



Forest of Dean
— DISTRICT COUNCIL —

Council name	Forest of Dean District Council
Name and date of Committee	CABINET – 8 October 2020
Report Number	PH.451
Subject	LOCAL PLAN PREFERRED OPTION
Wards affected	ALL
Accountable member	Councillor Chris McFarling, Cabinet Member for Planning Policy Tel: 01594 810000 Email: Chris.McFarling@fdean.gov.uk
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Summary/Purpose	<p>The review of the Council's current Local Plan (LP) comprising Core Strategy and Allocations Plan has been commenced and a range of issues and options were identified and consulted on in 2019. These have now been further considered along with the feedback received and additional assessment of potential sites and options. A number of draft plan policies setting out the general approach for the new LP have also been informally considered. This report however focusses on the selection of a strategic option and seeks endorsement of this together with approval for a consultation exercise based on this option. It is not yet fixed but it is expected that the strategic option will guide the content of the draft plan.</p> <p>From the issues that have been identified a range of generic options were suggested which could represent strategies for the LP to follow. These have been further considered and are evaluated in the attached paper. This report is a distillation of that evaluation and should be considered alongside the full document, and in the light of other evidence referred to.</p> <p>The LP programme has been affected by the pandemic and is consequently delayed. In addition government has published a white paper seeking views on a major reform of the planning system. This could change the nature and delivery of the LP but is at the consultation stage at present. Government has also signalled an intent to make changes to the current planning system on an interim basis. The most significant of these for the LP is a further change to</p>

	<p>the calculation which is used to determine housing provision. It could mean a very great increase in the number of dwellings required in the LP to the point where it is considered undeliverable.</p> <p>.</p>
Annexes	Annex A Local Plan 2041 LP Strategic Option Paper
Recommendation/s	<p><i>a) To approve and endorse a strategic option for the Forest of Dean Local Plan and to recommend it to Council</i></p> <p><i>b) To approve the consultation of the Local Plan preferred option and to recommend it be approved by Council</i></p>
Corporate priorities	<p>Improve community wellbeing, supporting and celebrating our distinctiveness.</p> <p>Develop a vibrant economy that is resilient and future proofed.</p> <p>Provide a range of affordable housing to meet the needs of the District.</p> <p>Protect and enhance the local environment and address the climate emergency</p>
Key Decision	No
Exempt	No
Consultees/ Consultation	Prior consultation in respect of the new Local plan, Issues and Options 2019

1. BACKGROUND

- 1.1.** This report asks Cabinet to approve key elements of a broad strategy for the new Local Plan (LP) based on the previous Issues and Options consideration. It is concluded that an option which includes the establishment of new strategic development in three locations and involves a new settlement, the expansion of Newent and a new mixed development on previously developed land at Beachley delivers the best LP option. This is considered best placed to be sustainable in terms of climate change and will establish a strategy which can carry on beyond the present end date of 2041. The recommended location for the new settlement is close to Gloucester in the area served by the A40 and A48, complementing the other major development at Lydney, Newent and Beachley. As this strategy marks a significant change to previous ways of delivering the development needs of the district it is considered that it needs to be considered by Full Council at this stage.
- 1.2.** This strategy best delivers the changes required in a manner that is compliant with the Council's Corporate Plan and the LP's own vision. While the headline items of the strategy are as outlined above, it is emphasised that much development will take place in accord with existing commitments and there will also be an element of continuity sites allocated over the district mainly of a non strategic nature. These will support existing settlements providing for their needs over the plan period. The large scale development at Lydney will continue through at least the first half of the LP period and will in effect be a fourth strategic site.
- 1.3.** In order to progress the LP, approval of a strategy is sought, and at the same time it is considered necessary to carry out consultation based on this. The second recommendation therefore seeks approval to carry out such an exercise. The decision on the strategy and the consultation will provide a suitable context for the draft plan and enable additional evidence material to be collected knowing it will support the LP.

2. MAIN POINTS

2.1. Context-

The current context for the emerging LP includes the National Planning Policy Framework (NPPF) and related guidance and the means of establishing a housing requirement that has evolved since 2018. It also includes the Council's own corporate objectives including an intent to "Support climate change resilient places, communities and businesses, and enhance environmental quality and biodiversity through the review of our Local Plan" (p8 Corporate plan 2019-23). The LP is one of the key routes through which this and other objectives must be delivered including the intent to achieve carbon neutrality for the Council by 2030.

