings and provision of renewable energy and possibly the development of local networks. The LP strategy is to ensure development becomes more sustainable and its policies and site specific proposals must do this.

### Question 6

#### Tackling climate change

Do you support the Council's approach for addressing climate change?

## Improving and Protecting the Environment

- **environmental protection and promotion of additional GI, supporting biodiversity and nature recovery**

**4.4** Deliver environmental protection including promotion of additional GI, supporting biodiversity and nature recovery. The LP will make allocations in conjunction with development, but also identify mechanisms and locations that are independent.

### Question 7

#### Improving and Protecting the Environment

Do you support the Council's approach for Improving and Protecting the Environment?

## Design

- **achieving a high standard of sustainable design**

**4.5** Achieve a high standard of sustainable design - promotion through new guidance. Good design, protection and enhancement of character and quality of place are essential components of several key aspects of the vision and are important to the community. Their promotion is an important part of the strategy.

## 4 Overall

**4.6** While the present LP strategy is as set out above, the overall approach to local planning must be to maintain an up to date and suitable plan. The present review is intended to set a deliverable LP in place which looks forward to 2041. As indicated above, it does this partly through considering what the FoDD should be like in 2041 and deriving policies and proposals to get there. LPs are however reviewed on a regular basis and need to be rolled forward so that they provide adequate guidance far enough into the future. This LP will be likely to be reviewed in its early stages and will need to assess the needs of the area incorporating new evidence and taking into account the performance of this (2021- 2041) LP. It will be appropriate to review the spatial strategy and consider how if at all this will need to change to provide for the future. It will almost certainly be necessary to review the appropriateness of the spatial elements of this strategy and revisit alternatives including the possible adoption of a strategy that looks to new settlement(s) in the light of both the area's capacity and the need for a continued and probably more rigorous emphasis on sustainability.

### Question 8

#### Sustainable Design

Do you agree with the Council's approach to achieve a high standard of sustainable design?

## 5. Approach

**5.1** The implications of the draft strategy are considered briefly below, firstly in respect of how the strategy and LP will address the LP vision and seek to implement it. Secondly the implications of the spatial strategy are considered in the form of an illustrative table of the distribution of development that could result. Thirdly reference is made to the general LP policies that will be needed in addition to the basic allocations for development in order to support the strategy.

### Assessment of Strategy - Plan Vision

**5.2** The strategy is assessed below against the overall points from the plan vision. The following table illustrates how it will be expected to deliver over the period to 2041.

Table 2 Strategy and plan vision

<b>Key point from vision <u>as amended</u></b>	<b>Principal LP actions</b>
<p><b>Deliver carbon neutrality through strategies and plans</b></p> <p><b>The district is actively engaged in pursuing a low carbon future and new development is designed to adapt to climate change.</b></p>	<p>Prioritise and promote a sustainable future - and demonstrate that it is doing so against benchmarks- policies and proposals must demonstrate they support FoDDC targets and national objectives. The proposed strategy will support these and is compatible with the need for carbon reduction. It is less likely to be the most sustainable option but is likely to perform better than a strategy with a greater degree of dispersal. Promoting development in a relatively few concentrated locations and making these more self contained and sustainable will benefit this objective.</p>
<p>In 2041 younger people are more likely to want stay in the district with good access to education employment and housing</p>	<p>ensure housing availability in terms of tenure, type and total supply, plan to provide access to educational opportunities</p> <p>encourage range and availability of employment. Maintain an attractive environment- guide development to appropriate locations. The strategy as proposed will support this objective promoting a range of well serviced locations.</p>
<p>The needs of an ageing population have also been incorporated into the design {delivery} of new development</p>	<p>provide development in accessible locations with good access to facilities, support, require and encourage provision of facilities- supported by strategy</p>
<p>It is a place where healthy lifestyles are an everyday part of living and working in the district.</p>	<p>require good design of inclusive development and its environment, provide accessible recreation space, walk/ cycle provision- LP strategy of selected and relatively concentrated locations should better support this objective</p>

