Local Plan - Issues & Options

The consultation raises a significant number of key questions on which FEP in its Sub-groups has not gained a considered complete view at this time. The below therefore represents current thinking based on members’ understanding of the issues. FEP looks forward to considering further these questions in order to provide a fuller response over the next 6 months to assist in the development of the Local Plan.

**Question 1**

**“Development that meets the needs of the present without compromising the ability of future generations to meet their own needs” 1987 Bruntland Commission**

**Do you agree that the LP should take as an initial theme the above definition of sustainable development?**

Agreed if ‘the present’ is understood to mean at least the 20 years of this plan with a rolling view in the later years; not the present as in today and the next 3 years.

**Question 2**

**Should the plan look forward to year 2041? Should the plan review and change, where necessary, all of the current AP and CS?**

Agreed the opportunity is to plan looking forward to maintain the District’s balance as a working forest in a rapidly changing world as a rural exemplar; not to look backwards with grudging change going forward. A review of the CS and Allocations Plan are therefore appropriate.

**Question 3**

**Do you agree with the need to bring carbon emissions down to zero by 2030?**

Clarity is required here. Is the aim for FoDDC to bring down carbon emissions to zero or is it for the plan to enable premises for work, business and leisure to have net zero emissions and for transport within the district to be net zero?

**Question 4**

**Do you agree with the Vision p5 of plan, and are there any particular aspects of it that are especially important?**

As a starting vision this encompasses much of the discussions at FEP in stakeholder and sub-groups. At this stage we would not highlight any of the bullets as having more importance as they resonant with the agreed FEP SWOT of 2018 attached to this response.

**Question 5**

**The above table contains a list of key issues, do you agree with them and are there any that are especially important?**

Access comments on overall and development locations; the major challenge with connectivity and carbon reduction is existing locations rather than newbuild.

It is increasingly clear that transport policy development is based on existing modes and passengers rather than asking potential users how they would travel if X was possible.

Home working based on How Fast How Good is Your Broadband is already significant in the District which bodes well for Industry 4.0 commercial activity.

Economy- the district already has a very diverse base and a manufacturing distinctiveness above the rural national average. Increased diversity might therefore come from more medium-sized rather than micro businesses. Space is therefore needed within the district to enable businesses to grow from start-up to 20+ employees in a single location on a habitual basis given the changes in office v homeworking.

The ICT/cyber opportunity should not be overlooked given the tie in to agritech and Cyber-Cheltenham both key elements of the Local Industrial Strategy for Gloucestershire.

Affordable Housing is essential to balance demands on housing and attractiveness of district with the removal of tolls.

Other major sites- need to develop specifically what LP needs to do. We appreciate that these are a little opaque at the moment and that for all 3 we as a district are reactive currently.

Q**uestion 6**

**Do you have any comments on the above (calculation method for delivery of housing and housing trajectory)?**

Calculation seems robust. A question arises of how compatible this might be if the District is successful with a Biosphere Reserve application which denominates land into core, buffer and transition zones in its ecological-economic model.

**Question 7**

**Given that the above calculation of housing need is an estimate, do you have any comments at this stage?**

If housing need is calculated by affordability, does this get skewed by the significant price rises in the South of the District resulting from the toll removal? Does it dictate the type of houses that can be built in terms of size and capacity or is it a bald number of whatever size. Affordable housing is a key issue.

**Question 8**

**Do you have any comments on the possible land requirement?**

If the majority of 4,200+ homes are accounted for by incremental development, is this likely to be within a few small areas such as the existing towns or spread among all urban centres eg villages and hamlets?

Incremental growth might be seen to have reached tipping point with some centres for access to services.

What is the ratio between accommodation land and commercial space to provide employment for the occupiers? Without the businesses for employment the risk is housing for older people increasing the aging population rather than retaining the young.

**Question 9**

**The above are basic constraints to development. Would you agree or wish to add or remove any of them?**

Agree the constraints that make the District a national landscape and a local planning restriction nightmare!

**Question 10**

**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?**

We are unclear how far these discussions include the input from the Neighbourhood Development Plans or indeed whether all identified areas have current NDPs (Coleford’s is noted).

Neighbourhood development plans often raise the following issues on housing & development:

* + Communities are not totally opposed to housing but are concerned that it meets the needs of the community with a preference for mixed development erring on the side of affordable housing. There is concern about the lack of young people able to afford homes and older people being able to downsize. For this reason, Lifetime homes should be considered for inclusion in developments, this need not be arduous. Consultation with a developer stated that a dining room/study with a wet room downstairs and doorways large enough for a wheelchair need not incur prohibitive costs.
	+ All housing should be of good quality and although Sustainable Homes Code is no longer mandatory should be referred to.
	+ There is a preference for smaller developments or larger developments on brownfield sites
	+ There appeared to be no great objection to affordable housing on exception sites as long as there was community consultation with regard to options.
	+ Density & design should also meet the needs of the community space and leisure areas also need consideration within a large development as well as landscaping and safe play areas.
	+ Large developments which increase the likelihood of more commuting making it a dormitory area
	+ Maintaining the identity of the village, parish, community which could mean a buffer zone between them. Maintaining their community is extremely important
	+ SUDS for all developments and how flood risks will be managed so that the development remains safe throughout its lifetime, “taking climate change into account.''