- 2.2.** There is a new government White Paper (WP) proposing radical change to LPs and Development Management, but it is at present a discussion document only. If implemented it would necessitate a complete change to the form and content of a LP. There is also a government consultation paper in respect of change to the existing system which would form an interim step to any more radical change. This does not affect the form of the emerging LP but its recalculation of the housing requirement which Local Authorities (LAs) would have to provide for would have a major impact.
- 2.3.** Although presently unclear what the binding housing requirement for the district would be, the starting point would be a figure of 12,162 dwellings required over 20 years as opposed to the present new plan figure of 7440. This may not be the final target because it would be subject to a process that takes account of any constraints, such as Areas of Outstanding Natural Beauty (AoNB) or Special Area for Conservation (SAC) as well as areas at risk from flooding. It would be calculated by government. Although this change is only a proposal at present it does suggest a significant upward shift in the number of dwellings that the LP would have to provide for. There are many issues arising from these two sets of proposed changes, and the nature and content of the emerging LP may be greatly affected by them. For the present and given the status of the two consultations, the LP is being prepared as indicated above, using guidance that currently applies. A move to a housing figure of 12,162 would effectively double the present requirement to identify new sites, to about 8000 new dwellings.
- 2.4.** Under the current requirements the LP will need to provide for development including about 4000 dwellings on sites not currently identified over the 20 year plan period. It must do this in a manner that makes the optimum contribution to the reduction of carbon and in a manner that can deliver environmental gains including green infrastructure. Carbon reduction means providing locations that promote less travel, provide for increased active travel and public transport and are well located for shared facilities whether existing or new. They must also support the prudent delivery of infrastructure and the constructions themselves must be energy efficient and well designed and planned.

2.5. Overall constraints

Over the (Forest of Dean District) FoDD there are a variety of constraints on development as well as opportunities. The former include designated areas such as AoNB within which major development is not appropriate though smaller local change may be beneficial. Constraints include those designated wildlife sites which are not able to be developed and more local designations which also need to be respected. Areas at risk from flooding are also largely excluded. As well as designated areas there are landscape considerations which are constraining. Some areas of complex relief would be difficult to develop and the landforms are in many localities (whether designated or not) attractive and important areas of countryside worthy of protection in their own right. The Forest of Dean, (ie statutory forest (FoD)) itself contains various designations but it and its related woodlands are not able to be proposed for development with very few exceptions

such as sites already built on. Although communications and access is generally reasonable in the FoDD, there are differences between the various areas and allied to this some localities are well placed for access to services by various means of transport while others are not. The two AoNBs, the FoD and the uplands associated with it generally form the most constrained parts of the FoDD along with those affected by the main SACs along the Severn and Wye rivers as well as the numerous sites identified which host bats.

2.6. Opportunities

Areas which present potential development opportunities include previously developed land which may be suitable for new uses, and locations which are relatively free of constraints and can be afforded or already have good access to facilities in larger settlements. Opportunities of this nature can be identified in the various settlements across the district. Change should be in some way proportional to the size and nature of settlements to which it relates or it may be promoted where the necessary facilities can be made available. Access to facilities and importantly job opportunities will involve looking at services, jobs and other facilities outside the FoDD but to which it has suitable access. The need to provide a new LP over a relatively long period can mean that there is an ability to promote comprehensive mixed developments in appropriate locations and develop new or enhanced services.

2.7. The LP will need to continue to provide for the needs of existing settlements in a manner that supports their function and overall sustainability. Existing committed sites will serve part of this role, and although they will be reviewed and some may be deleted it is considered appropriate to retain most. To these retained sites, many of which are being developed at present there may be scope for further additions. This is however limited by the nature of the settlements and constraints which apply. These in turn mean that the LP must consider options that go beyond the incremental expansion of places that have spare capacity and the realisation of existing commitments. Sources of information include sites suggested over the various calls for sites and those identified during the now complete re survey of all the defined settlements in the LP.

2.8. Looking at the potential for growth at the main settlements the following major considerations apply:

Lydney: Currently there are permissions or allocations capable of supporting almost 1,500 new dwellings in Lydney, some of which are under construction. Beyond the areas covered by these there may be some limited opportunity on unconstrained land that is well related to the town. The current level of commitments and activity means that they will probably provide new dwellings over at least the next ten years and it is likely that the build rate (151 completions 2019/20 with four active national builders) is at or near the maximum that can be sustained.

