



Forest of Dean District Council

LOCAL PLAN

2021-2043

**Local Plan Options
to Deliver the Additional Housing
Requirement
July 2025**

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I Introduction

I.1 Although the Forest of Dean District Local Plan is still in the early stages of development, the introduction of a new formula for calculating housing need in the revised National Planning Policy Framework (NPPF), published in December 2024, has had a significant effect on the Local Plan production. The new standard method for calculating housing need results in an increase in the number of homes required in the district from 330 homes per annum to 600 homes per annum over the plan period.

I.2 The Local Plan is the key document that directs building and development within the Forest of Dean District. It shows where there are opportunities for sustainable forms of development, and indicates which development will and will not be supported by the Council in different locations. The Local Plan provides a broad range of policies and maps on how we use land, including which areas should be used for housing, employment, green and blue space, recreation & wildlife.

I.3 A draft Local Plan consultation (Regulation 18) took place during the Summer of 2024, using the 'old' method of calculation providing allocations for 6600 homes over the local plan period to 2041. Due to the revised housing requirement, the council is now revisiting the housing allocations. The key issue is how to accommodate the increased scale of growth and changes that are expected during the plan period in a way which is sustainable and appropriate. This requires an assessment of the current limits to growth including national and local constraints, and where opportunities for growth could be accommodated.

I.4 It is unlikely that the previously agreed strategy will be capable of meeting the new calculated housing need in a sustainable manner and therefore must be reviewed. The purpose of this document is to provide an explanation of the options available to accommodate the additional homes and where sustainable development could be located.

I.5 The Draft Local Plan consultation was a very valuable exercise, receiving over 1600 comments on issues such as housing, environment, climate change, sustainability and site allocations. The content of the Local Plan will continue to be evaluated with regard to the comments received during the consultation, the changes to the NPPF 2024 and discussions with duty to cooperate bodies. The Local Plan will then be revised as appropriate in light of these considerations and also any changes to the current agreed strategy as a result of this options consultation document. These changes will be the subject of a Revised Draft Local Plan consultation late 2025/early 2026.

I.6 This Options consultation is a chance for different policy approaches to be appraised and commented on before setting the strategic approach for the Plan. We welcome suggestions of new or amended approaches to those suggested through the consultation. It is acknowledged that further evidence work will be required to support the final plan, including a housing needs assessment and infrastructure delivery plan.

I.7 It should be noted that we are still at an early stage in identifying the particular infrastructure requirements for potential allocations (education, healthcare, highways etc). We are preparing an Infrastructure Delivery Plan (IDP) and as the Local Plan makes further progress, each of the allocations will be subject to a more detailed assessment through processes such as the IDP and sustainability appraisal.

2 The Local Plan to date

2.1 The current Forest of Dean District Local Plan consists of the Core Strategy and Allocations Plan adopted in 2012 and 2018 respectively and the Cinderford Northern Quarter Area Action Plan adopted in 2012. They set out a strategy for delivering the homes, jobs and infrastructure needed in the district between 2011 and 2026. The new Local Plan when adopted will replace these documents.

New Local Plan

2.2 The initial stages of Local Plan consultation took place in 2019. The Issues and Options Paper identified the key planning issues and opportunities the new Local Plan should address. It set out a draft vision and aims for the Local Plan. A key challenge was the need to ensure that the Local Plan delivers a sustainable strategy compatible with the Council's motion on climate change 'to help deliver carbon neutrality through all relevant strategies and plans.' The key aim is to deliver real change which will maximise the Local Plan's contribution to achieving the FoDD's target of zero carbon by 2030. A range of generic options were suggested for consideration during the consultation.

2.3 The Preferred Option consultation 2020 focused on the selection of a strategic option and a broad strategy for the Local Plan. The option included the establishment of new strategic development in three locations and the creation of a new settlement. This was considered to be sustainable in terms of climate change and establish a strategy which could carry on beyond the present end date of 2041. The recommended location for the new settlement was close to Gloucester in the area served by the A40 and A48, complementing development at Lydney, the expansion of land to the east of Newent and a new mixed development on previously developed land at Beachley.

2.4 Following feedback from the consultation in 2020, it was considered that a revision of the first draft strategy was required. The Second Preferred Option 2022 was a revised strategy that placed a strong emphasis on Lydney making it the district's principal settlement, with the vision of providing a true gateway to the Forest of Dean, whilst promoting the complementary relationship between all forest towns. It recognised constraints and opportunities elsewhere and proposed further change in the form of new development, including a mixed use site at Newent, the regeneration of Beachley Barracks and supporting sustainable mixed use developments at the towns, major villages and at selected villages.

2.5 The Draft Local Plan 2024 sets out the policies that reflected the Council's preferred spatial approach taking account of the evidence and the engagement undertaken to that date. In addition the plan contains core policies that establish the overriding principle of sustainable development and its importance to the Forest of Dean, plus policies related to construction and use of buildings, and climate adaptation. Other policies set the scene for the location of new development, covering the settlement hierarchy and protection for the countryside. Complementary policies for the protection of land, important characteristics and features of the district are included, as are policies seeking improvements in the wider environment, nature conservation and biodiversity.

3 National policy and recent changes

3.1 The Draft Local Plan consultation commenced in early July 2024, shortly after a general election. On 30th July 2024, during the 6 week consultation period, the new Labour Government launched a consultation on proposed changes to the National Planning Policy Framework (NPPF). This among other things included changes to the way that housing need is calculated in each local authority area. It proposed new mandatory housing targets for local planning authorities. In December 2024 a revised NPPF was published introducing these changes to national planning policy aimed at tackling the country's acute housing crisis and to stimulate economic growth.

Changes to the Housing Requirement

3.2 The most notable change to the revised framework is the way in which the local housing need is calculated. Housing need is an assessment of the minimum number of homes needed in an area and is the first step in the process of determining how many homes need to be allocated in the Local Plan known as the housing requirement.

3.3 As a result, the amount of housing the FOD District is required to plan for through the Local Plan has increased significantly – an uplift of 82%, from 330 new homes per year to 600 new homes per year. Over a twenty-year period this would equate to over 12,000 new homes.

3.4 Given the scale of change, it is unlikely that the current agreed strategy is capable of delivering a housing requirement to meet this revised need.

3.5 This doesn't mean starting again, the work that has been completed to date and the responses received to the Draft Local Plan 2024 consultation are still relevant. The Council will continue to consider the matters raised as part of the progression of the Plan. However, in April 2025 the Council agreed it is necessary to review the current development strategy and explore what other potential strategic options may exist so that the district may meet its housing need.

National Development Management Policies

3.6 The Levelling Up and Regeneration Act 2023 (LURA) introduced National Development Management Policies (NDMPs) – that are intended to replace generic policies contained in local and neighbourhood plans. The intention has been that NDMPs would be published for consultation in March 2025, but this has not taken place. NDMPs will mean that some current plan policies will no longer be necessary as local plan policies should not repeat or conflict with them.

4 The Plan Period

4.1 The NPPF requires that strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. The agreed plan period for the Draft Local Plan covers 20 years from 2021 to 2041.

4.2 Due to the need to revise the strategy for the plan and taking into consideration the timetable set out in the Local Development Scheme for preparing the Local Plan, it is unlikely that the new Local Plan will be adopted prior to 2027. It is therefore proposed that the plan period is extended by 2 years to a period covering 2021 to 2043. This does however impact the total number of homes that are now required to be planned for over the Local Plan period.

4.3 The Draft Local Plan (July 2024) identified a housing supply of 6,600, dwellings over the 20 year plan period. The mandatory standard method target is a minimum of 600 dwellings per annum. Over a revised 23 year plan period the housing requirement would be increased to 13,200 dwellings. This means there is a shortfall of a minimum of 6,600 dwellings from that allocated in the Draft Local Plan Consultation 2024.

4.4 This is a minimum number of dwellings and additional supply will need to be identified. It is also significantly in excess of the past annual housing completion rate in the Forest of Dean District. The average rate over the last 10 years is 358.

