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1 introduction

1.1 This document shows how the possible alternative strategies for the Forest of Dean Local Plan have been considered in respect of the plan's vision and objectives. It includes a broad assessment of the options and relates them to the wider local and national environment, to the adjoining areas and to the FoDDC's own corporate objectives.

1.2 The Issues and Options paper of 2019 identified that there would be a likely need for the LP to provide a range of development opportunities along with other policies. It was considered at the time that land for about 4000 dwellings would need to be identified in addition to those currently permitted and or allocated.

Box 1

Potential changes to housing requirements and the Local Plan system, consultations

1. There are two potential areas of change being considered by government which will affect the LP and which are currently at the consultation stage
2. The number of 4000 additional dwellings remains the one considered for these options, but a government consultation in August 2020 has proposed changes to the way in which housing requirements would be calculated and this has changed the potential requirement to one which may require an additional 8000 homes and a total of over 12000 over the 20 year period (as opposed to the current running total of 7440). The new figure has little status at present and the consultation suggest it would be subject to a process whereby local constraints (such as AoNB) would be taken into account providing some variations from the calculated figure. It is nonetheless likely that there will be changes during the gestation of this LP in the way in which housing requirements are to be derived. The governments intention is that they would be binding requirements and that across the country the annual delivery of new housing would be set at 300 000 dwellings per year against the 241 000 achieved in the last year.
3. More fundamental are the possible changes to the planning system contained in the White Paper, Planning for the Future published in August 2020. This proposed a major change to Local Plans and to Development Management. It would be sufficient to require the LP to be redesigned although much of the evidence base would be applicable. The WP is the subject of consultation until 29th October after which further information is expected. It has generated much comment and debate.

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1.3 A number of constraints were identified in relation to considering where these may be built. Some constraints such as AoNB are nationally recognised and rule out major development. Others of this nature which generally preclude development include SACs, SSSI and areas prone to flooding. These constraints will need to be considered however the requirements of the LP are derived.

1.4 In addition to nationally recognised constraints, there are some of a more local nature that may guide development choices. Typically these include areas identified as locally important landscapes, or key wildlife sites. They are designated in order to protect identified assets so while they affect development choices but can be overridden.

1.5 At the same time as seeking to avoid constraints, a LP must deliver parts of the FoDDC's wider corporate agenda. This means using policies to protect sites and require certain forms of development as well as selecting the optimum locations. A plan's allocations and policies must be shown to have a positive effect overall.

1.6 Any portfolio of sites identified in the LP must perform well in supporting the economy, the community and above all addressing climate change.

1.7 A Local Plan (LP) is a planning document that is intended to bring local solutions to address the needs of an area. It must take the local and national context and provide policies and proposals that deliver the aims and objectives of these by means of its policies and proposals. The LP will not be able to be adopted (will not come into force) if it does not base itself on evidence and demonstrate how it meets the objectives that are set. It must show how it addresses the corporate objectives of the body that owns it (FoDDC), and should do as much as possible to achieve them. The key issues and areas for the LP to act are set out below:

<u>Plan issues with key issues in heavy type</u>	<u>What LP needs to do</u>
Overall issue: a sustainable long term outcome	Prioritise and promote sustainable future and deliver on sites and by strategy (enable delivery). <u>NOTE: a sustainable future includes delivery of development that is compatible with climate change and promoting actions that reduce carbon emissions in recognition of the declared and acknowledged climate emergency</u>
Access	Policies to ensure good physical access and digital access/ connectivity overall and for identified development locations

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<u>Plan issues with key issues in heavy type</u>	<u>What LP needs to do</u>
Access to facilities	Ensure efficient and effective access to facilities/ services from new and existing development locations- physical and electronic access
Access by a variety of means of transport	Policies to use public transport, walking and cycling and to encourage provision to enable walking/ cycling as well as promoting/ allocating sustainable locations
Access to employment opportunities	Provide opportunities for a range of employment including home working
Create and retain balanced communities	Provide a mix of housing and employment and other development, alongside recreation opportunities and community facilities
Ability to adapt and innovate	Plan to be able to cope with some degree of change including new initiatives and designations. Facilitate appropriate exemplar schemes
Conservation- built environment	Support conservation through policies and proposals.
Design	Policies to achieve good overall function, appearance/ quality of design/ energy efficiency and resilience
Design accessibility	Policies to ensure accessibility within development for a variety of means of transport
Design durability	Need for long term enduring designs and plans
Design inclusive	Ensure the design of inclusive development (reference in policy)
Economy	Promote a more diverse and robust economy support and promote a range of opportunities (sites and activities)
Economy widen range as appropriate	Identify range of employment opportunities
Economy employment range of sites	Provide a range of sites

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<u>Plan issues with key issues in heavy type</u>	<u>What LP needs to do</u>
Economy support for enterprise	Policies to support new and existing enterprise
Economy- sustainable tourism	Promote to increase overall benefit/ quality
Education	Access to educational opportunities and ensure provision where there is new development
Education new opportunities	Facilitate new and improved educational opportunities
Environment	Net gain principle applied to carrying capacity and protection; overall sustainability
Environment avoid flood risk	Take account of flood risk and likely changes to risk including changes in sea level, increase in extreme events
Environment- green infrastructure	GI policies to identify land and principles
Environment- landscape protections and enhancement	Protection and enhancement of the landscapes, identification of locally valued landscapes
Environment quality of allocations	Allocations that maintain the quality of the environment and seek improvements where possible
Environment quality overall	Aspirational policy for improvement/ enhancement and overall approach
Environment resilient against climate change	Policy to ensure resilience of allocations and individual allocations that comply. Policies to support and encourage renewable energy, additional tree planting for sequestration etc.
Housing	Mix of types and overall delivery sufficient to meet needs, deliver Affordable Housing all to be long term sustainable in terms of location and construction
Housing AH addresses local needs	Allocate sites that can provide affordable housing to address local need, enable "exceptions" sites. Allocations and delivery policies provide housing as far as possible where it is needed