## 5 Approach

Key point from vision <u>as amended</u>	Principal LP actions
The implementation of sustainable development enhances the quality life for residents and visitors alike	improve access to facilities by a variety of means, approve long term enduring designs and plans, ensure development that takes place is future proof and sustainable- the proposed strategy addresses this issue
The diverse landscapes and heritage of the area is so distinctive that it is recognised nationally and internationally	ensure protection and enhancement of the landscape, include overall policies that support conservation and development that is compatible - a relatively concentrated pattern of development as promoted is likely to be compatible with this objective providing the locations chosen respect landscape and heritage.
A thriving tourism market is underpinned by a high quality natural and built environment	robust conservation policies and allocations that maintain the quality of the environment and protect from undesirable impacts- the draft strategy supports these aims and objectives
The lack of affordable housing has been addressed through imaginative and sustainable ways providing an appropriate range of tenures which support local communities, services and facilities	delivery of affordable housing to address local (FoDDC) need, in locations which benefit from and support local services- the draft strategy will support this objective
The area has resilient and diverse employment opportunities with strong links to good local schools embracing in particular industries of the future	provide for a range of employment and educational opportunities and policies to deliver/ allocate suitable sites  enable employment change for example to more IT based and additional homeworking- the strategy of concentration on a few sites and raising the profile of Lydney will support this objective
The district is better connected through improved transport, digital and mobile data connections which reduce the need to travel and provide a distinctive local offer	include policies that support sustainable locations and enable service provision in an efficient manner- the concentration element of the strategy will support this objective
The Forest of Dean is known as an amazing place to start and grow business	support and enhance quality of environment, provide physical support for new business in sustainable locations and a range of sites. Policies to support enterprise.- all deliverable with the strategy as proposed

## Approach 5

**Question 9****The strategy and plan vision**

Do you agree with the Council's assessment of the strategy against the overall points from the plan vision?

**Scale and distribution of housing**

**5.3** The emerging strategy could involve a general distribution of new housing as set out below. Supporting facilities and other development such as employment opportunities will need to be provided for approximately in proportion with the major allocations made. While the housing figures are provisional and they do not include the contribution from small sites of less than five dwellings except in the summary at the foot of the table, it shows how the "need" (as defined in the government's standard method) as it is currently understood may be met. Small sites throughout the district are expected to add over 60 units per year (1200 over 20 years).

**5.4** The LP will have to show how it can provide for development throughout the plan period and will also need to contain some "carry over" to ensure continuity. It needs to include some allowance for non implementation (sites allocated that do not come forward). Although it is certain to be reviewed several times between adoption and 2041, it needs to show how it meets the needs as they are presently identified over the whole period, even though the approach and numbers required are likely to change over time.

**5.5** The table below is an example of the scale and distribution of housing that the LP would need to provide for in order to implement the draft strategy. It is provided in order to illustrate the nature of the distribution that the draft strategy would require, and may change as potential allocation sites are examined in more detail. It could also change if the draft strategy itself was to be amended, for example following the consultation exercise. The table presents possible housing totals but other allocations for development and for open land for recreation, GI etc would accompany these, broadly in proportion with the scale of development planned.

**Table 3 Scale and distribution of housing**

<b>LOCATION</b>	<b>TOTAL HOUSING new to LP (approx)</b>	<b>EXISTING COMMITTED (approx)</b>	<b>Broad approach</b>
Lydney	1326	1134	Major focus in terms of scale of housing also employment and supporting development

## 5 Approach

LOCATION	TOTAL HOUSING new to LP (approx)	EXISTING COMMITTED (approx)	Broad approach
Newent	600	376	Development allocation proposed in support of improved connectivity and support for existing town
Beachley	600	0	Redevelopment and regeneration of previously developed land
Cinderford	100	569	Regeneration for the town with and emphasis on redevelopment sites, and supporting investment
Coleford	107	487	Policies and proposals to support town and its function, regeneration of Five Acres site for community uses
Major Villages	907	321	Development to support the largest and most accessible locations where constraints allow
Other Villages	554	138	development to support most accessible locations
town + Beachley total	2733	2566	74 % of allocation in these five locations
total	4194	3025	
With allowance for small sites and windfall total is 4194 + 3025 + 1200 (small sites) + 500 (windfall) = 8807 or 20% over 7440.	The above meets the current (May 2022) assessment of need and any subsequent change in the assessment either through a change in the method or the use of different figures may alter this.	The above is subject to change as sites are reviewed in detail, potentially reducing the number.	

