

# **Lydney Draft Neighbourhood Plan | Regulation 14 Consultation, Key Consultation Feedback Summary**

**November 2025**

## **Summary of Feedback & Lydney Submission NP Response**

This summary lists key substantive matters raised by respondents to the Regulation 14 Public Consultation on Lydney draft pre-submission Neighbourhood Plan. The response of the submission plan to these matters is recorded in *italics* following each representation issue.

A spreadsheet of representations is also available in the consultation database.

### **1 Statutory Consultees**

#### **General**

##### **Positive Reception:**

All organisations praised the plan's overall vision, community engagement, and focus on heritage and design.

They see it as a strong foundation for future development, *provided the identified issues are addressed.*

#### **Forest of Dean District Council (FoDDC)**

FoDDC has been engaged with the production of the plan in the lead up to the publication of the Reg 14 draft. In addition to providing an SEA/HRA screening opinion, it had helpfully provided earlier comprehensive comments on the emerging Reg14 draft which were addressed prior to publication of the Reg 14 document.

Reg 14 responses were provided by several sections within the planning service without moderation. This created some challenges and conflicts in addressing reps'. LTC Members met with FoDDC officers following the receipt of FoDDC reps to resolve challenges and agree appropriate and proportionate responses that, in particular maximised the likelihood of LNP maintaining relevance and continue in to be in conformity with emerging strategic growth at Lydney in its role as a strategic settlement.

##### **General Commendation:**

FoDDC congratulated the LNP team on the hard work, finding the plan "attractive and accessible" and the level of detail "very interesting."

## **Significant Comments Relating to the Local Plan:**

Comments are provided in the context of the changing Draft Local Plan context following the 2025 changes to the NPPF and resultant 82% uplifted housing requirement. Public consultation in August/September 2025 to re-considered the local plan strategy and options for a higher allocation of housing at Lydney. The Local Plan period is also extended by two years, from 2021-2041 to 2021-2043. It was advised that LNP2 should address these changes to be up to date for longer.

There was concern expressed (by Development Management officers) that LNP might not be planning for the new required growth. The NDP's suggested housing number and "tight" boundaries may be inconsistent with strategic growth plans. If the NDP is adopted before the new Local Plan, it could become "out of date". This was a core subject of discussion with FoDDC officers in the submission plan response.

*The proposed plan period has been extended to 2043 to align with FoDDC emerging Local Plan.*

*LNP does not undertake a boundary review. However it does not prejudice a revised development boundary being established through the FoDDC Local Plan process.*

*Revised background text and revision to Policy LYD ENV1, shaped with FoDDC, seeks to clarify and ensure uplifted strategic growth can be delivered with ongoing LNP support through a strategic plan led allocation approach and within a proportional set of LNP criteria relating to delivery of LNP objectives.*

Textual and Formatting Errors: The council provided a list of specific typos and grammatical errors to be corrected on pages 11, 13, 26, 30, 31, 36, 44, and 54.

*FoDDC comments of itemised alterations and corrections to text have been addressed in the revisions. LTC is grateful to the District Council for its attention to these matters.*

## **Specific Development Management Team Concerns:**

The policy on Biodiversity Net Gain (BNG) is seen as redundant since it's a national requirement.

*Policy LYD ENV2 seeks to protect and enhance Lydney's landscape, green and blue infrastructure and biodiversity which contributes significantly to local distinctiveness and wellbeing. Securing biodiversity net gains is an integral part of this policy ambition which is especially significant in the context of significant levels of strategic housing growth. The reference to national policy criteria enables the policy to be in conformity for the lifetime of the plan whilst national policy may change.*

Policy HC1 on house types is considered too vague without specific percentages.

*Specific policy updates have been discussed with FoDDC in drafting submission plan policies. It was noted that the Housing policy LYD HC1 is supported by the Lydney Housing Needs Assessment (see evidence base) that does provide specific housing metrics.*

A greater focus on connectivity improvements for new housing developments is suggested.

*LNP policy LYD ENV1 (B) specifically states that development will be supportable where it 'Is well-related to Lydney's existing built area and sustainable transport infrastructure and road network and it provides improved transport infrastructure to ensure it is well-connected and does not result in unacceptable transport impacts. This together with policy LYD TRAN1 promoting sustainable transport is considered to provide proportionate weight to connectivity.*

#### **Comments on the Town Centre Masterplan and Design Guide and Code:**

It should be noted that these documents are evidence base/guidance documents and do not form part of the proposed LNP policy framework. However, FoDDC comments on them are welcomed with responses below.

The Town Centre Masterplan is considered an "interesting document with some great aspirations," Pages 23 and 24 need to be updated.

The Design Code is praised as a "very insightful document with a large amount of quality design advice."

#### **Specific Design Code Issues:**

'Policy' LB 06 on extensions is incomplete as it doesn't mention the impact of side extensions on neighbours' amenity.

Garages: The council recommends specifying minimum sizes if they are to be used for parking.

*These points are noted and may be addressed in a future iteration of the design guide and code. Design issues are addressed more generally within the High Quality Design Policy (LYD ENV4, that sets criteria for development within each of its character areas. This includes residential extensions.*

Public charging points: Question the lack of detail on the required level of charging and the enforceability of a policy on avoiding blocking by other cars.

*LNP is committed to promoting all forms of sustainable travel. This includes maximising the electrification of private car travel. Design guidance carries less weight than Building Regulations governing the level of ULEV charging associated with development. However, this may be addressed through a review of the design guidance.*

Green spaces: The plan's reference to aligning with Local Plan standards is problematic because the current Local Plan lacks these standards.