Cinderford: There are sites yet to be developed at Cinderford which are allocated and have permission, (about 600 committed) but beyond these there is little scope

because of the statutory forest and landscapes/steep slopes as well as the protected sites which surround the town. The LP will continue to support the Cinderford Northern Quarter as an important aspect of its strategy.

Coleford: Sites capable of accommodating about 550 dwellings can be identified at present in Coleford and immediately surrounding villages. Beyond these the forest boundary and some designations represent firm constraints and the locally valued landscape which sits between Coleford and the forest edge settlements is another constraint supported by the Neighbourhood Development Plan (NDP) and the current LP. AoNB and its setting is a further consideration in some areas. There is therefore limited potential at Coleford.

Newent: Partly constrained by a watercourse and floodplain to the north, the protection of the town centre from the impacts of development is also important with its concentration of Listed Buildings and some access constraints. The town, set in an attractive landscape is considered to have some potential for expansion especially in the south east. To enable this local access and wider travel issues (including alternatives to car borne commuting) must be satisfactorily addressed and improved for new and existing development.

Note: the above general conclusions in respect of the four towns were set out in the Issues and Options Report of 2019.

Tutshill Sedbury and Beachley: Tutshill and Sedbury make up the largest settlement in the FoDD after the towns but effectively function as part of Chepstow. Although affected by various constraints and presently affected by congestion around the A48, there are some opportunities for additional development. One, possibly the largest, is that Beachley camp is planned to be disposed of by the Ministry of Defence (MoD) and presents a large area brownfield site for which an alternative use will need to be found. Transport and access to and around Chepstow is currently the subject of an extensive study and development on either side of the border will need to demonstrate that it can be accommodated bringing any necessary improvements.

Bream: As one of the largest FoDD villages, Bream could support some change, having services and being relatively accessible. Most of it lies in or on the edge of the statutory forest however and additional parts may be constrained by former iron mines, the associated cavities and the designated SACs.

Mitcheldean: Mitcheldean hosts a great deal of employment, related services and is quite accessible. It is a potential location for additional change although the current allocations have not been taken up. The settlement is quite constrained by landscape and nearby SACs but remains suitable for some growth.

Newnham: well served although the Conservation Area and nearby SACs must be fully considered. There is some potential for additional change to the north of the village adjoining the new development now commenced.

Drybrook: commitments for over 110 dwellings at present and limited by landscape and forest

Lydbrook: limited by relief, AoNB and forest, relatively little scope for additional development

Yorkley/ Whitecroft and Pillowell: limited by landscape and forest, some limited scope for additional development including land presently allocated at Whitecroft.

Table 1 Indicative allocations for a strategy using existing settlements only

	Current commitments	Indicative additional allocation	Additional sites for maximum capacity: notes
Lydney	1500	250	Some additions beyond existing commitments
Cinderford	600	130	Little scope beyond current allocations some redevelopment potential
Coleford	550	300	Some allocations including in locally protected landscape
Newent	400	700	Major development plus smaller sites within town and on periphery
Tutshill Sedbury Beachley	180	800	Beachley Camp mixed development plus additional land at Tutshill Sedbury
Large Villages and others for new allocations	850	1275	Maximum capacity of potential sites- Newnham, Mitcheldean, Bream also probably developments in settlements such as Huntley and Woolaston
Total	4080	3455	Maximum capacities are identified in the list above- within these there is potential for smaller scale allocations
Difference from 4000 sought		-545	Can provide with a large number of allocations

2.9. Existing settlement capacities The table above indicates the possible scope for existing capacities in settlements across the district using a combination of sites including some suggested during consultations that are considered suitable and others identified as part of the LP process. Most are large incremental additions to existing settlements but several would be more strategic major sites. Major development is assumed at Newent, Beachley and another location or two such as

Huntley. This is for the purpose of illustration of how a LP option based around the expansion of existing settlements would have to deliver. It is broadly in keeping with the settlement hierarchy except where new major allocations are possible and these would need suitable supporting infrastructure. All potential sites would need additional consideration before they could be allocated but the main points are that the option is one that represents the ultimate capacity of most areas and it is one of dispersal. It does fall short of the current running target of 4000, implying an additional 500+ dwellings would need to be accommodated. These could be on smaller or larger sites and would further stretch the capacity of the area to provide suitable sustainable opportunities.

