

17<sup>th</sup> March 2026

Local Plans Team  
Council Offices  
Forest of Dean District Council  
High Street  
Coleford  
Glos GL16 8HG

Sent by email only to:  
localplans@fdean.gov.uk

Dear Sir/Madam,

**Forest of Dean District Council Local Plan 2025-2045  
Regulation 18 Consultation Response March 2026**

Please find below Redmarley Parish Council's response to Forest of Dean District Council's Regulation 18 consultation on the Revised Draft Local Plan

Yours Faithfully,  
Redmarley Parish Council

This representation to the Forest of Dean District Council Revised Local Plan Regulation 18 Consultation is made by Redmarley Parish Council. Redmarley Parish Council is disappointed that no engagement has been made by the District Council prior to this stage, considering that under the Revised Draft Local Plan the Parish is asked to provide for 28% of the total allocation.

### **Sustainability Appraisal**

The Sustainability Appraisal published to accompany the Regulation 18 consultation clearly does not independently and impartially appraise all sites equally and appears subjective rather than objective. The District Council was also advised that the Interim Sustainability Appraisal published alongside the consultation exercise held in July 2025 could be construed as being impartial.

Rather than accurately and impartially appraising all sites within the Local Plan, it appears that the Sustainability Appraisal has been written to effectively 'retrofit' the Council's pre-determined strategy. Furthermore, it is well held, and underlined by Paragraph 34 of the National Planning Policy Framework, that plans should be informed by the Sustainability Appraisal rather than a (pre-determined) strategy informing the Sustainability Appraisal. It is reasonable to conclude that the current Sustainability Appraisal has been significantly altered to accommodate policies RLP.60 and RLP.61.

### **Glynchbrook 'Garden Village' (Redmarley Parish) – Policy RLP.60**

Redmarley Parish Council strongly objects to the inclusion of Policy RLP.60 on the grounds set out below. It should be noted that the proposed development strategy is also considerably flawed in the opinion of Redmarley Parish Council.

#### **Impacts on the Malvern Hills National Landscape and the Wider Landscape**

The site outlined under Policy RLP.60 sits wholly within the setting of the Malvern Hills National Landscape and the southern end of the Malvern Hills SSSI sits just over 2km away.

Paragraph 189 of the National Planning Policy Framework states that great weight should be given to conserving and enhancing landscape and scenic beauty within National Landscapes. It further outlines that development within the setting of National Landscapes should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas. Policy RLP.60 indicates that site masterplanning can 'significantly mitigate' the development by ensuring that it blends into the landscape around it. Redmarley Parish Council considers that even with a masterplan, a development in this location, regardless of scale, would have an unacceptable and irreversible impact upon the Malvern Hills National Landscape. Furthermore, a development in this location would introduce noise, additional traffic and light pollution which would further damage the National Landscape. It is further noted that the District Council admits that a development in this location will inevitably have an impact upon the (National) Landscape and surrounding area.

Whilst the Malvern Hills National Landscape is mentioned fleetingly within the Policy documentation and the Sustainability Appraisal, neither document mentions the

nearby SSSI of the Malvern Hills which as stated above, sits just over 2km away. There are also a further number of SSSI which are likely to be impacted by the proposed allocation under Policy RLP.60 which are also not mentioned in the SA, Local Plan or the Habitats Regulation Assessment. Turning back to the Malvern Hills SSSI, it is noted that the condition of this SSSI has been rated as unfavourable, primarily as a result of increasing recreational pressure<sup>1</sup>. It is reasonable to conclude that a development of 3500 dwellings would result in a significant increase in recreational pressure on the Malvern Hills, including both the National Landscape and the SSSI. It would also likely lead to significant damage of habitats which are heavily relied upon by a diverse range of fauna. Paragraph 193(b) of the National Planning Policy Framework outlines that development on land outside of a SSSI but ‘...is likely to have an adverse effect on it’ should not normally be permitted. There is no evidence presented by the District Council that the proposal could clearly outweigh its likely impact upon the features of the SSSI and the wider network. Redmarley Parish Council contends that the District Council will be unable to provide such evidence, primarily because the limited benefits of the proposal (solely meeting the housing need outlined under the NPPF) are unable to demonstrably outweigh the significant negative impacts upon the Malvern Hills SSSI and wider network. This in tandem with the fact that there are clear, reasonable and workable alternative sites to Policy RLP.60, as outlined by Redmarley Parish Council to the District Council in September 2025, means that Policy RLP.60 appears completely unviable.