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<u>Plan issues with key issues in heavy type</u>	<u>What LP needs to do</u>
Housing AH in locations to benefit from services	AH in locations which benefit from and support local services
Housing numbers	Allocations must be deliverable/ developable-adequate overall housing supply 5 year and plan period
Housing type	Housing availability by type including self build and tenure
Previously developed land- make best use of	Policies to support and bring forward previously developed land
Spatial strategy that is accepted/ supported by residents	Planned changes need to be explained and understood/ accepted by community
Town centres- support and vibrancy	Effective TC policies for sustainable active places (mixed development)
Other Major site specific issues	
A48 connectivity	Addressing the constraints imposed by A48 at Gloucester and Tutshill
Gaining positively from West of England and South East Wales City regions	Plan policies which take advantage of nearby major strategic plans and strategies
Gaining positively and being part of the Gloucestershire Plan (benefitting from it and contributing to it)	Plan solutions which take account of and benefit from Gloucestershire strategy

1.8 The above list can be used both as a checklist for the LP and eventually as a means of monitoring. It takes the overall theme of ensuring that the LP's delivery of development is compatible with climate change and promoting actions that reduce carbon emissions in recognition of the declared and acknowledged climate emergency. This means that the LP should be directed to maximising the reduction of carbon emissions through its policies and proposals. In doing so it will need to ensure that it delivers or enables the development that is needed in the FoDD during the period 2021-41.

1.9 In meeting the requirement for a sustainable form of delivery, the LP must take account of and address issues of transport, infrastructure and the well being of the community and the local economy. It needs to do all of this whilst safeguarding and bringing about improvements to the natural and built environment. The policies to

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guide and the proposals to identify land for specific development or protection must ensure that a balance is maintained between assimilating new development and protecting the well being of the environment and the community.

1.10 It is achieving this balance that is both the most challenging aspect of a LP and also potentially where the greatest success may be measured. This may be judged by considering the vision set out in the Issues and options paper or by reference to the table above.

1.11 There will be alternative courses of action that a LP may take. These will include both alternative policies (different approaches) and alternative proposals (different allocations- showing how the needs of the area may be met by varying the pattern of new development (sites) that are being promoted). Options for the FoDD exist in both areas, though there is less scope for the variation of the policies in many cases because they are directed to the delivery of national and local policy or are directly linked to important local characteristics. The LP will need for example to promote Green Infrastructure, it will have to have a policy directed to increasing renewable energy provision and will embrace the government's net gain in biodiversity. Where local circumstances (supported by evidence) support particular policies these may be added. The likely performance of the LP is assessed as it is created through a Sustainability Appraisal. This is used to evaluate and amend the LP policies and proposals as it evolves in order to achieve the best overall results.

1.12 Within certain constraints the LP should therefore guide the distribution of new development. It must provide for the appropriate level of change and adhere to certain quite extensive guidance but that still leaves a range of potential options. These will vary and overlap, but at the issues and options stage the following were presented:

1. **Selective planned expansion of existing settlement(s). This is limited to those where there may be sufficient scope to provide part of a strategic option by selecting particular settlements and choosing to promote them possibly alongside infrastructure improvements for a greater scale of development than would otherwise have been the case.** A study of the FoDD and the various main constraints that apply suggests that there are restrictions in terms of the capacity for change at many of the existing settlements. This may limit the choices under this option. Given the finite capacity, the resulting strategy may not be able to provide for the longer term (beyond the plan period).
2. **Maximum incremental change to the extent of absolute constraints. This option would simply consider the ultimate capacity of settlements and allow development where possible, it could be likened to the application of the NPPF presumption in favour of sustainable development.** This is an option which could also be termed dispersal although the bulk of any change is expected to be directed to existing settlements in a manner that respects the main constraints it relies on the allocation of new sites across the widest possible range of settlements. It is the option most akin to the "do nothing" option.

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3. **Planned new settlement(s). The identification of one or more new settlements and the promotion of a scale of development that would create a community supported by appropriate infrastructure.** The option to provide a new or substantially new settlement or settlements which will establish a sustainable long term option as part of the LP strategy.
4. **Negotiated agreement that some development will be passed to adjoining authority(ies). An agreed major element of the FoDD required development would be met in an adjoining area.**

1.13 The above options were included in the Issues and options paper on which there was a full consultation in 2019. They were proposed after considering the most fundamental constraints in order that they may be realistic. Although it is inevitable that this will limit the range of options that could be proposed there is nothing to be gained from assessing or considering an option that could not be entertained because of a conflict with national policy.

1.14 In deriving the above and ensuring that each is tenable, there is also a degree of convergence especially between options one and two, and four is really an alternative strategy that LAs are able to consider only under specific circumstances. It is considered unlikely to be able to proceed. The issues and options consultation did result in some support for options one to three and these are considered below with particular attention paid to whether they are deliverable and how well they may deliver the wider LP and FoDDC corporate agenda.

1.15 The Issues and Options paper did conclude that the options are in effect headline strategies and that whichever one would proceed, if any, there would be an element of others in the final LP. This is both inevitable and desirable in that a number and range of development across the district (in sustainable locations) is likely to be promoted in order to support individual communities. The level of these "continuity" allocations could vary and the LP strategy may be to enhance or reduce them according to the its chosen approach. Like all options and elements of options, as well as individual sites, all will be the subject of sustainability appraisal as well as much further assessment.

1.16 The Issues and options exercise resulted in responses from a variety of individuals and organisations. Overall there was support for the options one two and three, with substantial support for the new settlement option as well as the more conventional approaches. The protection of the environment and carbon reduction/climate change were considered important by a large number of respondents. A relatively large number of responses were related to the promotion of specific sites. Following this exercise the LP process now needs to consider its strategic options and their contexts.