The Beachley opportunity needs full exploration as a solution to housing, commercial land and access with the Great Western Gateway.

**Question 11**

**One approach is to look at the settlement hierarchy and propose development in keeping with this, is this the right general approach, if not why not? Are the constraints referred to the right ones?**

If the hierarchy is the one which follows the larger villages listed it becomes clear that they are all South of Mitcheldean; the district outside of that is missing eg Huntley, Longhope, Gorsley.

What would the alternative be and would there be additional constraints in creating new centres?

Has consideration been given to the new employment land being opened up South of Ross in the new enterprise park and the housing opportunity within short commute distances which might be current smaller villages?

Until the traffic congestion in the Chepstow area is alleviated then there should be limited development in the Tidenham area. Future development at Beachley barracks should be conditional upon the provision of a by-pass.

**Question 12**

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

Yes to both options.

When there is large development proposed, services (doctors, schools etc) should meet the extra needs of that development and be ready at the same time as the development is ready for occupation. This has been seen as a priority.

**Question 13**

**The above areas and strategies all relate to or include the Forest of Dean. How should the Forest of Dean respond? For example, should it place its new development near the other main centres, look to use any improved transport linkages, or co-operate to deliver new infrastructure, etc.?**

Positively. The District does not operate in isolation. It needs to debate openly across the rivers and along the transport connections (road and rail) to avoid creating housing that prevents sustainability and lower emissions.

A48 connectivity and addressing the constraints imposed by A48 at Gloucester and Tutshill

Need to emphasise the need for serious consideration to the two pinch points to access to and from the Forest of Dean via the A48, especially considering the substantial housing developments currently in progress, and those planned for the future, around Tutshill, Sedbury, Beachley and Chepstow. The outer Chepstow Bypass and a Third Severn rail crossing should be options to be explored in collaboration with partner authorities.

**Question 14**

**Are the above the right key messages that need to be considered in thinking about development options? Are there any more? Are some incorrect?**

Key messages are broadly correct. The additional message is around the opportunities and threats of the Great Western Gateway which requires collaboration with neighbouring authorities to maximise the benefits locally of the former and minimise threats created by assumption of others.

**Question 15**

**The basic options above all assume that there will be a certain amount of change spread across the district anyway, whether new housing, employment, shopping or whatever. It is the strategic (major) changes that the options relate to, so for example any named settlement may have some development but if it featured in a particular option then there may be a specific major new site or new neighbourhood. They are explained in greater detail below. Which option or options would you support (please say why and please do suggest general or specific locations that should be considered for new development)?**

The end plan is likely to be a mixture of all these options. There is recognition of the capacity issues of the existing settlements and the need for exploration of the potential of a planned new settlement. A significant amount of the new housing that will be required in the plan could be delivered by the building of a new garden village in the Elton area. This needs to be linked to the provision of a station or halt in this area. The Forest is served by only a single station at present.

**Question 16**

**Do you have any further comments on the range of 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?**

This requires fuller FEP debate before consensus comments can be made.

**Question 17**

**What do you think the four towns or any of the specific locations should look like in 2041?**

The only comment made so far is for Lydney.

There could be an opportunity for Lydney to play a more important role in the Plan if a Third Severn Crossing between Lydney and Sharpness was built. A bridge could accommodate rail, cycle and pedestrian access across the river. A big constraint to further future development is the actual, or perceived, lack of accessibility and connectivity. Lydney could be the Gateway to the Forest of Dean and be a major transport hub for the district with better rail connections and better rail facilities combined with a proper integrated bus service and the use of the Steam railway to open up sustainable access to the centre of the Forest.

**Question 18**

**Do you agree with these priority areas, how can the LP best address the issues of climate change and renewable energy?**

The element missing here is the enabling infrastructures for future mobility and effective home-working which include:

* options for community work locations such as drop-in locations for homeworkers wanting reliable higher-level digital services
* fibre as part of new builds of domestic and commercial properties.
* 5G and future enablement of transport and infrastructure digital solutions based on high latency solutions
* acceptance of planning relaxation for 25m (ft) masts where/if required

**Question 19**

**Are these the main areas to be considered for housing policies in the new plan when seeking to deliver the required types and numbers? Are there any others? Are there any particular locations which should be considered?**

See Q10 response

**Question 20**

 **How best can new employment be planned for and what can help deliver it?**

The nature and scale of employment is radically changing. Through Industry 4.0 and already evolving trends, businesses will have fewer employees in a single location and dispersed working will become more common. HFHG is Your Broadband revealed high numbers working from a domestic setting either because it was also their place of business or because through technology they were able to not be in the purpose-built office to be working.