It is difficult to understand how the proposal under Policy RLP.60 is underpinned by the ‘Garden City Principles’. The objective of a Garden City is to ‘enhance the natural environment’, however it is clear that this proposal will have a drastic negative impact upon the Malvern Hills National Landscape and the wider biodiversity of the area. It is hard to envisage that any mitigation as proposed by the Sustainability Appraisal will be suitable to offset any such negative impacts.

Policy RLP.132 is noted regarding Locally Valued Landscapes (LVL). The Parish Council is concerned that the District Council appears to have given the proposed Coleford LVL significant weight within the Draft Local Plan whereas the proposed LVL for Lowbands has been given limited weight. The Coleford LVL has been used, almost exclusively, to rule out allocations which could add up to approximately 2000 additional dwellings whereas the District Council has not given any weight to the LVL when assessing Policy RLP.60. This shows a very clear inconsistency in policy application across the Local Plan and brings into question the impartiality of the District Council and the plan as a whole. For clarity, Redmarley Parish Council supports the introduction of a Locally Valued Landscape at Lowbands through Policy RLP.132 (if given equal weight with all other LVLs within the Policy) and is disappointed that the District Council has refused to support a request for one covering Redmarley Village and surrounds.

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<https://designatedsites.naturalengland.org.uk/SiteFeatureCondition.aspx?SiteCode=S1001017&SiteName=The%20Malvern%20Hills%20SSSI>

## Highways Impact

There appears to be no evidence to suggest that the District Council has considered the likely implications of Policy RLP.60 upon the local highway network or trunk road network.

With Policy RLP.60 the M50 (trunk) runs through the centre of the proposed site, the A417 borders to the south and multiple Class 3 and 4 highways also border the site on multiple sides. Regarding the trunk road network, specifically the M50, the District Council has not produced any evidence to suggest that they have assessed its capacity through transport modelling. It is the opinion of Redmarley Parish Council that in their current form, Junctions 1 and 2 of the M50 and Junction 8 of the M5, would need significant engineering upgrades to increase their capacity required for the growth proposed under Policy RLP.60. The District Council will be aware that the Stroud District Council Local Plan has been significantly delayed by a lack of evidence surrounding upgrades to Junction 12 through Junction 14 of the M5, culminating in the Plan being recommended for withdrawal by the Planning Inspectorate in October 2025. The Parish Council notes with interest the developments in this case and the involvement of certain Officers across both Local Plans.

Furthermore, there is often significant congestion on the A417 towards Gloucester, particularly at Maisemore. The A417 at Maisemore also regularly floods in the winter months from the adjacent River Severn, blocking the main route into and out of Gloucester for significant periods of time, forcing drivers to use minor roads as a diversion. In addition to flooding at Maisemore, roads bordering the development often regularly flood causing further disruption.

Upgrades to the trunk and local road network to alleviate these issues will require significant investment backed up by Section 4 & 6 and Section 278 agreements. It would also require evidenced Duty to Cooperate discussions with both Worcestershire and Herefordshire Highways and National Highways due to the wide impacts such a proposal would have. It is reasonable to assess, given the statements made by Malvern Hills District Council<sup>2</sup>, that Forest of Dean District Council have not held any Duty to Cooperate discussions with any of the relevant parties.