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2.1 The spatial options for a plan depend not only on what change it has to accommodate but also and crucially on the environment (and environmental capacity) of the area in which they will be delivered. Having indicated that there is likely to be a need for a range of new sites to be identified for development, it is necessary to look at some important (initial) constraints which need to be taken into account.

Statutory forest

2.2 The statutory forest boundary encloses a large proportion of the FoDD. Within it are many freeholds and substantial parts of some of the largest settlements in the district. The woodland and associated non planted areas, many of which form boundaries to more built up areas or lie within them are owned by the Crown and cannot be developed. Land within the freeholds can be considered in the usual way in the LP but these areas are almost all tightly defined by areas of forest (Crown land). Their expansion for built development into the surrounding forest areas (planted or not) is therefore not possible. The current AP policies map shows the statutory forest and in addition there are some outlying woodlands where the same restrictions apply. Whilst expansion of built development into areas of woodland would normally be a difficult process, in the FoD it is not possible. In addition to this much of the woodland (FoD and other areas) is either ancient woodland or is former ancient woodland and that too is protected from development including under the revised NPPF. The statutory forest boundary and the freeholds within it cover about 17% of the district which amounts to about 9358ha.

Designated sites

2.3 There are a great variety of statutory and non statutory designated sites in the FoDD. The NPPF establishes a hierarchy of designated sites and those of national importance cannot be developed nor should development that is proposed have an adverse effect on them. These (SAC, Special Areas of Conservation, and Ancient Monuments for example) are spread throughout the FODD. Features defined in the NPPF as of local significance should be avoided. Many of the designated areas are also within other protected areas such as the FoD itself or the Wye Valley AoNB. The main areas where ecological designations are concentrated are the Wye Valley, close to the Severn Estuary and the Forest of Dean itself.

2.4 There are two AoNBs affecting the FoDD. Whilst these are not absolute constraints on development, major new development would not be expected (NPPF172). The current identified AoNBs are affected by other constraints and any strategic development option should avoid them.

2.5 The various designated sites are shown on the current Policies map which accompanies the Allocations Plan <https://www.fdean.gov.uk/planning-and-building/planning-policy/adopted-local-plan/>

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Areas prone to flooding

2.6 Throughout the FoDD there are areas that are at risk from flooding, including areas of low lying land associated with the Severn Estuary and the River Wye. In addition, there are floodplains associated with smaller rivers such as the Leadon and the Lyd. These limit the scope for development though not to a great extent. The majority of the areas concerned are unlikely to be considered for development but where watercourses run through existing settlements (for example Lydney and Newent town centres) there are limitations imposed by this. Broad areas that are susceptible to flood risk (lie within flood zone 2 or 3) would need to be excluded from those considered for most types of new development.

2.7 Flooding from surface water is a more local matter and individual sites will need to take account of this, with particular regard to that associated with the rivers and some of the areas low- lying land. Areas prone to rapid run off also impose additional constraints.

2.8 As an initial guide the EA mapping of flood risk areas provides guidance suitable for this strategic level of evaluation. It is normal practice to allow for the effects of climate change in planning for future development and the LP will need to do so, taking account of the latest available evidence in respect of the possible rise in sea level, and other potential changes such as the possibility of more extreme flood events. These considerations are likely to influence the plan and its options in providing for a sustainable long term future.

Relief

2.9 Relief is not an automatic constraint on development in the FoDD, however there are areas where slopes are acute or where landforms are broken and complex that would make development very difficult (if it were even desirable because of landscape issues). Most of the higher land is in the south and west of the district, and other constraints also apply to much of these upland landscapes. Some are protected for ecological importance, much lies within the statutory forest and the Wye valley AoNB for example.

Landscapes

2.10 The various landscape characteristics over the FoDD bring a variety of constraints and opportunities for development. Many of the more complex landscapes are areas where other constraints apply and this is especially true in respect of the FOD and the Wye Valley. Other landscape areas are however vulnerable to change and need to be respected in considering development opportunities. Low lying land near the Severn Estuary is especially vulnerable and like other areas may also be affected by other designations and therefore need to be protected. Any major

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development will inevitably have an impact on a landscape and its assimilation into an appropriate setting with suitable design is essential. Some landscape types are much more able to accommodate change than others.

Accessibility

2.11 Constraints tend to be interrelated. For example, areas of complex broken relief may be less accessible, woodland may be more likely to be of ecological importance and areas further away from the large settlements tend to be less well served by roads suitable for a variety of traffic. Accessibility in the physical sense is often cited as a major constraint to development in the FoDD. It does limit options and there is a perception of relatively poor access to much of the district. In addition there are clearly apparent "pinch points" at the Gloucester and Tutshill/ Sedbury extremes of the A48. Here the issue is network capacity though that needs to be addressed from the standpoint of alternatives to travel and alternative means of travel as well as considering physical improvements. Plans may however seek improvements and may also try to identify opportunities that make the most of the existing infrastructure. This approach, which includes the encouragement of improved IT connections is an important aspect of how the LP may be made more resilient as well as sustainable.

2.12 Access to the rail network is via a single passenger station at Lydney, or others out of the district at Chepstow and Gloucester. This could only conceivably change with significant major investment and is an important consideration in evaluating development locations and options.

2.13 Not all the above constraints are absolute, but all do have an effect on the potential of areas affected to accommodate new development. Generally the larger the potential site the greater the impact, so for example small schemes for additional housing are expected to take place within the AoNBs but major sites are unlikely to be acceptable. There is a broad pattern of constraints which are illustrated on the policies map and which shows clear differences within the FoDD in terms of the degree to which various areas are affected.