Question 1

Do you have any comments or views on the proposed plan period for the new Local Plan? (Please set out below with evidence or justification to support your comments)

Should the plan look forward to the year 2043? (If not what year and what is your reasoning?)

5 Sustainable Areas and Sustainable Settlements

5.1 One of the key aims of the planning system is to create sustainable communities by bringing housing, jobs and services closer together in order to provide high quality places that support the overall well-being of communities reducing the need for travel. These sustainable communities are capable of accommodating a degree of self-containment by having a range of services broad enough to fulfil the day to day needs of residents. This is an important ambition of the Local Plan for the Forest of Dean. The settlement hierarchy provides a systematic process to understand the way in which the settlements interrelate and enables growth to be planned in those settlements that have a range of services and employment opportunities, while those settlements that have limited or no significant services are evidentially less sustainable.

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

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

5.4 Therefore the most sustainable locations are those with a range of employment opportunities, services and facilities and can be accessed using sustainable modes of transport. Those settlements with access to better sustainable transport connectivity should be the main focus for strategic development or areas where sustainable transport are being developed or could be provided as part of a development.

Question 2

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

Biosphere

5.5 The FODD is a candidate UNESCO Biosphere and will be seeking formal designation during the development of the plan. The designation does not add any new legislation or controls to an area. It is about recognising and celebrating what is unique and special about an area in terms of the environment, culture, heritage and economy. Biospheres are seen as ‘learning places for sustainable development’.

5.6 UNESCO Biospheres are a way of valuing the natural environment and cultural heritage where people and nature can work together with future generations in mind. It forms a context and overarching strategy principles to support and deliver sustainable development. It acknowledges existing protections and supports sustainable development, recognising the natural world and working with it. It is a way of supporting a thriving economy by bringing money back into the local economy.

5.7 As a sustainable development framework the Biosphere is seen as complementary to a local plan which is required to have sustainable development at its heart.

6 Settlement Hierarchy

6.1 The Forest of Dean District contains a network of settlements diverse in size and function, which interact with each other economically and socially but also have key relationships with others outside the district. The scale and type of relationships between settlements must be carefully considered in order to strategically plan for future population growth, ensuring growth and development occurs in areas where infrastructure and services are able to support growing communities efficiently while promoting sustainable development.

6.2 The Settlement Hierarchy paper accompanying the Draft Local Plan consultation in 2024, although subject to review as part of the Local Plan development provides evidence upon which to determine the role and functionality of the interrelationships between Forest of Dean's existing network of settlements. The economic, social and cultural relationship between settlements is complex and cannot be based on population size, employment and transport accessibility alone. In the Forest of Dean District no one centre is dominant among the four towns. The proposed Draft Local Plan 2024 strategy suggested that the towns continue to coexist with no one being dominant. The emerging strategy and the constraints on development suggest that Lydney remains the largest centre with the most potential for development, Cinderford being constrained by statutory forest requires support for its regeneration and Newent in the North will continue as a service centre for the locality. Coleford has limited scope for development without impacting the character of the area. Some erosion of the open areas between Coleford and the surrounding arc of settlements may be required depending on the new strategy.

6.3 The remaining villages sit in a complex but understandable hierarchy with the employment area at Mitcheldean being a notable asset. Many villages are part of the "forest ring" settlements located within the Statutory forest and are interrelated. They are also frequently physically constrained by the statutory forest so cannot expand significantly even if that was desirable. Conservation of the form and of features within these settlements is paramount. Bream, the largest village, has a good range of facilities as well as being close to other centres. Newnham has an outstanding conservation area. The notable characteristics of the villages and towns don't generally affect the hierarchy as it now is but do impact on the potential for change. This potential change must balance conservation with development opportunities.

6.4 The hierarchy exists within the context of various physical constraints which may reduce or enhance the ability of the settlements concerned to accommodate change. In the FoDD for example several of the larger settlements are heavily constrained by the forest boundary, or by landscape, areas that are liable to flooding and these, often absolute, factors mean that any new allocation could also be limited. Conversely where there are opportunities such as potentially large previously developed sites or areas which can accommodate new areas for nature recovery alongside new development, there may be additional benefits from making allocations.

6.5 Despite some housing growth in villages across the District, many settlements have generally continued to lose their services, especially shops. This follows a general trend of increased competition from large supermarkets resulting from increased mobility of the population as well as the increase of online services. However, for those without a car there is more reliance on bus services for economic and social links.

6.6 Creating sustainable development remains paramount in the revised National Planning Policy Framework (NPPF). There is an increased need and a wider acceptance of the need to apply the principles of

sustainability to plan making and provide a future strategy that will place new development where it is well serviced and provide for the wellbeing of communities reducing the need to travel especially by private transport. Using a settlement hierarchy to support the plan strategy is an essential step although plans can also change hierarchies for example by the promotion of new centres or even settlements. Where allocations support existing facilities or rely on them there is unlikely to be a major additional infrastructure requirement of the scale required for example by a new settlement. It remains the case that some additional provision will be vital and this should be made in a manner that will benefit the existing settlement as well as supporting any new developments.

6.7 The proposed Draft Local Plan 2024 strategy was intended to support existing settlements and includes steering development to previously developed land. The Settlement Hierarchy Policy LP.4 provides a context for allocations and to guide non allocated development. It was considered to deliver a sustainable strategy for the plan period using the old calculation of housing requirement. Given the change in housing requirement and nature of many of the settlements it will be necessary to review the strategy and consider a wider range of options if a high degree of sustainability is to be maintained.

7 Settlement constraints

7.1 This paper considers the options available following a recalculation of the number of houses required during the local plan period. The options cannot be considered without understanding the issues that face the district and its settlements. These issues were set out in the 2019 Issues and Options paper and are updated here for clarity and completeness. 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, although it has also seen substantial growth in previous plan periods. All serve their surrounding hinterlands, are relatively sustainable locations for development and have been the subject of relatively large changes under the Allocations Plan and the previous Local Plan. They are however each affected by some key constraints. The extent to which these constraints apply is a major consideration when considering possible allocations for the Local Plan. In addition, there are some particular characteristics that need to be taken into account which affect the potential for the accommodation of further change.

Lydney

7.2 There are a high number of 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. The emerging Local Plan allocations are anticipated to complement the future ongoing housing delivery in Lydney over the plan period.

7.3 There were about 750 outstanding housing commitments in March 2025. A realistic assumption for housing delivery in Lydney may be that new building at about the current rate will continue until at least 2027/28 and that the current committed sites may even then not be completed.

7.4 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 A48 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, with regular services to Gloucester, Cheltenham and Birmingham as well as services to Chepstow, Newport and Cardiff, and Severn Tunnel Junction with its connections to Bristol.

7.5 The above consideration does not in itself rule out further allocations at Lydney which could serve the latter part of the new plan period. 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.

7.6 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.

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

Cinderford

7.8 In Cinderford the main constraints are more apparent than in Lydney and some are absolute, limiting scope for change. There are about 300 housing commitments identified at March 2025. These are associated with a variety of new and previously developed sites. Whilst many previously developed sites are considered to be in good sustainable locations for new housing there are often additional challenges for them to come forward, particularly around viability, as a result of past uses. 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.

7.9 Outside the land currently identified for some form of development, the opportunities are very limited. 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. It is not possible to entertain options that involve incursion into the statutory forest. The boundary not within the forest largely comprises very prominent and attractive land which tends to be steeply sloping. Much of the land to the east of the settlement, where the settlement is not directly bordered by forest, is constrained by landscape, further substantial development here would result in significant landscape impacts.

7.10 Forest Vale industrial estate forms the largest employment area in the District, it has incrementally developed since the 1970s offering a broad range of employment and many local services and a valid planning permission for 49 houses. The Cinderford Northern Quarter Area Action supported the regeneration of Cinderford, providing for the development of a further education college in an exceptional setting. In addition a new hospital opened in 2024 replacing two now closed facilities in Lydney and the Dilke Hospital just outside Cinderford.