Additionally, it would be reasonable to expect some evidence of Transport Modelling at the Regulation 18 stage and it appears that the District Council has not undertaken such modelling.

Point 22 on Policy RLP.60 states 'Primary vehicular access from the A417... with necessary improvement to the existing highway network'. As mentioned above this would be expected to be delivered through a Section 278 agreement, although it is likely this would not be able to take place without significant disruption to the general public using the A417, particularly if it involves the creation of a new access for 3,500 dwellings. It would also be reasonable to question whether the District Council has made arrangements for the provision of funds for claims under the Land Compensation Act 1973.

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<sup>2</sup> <https://modern.gov.malvern hills.gov.uk/documents/s39454/Appendix%20-%20MHDC%20Response%20to%20the%20Forest%20of%20Dean%20Local%20Plan%20Regulation%2018%20Consultation.pdf>

## Infrastructure Delivery

Experience shows that infrastructure delivery in new single settlements is incredibly slow, and this has been raised on numerous occasions by Redmarley Parish Council. The District Council, however, is dismissive about, and unwilling to acknowledge, the very serious concerns around infrastructure delivery. In order to assess the viability of infrastructure delivery, the District Council is expected to produce an Infrastructure Delivery Plan. It would be reasonable to have expected the District Council to have begun the assessment of infrastructure prior to publishing the Draft Local Plan and that prior to the Regulation 18 consultation, a draft Infrastructure Delivery Plan would be published, however it is clear that the District Council have done neither. In September 2025, officers stated that the Infrastructure Delivery Plan would be produced 'around Summer 2026' and then in March 2026, officers confirmed that work had not yet begun on an Infrastructure Delivery Plan. This is incredibly concerning, and underlines that either the District Council is not taking this Local Plan process seriously, or has no confidence that this Draft Local Plan, and the policies within it, are sound.

Policy RLP.60 (and to equal extent RLP.61) will put significant strain on NHS services due to the additional demand created by a new settlement with an expected final population of 6,000 to 7,000. The nearest GP surgeries are in Staunton and Ledbury, and both are unlikely to have capacity to take on significant numbers of new patients. Once again, it is likely that occupiers will seek healthcare services from a wide range of places, including those in the neighbouring counties of Herefordshire and Worcestershire who are unlikely, in part due to an apparent lack of Duty to Cooperate discussions, to have the ability to increase capacity to meet the new demand.

It is noted that the Draft Local Plan states that there will be a provision of an FE primary school and contributions towards the provision of a FE secondary school. The wording of this paragraph is interesting as it states 'towards' which suggests that the developer is not expected to provide the full funding for the Secondary School and thus it is expected that Gloucestershire County Council, as the local education authority, would make up the shortfall in funding. It would be reasonable to question whether, once again, the District Council has held any Duty to Cooperate discussions with Gloucestershire County Council regarding this provision. In any case, it is likely that the provision of such requirements will have a significant negative impact on the viability of the development, particularly the deliverability of the 30% of affordable dwellings. It is also noted with interest, the Council's statement that the 30% of affordable dwellings will help to address 'tenure, type and size of dwellings needed with the Local Planning Authority area'.

It is clear that throughout Policy RLP.60, a significant amount of infrastructure will be funded through 'contributions'. As stated above, it is likely a substantial amount of contributions will reduce the viability of the development and therefore have an impact on the deliverability of the 30% affordable dwellings.

## Heritage Impact

The proposed allocation will adversely affect the setting of a number of Grade II listed buildings and one Grade II\* listed building. There is also a scheduled monument approximately 1km to the south of the proposal. Paragraph 213 of the National Planning Policy Framework deals with harm to significance of a designated heritage asset, including development within its setting. All designated heritage assets whose setting will be adversely affected by the proposed allocation derive their significance from their rural nature and remoteness. By introducing urbanisation into their setting it is clear that the significance of such heritage assets will be affected. It is also clear that the 'exceptional' test introduced by Paragraph 213a of the NPPF, would not be met by the proposal and the public benefits of any development within the setting of the designated heritage asset would be heavily outweighed by the harm caused. It is noted that the Sustainability Appraisal states that 'any negative impacts on heritage assets' can be 'mitigated', however it is difficult to see how any level of mitigation could truly prevent harm to the setting of such heritage assets.