## Approach 5

**Question 10****Scale and Distribution of housing**

Do you agree with the Council's approach for the scale and distribution of housing?

**General policies proposed**

**5.6** In addition to identifying sites for development, the strategy requires the LP to cover the a wide range of subject areas in order for it to be implemented. The table below illustrates these and provides a guide to the general policies that the LP may need to include.

**Table 4 General policies proposed**

<b>Policy or policy area</b>	<b>Intentions</b>
Sustainable development	General outline of principle of sustainability- fundamental to LP and strategy and also required by national guidance
Net biodiversity gain/ nature recovery/ building with nature or equivalent	Requirement for biodiversity improvements as part of development- necessary principle for LP and strategy- may benefit especially from larger planned allocations and allocations to facilitate nature recovery, principle of building with nature or equivalent to be tied to development proposals- all support
Development in the countryside	Regulation of development away from defined settlements- supports strategy in protection of environment and rural areas
Settlement heirarchy	Principle of allocation and scale of development expected- supports strategy in location of development and broad sustainability
Mixed land uses	Encouragement of mixed uses- intended to promote reduced travel and support sustainable development
Infrastructure provision	Need for infrastructure and efficient provision- supports strategy in seeking development in locations where suitable infrastructure is or can be provided
Green infrastructure	Need for and allocation of Green Infrastructure- supports strategy and likely to benefit especially from larger development allocations which can better enable GI

## 5 Approach

<b>Policy or policy area</b>	<b>Intentions</b>
Renewable energy	Support for renewable energy and guidance for locations- can support local networks benefitting from major allocations in strategy and overall positive approach as required in national guidance
Design principles	Design principles including climate, aesthetics and accessibility/ inclusion - supports a key element of strategy
Historic character and distinctiveness	Support for historic character - supports strategy quality of environment
Locally distinctive areas	Support for distinctive settlement areas- supports design element of strategy
Land of recreation and amenity value	Recreation and amenity land provision and protection
Locally valued landscapes	Local landscape policy - protection
Flooding and water quality	Flood risk and water quality
Site conditions	Site conditions pollution, contamination etc
Community facilities	Provision of community facilities and protection of existing- major allocations may be better able to provide, some allocations may provide support for new existing and improved facilities- supported by strategy
Major sites- allocations	Broad spatial distribution of major development - reflects strategy
Other allocations	Other allocations
Employment uses- allocations and retention	Encouragement and allocation of employment uses
Housing delivery, affordable housing, adaptable homes, custom and self build, specialist accommodation and Gypsy and Traveller and Showpeople provision	Basic policies covering provision and type of housing, essential in support of strategic aims and objectives
One planet development/ low carbon schemes for sustainable living	Support for exceptional sustainable low impact housing related to land.
Space standards	Adoption of nationally described standards for housing
Economic development	Support for broad economic development
Town centres	Overall support for mixed use centres
Allocation policies, detailed settlement policies	An extensive range of proposals making site allocations in accord with the strategy



## Approach 5

Policy or policy area	Intentions
Cycle routes	Part of promotion of active travel and increased recreational opportunities.

**5.7** Although this strategy is a draft it is an important step in the LP process, and should set the context for the more detailed policies and proposals. It and the LP will be progressively supported by more evidence, and further consultation. The overall approach is one for which formal approval has been sought as a preferred option for the LP.

### Question 11

#### General policies

Do you agree with the general policies that the Council proposes to include in the local plan?