7.11 Cinderford is in a position to have some influence outside the district and being close to Ross on Wye 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 for Cinderford and plan for future uses of the Northern Quarter.

Coleford

7.12 Coleford currently has a similar number of housing commitments to Cinderford (300). 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 the arc of settlements look to Coleford to provide much of their services, current planning policy seeks to retain a physical separation between Coleford and the settlements nearby. There is no need to support a functional separation, but assuming the physical visual gap is to be retained it will be a major constraint. The maintenance of the gap is strongly supported by the Allocations Plan (AP), Draft Local Plan 2024 and the Neighbourhood Development Plan (NDP). Other landscape constraints exist such as the close proximity to the Wye Valley National Landscape (WVNL), and the relief and broken yet attractive nature of the land to the north of Berry Hill. Aside from the current opportunities identified in the Allocations Plan and Draft Local Plan there may be some scope for

additional housing but would require substantial review of existing landscape policies. The policies which identify the gap and protect it are local policies seeking to protect the environment in the manner advocated in the NPPF. The recent NDP is clear in its protective approach as is the Allocation Plan and Draft Local Plan. 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 policy. Promoting this change would make it very difficult or impossible to demonstrate that new developments would add to the overall quality of the area, and they would be likely to fail to be sympathetic to local history and their landscape setting.

7.13 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.

7.14 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.

7.15 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

7.16 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. Overall there are areas that are less 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 though not necessarily very great. Outstanding commitments for housing (about 400 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 needed. A mixed use site including 375 dwellings to the East of Newent which is an Allocation in the Draft Local Plan²⁰²⁴ has been allowed at appeal January (2025)

7.17 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 maintaining or improving the sustainability of this relationship is an issue for the new plan.

Tutshill/Sedbury and Beachley

7.18 Tutshill/Sedbury is functionally part of Chepstow and is situated at the extreme south of the FoDD. Many of its principal interactions are not within the FoDD but within Monmouthshire. There are some

major constraints that affect the area but equally some opportunities. Both the Wye and the Severn are internationally important protected areas Special Areas of Conservation (SAC). The area, along with Chepstow is experiencing considerable current housebuilding activity; three sites within the FoDD with approximately 246 new dwellings have recently been completed. It is the cumulative effects on biodiversity that should be considered. There is scope for additional development but this would need to fully address any access issues both locally and on a wider basis.

7.19 Situated further south on the peninsular is Beachley, which contains at present a MoD camp around a smaller settlement and an area of settled dwellings formerly a series of huts. Recent consultation responses from Defence Infrastructure Organisation suggested that the MOD would seek to close the camp by 2031 and if this intention remains the Local Plan will therefore need to address the future of this area probably considering 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.

7.20 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.

7.21 Contiguous with Tutshill/Sedbury is Chepstow (Monmouthshire) providing many of the services for Tutshill and Sedbury including a hub for transport with main line rail services and bus service to Newport, Bristol and beyond. As it is located at one of the identified A48 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 areas may be implemented. At a wider level, the accessibility to the FoDD from Bristol and Southeast Wales and ensuring any interaction is of benefit to the FoDD is an issue for the Plan.

7.22 There are likely to be some changes proposed in the settlements listed but that the scale of these is limited by the constraints identified.

Larger Villages

7.23 In addition to the settlements above, there are large villages which have in the past seen varying degrees of change and have featured in allocations in the past and current plans. As part of this options exercise it is considered that some overall "baseline" level of change is likely to continue on the lines of steady incremental growth in keeping with the identified constraints. This level of change is in keeping with the expectations that the settlements concerned will continue to evolve. For the purposes of considering issues and options however, one option may be to consider if there is scope for allocations in any of the larger villages for major change in comparison to the current policies which apply.

7.24 The basic general constraints described above apply throughout the FoDD and affect some of the larger villages. Some straddle the statutory forest boundary, others are close to the Severn or partially within WVNL. As part of the current exercise of identifying issues and assessing possible options, the following should be considered.

7.25 **Bream** is constrained by landscape and the forest boundary but also in some areas by ground conditions and proximity to protected SAC sites. It is a large village well placed for access to Lydney and also

well served by its own shops and other facilities. The population is about 3500 making it the largest in the FoDD after the towns and Tutshill/Sedbury. The physical limitations referred to above and in some cases environmental ones linked to existing uses, limit the potential to identify opportunities that would bring a greater degree of change than a policy of modest incremental change would suggest.

7.26 Drybrook and Harrow Hill together have a population of about 1700 and are close to Cinderford and also Mitcheldean. They have reasonable services and general access although parts of both are locally served by narrow lanes. The main constraints are landscape and the forest boundary which with the variable relief, limit development potential.

7.27 Mitcheldean is with a population of about 2700 large with major employment in the form of Vantage Point, an integral part of the village. It is close to Cinderford and accessible from the main road network. The village is regarded as a sustainable location with services and employment. Landscape and ecology are constraints which need to be balanced against the level of services and employment that is available together with the generally reasonable accessibility.

7.28 Newnham on Severn has a range of services and is accessible by road. The village is centred around a Conservation Area and close to the Severn Estuary. It is also constrained by the landscape setting and various protected sites. There is an existing allocation for expansion to the north which is defined only by the present AP. Future change would need to be shown to be compatible with the conservation and landscape conservation and would probably mean that any opportunity would involve additional land to the north of the present allocated site.

7.29 The Lydbrook/ Joys Green/ Worral Hill area is variously constrained though it forms an extensive group of three distinct but related settlements. Relief, National Landscapes and the Forest boundary are the main constraints with steep valley sides and limited access to some areas being notable characteristics.

7.30 Whitecroft/ Pillowell/ Yorkley are limited by Forest boundary but with some scope for change accessible in some areas and some services and employment. Away from the forest boundary the landscape is in many cases open and prominent giving emphasis to the Forest edge location.

7.31 Although there is undoubtedly scope for some additional change in the larger settlements, this generally lies within the area of incremental change and there are more fundamental constraints in most that would limit more major change. The exceptions may include Tutshill/ Sedbury and development in this general area.

7.32 From the above it is plain that capacity for future change may be limited if the options use only development around the existing settlements and the key characteristics of the area are to be retained. There is a finite capacity which is close to being reached in a number of the larger existing settlements. Changes to the local planning policies could be made to enable further development in some cases and these may be implied in options that are presented below. Some may not be appropriate and will be excluded as the Local Plan progresses.

8 Strategic Housing and Economic Land Availability Assessment (SHELAA)

8.1 The Council updates the evidence it holds on available housing and employment land annually, by undertaking a Strategic Housing and Economic Land Availability Assessment (SHELAA)¹. Sometimes referred to as a SHLAA or HELA. The Council asks organisations and the general public to identify land which may be suitable for accommodating housing development in the future. Recently this has included land which may be suitable for employment areas, or a combination of both employment and housing.

8.2 A SHELAA is a technical exercise to determine the quantity and suitability of land potentially available for housing development. It is a required part of the evidence base needed for the preparation of a Local Plan (as specified in the National Planning Policy Framework, para. 72).

8.3 The SHLAA process is complementary to the plan making process and the allocation of sites. The aim of this exercise is to have a clear understanding of land which is available and to identify as many sites as possible that have housing and/or employment potential in the District. Its purpose is to provide a future reserve of sites that can be considered for allocation in order to deliver new dwellings in the emerging local plan.

8.4 An assessment of land availability identifies a future supply of land which is suitable, and the likelihood of development coming forward i.e. whether it is available and achievable for housing and economic development uses over the plan period. The assessment is an important source of evidence to inform plan-making and decision-taking, and the identification of a 5 year land supply of housing land. This is a technical exercise it should not be used to imply that a specific site is acceptable to be allocated for development or otherwise.

8.5 The role of the assessment is to provide information on the range of sites which are available to meet the local authority's requirements. The local plan preparation will determine which of those sites are the most suitable to meet those requirements.