The proposed allocation is also adjacent to the Lowbands Conservation Area and the Lowbands Chartist Settlement. Lowbands is well recognised as the last Chartist Settlement which has been 'untouched' by inappropriate development within the Forest of Dean. The District Council will be aware that the Snigs End Conservation Area has been placed on Historic England's At Risk Register. The numerous press releases from the District Council regarding this outline the District Council's unacceptable attitude towards historic settlements within the District. The District Council should be learning from its past failures and protecting the Lowbands Conservation Area and related Chartist Settlement.

## Politicisation of the Plan

The main controlling political party within Forest of Dean District Council is the Green Party and they have been open in their favourability towards new settlements<sup>3</sup>. When developing the Local Plan, it is important the District Council ensures that the process is evidence based and not influenced by any internal or external pressure. Consideration should be given to R (Stonegate Homes) v Horsham DC [2016] EWHC 2512 (Admin) in which the Court considered a Neighbourhood Plan which had dismissed a particular site for development without undertaking a formal assessment of impacts. Patterson J held that the Council had not met its obligation to assess the alternatives in a comparable manner and quashed the decision to make the Neighbourhood Plan.

Accordingly, any decision to accept or reject any sites should be based upon appropriate evidence. Should a decision be made to proceed with a strategy that appears to be based upon external pressure from developers and landowners, or what is considered by members, particularly those from the controlling party, to be politically sustainable, it is, in our view, significantly vulnerable to legal challenge. The District Council should further ensure that there are no conflicts of interest between any individuals involved in the process which would impact upon any decisions made.

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<sup>3</sup> Minute 9.2(a) - <https://meetings.fdean.gov.uk/ieListDocuments.aspx?CId=120&MId=4453&Ver=4>

## **Allocations**

Forest of Dean District Council, through both officers and members, has argued that a strategy of dispersed growth is not feasible due to the number of dwellings allocated by the NPPF (through the Standard Method). However, Redmarley Parish Council has significant evidence to challenge that claim. Currently, the Sustainability Appraisal rules out, predominantly through inconsistency in policy application, approximately 5,000 dwellings. The District Council would be advised to refrain from making similar assertions regarding a dispersed growth strategy in future without adequate substantiation.

## **Conclusion**

Redmarley Parish Council objects in the strongest possible terms to the current Draft Local Plan and proposed allocations of RLP.60 and RLP.61. It is clear that, contrary to the findings of the Sustainability Appraisal, the proposed allocation of RLP.60 is not a sustainable or appropriate location for strategic growth of any kind. Furthermore, the Sustainability Appraisal is flawed as it does not adequately consider all the impacts of the proposed allocation, and neither does it appraise all sites equally. It is clear that the Sustainability Appraisal has been adjusted in order to effectively 'shore-up' the District Council's pre-determined strategy of building new single settlements, rather than spreading the allocations equally through the District. When assessed against the test for examining plans at Paragraph 36 of the National Planning Policy Framework, Redmarley Parish Council does not believe that the draft Local Plan is 'sound'.

Despite claims to the contrary, it is clear that Forest of Dean District Council has failed to engage with neighbouring authorities who will be impacted upon significantly by Policy RLP.60. It is contended that the District Council has not engaged in such discussions because it is aware that significant issues exist with the proposal.

It should be noted that should the District Council seek to continue pursuing a strategy with Policy RLP.60, then Redmarley Parish Council reserves the right to take any such action it deems expedient to protect its parish from significant and irreversible damage.