Major constraints in the larger settlements

2.14 The settlement pattern in the district is quite varied and includes most notably a distinct and relatively concentrated form around the edge of the statutory forest. There are four towns, three of which are of a similar size and the fourth, Newent is slightly smaller. All serve their surrounding hinterlands, are relatively sustainable locations for development and have been the subject of relatively large changes under the AP and the previous Local Plan. They are each affected by some key constraints including those listed above and the extent to which these apply is a major consideration in framing Issues and Options for the 2041 LP. In addition, there are some more specific characteristics that need to be taken into account which affect the potential for the accommodation of further change.

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Lydney

2.15 There are a high number of housing commitments in Lydney which will be built out over a number of years. They are sufficient to provide for a build rate up to the maximum that is assumed to be able to be sustained over a period that extends well into the next plan period. Further allocations even if there were land available would not therefore necessarily add to the numbers able to be delivered per year during the early years of a LP but could extend the time over which new housing could be delivered in Lydney. There were about 1500 outstanding housing commitments in March 2020. A realistic assumption for housing delivery in Lydney may therefore be that new building at about the current rate (151 completions recorded in 2019/ 20) will continue for about 10 years.

2.16 The above consideration does not in itself rule out further allocations at Lydney which could extend the period over which new housing could be delivered. There is scope for a degree of change but there are some very real physical constraints which preclude major additional development. There may also be a case for a period of assimilation following the final development of the land to the east of the town. Policies to support and bring forward additional employment services and other facilities will need to be reviewed and are expected to be part of the new plan alongside the continuation of the regeneration theme. The areas of land involved are likely to be similar to those already allocated (but not developed) under the 2026 AP.

2.17 The proximity to the Severn Estuary is a constraint on development, although with the possible exception of the lowest lying land not an absolute one. Strategies to ensure there is no undue pressure on the estuary from recreation are already needed and will continue to be necessary. Areas prone to flooding will need to be avoided. The town shares part of its boundary with forestry commission woodland which is one constraint and the landscape forms another. When read alongside the land limited by flooding and the separation imposed by the railway and bypass, the potential for the identification of major sites is further reduced.

2.18 As far as the plan options are concerned, There may be some limited scope for new allocations at Lydney but on initial examination of the basic constraints, landscape, ecology, land use (forest), and potential flooding will be limiting factors. For the purposes of plan options, a small additional allocation may be assumed, albeit site(s) have yet to be identified.

2.19 Lydney does interact with the other forest towns and is in a position to attract trade which may at present be lost to Chepstow. Its position on the A 48 is an advantage but the A48 itself is constrained where it leaves the FoDD at Chepstow and close to Gloucester. The main line station is a major advantage over other locations.

Cinderford

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2.20 In Cinderford the main constraints are more apparent than in Lydney and some are absolute, limiting scope for change. There were about commitments for about 600 dwellings identified in Cinderford to 2026. These are associated with a variety of new and previously developed sites. While there may be some scope for additional previously developed sites to be identified this is limited especially in view of the need for all sites to be able to show that they are viable however they may be developed. The current commitments include land which may be developed in partnership with Homes England and much of this is owned by the FoDDC. Outside the land currently identified for some form of development, the opportunities are very limited. It is not possible to entertain options that involve incursion into the statutory forest. Other landscape constraints would also preclude much of the land to the east of the settlement, where the settlement is not directly bordered by forest. Only about 20% of the settlement boundary is not within the statutory forest and also less than 25% of the settlement itself lies outside it. The boundary not within the forest largely comprises very prominent and attractive land which tends to be steeply sloping.

2.21 Cinderford is in a position to have some influence outside the district and being close to Ross could compete to a degree. It is well related to interact with the other forest towns and is the closest of the three to Newent. The LP will be expected to continue to support the present FoDDC regeneration policies and especially the development of the Northern Quarter. It is the location for the new FoDD hospital.

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Coleford

2.22 Coleford currently has a similar number of housing commitments to Cinderford (600). It is for current planning purposes regarded as Coleford town together with a nearby arc of settlements which have as their "outer" boundary forest or forest waste. Although functionally together, planning policy seeks to retain a physical separation between Coleford and these nearby settlements. There is no need to retain a functional separation, but assuming the physical visual gap is to be retained this is a major constraint. The maintenance of the gap is strongly supported by the AP and the NDP. Other landscape constraints exist such as the close proximity to the AoNB, and the relief and attractive nature of the land to the north of Berry Hill. Aside from the current opportunities identified in the AP there may be some scope for additional housing but after initial consideration it would appear limited. Although this approach could be changed to enable the development of land between Coleford and the surrounding settlements this would be a fundamental change leading to a less easily interpreted landscape and also a much less attractive and locally distinctive one. The approach would be contrary to national and local policy. Development proposing this change would need to demonstrate that it would add to the overall quality of the area, and that it was sympathetic to local history and the local and wider landscape. These requirements are considered very unlikely to be able to be met by development of any scale.

2.23 The above constraints apply to all types of development and although there are current sites identified for new employment uses around Coleford, these are in relatively short supply.

2.24 Overall, although constrained, the basic principle that Coleford should be able to accommodate a degree of change as with the other towns should be accepted. It is a relatively sustainable location. As indicated above however, outward expansion will need to be relatively modest and limited in particular by landscape and the forest boundary. The existing commitments are likely to provide new dwellings just beyond the present LP period (ends 2026).

2.25 Coleford is well placed to benefit from changes in the other two forest towns and to complement them. It could potentially have some influence outside the district but this is likely to be at a low level given the nearby presence of Monmouth.

Newent

2.26 Unlike the other three towns, Newent is not constrained by the presence of the statutory forest or related woodlands. It is set in an attractive rural setting. There are in the centre a large number of Listed Buildings which mainly lie within the Conservation Area. Land around the town is variously constrained with the notable case of the protected route for the canal to the north and the area potentially at risk from flooding beyond that. Some areas in the centre are also at risk from flooding whilst accommodating a variety of town centre uses. There are areas that are less

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constrained around the town and could offer some potential. The need to provide access to the centre and to ensure that any development that does take place does not do so to the detriment of the centre is an important consideration. Overall there is identifiable potential in Newent especially in the southeast for some change, especially if it could bring benefits to the remainder of the town through infrastructure and accessibility improvements. Outstanding commitments for housing (about 370 on large sites) are generally likely to be taken up in the short to medium term. There is some scope for further employment land to be developed and also a need.