¹ [Strategic housing and economic land availability assessment - Forest of Dean District Council](#)

9 Identifying the supply of land for homes

9.1 The starting point when considering additional development is the SHELAA. The SHELAA contains a schedule and the mapping of all sites submitted by landowners and developers.² Other sites can also be considered but must be considered available and deliverable.

9.2 NPPF paragraph 72.... 'planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of: a) specific, deliverable sites for five years following the intended date of adoption; and b) specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.'

9.3 The Local Plan process to date has investigated potential opportunities for brownfield sites, the extension of towns or larger village settlement boundaries. A review of the potential for increasing densities at appropriate locations and any additional opportunities adjacent settlement boundaries will continue, but additional green field sites will still be required. These will be in addition to the housing sites identified in the draft local plan.

9.4 The approach to identifying additional capacity must demonstrate the application of a robust methodology to site selection which can be justified at examination. With greater emphasis being placed upon the delivery of an increased housing requirement, along with achieving the aspiration of a net zero target, work must be undertaken to focus how we define sustainable locations for development, and subsequently, what constitutes a sustainable settlement.

9.5 Options to develop the land surrounding our existing settlements and towns, as well as the infrastructure that support them (highways, drainage and services etc.), are becoming exhausted, and will not be capable of delivering or subsequently supporting the 13,200 total new dwellings required up to 2043.

9.6 We will, therefore, need to consider all sites that have been submitted or promoted through the Strategic Housing and Economic Land Availability Assessment (SHELAA) since its inception in 2007, and must take account of all possible options at this stage. Additionally, the district would find further benefit if sites capable of bringing forward employment opportunities could also be identified in tandem with housing development; to be capable of providing that local economic resilience and incentives for local people to both live and work within the district, and to secure the skill-base within our locality instead of it being lost across the district boundary. The housing and employment needs will be evaluated through the Gloucestershire Housing and Economic Needs Assessment and the Forest of Dean District Council Local Plan Economic Viability Assessment.

9.7 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 additional strategic sites to be identified, it is necessary to look at some important (initial) constraints before the basic options can be identified. These issues and constraints were set out in the original Issues and Options paper in 2019 and repeated here for completeness. These will be the subject of a great deal of further study throughout the plan preparation but this initial stage is an

² <https://www.fdean.gov.uk/planning-and-building/planning-policy/strategic-housing-land-availability-assessment/>

essential step in setting out the options. It will set some of the context and help to ensure that the options are at least broadly credible. The constraints will be considered in a great deal more detail elsewhere not least through the Sustainability Appraisal process.

Statutory Forest

9.8 The Statutory Forest boundary makes up 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 settlement boundaries 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 Local Plan 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 not possible. The Draft Local Plan consultation 2024 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 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 is approximately 9358ha.

Designated sites

9.9 There are a great variety of statutory and non statutory designated sites in the FoDD. The district also benefits from several priority habitats, which include ancient and native woodland, wood pasture and parkland with veteran trees, lowland meadows, and traditional orchards.” Both International and nationally important sites of ecological importance (eg. Special Areas of Conservation (SAC's), Special Protection Areas (SPAs), Ramsar sites and Ancient Monuments) are spread throughout the FODD. The main areas where ecological designations are concentrated are the Wye Valley, close to the Severn Estuary and the Forest of Dean itself. Nationally important sites are in effect absolute constraints and would rule out development of them or where it would be likely to have an adverse effect on them. The basic guidance is in the NPPF which establishes a hierarchy but the importance of "locally significant" features and designations is such that plan allocations should avoid or improve the setting of these. Many of the designated areas are also within other protected areas such as the FoD itself or the National Landscapes.

9.10 There are two National Landscapes affecting the FoDD, the Malvern Hills and Wye Valley National landscapes. Whilst these are not absolute constraints on development, major new development would not be expected (NPPF Paragraph 189). The current identified National Landscapes are affected by other constraints and compliance with this aspect of national policy is an essential part of any strategic development option. The various designated sites are shown on the Policies map which accompanies the Draft Local Plan 2024 consultation.

Areas prone to flooding

9.11 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 and two rapid response catchment areas have been designated in relation to Lydney and Cannop Brook and Cinderford/Soudley Brook. These limit the scope for development in some areas 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 lie within flood zone 2 or 3 would need to be excluded from those considered for most new development.

9.12 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.

9.13 As an initial guide the EA mapping of flood risk areas³ 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

9.14 Relief is not an absolute 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 National Landscape for example.

Mining Activity

9.15 The Forest of Dean has a history of mining activity, there are recorded coal mining features present at surface and shallow depth including; mine entries, coal workings and reported surface hazards. These features may pose a potential risk to surface stability and public safety.

9.16 Policy LP22 – Site Conditions in the Draft Local Plan 2024 acknowledges the potential risks posed from ground instability including mining legacy and that appropriate remediation measures should be identified. Development in High Risk Area from former mining activity require a Coal Mining Risk Assessment as will consultation with the Coal Authority.

Accessibility

9.17 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. A response to these issues is generally twofold. Plans may seek improvements and may also try to identify opportunities that make the most of the existing infrastructure. In addition, development proposals may seek to identify opportunities that depend less

³ <https://flood-map-for-planning.service.gov.uk/map>

on physical access for volume or heavy traffic. This, 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.

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

Landscapes

9.19 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 estuary is especially vulnerable and like other areas may also be affected by other designations and therefore need to be protected. Major 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.

Question 3

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

10 Options

10.1 At the heart of the NPPF is a presumption in favour of sustainable development (NPPF, paragraph 11) and for plan-making this means that “all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”.

10.2 The Local Plan is not simply about planning for new housing - it is about helping to create sustainable and healthy places, and supporting job growth. However, given the uplift in new homes required we need to revisit our Spatial Strategy, to understand how best to try to meet the new housing requirement, as well as providing land for businesses, schools, health facilities and green spaces.

10.3 The overall context for the Local Plan remains broadly the same as it was in 2019, with the current expectation that the new Local Plan will need to provide for the needs of the Forest of Dean district but now up to 2043 and that the level of development that it should support will include about 13,200 new dwellings.

10.4 Alongside the need to provide for the expected level of change, there is a requirement for the Local Plan to address national and local priorities of climate change, ecology and support for the community, its economy and the environment. Policies and proposals in LPs have always needed to respect and improve the environment. Issues such as biodiversity and climate change have long been relevant and have had a significant influence on the plans themselves. That situation is now changing to one where as an overall theme, climate change is the fundamental influence on the contents of the Local Plan. The policies and proposals must all be compatible with the delivery of a resilient and low carbon district while also meeting the needs of the area. Where the Local Plan can have a positive impact on carbon reduction it must do so. This development needs to be located with access to sustainable forms of transport provision and close to jobs and services.

10.5 The strategy needs to provide for the required minimum of 13,200 homes over the plan period. The main assumption, at this point in time, is that the majority of the proposed allocations in the Draft Local Plan 2024 consultation will remain. There is therefore a need to find land for an additional 6,600 homes within the District. However all policies and allocations in the Draft Local Plan 2024 will be reviewed in the light of a new strategy as part of the Local Plan process. A revised Draft Plan will be the subject of a consultation in early 2026.

10.6 There are various ways that this could be done, and it is now the time to revisit all of the strategy options available to ensure that the most sustainable option is selected and that the Local Plan is found sound at examination. Therefore the following section provides an update on potential approaches that we may consider. It sets out the 5 options for a development strategy that have been identified in the Sustainability Appraisal, an explanation of what the option involves and the Sustainability Appraisal assessment of the option.

Sustainability Appraisal (SA)

10.7 A sustainability appraisal (SA) is a systematic process that evaluates the potential environmental, economic and social impacts of proposals against reasonable alternatives. It is conducted during the preparation of local plans to ensure the sustainability considerations are integrated into decision making frameworks. The purpose of the appraisal is to promote sustainable development by assessing how plans and projects contribute to sustainability goals. It helps inform and guide the planning process, ensuring that sustainability is a core consideration. It ensures that the principles of sustainable development are applied to planning policies, allocations and guidance, and provides a framework for decision making through the Plan drafting stage.