- 2.10.** Alternatives The Issues and Options paper of 2019 highlighted the same issues that the above table shows, these being the general lack of capacity over the FoDD and also the need to make compromises in order to accommodate the scale of change that is sought. These include the identification of sites that are constrained, may have locally important protective designations and leave little capacity for future plans. More importantly the strategy of dispersal reduces the ability of new development to share infrastructure and new facilities and may place further stress on existing facilities. There is less scope to identify items such as Green Infrastructure (GI). Overall the impact would be spread across the FoDD with localised effects occurring where land is allocated.
- 2.11.** A dispersal option spreads the “load” and does not rely on just a few sites, although in this case it would require a small number of larger allocations because the capacity does not exist elsewhere. Some sites would be better located to benefit from transport networks that exist. Overall the option could be delivered to the current level of housing required. It would not perform well in terms of sustainable development where there is an ability to reduce travel and provide sustainable development in the best locations.
- 2.12.** Alternatives to the above were proposed at the Issues and Options stage. The development of a new settlement was considered and has the following advantages and disadvantages:
- It can be part of a planned long term strategy
 - It should be better able to contribute to carbon reduction by economies of scale, location and providing facilities as required in one place
 - It can deliver community facilities and supporting GI, landscape
 - It can be planned as a sustainable location and designed accordingly with purpose built infrastructure such as schools making the optimum use of available land
 - Provision of affordable housing may be better achieved as part of a single settlement
 - The location can be chosen to benefit the area (for example where it can contribute to better transport links)
 - To make an allocation requires considerable supporting (evidence) material

- It requires major infrastructure
- It will take a long time to be developed (so must be regarded as available in the mid or later part of the plan period- this may however provide a degree of regulation of the likely pace of development)

2.13. In the FoDD the LP option that includes a new settlement is considered to have considerable advantages. It is not an exclusive option, but would exist alongside a range of other sites. These would be taken from those considered in table 1 but without the need to select all. Development which can sustainably support existing settlements would continue both as existing commitments are built and with new allocations.

2.14. The location of any new settlement must be considered at this stage in the context of other elements of the strategy and known major constraints.

- Major development is considered appropriate at Beachley and at Newent as part of a LP.
- Lydney in effect forms another strategic site.
- Much of the FoDD is orientated towards Gloucester/ Cheltenham and this brings benefits and problems too.
- There is one railway and the main lines of communication are the A40 the A48 and the A4136 as well as the A417 and some north to south secondary routes.
- The least physically constrained areas in the FoDD are in the east and north.
- Much of the employment and higher level services used by the FoDD are in the Gloucester area.
- Active travel should be considered but is best implemented where origins and destinations are reasonably close.

2.15. The above suggests a location near the main routes of travel, though the modes of travel will need to change to be more sustainable. Physical constraints mean that a location near the core of the Forest is not possible.

On balance the major strategic sites which it is recommended the LP should include are Lydney (predominantly the existing allocated land), Newent, chiefly to the southeast, Beachley Camp for mixed development and a new settlement in the vicinity of the A48/A40 with potential to connect to the railway.

Table 2 illustrative new settlement option, possible distribution of allocations

	Current commitments	Indicative additional allocation	Additional sites for maximum capacity: notes
Lydney	1500	150	Some additions beyond existing commitments

Cinderford	600	130	Little scope beyond current allocations
Coleford	550	100	Some allocations in locally protected landscape
Newent	400	600	Major development plus smaller sites within town and on periphery
Tutshill Sedbury Beachley	180	800	Beachley Camp mixed development plus additional land at Tutshill Sedbury
New settlement	0	2000	Ultimate capacity greater than 2000- depends on location and phasing, 2000 assumed by 2041
Large Villages and others for new allocations	850	250	Maximum capacity of potential sites- Newnham, Mitcheldean, Bream also probably developments in settlements such as Huntley and Woolaston
Total	4080	4030	Possible scales of development above are illustrative to show how current 2041 LP requirements can be addressed
Difference from 4000 sought			Can provide

- 2.16.** There is presently considerable uncertainty with regard to the future housing requirements that LPs will have. Even if they remain the same or similar to the present, additional flexibility in meeting plan totals is desirable. This enables changes sought by an Inspector at examination to be better addressed and provides scope for a LP to show how it would deliver continuity beyond its current plan period. Some form of allowance for non implementation of allocations is also necessary in demonstrating the robustness of a LP.

