

HUTCHINSONS

Planning & Development Consultants

PLANNING STATEMENT

Forest of Dean District Council Revised Draft Local Plan 2025-2045

**Representations on behalf of Churcham, Huntley, Westbury on
Severn, Tibberton, Highnam and Minsterworth Parish Councils**

March 2026

HUTCHINSONS

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1 INTRODUCTION

- 1.1 These representations are submitted on behalf of six Parish Councils at Churcham, Huntley, Westbury on Severn, Tibberton, Highnam and Minsterworth.
- 1.2 They are submitted to summarise and update the representations previously submitted in connection with an earlier consultation by David Crofts (Planning Consultant) on their behalf. His Statement is submitted again as an Appendix to these representations for completeness and to emphasise that many of the concerns and issues raised remain unresolved and relevant to the latest consultation.
- 1.3 The main focus of the Parish Councils' objections is based on the allocation for a new community, notated as "Land West of Severn (Churcham Parish)," which is Policy RLP. 61.

2 RECENT CHANGES IN POLICY, ETC.

- a) Changes to National Planning Policy Framework, December 2024
- 2.1 Like many authorities, the changes to the Standard Method of assessing housing need has resulted in an increased housing requirement. This means that the new Revised Draft Local Plan proposes some 12,500 additional dwellings and new employment land to meet required needs for the next 20 years.
- b) Duty to co-operate
- 2.2 The statutory duty to co-operate was introduced by the Localism Act 2011, requiring neighbouring authorities to continuously engage with each other to address strategic spatial issues. That duty will be removed on 25th March 2026.
- c) Adoption of a revised National Planning Policy Framework
- 2.3 The Government has published major revisions to the National Planning Policy Framework, which are expected to take effect in the summer of 2026, following recent consultation.
- 2.4 The revisions continue to include the promotion of sustainable development and transport and are likely to confirm the preference for major new development
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outside settlements in countryside locations to have easy access to a train station.

3 FOREST OF DEAN DISTRICT COUNCIL'S (FODDC) APPROACH TO HOUSING DELIVERY

- 3.1 Dealing first with the changes created by the 2024 revisions to the standard method of calculation, which have resulted in a considerable 5-year supply shortfall (1.9yrs) in the FODDC area, it is unsurprising that the Council has opted to focus new development on the towns of Coleford, Cinderford, Lydney and Newent and the larger villages, where access is already available to services, facilities, employment and infrastructure. The strategy also puts forward the creation of 2 new settlements, but we suggest the basis for that choice is ill-founded.
- 3.2 What is surprising is that the Council is relying so heavily on a new settlement solution which will do nothing in the short-term to deal with an identified housing supply crisis.
- 3.3 As we have pointed out, the housing supply shortfall is at a critical level in the District now and an immediate resolution is called for. The Plan indicates that 42% of the total housing allocations will be catered for by the 2 new settlements, but that provision, even at best, will not help to resolve the current shortfall, because the lead-in times are likely to be so long. This risks the 5 year land supply, opening the door to speculative development across the District.
- 3.4 The Plan does acknowledge the need to provide allocations at the main towns, but we believe more allocations are needed in such locations, which are locationally sustainable and capable of delivery in the short term. Relying on the provision of new settlements is in our opinion unrealistic and unlikely to succeed. It is important that this is co-developed with an economic strategy that positively contributes to the District.
- 3.5 The Government recognises the important role played by small and medium sized developers in the latest proposed version of the NPPF, because of the relatively short timescale for implementation and we believe the provision of further allocations on the edge of the towns and larger villages with existing services is preferable to the provision of new settlements and the uncertainty
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which that entails.

- 3.6 One of the main problems that is encountered with the creation of new settlements is the provision of infrastructure to service them, which often lags behind the house building and the result is the construction of a large housing suburb without education, shopping, open space, public transport and other facilities being provided. The Revised Draft Local Plan contains no infrastructure development plan or evidence of how this will be delivered.
- 3.7 In addition, we are concerned that the creation of a new settlement at Churcham of 2,000 dwellings is insufficient in scale to fund the infrastructure to service an independent new settlement and its geographical location means that it will merely become a satellite estate of Gloucester, looking to the city for all its facilities.
- 3.8 Whilst the statutory duty to co-operate with other neighbouring authorities will cease to have effect later this month, we acknowledge that the allocation at Churcham may be desired to be a cross-border collaboration with Tewkesbury Council, which would increase the overall housing numbers of the settlement, the strategic local plan for Tewkesbury (Cheltenham and Gloucester is at a very early stage and it is unclear whether such an allocation would be pursued in the future.
- 3.9 Regardless of any allocations which may or may not take place in an adjoining District, the new settlement at West of Severn must be judged on its own merit as presented now and the required infrastructure, including a new station, simply cannot be supported by a development of the proposed scale.
- 3.10 The new version of the NPPF emphasises that access to a station is important when considering development in the countryside, but whilst the new settlement area adjoins the railway, we do not believe the construction of a new station is a viable proposition, particularly if the allocation is restricted to 2,000 new dwelling as set out in the Revised Draft Local Plan. A station at Lydney already exists and that settlement should be the focus for further additional development.
- 3.11 The opportunity to allocate more development at Lydney provides a much more sustainable and economic option for strategic growth, because it already benefits
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from a wide range of facilities and services, including a station, which could be expanded with appropriate travel infrastructure to serve the new local allocations.