### Any further comments

### Question 12

#### Are there any further comments you wish to make?

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

## 6. Useful Links

### [Economic Needs Assessment 2020](https://www.fdean.gov.uk/media/3otmd5cb/gloucestershire-economic-needs-assessment-2020.pdf)

<https://www.fdean.gov.uk/media/3otmd5cb/gloucestershire-economic-needs-assessment-2020.pdf>

### [Flood Risk Assessments](https://www.fdean.gov.uk/planning-and-building/planning-policy/flood-risk-assessment/)

<https://www.fdean.gov.uk/planning-and-building/planning-policy/flood-risk-assessment/>

### [Forest of Dean Local Plan Evidence Base](https://www.fdean.gov.uk/planning-and-building/planning-policy/our-current-local-plan/local-plan-evidence-base/)

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

### [Forest of Dean Local Plan Supporting documents](https://www.fdean.gov.uk/planning-and-building/planning-policy/supporting-information-for-the-local-plan-2041/)

<https://www.fdean.gov.uk/planning-and-building/planning-policy/supporting-information-for-the-local-plan-2041/>

### [Gloucestershire Local Housing Needs Assessment Final Report 2020](https://www.fdean.gov.uk/media/pulc3euu/gloucestershire-local-housing-needs-assessment-2019.pdf)

<https://www.fdean.gov.uk/media/pulc3euu/gloucestershire-local-housing-needs-assessment-2019.pdf>

### [Heritage Paper 2019](https://www.fdean.gov.uk/media/kwcduehl/heritage-character-assessment.pdf)

<https://www.fdean.gov.uk/media/kwcduehl/heritage-character-assessment.pdf>

### [know your Place](https://www.kypwest.org.uk/)

A digital mapping project that is putting neighbourhood's heritage on the map -  
<https://www.kypwest.org.uk/>

### [Magic Website](#) -

The MAGIC website provides authoritative geographic information about the natural environment from across government.

[National Model Design Code](https://www.gov.uk/government/publications/national-model-design-code) <https://www.gov.uk/government/publications/national-model-design-code>

### [National Design Guide](https://www.gov.uk/government/publications/national-design-guide)

<https://www.gov.uk/government/publications/national-design-guide>

### [Strategic Housing Land Availability Assessment](https://www.fdean.gov.uk/planning-and-building/planning-policy/strategic-housing-land-availability-assessment/)

<https://www.fdean.gov.uk/planning-and-building/planning-policy/strategic-housing-land-availability-assessment/>

### [Strategic Landscape Assessments 2022](https://www.fdean.gov.uk/planning-and-building/planning-policy/our-current-local-plan/local-plan-evidence-base/)

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

### [Streets for a Healthy Life](https://www.gov.uk/government/publications/streets-for-a-healthy-life)

<https://www.gov.uk/government/publications/streets-for-a-healthy-life>

### [Sustainability Appraisal](https://www.fdean.gov.uk/planning-and-building/planning-policy/sustainability-appraisal/)

<https://www.fdean.gov.uk/planning-and-building/planning-policy/sustainability-appraisal/>

### [Viability study](https://www.fdean.gov.uk/media/0ewl3r1a/fod-viability-final-report-only.pdf)

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

## 7. Survey questions



FOREST OF DEAN DISTRICT COUNCIL  
**OUR LOCAL PLAN**  
WORKING TOGETHER FOR A BETTER FUTURE

**HAVE YOUR SAY AND HELP  
US TO CREATE OUR PLAN**

The questions below are a complete list of all the questions found throughout the document.

### Question 1

#### Lydney

Do you agree with the Council's approach to enhance the role of Lydney featuring additional growth and improved facilities?

### Question 2

#### Newent

Do you agree with the Council's approach for development of Land at Newent?

### Question 3

#### Major villages and towns

Do you agree with the Council's approach to support mixed use development at major villages and towns?

### Question 4

#### Beachley

Do you support the Council's approach for redevelopment for mixed uses of land at Beachley?

## 7 Survey questions

### Question 5

#### Sustainable development at villages

Do you support the Council's approach for sustainable development at villages?

### Question 6

#### Tackling climate change

Do you support the Council's approach for addressing climate change?

### Question 7

#### Improving and protecting the environment

Do you support the Council's approach for improving and protecting the Environment?

### Question 8

#### Sustainable design

Do you agree with the Council's approach to achieve a high standard of sustainable design?

### Question 9

#### The strategy and plan vision

Do you agree with the assessment of the strategy against the overall points from the plan vision?

## Survey questions 7

**Question 10****Scale and distribution of housing**

Do you agree with the Council's approach to the scale and distribution of housing?

**Question 11****General policies**

Do you agree with the general policies that the Council proposes to include in the local plan?

**Question 12****Are there any further comments you wish to make?**

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