10.8 The Sustainability Appraisal 'Further Interim Report for the Local Plan Options to Deliver the Additional Housing Requirement' accompanies this Document and can be found in the supporting documents using the following <https://www.fdean.gov.uk/media/5awdx3yk/sa-further-interim-report-2025.pdf>

Question 4

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

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

Key considerations

10.9 The local plan is a key document in relation to addressing climate change and the policies will take account the Council's climate change reduction targets. The Plan will need to comply with legislation in relation to mitigating and adapting to climate change.

10.10 The overall aim of the Local Plan must be one of promoting a more sustainable form of development, especially in respect of selecting longer term enduring locations that provide a good place to live, community wellbeing, reduce the need to travel and can deliver carbon neutral development.

10.11 The likely need for change will require strategic solutions beyond simple incremental change at various locations. There may be a requirement to consider the combination of more than one of the options to find a solution to the growing the demand for housing.

Option 1: Selective planned expansion of existing settlement(s)

10.12 This option would follow a pattern similar in distribution of development to the Draft Local Plan 2024 consultation document, but to a greater extent than currently proposed. The strategy would be based on growth at the most sustainable settlements. These would be the areas with the best access to services and facilities, access to jobs and well connected by modes of sustainable transport and active travel.

10.13 This strategy option enables the promotion of one or more existing settlements and can take advantage of their services, facilities and attributes and respect any constraints. There would be a need for commensurate infrastructure improvements to support the increased scale of development. Due to the various constraints, highlighted in Section 7, many of the settlements have capacity restrictions. The constraints and level of development set out in the Draft Local Plan 2024 is described below.

Scope for Development set out in Draft Local Plan 2024

Towns

10.14 The four main towns and major villages would remain the focus for the new development as they possess the greater share of services and facilities. The next most sustainable settlements in the District are those classed as major villages in the settlement hierarchy. These villages vary in size and potential capacity with a varying range of job opportunities, facilities and services. The most notable major village is Mitcheldean with the proximity to a large employment site. There would be alongside these allocations more limited development in the larger settlements and then in selected smaller villages. Priority is given to the four towns however scope for additional growth varies significantly.

10.15 Allocations would be limited to those settlements where there may be scope to support the development, through selecting particular settlements and choosing to promote them alongside infrastructure improvements to accommodate the greater scale of development than would otherwise have taken place.

10.16 Coleford - The Draft Local Plan 2024 allocates land for approximately 370 new dwellings and supporting development including employment land. A site of 203 dwellings has recently been completed at Berry Hill. There are SHELAA sites around Coleford however, to promote a larger scale of change in Coleford there would need to be a change in the protection of the landscape around the town itself. This would not be compatible with the present planning policies in either the FoD Allocations Plan, Draft Local Plan 2024 or the Town Council in their NDP.

10.17 Cinderford is located in the Statutory Forest, The town's physical location on the edge of the Statutory Forest means that it is located on high ground and on a ridge providing extensive views across the Forest itself and to the wider countryside. The landscapes around are open and the outward expansion of the town is heavily limited both by the Forest itself into which it cannot expand and the prominent and attractive countryside which must be protected. Land for about 320 dwellings has been identified at Cinderford in the Draft Local Plan 2024 in support of the town's continued regeneration. SHELAA sites have been submitted around the settlement boundary of Cinderford.

10.18 Newent - The Draft Local Plan 2024 allocates land for approximately 645 dwellings and associated infrastructure, services and facilities. Land to the East of Newent benefits from a planning consent for 375 dwellings covering part of the allocated site. Newent may have potential for additional change. This is qualified by the need to improve access around the town and also protect the centre. Around the town is

predominantly agricultural land and especially to the south and east there some areas for additional development suggested through SHELAA sites. Landscape limitations are more apparent to the west of the town though there may also be some potential SHLEAA sites along with the southwest. The scale of possible additional development would need to be supported by necessary infrastructure.

10.19 Lydney has seen considerable development throughout the past local plan periods. The Draft Local Plan 2024 allocates land for 1160 dwellings and associated development. There are considerable commitments in Lydney many carried forward from the Allocations Plan and likely to support new development over a longer period than the next 10 years. The rate of development in Lydney over this time is likely to match or exceed any that could be supported by any other FoDD town. Again sites presently identified in the SHELAA are located around the settlement boundary.

10.20 Overall there is only limited scope for selective planned development at the towns beyond that which is currently allocated in the Draft Local plan 2024.

Villages

10.21 The villages vary in size and potential capacity. When considering the strategy for the FoDD an appropriate starting point is the settlement hierarchy discussed earlier and explained in greater detail in the settlement Hierarchy paper.⁴ In some cases the settlements are quite close and the inter dependent nature of some of the settlements means that, for example, services in one may benefit from an allocation in another.

10.22 Tutshill/Sedbury functions as part of Chepstow and with a population of approximately 4000 is the fifth largest settlement in the FoDD. Current allocations in the Draft Local Plan 2024 amount to 245 dwellings on two sites. There may be scope for additional development under an "incremental" option but also as a planned expansion. Any new development would need to address the need for infrastructure including the overall links to Chepstow and the M48/A48. Additional infrastructure may be needed for a greater scale of change.

10.23 Bream with a population of around 3500 is the next largest settlement. Its edge of Forest location is however a constraint. Additional land with potential for new housing is limited without major changes to the current policy approach. Existing commitments are also limited in extent, because of the constraints (primarily due to about two thirds of the settlement being within the Forest boundary). This will limit both the short and long term potential despite the size of the settlement and its relatively sustainable nature due to relatively good accessibility and its service base.

10.24 Whitecroft/ Pillowell and Yorkley are a group of villages also constrained by the Forest boundary and by landscape issues. The Draft Local Plan 2024 allocates one site for mixed development which includes 66 dwellings in Whitecroft but landscape, access and the forest itself are major constraints.

10.25 Mitcheldean lies outside the Forest boundary and contains a large amount of employment at the Vantage Point Business Park. There is also a range of services which support the resident and day-time population. Mitcheldean would be a comparatively sustainable location, the Draft Local Plan 2024 allocates land for 180 dwellings on a greenfield site and 19 dwellings on two smaller previously developed sites.

⁴ <https://www.fdean.gov.uk/media/4mtdkouh/settlements-in-the-forest-of-dean-keynote-2023.pdf>

10.26 Drybrook is quite close to Mitcheldean, and is regarded as a large village with a range of services. The Draft Local Plan 2024 allocation proposes about 100 new dwellings. It is considered that the capacity for change and scope for additional development would be greatly limited by the various constraints that apply such as the landscape and the Forest boundary.

10.27 Other villages - Within the range of other villages it is likely that there is some potential for additional development broadly proportional to the size of the settlements concerned. There will be a number of additional constraints and also opportunities that will affect this potential. The Forest boundary will impose a constraint whilst others may benefit from comparatively good access and a reasonable level of facilities. Without major changes to policy, apart from the larger settlements the scope for additional development at villages is modest. One policy option may however be to promote a major expansion of one or more villages where their location is broadly sustainable. Such a course of action would depend on the ability to provide sufficient new services and may be regarded more as a planned new or expanded settlement.

10.28 A table of proposed housing allocations by settlement can be found in the Draft Local Plan 2024.⁵

Question 5

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

Sustainability Appraisal Assessment of Option I

10.29 This option is limited to 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.

The positive effects (in sustainability terms) of this option include:

10.30 The ability to select development of appropriate scale in the most sustainable locations. Taking advantage of the facilities nearby such as education, health, retail and recreation as well as the infrastructure which is already in place in the larger towns/villages, without overburdening those settlements, but instead encouraging business and an increased range of employment opportunities, all with a long-term cumulative positive effect on SA Nos. 3,4 & 5. Also reducing dependence on the private car, encouraging use of public transport and active travel, and introducing low/zero carbon off-set measures, all of which have long-term positive effects on SA No. 1 for healthy living along with SA Nos. 3 and 10. Selective expansion can also provide a mix of housing types and sizes to better meet the needs of different sectors and reduce inequalities as well as designing out crime, which are positive effects for SA No. 2. Such an option can also promote biodiversity net gain and be designed to strengthen connectivity for wildlife habitat and create GI, which is a positive effect on SA No. 7.