3. NEXT STEPS FOR THE LOCAL PLAN

- 3.1.** This report considers strategic options. While it takes account of development possibilities which have been highlighted during the recent call for sites and at the

issues and options stage, and the individual sites proposed have been studied and evaluated, the considerations above do not imply any particular proposal will or will not be expected to be allocated. All will be considered on their merits having regard to the preferred option for the LP and its needs. At this stage in the LP the Council welcomes further dialogue and information in respect of the potential content of the LP.

- 3.2. From the increasing amount of evidence being accumulated the next major step is to compile a draft LP. This will be a complete plan which will be approved by the Council for further consultation. It will at the time it is approved represent the views of the council and will be a material consideration in determining planning applications. It will be the subject of a further full consultation the results of which will be used together with any additional evidence to compile a revised plan. This revised plan will be subject to a further consultation before the responses to this, and the plan is submitted for examination. It is not expected that the plan be further changed as a result of this final consultation except as part of the examination process.

4. CONCLUSIONS

- 4.1. The above report supplements and also summarises the wider discussion in the attached document, Preferred Options. It supports the LP going forward in a manner that best delivers against the current levels of housing required, in a manner that best meets the Council's corporate objectives.
- 4.2. Two basic approaches have been considered and illustrated, the first based around existing settlements but with a number of larger "strategic" allocations and the second with strategic sites including a new settlement. The former stretches capacity in reaching the overall requirement and would result in a dispersed pattern of new development which would not perform as well in respect of overall objectives nor as part of a long term strategy. The latter would not soak up all available capacity, would not require allocations where some constraints are not respected, and could establish a long term pattern. It would allow focussed attention on transport infrastructure provision including active travel.
- 4.3. There are areas in common with the two approaches due in part to the existing committed sites that would be largely taken into the new LP as allocations and also the common new proposed allocations at Newent and Beachley. Furthermore both provide for continuity of development meeting the needs of individual settlements by existing commitments and new allocations.
- 4.4. It is recommended that the attached document be the subject of consultation in respect of the LP strategy accompanied by supporting material. Although the LP itself would contain a number of general policies and various allocations the decision sought at this stage is the endorsement of a strategy which encompasses the following:
 - Providing for about 4000 new dwellings over and above present commitments

- Identifying new strategic sites for mixed development at Beachley of the order of 600 dwellings, Newent of the order of 600 dwellings and in the vicinity of the A48/ A40 close to Churcham of the order of 2000 dwellings within the LP period.
- Identifying further development opportunities in accord with the settlement hierarchy at towns and larger villages
- The strategic allocations are only to be delivered alongside satisfactory transport and travel provision to reduce the need for travel, provide for active travel and support public transport.

4.5. The above refers to the current calculation in respect of housing required in the FoDD. Any revision (as may be included in the development of proposals by government currently being consulted on) may require further consideration of the strategy.

5. FINANCIAL IMPLICATIONS

5.1. The cost of the current plan making exercise is substantial whichever option is chosen.

6. LEGAL IMPLICATIONS

6.1. It is a requirement for the Council to have an up to date Local Plan. The proposals sought for approval here are consistent with the development of an up to date plan and the proposed process follows the relevant regulations.

7. RISK ASSESSMENT

The possible strategies carry risk and potential delays also are risks that there will not be a LP in place when required by government. External events (pandemic and now proposed changes to the planning system) are substantial risks to the programme, the former having diverted some resources and caused delay and the latter may lead to a very different kind of new LP.

8. EQUALITIES IMPACT

No implications: the process will ensure all who wish to engage in the consultation are able to do so.

9. CLIMATE CHANGE IMPLICATIONS

The LP must consider the implications of its policies and proposals for climate change. The importance of this is referred to in the report and supporting information. There is a risk that the dispersal option will perform much worse than one where a new planned settlement is able to be promoted and developed in a

suitable location. This is one very significant reason for the choice of the recommended option.

There are differences also in the ability of each to deliver against the Council's corporate objectives. Overall the recommended option is considered to perform much better in respect of achieving the district's and wider climate change objectives.

10. BACKGROUND PAPERS

The following documents have been identified by the author of the report in accordance with section 100D.5(a) of the Local Government Act 1972 and are listed in accordance with section 100 D.1(a) for inspection by members of the public:

National Planning Policy Framework, 2019

Planning Practice Guidance

Local Plan Evidence Base documents (see website for details)

Local Plan Issues and Options paper, 2019

Local Plan Preferred Option paper 2020.

These documents will be available for inspection at the Council Offices during normal office hours for a period of up to 4 years from the date of the meeting. Please contact the author of the report.