2.27 Newent's relationship with the remainder of the FoDD is more detached than is the case in the forest core (Cinderford, Coleford and Lydney) so any shared benefits from additional development would be less apparent than between the three towns. It is also in a position where commuting to Gloucester/Cheltenham is most apparent and improving the sustainability of this relationship is an issue for the new plan.

Tutshill/Sedbury and Beachley

2.28 The southern part of the FoDD and the Tutshill/Sedbury and Beachley area in particular is in a strategic position within the FoDD at the "pivot point" between the West of England and the South East Wales City region. This may produce both pressures for development and provide scope for benefits.

2.29 Tutshill/Sedbury is functionally part of Chepstow which provides many of the services and facilities needed. It is situated at the extreme south of the FoDD. There are some major constraints that affect the area but equally some opportunities. Both the Wye and the Severn which are close by are internationally important protected areas (SAC). The area is one that is along with Chepstow presently experiencing considerable housebuilding activity and the three sites within the FoDD (all under construction) are likely to be completed in the short- medium term with delivering 246 new dwellings. Beyond the current commitments there is scope for additional development but this would need to fully address any access issues both locally and on a wider basis.

2.30 Situated further south on a peninsular is Beachley which contains at present an army camp around a smaller, older settlement and an area of settled dwellings, formerly a series of huts. The latest defence review (2016) suggested that the MoD would seek to close the camp by 2027 and if this intention remains the Plan will therefore need to consider a variety of potential uses. Beachley Peninsular is constrained by access and by its proximity to the Severn and Wye estuaries but if the camp is vacated there will be opportunities for beneficial change.

2.31 As it is located at one of the identified A48 and transport pinch points, Tutshill/Sedbury and Beachley is the focus of current discussions about how possible solutions to benefit both Monmouthshire and Gloucestershire, as well as the wider

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areas may be implemented. At a wider level, the accessibility to the FoDD from Bristol and Southeast Wales and ensuring that this interaction is of benefit to the FoDD is an issue for the Plan.

Larger villages

2.32 The largest villages in the FoDD ranging from Bream and Mitcheldean to Lydbrook and Newnham have some committed development sites and most had allocated development sites in the outgoing AP. There is potential for additional development at some of these although similar constraints apply to those around the towns. The capability of the villages to provide services and therefore represent reasonably sustainable locations also varies. In a few cases there may be opportunities for larger developments, notably where sustainable transport linkages can be made use of and where there is the opportunity for existing services and facilities to be supplemented. There are also smaller villages that have some facilities or potentially good (public) transport accessibility which can be considered for allocations of new development. This strategy amounts to a rekindling of the village expansions seen in the 1970s with FoDD examples including Longhope, Mitcheldean and Huntley but if applied today it would need a greater emphasis on providing a mixed and sustainable form of development and would need a more contemporary (sensitive) approach to environment and landscape. The list below summarises the larger villages, their main constraints and potential.

- Bream population about 2600- large village much of which is constrained by forest, good facilities, and accessibility- some scope for additional development where landscape and statutory forest is not a constraint. Overall it has limited potential due to constraints but is a suitable location for additional allocation(s).
- Drybrook Harrow Hill- Large/medium village of about 1500 population and quite well served by local facilities, access indirect, constrained by forest and landscape. there are current allocations (2020) for about 120 new dwellings. Very limited potential beyond existing allocations which will add about 20% to the current population.
- Mitcheldean population about 2200- large and well served with a range of facilities especially major employment. It is quite accessible; landscape and ecology is a major constraint- The current allocations have not yet been implemented. Size and facilities support additional sustainable allocation(s) though landscape/ ecological constraints may be limiting factor
- Newnham population about 1200- medium size but well served and accessible, current allocation 80+ soon to commence constrained in all but north where additional potential may exist, subject to ecological considerations. Scope for additional development and allocation.
- Lydbrook Worrall Hill and Joys Green population about 1500- medium size and physically constrained also close to forest and AoNB. Some services accessible but not from main transport route and there are major landscape constraints.

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There is a current single allocation on a brownfield site. Some flooding constraints. Overall very little or no scope for additional allocations.

- Yorkley Pillowell and Whitecroft Population about 2000- large group much of which is heavily constrained by relief, forest and landscape but some scope for change including allocated site; accessible and some facilities. One current mixed allocation and limited potential for new allocations.
- Blakeney population about 700 medium size with some facilities and accessible constrained by landscape, and relief but accessible for public transport routes. No current allocations but only limited scope for additional allocations.
- Huntley population about 950- medium size but with limited facilities, potentially accessible location- fewer constraints than some locations but limited services, may have scope for additional development
- Littledean population about 800, some services but close to Cinderford, landscape constraints limit scope
- Longhope population about 900- some services but limited by landform and limited scope for additional development
- Ruardean population 1100- some services constrained by landforms leaving only limited scope
- Sling population about 800- constrained by forest, and ecology; close to employment but has few facilities, one allocation at present with little additional scope
- Staunton/ Corse population about 700 heavily constrained by historic settlement pattern and buildings, Conservation Area, currently two allocations but little capacity beyond
- Woolaston population about 700 potential landscape constraints; some limited facilities has a current allocation (36) and application- potentially accessible by public transport.

2.33 The above list indicates that it would be possible for the LP to identify land at a number of villages for further development. It does also show how this potential is limited by primary constraints. Whilst a limited number of allocations would sit as part of an overall strategy and form part of the continuity element of any LP, to raise the number to the full capacity would make such allocations part of the LP strategy which would then become one of dispersal of new development.