⁵ Forest of Dean District Local Plan 2021-2041, Consultation Version July 2024

The negative effects (in sustainability terms) of this option include:

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

10.32 Furthermore, an option solely relying on this strategy may therefore only be able to deliver a certain quantum of development. It may also be an option that would not ensure a longer-term sustainable strategy because the existing capacity would be exhausted.

10.33 Overall, Some of the negative effects of this option could however be mitigated, such as the provision of improved infrastructure (and funding for it), designing schemes to create active travel routes for healthy living (positive effect on SA No. 1) and improved public transport to reduce traffic generation and to improve carbon offset (positive effects for SA Nos. 3 and 10). However, the best method of mitigation to avoid putting too much pressure on the infrastructure of existing settlements and to provide a more long-term sustainable strategy would be to combine this Option with another one.

Option 2: General distribution of housing around all existing settlements (planned sharing of the housing numbers across all settlements).

10.34 This option would result in each settlement across the district with a settlement boundary, defined in the Draft Local Plan 2024, regardless of its scale or location, receiving a share of the required housing numbers. The strategy would also result in a distribution of mixed use and/or employment sites across the settlements. The option would appear more equitable with housing provided widely across the district able to support local housing need and provide greater choice of sites. However, development would not be limited to settlements where there are sufficient services, facilities and infrastructure to support the proposed housing growth. As such the option would not result in all development taking place in settlements that have the necessary infrastructure, key services or a good level of connectivity although some development would. It would result in a mixture of outcomes depending on the settlement itself.

10.35 Although it would divide growth between a greater number of settlements, it may be disproportionate to the infrastructure some of the settlements could provide. The allocations may have greater environmental impacts, not support active travel for all developments and generate a wider spread of rural traffic and ultimately not create a sustainable form of development.

Sustainability Appraisal Assessment of Option 2.

10.36 This option would result in each settlement (regardless of its scale or location) across the district having to 'take on' a share of the required housing numbers, which would also result in a dispersal of mixed use and/or employment sites. It is not limited to where there may be sufficient scope or infrastructure to underpin the development, but instead it would result in a mixture of outcomes.

The positive effects (in sustainability terms) of this option include:

10.37 Mainly, this option results in neutral SA impacts, rather than positive ones. However, it could provide the housing requirement, including affordable housing and a mix of housing types and sizes for the District and new housing would be spread across the district, thus reducing inequalities (having a positive effect on SA No.2). Some (probably a limited number of) sites would be in close proximity to existing services and facilities, including health and education and may provide small scale scope for active travel connections (for healthy living), use of public transport (reduction in dependence on the car) which have positive (albeit very limited) effects for SA Nos. 1,3,4 and 5.

The negative effects (in sustainability terms) of this option include:

10.38 Some of the many smaller and rural settlements in the district would be significantly changed by an increase in development which would be out of scale and character and not supported by any infrastructure, services (health, education, employment, retail), public transport or active travel choices. This option is likely to lead to widespread speculative development in highly unsustainable locations. It would not ensure that housing is in close proximity to services, or facilities to either improve health, academic skills or to support the local economy. There is likely to be lack of employment or social facilities and would be a higher dependency on private transport, all having a long-term cumulative negative effect on SA Nos. 1, 3, 4 and 5. These sites would also result in fewer opportunities to support energy efficiency to reduce effects of climate change (carbon dependency) whilst simultaneously making it difficult to conserve biodiversity or provide biodiversity net gain (BNG) or promote Green infrastructure (GI), both causing negative effects on SA Nos. 7 and 10. The only sites which could be more sustainable would be those in the towns and larger settlements where infrastructure and services already exist. As such, this option demonstrates little scope of being sustainable and reliance on this strategy would only deliver a certain quantum of development over this plan period and would not ensure a longer-term sustainable strategy as some of the existing capacity of many of the settlements may be exhausted.

10.39 Potential mitigation to overcome the negative impacts is extremely limited, as this option does not provide the potential to select only the most sustainable locations for development. Therefore, this option is not sustainable.

Option 3: Maximum incremental change to the extent of absolute constraints.

10.40 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 where plans are not up to date i.e provided all national constraints are respected and there is a reasonable connection to services it is accepted that no 'better' options can be relied upon. This is an option which could also be termed dispersal although the majority 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.

10.41 This type of option is best described as where the location of new development is primarily determined by available capacity of sites. It is not a strategy based on seeking the optimum change distribution

in order to realise what may be other aims and objectives of a plan. Such an option may deliver development that is reasonably sustainable but the option is capacity led and a range of less sustainable dispersed sites would be more likely. Incremental change is probably an element of most options but the main characteristic of this option is that it uses opportunities where they occur. It is a strategy where the overall aims and objectives are simply to accommodate the required level of development.

10.42 This option would see the available capacity being taken up in the towns without a set priority or a strategy that promoted one over another. The constraints set out in Sections 7 and 9 would however tend to limit the capacity and this may be below the level required to accommodate the scale of development likely to be needed by 2043. In larger villages and other villages the capacity based allocations would see development promoted where sites could be identified.

Sustainability Appraisal Assessment of Option 3

10.43 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 where plans are not up to date, i.e. provided all national constraints are respected and there is a reasonable connection to services it is accepted that no 'better' options can be relied on.

The positive effects (in sustainability terms) of this option include:

10.44 Outcomes are likely to be similar to Option 2, the main positive effect of this option is that it could provide the housing requirement, including affordable housing with potential to provide a mix of housing types and sizes to meet the needs of different sectors of the community and to reduce inequalities, which are all positive effects for SA No.2. A limited number of sites would be in close proximity to existing services and facilities, including health and education and may provide small scale scope for active travel connections (for healthy living) and use of public transport (reduction in dependence on the car) which have positive (albeit very limited) effects for SA Nos. 1,3,4 and 5.

The negative effects (in sustainability terms) of this option include:

10.45 Benefits of existing services, such as health, education, leisure or retail as well as economic benefits (employment) would be very limited and highly dependent on the developer providing them given the nature of what could be piecemeal development. Given that development could take place to the absolute constraints of the settlement, sites are thus more likely to be located in the most sensitive landscape areas with little or no mitigation measures, not protecting the landscape or areas of landscape value, having negative effects on SA No.6. Furthermore, there would be little opportunity to mitigate ecological and environmental impacts, making it difficult to conserve biodiversity or provide connectivity between wildlife habitat (negatively affecting SA No. 7). Development in this manner would increase traffic generation and congestion, having negative effects on SA No.8 and also put additional unplanned pressure on infrastructure, resulting in higher carbon emissions with no planned approach for carbon offset (negative impacts on SA No.10). The generation of waste is less likely to be managed in a sustainable way and development is more likely to be in close proximity to heritage, thereby not always maintaining cultural and historical assets with little chance of mitigation, having long-term negative effects on SA Nos. 11 and 12.

10.46 Overall, potential mitigation to overcome the negative impacts are severely limited and as such this is not a sustainable option, particularly with the uplift in Local Housing Need as this will only lead to largescale and widespread speculative development in highly unsustainable locations.

Option 4: Planned new settlement(s).

10.47 This is a planning option that is being considered and implemented in a number of locations across the country. It would identify one or more new settlements and promote a scale of development that would create a new sustainable community supported by the appropriate infrastructure. The option to provide a new or substantially new settlement or settlements would establish a sustainable long term option, potentially beyond the Local Plan period.