This is reflected in NDP feedback:

* Many small businesses have been consulted during the NDP process many sole traders, freelancers and employing 2 or 3 people. They have said they need improved broadband and mobile infrastructure.
* Although welcoming Tourism there were concerns about sustainable tourism and development of attractions and accommodation especially the type e.g for parties in the middle of a residential area and number of accommodation units.
* Controlled business development, especially where there were employment opportunities, were generally supported in appropriate areas usually outside a village / town centre area (other than retail)

In planning terms therefore for employment what is key are flexible sites that enable a business to grow either in a location or in another location in the District. The flexibility here is both size and type of business. For developers office space might provide the highest return but load-bearing manufacturing sites are also needed. Conversely a presumption on shed-type development is unhelpful in the longer term.

**Question 21**

 **Are these the right Natural Environment issues to be considered for the LP policies?**

NPDs see environment as breathing spaces for health & wellbeing; they stress the importance of open spaces, including woodland, other than recreation grounds, with no encroachment onto these spaces and the protection of wildlife and wildlife corridors.

FEP’s Biosphere Reserve Action Group will be putting forward project plans to the next Stakeholder meeting to take the potential reserve to the next stage. The Unesco biosphere reserve requirements could be deployed across the whole district as a green infrastructure approach.

**Question 22**

**Do you have any comments on how the plan should consider transport and infrastructure issues, what key items will be needed and how may they be delivered?**

FEP presumes that transport requires a radical overhaul in approach and that infrastructure will need to be delivered to support the LP. This is based on the view that both are already highly constrained by looking backwards or past under-investment.

We need to look carefully at our transport system now as it is not meeting the needs of the population currently. Rural Integrated Transport schemes need to be investigated as they offer a range of solutions to retain affordable accessibility to those that need it. The combination of community transport mini-buses and taxis has been proven to require fewer subsidies and create better flexibility and reliability than conventional models.

We cannot support a system which produces more vehicles onto congested roads. While electric cars are unsustainable globally in the longer term; they may provide a short-term solution needing balance in public and private charging stations. We need to invest in electric bike recharging points, right across the district and within each home as a longer-term solution.

Modes of travel will change rapidly rendering the precursors redundant as circumstances and needs evolve. Therefore, we need to incentivise meeting residents needs as much as possible at home, in their community within walking and cycling distance. We need to design out the need to travel and then provide the mass transit facility which connects to the rest of the area/county and country. This focus on integration of public transport should be based on what users and commuters need rather than financial boundaries (ie into Bristol)

NPD feedback suggests:

* All forms of transport should be considered with thought to width of pavements and other pathways including footpaths for travel by foot / cycling/ mobility scooter etc and how they link to services and other locations.
* Future transport development (e.g electric/hydrogen) should be considered as planning matters so that any development can include not only known changes but also an opportunity for change to come taking climate change into account.
* Use of public transport (including funding community transport) to meet the needs of getting to school/ work/ health appointments/ business/ leisure. It is generally felt that the present system does not meet the needs and will not meet the needs of a future aging population.

FEP supports a new physical link from the Forest to the areas of Gloucestershire south of the River Severn and beyond. Any assessment of a potential link would need to primarily consider the impacts on the local communities close to the crossing within the district and the communities within Stroud District, before considering its wider economic benefits to the Forest as a whole. The aspiration should be for the link to be a zero carbon structure, to create energy; increase the attraction of the Forest as a tourist location; improve the environment of the River Severn for all; be recognised globally as an exemplar project to reduce carbon from transport; create a vital link to the developments academic and commercial at Berkeley.

**Question 23**

**How should design including conservation be addressed?**

The best conservation of existing buildings is to find active purposes for them in line with permitted guidelines. Flexibility of planning approach is needed compliant with sustainable development. This also recognises that for some brownfield sites the ecological benefits trump the economic for planned decay.

**Question 24**

**Changing town centres are an important plan issue, what policies and approaches should be considered?**

This requires substantial consultation with each town and large village to ensure that they remain vibrant centres of population for work, services access and leisure. Town centres are sometimes guilty of backward thinking with an onus on preservation rather than regeneration by delivering services needed today. Could vacant shop spaces become community drop-in business centres?

**Question 25**

**How should the LP approach the issue of promoting healthy lifestyles and what policies are likely to be needed?**

The bald answer is yes. This links to the transport and design responses. Healthy lifestyles accessing the outdoor assets of the area are a key benefit to inward investment and business start-up. With an ageing population, keeping healthy for longer reduces the burden on services.

**Question 26**

**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 LP. If you have any additional points you wish to raise, please do so. There will be further opportunities for comments and for suggesting policies or sites that should be included in the plan, however if you would like to suggest any now we would be pleased to hear about them.**

We look forward to those future opportunities and to providing fuller and more considered responses to the questions raised.