2.34 Although not a limiting factor like many constraints, the inability of a particular site or option to make a positive contribution to sustainability is a vital consideration. Planning and plans should be seen as a positive activity (NPPF para35). Constraints will limit choices but the relative advantages to be gained from new development must also be taken into account. Overall a strategy that delivers the best portfolio of development options rather than one that simply meets the overall targets is likely to be the most appropriate for the LP and for the FoDD.

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3 strategic options

3.1 Taking account of the above, there are some clear guidelines that plan allocations will have to respect. Some will prevent certain choices while others may limit them or affect them in another way. The fact that a particular site is identified and able to be developed does not guarantee it will be the best performing option in terms of sustainability, climate change and against the FoDDC's other corporate objectives. One fundamental requirement is for the LP and its SA to evaluate the effect of the LP against either a do nothing or a minimum intervention option. Here the "minimum intervention" would amount to enabling sufficient land to be developed but would not seek the most sustainable pattern of development, merely one that is achievable. This may be a policy of relative dispersal of new development. As a principle it may be able to enable the quantity of development required but would most likely lose or dilute any strategy of promoting the most sustainable option. The options and variations discussed below will vary considerably in performance.

3.2 The LP process involves the testing of overall options, strategies and sites both generically and at a more detailed level. Individual sites are being assessed as are overall options as part of the SA (Sustainability Appraisal) process. The performance of each will be compared and the LP will proceed with a preferred option. It must be deliverable, viable and able to address the objectives of the LP. It must demonstrate that the amount of development required can be delivered over the plan period.

3.3 The LP options will need to be evaluated against the following:

3.4 climate change/ carbon reduction The overarching theme of the LP is to deliver the greatest benefits in carbon reduction that can be achieved whilst meeting the needs of the FODD. Some options will inevitably perform better than others in this respect. The ability to reduce the need to travel, and to introduce new public transport and active travel measures are important as is the need to use new infrastructure economically and provide for efficient energy use. It is important to evaluate the long term performance of any option including its ability to deliver beyond the current plan period.

3.5 landscape the impact of development on the landscape- individual and cumulative impacts on local and wider landscapes, and on individual settlements need to be taken into account. Some sites may be able to bring an enhancement while at the other extreme sites that may still be able to proceed may require extensive mitigation.

3.6 locational strategies The settlement hierarchy is based on the principle that the scale of any development should be in keeping with the level of facilities and services that can be easily accessed. This includes access to transport and employment but it is accepted that "self containment" will vary greatly. New allocations should be based on the principle that they are in proportion with the level of services

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that exist or can be provided and should be in step with the hierarchy as it is or will be as the plan is implemented. Although there may be large sites capable of development in relatively inaccessible locations, they are unlikely to perform well in terms of sustainability. Many LPs have an underlying strategy of supporting and promoting new development in keeping with the available services. The outgoing FoDD AP does this with its emphasis on the towns then major villages, although the actual allocations are made in a manner which provides for greater change in one town, in order to deliver a mixed form of development in the most sustainable location.

3.7 timing and pacing of development- the LP needs to identify a range of sites so that the annual requirement of new dwellings may be delivered over the whole plan period. This may be achieved by phasing of allocations (adding dates to the allocations policies) so that some will not come forward until a certain year. The policy may provide some flexibility but early development may be hard to resist.

Timing of development may also be affected by the nature of the allocations themselves. Large sites may take several years to be completed. At present some sites that are currently available are being built out but will not be completed for a number of years. Others may take several years to come forward. A range of site types in a variety of suitable locations in keeping with the needs of the area is required.

3.8 The basic options (excluding that of development partially in adjoining district council areas) have been described as follows. These are proposals for development yet to be committed and are considered in respect of a need for 4000 new dwellings over and above the present level of commitments and allocations. Some of these are likely to be smaller sites, as the NPPF requires at least 10% to be small sites and some will be sites identified in order to support local continuity. The basic options have been described as follows.

1. **Selective planned expansion of existing settlement(s).** This is limited to those where there may be sufficient scope to provide part of a strategic option by selecting particular settlements and choosing to promote them possibly alongside infrastructure improvements for a greater scale of development than would otherwise have been the case. This option is similar to that in the current AP.
2. **Maximum incremental change to the extent of absolute constraints.** This option would simply consider the ultimate capacity of settlements and allow development where possible, it could be similar to the application of the NPPF presumption in favour of sustainable development.
3. **Planned new settlement(s).** The identification of one or more new settlements and the promotion of a scale of development that would create a community supported by appropriate infrastructure. Any new settlement option would need to demonstrate how the complete strategy including the New settlement would benefit the district overall.

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3.9 Although they have been considered previously the following is a summary of the likely general advantages and disadvantages of the above.

OPTION- salient feature	ADVANTAGES	DISADVANTAGES
<p>1 selective expansion</p> <p>The main elements of this strategy would be selected major developments at existing settlements. These would be complemented by a range of other allocations in accord with the other policies in the LP.</p>	<ul style="list-style-type: none"> • allows settlements best suited to change to be identified • enables LP policy to support selected locations, and for example regeneration policies • should support development in most sustainable current location(s) (for example Lydney in 2018 AP) with • some scope for sharing infrastructure • will allow range of sites in terms of locations and sizes- provides for continuity • can allow or result in phased approach 	<ul style="list-style-type: none"> • may not enable long term strategy • could force allocations that have adverse impacts • scope likely to be limited by lack of capacity in/ around existing settlements • choice of locations for development may be more driven by availability of land than being the most supportive of the LP strategy overall • may stretch infrastructure by relying on existing provision
<p>2 maximum incremental development</p> <p>Note: smaller incremental schemes will continue as current permissions are taken up and new LP continuity allocations are made and implemented along with unidentified windfall development</p>	<ul style="list-style-type: none"> • potentially offers a wide range of sites- size and location • is flexible • some sites are unlikely to be constrained by the need for additional infrastructure 	<ul style="list-style-type: none"> • does not allow overall LP approach- more akin to NPPF presumption in favour of "sustainable development" • would not address climate change and sustainable transport improvements well • unlikely to support major infrastructure improvements or provision • may have a cumulative negative