10.48 New settlements feature in areas where there is limited capacity for change and where it is considered that the best strategy is to provide a planned solution rather than a wholly incremental one. This option would be implemented alongside one where other incremental development also took place partly because of the need to provide a range and continuity and partly in recognition that the new settlement option has a very long lead time and could not be expected to be commenced in the first part of the plan period.

10.49 The initial study of the constraints likely to affect strategic planning and referencing SHELAA sites suggests that there are areas in the eastern and northern part of the district that are less affected. To the north this is generally related to the M50 and to the west the A40, A48 and the rail line, although no station exists in the area.

10.50 Commuting patterns show that the eastern area looks to Gloucester and Cheltenham. The movement of road traffic especially demonstrates a significant degree of congestion and major development in the area of the A40/ A48 would need to demonstrate how this could be mitigated.

10.51 Although there are some clear constraints, the areas east and north of Tutshill/ Sedbury may offer potential for further development. This could only be realised if the present congestion issues on the A48 are resolved or significantly relieved. There is a proposed Draft Local Plan 2024 allocation at Beachley Barracks with the expectation it will be vacated by 2031.

Sustainability Appraisal Assessment of Option 4

10.52 The purpose of this option is to provide one or more new (or substantially new) settlement or settlements which would establish a long term option strategy.

The positive effects (in sustainability terms) of this option include:

10.53 The identification of one or more new settlements and the promotion of a scale of development that would create communities supported by appropriate infrastructure. It is assumed that new infrastructure appropriate to the needs of the settlement(s) will be needed but can be provided in step with its development. At this scale a masterplan approach could ensure that sites would be in closer proximity to health and educational services (or new ones created within the new settlement(s)), larger housing numbers can be provided (including affordable housing, wider mixes of housing better able to meet needs of different

sectors, and helping to reduce health inequalities with positive effects for SA Nos. 1, 2 and 3. Positive effects would also include greater opportunities for carbon reduction measures (through high quality construction methods and possibly a district heating system) with positive effects for net zero objectives and SA No. 10 that could be cumulative in the longer term. The option can plan to deliver all necessary services, including leisure, retail, etc. as well as offer employment choices. There is a greater opportunity to reduce or mitigate negative impacts to biodiversity and to create large swathes of green infrastructure, strengthening connectivity for habitats and species through a masterplan approach with potential major positive effects in the longer term for SA objective No. 7.

The negative effects (in sustainability terms) of this option include:

10.54 It is recognised that initially the introduction of development on greenfield land (often open countryside) has an immediate damaging impact on the local landscape, however, new settlements have the potential to be designed so that masterplans and design coding ensure that the new settlement is of high quality. Similarly, impacts in terms of traffic generation can be planned more effectively to connect to more public transport networks and to provide a high level of active travel options with longer term positive effects on SA objectives Nos. 3 and 1 through supporting healthy living.

10.55 Nevertheless, new settlements take a long period of time to become embedded and as such, short term housing needs would not be met across the plan period if this strategy were relied on alone. As such, this option can only offer long-term sustainability if combined with another option.

Option 5: Negotiated agreement that some development will be passed to adjoining authority(ies).

10.56 Development outside of the Forest of Dean District is an option in planning policy terms. It would be where an agreed major element of the FoDD required development would be met in an adjoining area, but only with the approval of the LPAs where the development would occur.

10.57 Duty to co-operate discussions to date have given no certainty that there will be scope for meeting some of the needs of the FoDD outside its administrative area. Duty to cooperate discussions will continue as the various Local Plans progress. This is because the surrounding areas themselves are constrained or are under greater pressure for development sites. There are at present no agreements between the LPAs to adopt a cross border solution to meet needs arising in the FoDD.

Cheltenham Borough, Tewkesbury Borough and Gloucester City Council's Strategic and Local Plan Area (SLP).

10.58 One of the main areas close to the FoDD which is under pressure for development locations is the SLP. Transferring development from the FoDD to this area is very unlikely to be a workable option. The SLP is now being reviewed in order to be able to provide sufficient land and is in need of additional land for housing over its lifetime. The options are currently being considered but are based on the development needs of the SLP not accommodating additional growth from neighbouring areas.

Monmouthshire County Council, Herefordshire Council and South Gloucestershire Council.

10.59 There have been no requests from the adjoining LPAs of Monmouthshire, Herefordshire and South Gloucestershire to accommodate development from the adjoining area. Likewise transferring development from the FoDD to these areas is very unlikely to be a workable option.

10.60 South Gloucestershire Council published their Regulation 19 Local Plan. The consultation closed in April 2025 and the Council expects to submit the Local Plan in the Autumn of 2025.

10.61 Monmouthshire County Council (MCC) local plan is prepared within the Welsh planning system. MCC consulted on its Deposit Replacement Local Development Plan, together with the supporting Integrated Sustainability Appraisal Report and Habitats Regulations Assessment between Monday 4th November and Monday 16th December 2024.

10.62 The Regulation 18 Draft Herefordshire Local Plan 2021-2041 conducted a public consultation between March and May 2024. Following the update to the NPPF and the mandatory housing targets published in December 2024, the council made a decision to cease any further work on the Draft Regulation 18 Local Plan as a new spatial strategy is required to address the significant uplift in housing growth. The Council is therefore progressing the Local Plan under the Levelling up and Regeneration Act (LURA) 2023 System.

Sustainability Appraisal Assessment of Option 5

10.63 This option would be where an agreed major element of the FoDD required development would be met in an adjoining authority area, but only with the approval of the LPAs where the development would occur. In this option any element delivered in an adjoining authority would be subject to SA through that authority(ies) plan/allocations.

The positive effects of such an option (in sustainability terms) include:

10.64 Overall, development outside the district has good potential to protect the landscape and areas of landscape value within the district, also providing protection of designated ecological areas, having positive effects on SA Nos. 6 and 7. Equally, development outside of the district is less likely to increase traffic generation, congestion and therefore be less harmful to local air quality as well as maintaining water quality and having little impact on waste generation within the district, which are positive effects on SA objectives Nos. 8 and 9. Carbon emissions are likely to be lower or unaffected when development is outside the district, however, it does not support energy conservation or work towards reducing effects of climate change within the District (SA No. 10).

The negative effects of such an option (in sustainability terms) include:

10.65 The most significant negative effect resulting from this option would be that the local housing need (which should include a mix of housing types and sizes, including affordable) within the FoDD would not be met by housing in a different authority and there would be no more housing available to existing and future residents of the FoDD and would not improve a healthy living. This has long-term negative effects on SA Nos. 1 and 2 and does not reduce social inequalities. Furthermore, development outside the FoDD offers no benefits for increasing or improving community services, such as recreation/leisure, educational, health or provide additional well-paid employment, which are all negative effects on SA Nos. 3, 4 and 5. Essentially, this

option is sustainable only in terms of fewer impacts on the environment, but conversely has a much more negative impact on both the economic and social strands of sustainability within the FoDD. Mitigation mechanisms could possibly include cross-border developments, which could offer more social and economic benefits to the District. This option alone would not provide the economic and social benefits of development.

10.66 This option is likely to be discounted as there is currently no evidence from duty to co-operate discussion with adjoining authorities that this is required, given that the surrounding authority areas themselves are constrained or are under greater pressure for development sites and furthermore, there is sufficient space within the district to provide housing. However, this does not preclude any potential cross-border applications where the housing is simply geographically located straddling the district's borders. In these circumstances each affected district benefits from the resultant proportional housing numbers. However, with the initiation of the Local Government Reforms and the Forest of Dean District Council becoming part of a Unitary Authority, this situation is likely to change in the future. However, given that the aim to submit the Local Plan during the Winter 2026, it is likely that the plan will be adopted prior to the Council becoming part of a unitary authority. As a provision in a neighbouring authority cannot be relied upon this is not considered sustainable.

Question 6

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

Question 7

Do you have any further comments on the range of options or suggestions of alternative options?

It may be helpful to consider the following:

- Are there any particular difficulties with some?
- Which may be the most sustainable?
- How may they be implemented?
- Which general locations may be best suited to further development?