4 THE LAND WEST OF SEVERN (POLICY RLP.61)

4.1 The Revised Draft Local Plan contains little justification for the allocation of 2,000 dwellings as part of a mixed development, of which an indeterminate area of land will be set aside for offices and employment. It does, however, identify a number of issues, which will be addressed.

4.2 As already indicated, the planned housing number and the geographical location of the allocation site mean that in our opinion it is unlikely to fulfil its role as a stand-alone settlement, because of its close proximity to Gloucester.

4.3 In such circumstances, there would be a significant increase in traffic movements in and out of the settlement, rather than remaining within it, as residents look towards Gloucester and the wider eastern area for employment, shopping and education etc., thereby increasing congestion on the already heavily trafficked A40 and A48. A large scale housing allocation as proposed would be unacceptable, because of the increased traffic it would generate.

4.4 The list of matters appearing in Policy RLP. 61, which the Policy indicates will be addressed, is more of a “wish list” of facilities that FODDC hope will be catered for. A development of this scale is unlikely to support all of the following: “*community and sports built provision*”; “*a local centre incorporating local retail, surgery and community uses*”; and “*a transport hub.*”

4.5 There is no inclusion of any sort of infrastructure development plan to ensure the various facilities are to be provided and at what stage. Without that type of surety, the provision of a new stand-alone settlement is precarious to say the least.

4.6 Policy RLP. 61 makes only passing reference to landscape and nature issues, but landscape impact is a critically important factor to consider. At present there are outstanding long distance countryside views across the valley when viewed from the Grade II* church at Churcham and these would be lost if the allocation development were to take place. The new development would also dominate the character of attractive rural views towards the site from the A48.

4.7 A further concern is the impact on nature and the allocation would be likely to present a serious threat to the RSPB ancient woodland wildlife reserve at nearby Highnam Woods.

4.8 The Sustainability Assessment carried out by the Council confirms that there are potential negative landscape issues. It acknowledges the open character of the site and accepts that “*the landscape is sensitive to a high amount of change.*” In our view the impact on the landscape is in itself sufficient to render large scale development inappropriate.

4.9 Whilst the proposed allocated site is modelled not at risk of flooding with non-climate change data, adjoining areas are both now and in the future. Flooding at various places on the arterial road network has already take place and is likely to continue. If that is the case, the allocated development site west of Severn would be effectively inaccessible.

5 THE CROFTS REPORT

5.1 We have already indicated that many of the issues raised in the Crofts Report in 2021 are still relevant and have intensified over the years. Concerns regarding transport and access and potential flooding are even more important now and have not been resolved.

5.2 The conclusion of the report that a major new development at Churcham would be unsustainable also remains.

6 CONCLUSION

6.1 The Parish Councils consider that the FODDC approach to development by proposing a new settlement West of Severn at Churcham is fundamentally flawed and the development it proposes is unsustainable.

6.2 A more sustainable approach to the identified housing need would be to provide further development in the towns and major villages where facilities already exist. Special focus should be aimed at Lydney, which already has a railway station.

6.3 This approach will need to be accompanied by an economic plan to provide the required level of economic growth.

6.4 The creation of a new settlement as proposed would constitute an unacceptable

impact on the landscape in a sensitive location.

- 6.5 The proposed scale of the development is unlikely to achieve the range of facilities referred to in the Policy. In spite of its location next to the railway, it is unlikely that a new station could be justified and the development will still rely heavily on the private motor vehicle.
- 6.6 Traffic issues on the A40 and A48 will be intensified and flooding in the future would make the site inaccessible.
- 6.7 The concerns raised by the Crofts report have still not been resolved.
- 6.8 In the circumstances, the Parish Councils request that Policy RLP. 61 is abandoned and a revised strategy is proposed entailing further development at Lydney and at other edge of sustainable settlement locations combined with a plan for economic activity.
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