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		<p>impact on infrastructure</p> <ul style="list-style-type: none"> • dispersed development likely to be less energy efficient • dependant on overall requirement may force development in locations where adverse impacts occur • no long term strategy- may not be positively prepared • delivery would be difficult to plan over life of LP (phase) • would not serve wider corporate aims well
<p>3 planned new settlement(s)</p> <p>This strategy is one of including a major planned development as the best means of meeting the overall objectives of the LP. Smaller incremental schemes will however continue as current permissions are taken up and new LP continuity allocations are made and implemented along with unidentified windfall development.</p>	<ul style="list-style-type: none"> • allows an overall strategy to promote more sustainable development • will have scope for infrastructure delivery (eg GI, transport, community facilities etc) • LP can select the best location and plan infrastructure accordingly • can provide for long term strategy • long lead time can complement take up of existing permissions and other sites- providing development opportunities throughout LP period. 	<ul style="list-style-type: none"> • headline strategy of new settlement needs complementary smaller continuity allocations • new settlement will have a long lead in time • may be locally unpopular • requires very extensive and detailed supporting evidence • new settlement will require major infrastructure- must be viable

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	<ul style="list-style-type: none"> • should enable a wide range of development • may offer scope for co operation with other authorities 	
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Evaluation

3.10 The single area where the most extensive demands on land for development will come will be for new housing. The LP will need to provide accordingly but any LP is about the overall delivery of a suite of policies and proposals and needs to be assessed as such. Its impact on the environment, on climate change and on the local economy and community are areas where the key test is how best can the development needs be met in a manner which achieves the other wider objectives. Options one and three represent intervention by the LP in order to both deliver an overall strategy and enable the necessary housing and other development objectives. This is much less true of option two where the strategy would be led much more by simply facilitating new development where it can occur. It is necessary to evaluate this option which is closest to a "do nothing" both for the purposes of the LP and as part of the SA to show the effect of a plan.

3.11 Option one- selective expansion would continue the approach in the current LP. If the capacity is available over the whole FoDD it would allow policy choices of to be made in order to best support the needs of the area. It would however be significantly affected by the constraints that are described above and the choice of settlements which could be promoted will be limited by these. Basic principles supporting sustainability suggest that most change should be at the largest settlements, and there remains a strong economic case for supporting the three forest towns. The previous LP/ AP (and the 2005 LP) were able to identify and promote Lydney as a location for a major share of new development and this took advantage of the greatest opportunity, supported the economy around the three interlinked towns of the south forest and made use of the rail connection. For reasons set out in the Issues and Options paper this option is not available for the new LP at least until the current commitments are built out and probably then only at a reduced scale due to landscape, landform and other land availability issues. Primary physical constraints affect Cinderford and Coleford assuming the policy of protecting the form of the town and the related but distanced arc of smaller settlements is to continue. The remaining largest settlements that could be promoted for option one would therefore be Newent and Tutshill/ Sedbury. After these, the scope identified in the table of villages above could be utilised and then in order to deliver this strategy other changes would be needed which affect at least some of the local constraints which are presently respected in the AP/CS..

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3.12 Newent is identified in the Issues and \options paper as potentially being able to offer some scope for growth conditionally on any development being able to improve local access to the east of the town and protect the town centre. The scale of this is likely to be limited and certainly will leave a very large (maybe 3500) number of new dwellings to be provided for elsewhere. On this basis whilst a strategic allocation is possible, it would complement rather than lead any selective expansion strategy.

3.13 Opportunities at each of the other locations as discussed above are generally less than at Newent, with the possible exception of Beachley where the current army base is scheduled to close and Tutshill Sedbury. Beachley Camp presents the LP with a different kind of opportunity, not whether or not to allocate the site but what to allocate it for given its almost certain availability as a vacant previously developed site. The MoD will seek best value so it is reasonable to assume the development sought will be mainly housing, and the LP would logically seek a form of mixed development. Although there are constraints, additional development at Tutshill/ Sedbury may be possible, subject to resolution of the present transport constraints which also need to be addressed in respect of any impacts from the development of Beachley Camp.

3.14 The key issue for option one is likely to be capacity. If about 4000 new dwellings and associated services and employment needs to be accommodated, the distribution may be based on the following (purely illustrative) table. The indicative additional capacities are used to illustrate the scale of allocation required and do not reflect any form of detailed site evaluation.

Location	existing capacity (commitments)	indicative additional capacity assumed (4000 required)
Lydney	1500	200
Coleford	500	150
Cinderford	500	150
Newent	400	500
Beachley	0	600
Large Villages	600	600
TOTAL	3500	2200 (additional 1800+ required)

3.15 The table shows an approximate representation of existing unimplemented consents and allocations, and indicative additions. Its purpose is to demonstrate the scale of additional need which would be likely to arise during the later part of the plan

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period not apportion new allocations. On the basis of the indicative additional capacity, which takes some account of the main constraints, it shows a further need beyond for about 1800 additional dwellings, that is almost the same as the entire east of Lydney development (total about 1850). Some degree of additional capacity would be released by considering allocations at smaller villages where there is scope (some facilities and transport connections). Other than this it would be necessary to make provision at one or more of the locations listed including larger villages and possibly others where there may be scope for a greater scale of change. Primary constraints would however limit the available choices at some.