11 Most Sustainable Combination of Options

11.1 There is limited scope for the current strategy approach, as set out in the Draft Local Plan 2024 to continue without major impact on one or more of the existing settlements. For the plan to proceed and found sound at examination it must be able to provide for the scale and pattern of change that is required by the NPPF's new standard method. Without an adopted Local Plan in place development will still happen at our towns and villages in an unplanned way. Growth will still take place, but with a significant risk of it being uncoordinated, and without the requirements for high-quality housing or joined up decisions about infrastructure.

11.2 In order to achieve the revised housing target, a combination of both Option 1, 'selective planned expansion around the most sustainable existing settlements', along with Option 4, 'the development of one (or more) sustainable new settlements' would be an appropriate sustainable response. A strategy reliant on either the extension to existing settlements, or the development of sustainable new settlements alone, will not achieve the number of new dwellings now required and distributed over the plan period. Options to develop the land surrounding our existing settlements and towns, as well as the infrastructure that support them (highways, drainage and services), are becoming exhausted, and will not be capable of delivering or subsequently supporting the total 13,200 new dwellings required up to 2043.

11.3 The combination of the two options would address concerns about the capacity available at many of the existing settlements and the quantity of development individual settlements can sustain. It may also ensure a longer-term sustainable strategy for individual settlements because the available sites would not be depleted.

11.4 A planned new settlement or settlement(s) would have positive impacts by providing sufficient local housing (including affordable) and access to sustainable community facilities, recreation and leisure facilities as well as education establishments and a vibrant local economy, whilst ensuring that harm to local biodiversity is sufficiently mitigated or avoided. However, it is necessary to highlight that these positive impacts are mainly in the long-term, provided that the new settlement is thoroughly master-planned and ensures that the size of the development is large enough to accommodate and maintain the much-needed services/facilities, as well as having a well-planned transport network and the necessary infrastructure being embedded from the outset. A new settlement would allow for a holistic approach to carbon reduction, but again this is a long-term goal.

11.5 This type of development would not work in a piece-meal fashion and if that were to happen, not only would the scheme have a negative impact on the landscape (given that the site would be greenfield), but would also result in high levels of waste and carbon production, as well as being an unsustainable location if the inhabitants could not walk/wheel/bicycle or use public transport to access services. The outcome and success or failure of such an option is very much dependent on the location, planning and timing of the development.

11.6 It is acknowledged that there is limited capacity for change around the existing settlements. A planned new settlement would not provide for the full housing requirement either and this would need to be supplemented by additional allocations at within or adjacent the settlement boundaries of the most sustainable towns or villages. It is assumed that the Draft Local Plan 2024 allocations will in most part remain. Of the additional 6600 homes an approximately 80% would be located in a new settlement(s).

11.7 The option of a planned new settlement implemented alongside one where other planned incremental development took place, would provide a range and continuity of development sites coming available through the Plan period allowing for shorter term housing need to be met. The new settlement option alone has a very long lead time and could not be expected to be commenced in the early part of the plan period.

11.8 Therefore a 'selective planned expansion around existing settlements' in conjunction with a 'planned new settlement' would be the most sustainable option. i.e. to combine Options 1 and 4. In addition to the positives of a new settlement, the additional allocation at selective locations would provide the opportunity to meet the housing needs towards the first half of the plan, including the necessary affordable homes in the most sustainable way available.

11.9 Supplementing those already allocated in the Draft Local Plan 2024 will continue to support the role and functions of existing settlements without overly pressurising them from even further large housing allocations, than if option 1 was chosen alone. This strategy also has the ability to locate new development in close proximity (even walking distance) from existing educational establishments, providing better academic scope for local residents. A well planned settlement expansion would be near existing facilities and services, sustaining the local economy and ensuring that there are more choices for local residents who are consequently more likely to invest their income locally. There is potential to improve the health and well-being of the population by providing housing within close proximity of existing services and facilities, including health services, such as doctor's surgeries, pharmacies, as well as leisure/recreation facilities for keeping fit and healthy (e.g. gym, sporting facility etc.).

11.10 Selective planned expansion around an existing town/village boundary should be planned to mitigate harm to the landscape, biodiversity, flora and fauna. The spatial strategy must address climate change by direct allocation of sites, the promotion of development that is more energy efficient.

11.11 As well as identifying new opportunities for growth, we must also be mindful of the need to future-proof our towns and settlements for future generations. Exerting additional pressure upon them without having regard to their ability to sustain new development and increases in local populations will fail to do this. As such, it must be identified and ensured that the additional infrastructure required to support both our towns and settlements as they expand will either be delivered as part of the developments themselves, or that the infrastructure providers are capable of such improvements or extensions. Early engagement with infrastructure providers, which is a critical element of the local plan review process, will assist with this.

11.12 Furthermore, a mix of development (of both sustainable new settlements, and larger and smaller developments) would also allow the Council to deliver a steady flow of new dwellings all through the local plan period, supporting the number of completions being recorded each year to meet the housing requirement set by the Local Plan (600 per annum).

Sustainability Appraisal Assessment Options 1 and 4 combination

11.13 The option of a combination of Selective Planned Expansion of existing settlements and Planned New Settlement(s), provides the benefits of both of the options and provides greater scope to avoid, reduce and mitigate potential environmental, social and economic harm.

The positive effects of this combination of options includes:

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

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

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

11.17 Positive effects would also include wider scale carbon reduction measures (through high quality construction methods and possibly a district heating system) with positive effects for net zero objectives and SA No 10 that could be cumulative in the longer term. The combination of both options also allows the Local Plan to continue to support the role and functions of exiting settlements without overly pressuring them from even further large housing allocations, than if Option 1 were chosen alone.

The negative effects of this combination of options include:

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

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

Question 8

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

12 Next steps

12.1 The purpose of the Local Plan is to guide change over the period in a manner that best benefits the area whether by accommodating new development or applying measures to protect and enhance the environment. This must be achieved through promoting and achieving development that is sustainable, where the district meets the needs of the present does not compromise the ability of future generations to meet their own needs. In practice this means finding, enabling, promoting and supporting new solutions which achieve net zero carbon emissions alongside measures to protect and support the environment. The Plan must deliver appropriate local solutions for the FoDD and consequently contains policies and proposals covering a comprehensive range of planning issues which reflect local circumstances. In order to fulfil its role, the LP needs to be able to pass successfully through the examination process bringing an appropriate strategy and set of policies that comply with national guidance, which is supported by appropriate evidence.

Consultation

12.2 You are therefore encouraged to comment on this Options paper. We welcome suggested changes to the Most Sustainable Option or proposals of alternative options. No decision has been made to where allocations should be made. Therefore we would also invite suggestions of available sites, not already submitted through the SHELAA process, for consideration to meet the development needs of the District in a sustainable way.

Question 9

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

Question 10

The questions posed in this document may be used as a basis for responses. However, the purpose of this consultation is to obtain a wide range of responses covering any subject that is relevant to the new Local Plan strategy. If you have any additional points you wish to raise, please do so.

There will be further opportunities for comments on a revised Draft Local Plan however if you have any additional points or suggestions you wish to raise now, please do so.

12.3 The next stage, following this engagement will be for Council to agree a revised strategy and preferred option for the Local Plan, this will probably take place towards the end of 2025. The decision to favour one option or another will be made in the light of consultation responses received and the issues described above.

12.4 Any new potential additional sites will be assessed and Draft Local Plan 2024 Consultation will also be reviewed in light of the new strategy. A revised version of the draft Local Plan will then be developed based on the agreed preferred option. A revised Reg 18 Draft Local Plan will, following approval by Full Council, be subject to further consultation early 2026.

12.5 In summary, the options for the future development of the FoDDC are based on the rate of housing delivery required by the revised NPPF. It is expected that the Local Plan will make allocations for the necessary 13,200 homes and other development in a manner that meets the needs of the FoDD within its own boundaries and in a sustainable manner compatible with the regeneration and sustainability aims and objectives of the Council.