3.16 Option two seeks to use development opportunities where they may arise. It would be likely to support the redevelopment of Beachley Camp. Beyond that a range of site sizes and types would need to be allocated on the basis of known potential sites. The scale and distribution would likely defer more to the availability than to desirability of supporting any particular LP approach except ease of delivery. The assessment of this option is best based on the assumption that it is deliverable (subject to the one qualification below) but that it provides no major benefit apart from to fulfil the LP's housing requirement. Primary constraints would be adhered to but others such as local landscape policies may not.

3.17 Using option two would require a demonstration that sufficient capacity is available at existing settlements. The LP needs to provide for the development of some 4000 dwellings over and above the current commitments, likely small sites and windfalls. This is the about the scale of the allocations in the AP in 2018. To provide development to this level in a manner that would also deliver a flow of sites which could serve the annual requirement through the plan period, it would be necessary to identify land at each of the towns, taking account of the likely current 10 year supply of land at Lydney, but also to make large allocations at some of the villages.

3.18 The needs could be met in a similar manner to option one, though it is unlikely to be as sustainable as option one with a more dispersed pattern of allocations. These are less likely to offer opportunities for improvements to services and facilities and less likely to support targeted investment such as may deliver transport "hubs". Dispersal may bring less focus on the need for major infrastructure though it could lead to reliance on capacity in what is already a strained network or networks as well as potentially utilising available, surplus capacity.

3.19 Option three The option which includes a new settlement could only deliver this alongside a range of other allocations, although a major part of the LP strategy would be to promote a new settlement or settlements. The option would almost certainly need to include the redevelopment of Beachley Camp and a number of continuity allocations in support of the existing settlements. Any new settlement/settlements would be supported as part of an overall LP strategy, possibly as part of a wider strategic approach but also as a means of implementing the wider LP objectives of long term development and sustainability. The option would need to take into account existing commitments, the most significant being at Lydney and

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these would support delivery in the early years, leaving any new settlement(s) for later. The lead times for such developments are in any case long, which can be both an advantage and disadvantage. A new settlement allocated now would probably be able to contribute to the needs of the area well beyond the end of the plan period, but it would be unlikely to provide any housing completions for the first eight to 10 years of the LP. This may for example mean a delivery within the plan period of about 2000 dwellings over 10 years.

3.20 Any new settlement would address the wider strategic aspects of the LP, such as providing scope for sustainable transport connections and could be part of a longer term potential strategy. It would need to be located in a relatively unconstrained area of the FoDD, and may have potential to be served by road and rail connection. Potential areas which could be considered for this form of development also include some that are close to larger settlements with their employment and service offer. The allocation would have a major impact on the area involved, its landscape and character. A new settlement would require extensive masterplanning and need to be supported by design guidance. It would require but also provide the opportunity for development including community facilities in a potentially sustainable location.

3.21 The above clearly shows that there are very considerable restrictions on any strategy that relies on existing settlements to deliver the land needed by the new LP. It also demonstrates that although they are presented as distinct options there are common features between all three. Turning back to the overall vision for the LP and considering the need to maximise its contribution to carbon reduction, it is apparent that a strategy which enables a planned form of development able to support/ use/ enable more sustainable forms of travel, and a reduction of travel is likely to be the most beneficial for the FODD. Options one and three offer this potential, though to differing degrees.

4 . conclusions and summary

4 conclusions and summary

4.1 The overall aims of the LP are in part set by the FoDDC corporate plan, especially in terms of climate change, supporting the economy, the environment and delivering affordable housing.

4.2 The above discussion considers two LP options which address the overall aims of the LP as well as its delivery targets. A third which would deliver against the targets is also evaluated.

4.3 The LP needs to meet the aims and be able to provide for the required level of development spread over the whole plan period.

4.4 The LP policies must therefore balance the delivery of change with protection and enhancement of the environment in a manner that provides for the future (is sustainable).

4.5 The likely need for development is such that the incremental approach of adding to existing settlements would be greatly stretched or unable to accommodate the level of change that will be required without making larger allocations at some locations, in the manner of the current LP. This in effect sets the choices for options as one involving selective expansion of existing settlements or another strategy involving a new settlement or settlements.

4.6 The scope for selective expansion is severely limited by the primary constraints affecting several of the larger settlements including towns. It is further limited by the need to allow for the completion of existing committed development such as at Lydney. This can only take place at a rate which can be supported by the market for new dwellings and the current committed sites are considered able to sustain this at current build rates for 10 years. Existing committed sites also help the LP process by ensuring development in the early years of the plan period.

4.7 A strategy which involved a new settlement or settlements would need to include elements of a more incremental approach in order to provide a supply spread over the plan period. This may in part be accounted for by the existing commitments that are rolled forward. Those that have planning permission would need to be honoured, those that do not will need to be reviewed and may be modified, retained as they are or deleted.

4.8 The two options that should be considered further would therefore both include a measure of continuity sites, whether existing commitments or additional allocations or both and would allow for new sites to be added where they were supported. They would each need a substantial element of new land to be identified in order to meet the need of the LP. This should both deliver the balance of the need and contribute to the overall aims of the LP by ensuring that the development proposed is able to address them.

4 . conclusions and summary

4.9 Of the two options, a strategy based on existing settlements alone would be unlikely to perform as well against the principles of sustainable development because it would not enable the concentration of infrastructure, and the selection of the site or sites and would risk being dependant on existing transport networks. It could be more flexible to changing circumstances and would avoid the LP depending on a single element. It would be unlikely to provide for a long term future in that delivery of the current LP requirement is likely to absorb all of the land options.

4.10 As referenced above, the LP will however need to include existing commitments so it will not be dependant on a single site. Any requirement to adjust the overall strategy will be able to be taken into the review of the LP. A new settlement strategy would be able to provide sufficiently over a long period, though with a long lead time.

4.11 Overall planning policy within the County and the wider area is looking to providing a more sustainable future and a strategy capable of delivery over a long period. A LP for the FoDD which does this is more likely to deliver its part of wider objectives and bring associated benefits.