*This is noted. Design Guide references Emerging Local Plan Policy LP19; New Recreational Land and Uses that states 'The adequacy of provision and any additional requirements will be assessed against the Council's prevailing standards for quality and levels of provision. These show how account will be taken of provision already available in the areas concerned'. Whilst this is contained within the emerging plan LNP policy seeks to be in her real conformity with FoDDC prevailing standards.*

### **Gloucestershire County Council (GCC)**

Positive Feedback: GCC broadly supports the plan's vision, particularly its holistic approach and focus on sustainable growth, health, and well-being.

Archaeology: The Heritage Asset List is welcomed, but the criteria for selection should be added to the evidence base. A duplicate section on Conservation Areas and St Mary's Church needs to be addressed.

*Noted. Duplication is removed. The methodology for selection will form part of the evidence base.*

Economy: The plan needs to emphasise skills development and the importance of retaining existing businesses alongside attracting new ones.

*Text supporting Economy Policy LYD ET1 states its intention is to 'continue to seek to protect existing places of work and support growth and inward investment to increase local opportunities for rewarding employment and reduce out commuting'. Policy LYD ET1 expresses positive support for existing employment areas and uses within Lydney. This includes supporting its continuity and resisting loss.*

*Whilst LNP cannot address strategic education and skills training provision through policy, the submission plan has, with the endorsement of LTC re enforced its commitment to 'To work with partners to increase school capacity and post 16 education and skills training opportunities to high levels of attainment and employment opportunities and incomes within the community.' In an additional LNP Community Project commitment*

Flood Risk: The plan incorrectly states that all of Lydney is in Flood Zone 3, making it appear entirely undevelopable. This must be corrected to specify that only "parts of Lydney" are in Flood Zone 3, and the relevant map should be referenced.

*Noted. This has been corrected.*

Public Health: GCC recommends adding a specific objective to address health inequalities, particularly in the east Lydney area. It also suggests highlighting the importance of social connections to combat loneliness and further exploring the health benefits of green and blue infrastructure.

Transport: A major concern is Transport Related Social Exclusion (TRSE), with Lydney East identified as a high-risk area. The plan should aim to reduce these barriers. Specific transport-related recommendations include:

Explicitly mentioning the railway station, bus station, and existing bus services (72, 23). Consider more frequent rail services and the "Robin" Demand Rapid Transport service.

*Policy LYD TRAN1 supporting text provides a background to multi-modal transport within and linking to Lydney and references specific facilities, locations and services that play a role in this. These relate to areas where LUD TRAN1 will be supportive. Submission plan background text encourages '...consideration of the benefits of re-routing the Coleford to Gloucester number 23 service to visit the Railway Station .....'. It also '.....supports a major review and redesign of the suggested bus interchange. The Lydney Neighbourhood Development Plan supports the development of an integrated light transport bus service using the latest low emission technology.'*

*Whilst LNP is a non-strategic development plan and cannot fully address transport related issues and inequalities, the submission plan Transport and Accessibility objective 6 states the aim to 'Support improvements to the transport network to enable all members of the local community to access and engage with the amenities and facilities of Lydney using healthy and sustainable transport.'*

*This objective seeks sustainable and healthy transport that provides access to local services and facilities across the community. This is reflected in LNP policies LYD ENV1 and LYD TRAN1 in particular that require well-connected development and prioritisation of active and sustainable transport infrastructure.*

*Policy LYD HC2; Protecting and Providing Community Facilities seeks to ensure isolation and inequalities for local people are tackled with specific references to promoting additional provision of;*

- a. Educational facilities to meet local needs;*
- b. Places to meet and socialise;*
- c. Facilities for young people, for example a wheels and skate park;*
- and*
- d. Additional health services and facilities.*

*LNP Policy LU/D TRAN1 (m,n,o) highlights the locally distinct and priorities of walking and cycle connections to local facilities, employment centres, Lydney town centre and Harbour, development of sign-posted public rights of way connecting the town centre, the railway station and harbour and leisure areas.*

*Background text (priority 3) specifically addresses the cycling connection between the town centre and harbour via the station. The network of routes is shown on Map 14, However, it is accepted the map may require updating to specifically show the cycle links.*

Mapping and highlighting existing cycle routes to build upon the network. Adding a mention of cycle parking and the walking/cycling path between the station and town centre.

*GCC kindly provided additional mapping of cycle routes within and linking to Lydney. These have been added to the evidence base. Suggestions are noted.*

Education and Skills Training;

Gloucestershire County Council expressed concern that the updated Reg 14 plan is perceived to slightly reduce emphasis on skills development from the previous vision statement. While this may be implicit in other priorities, it was suggested this remains a vital consideration for the town's ambitions for encouraging sustainable growth and attracting employment.

*Whilst Education and skills training provision is a strategic matter, with post 16 education and training facilities located outside of Lydney, the submission plan increases reference to the importance of this at the local level.*

*Vision Statement; 'Lydney will provide local people with opportunities to have rewarding jobs,,,,,,and accessible health, education and community facilities for all....'*

*Objectives; 'Ensure the necessary community facilities, education, training and employment opportunities are delivered alongside development to increase community wellbeing and remove health and social inequalities.'*

*Policy; LYD HC2; Community Facilities. '...Development which would lead to the improvement of the quality or additional provision of the following community infrastructures should be supported,.....  
a. Educational facilities to meet local needs;'*

## **Historic England**

No Major Issues with no detailed comments or issues to raised with the plan.

There is praise for Heritage Policies: They "applaud" the policies that celebrate and protect the area's distinctive character and heritage.

Specific praise given to the Design Code: They single out the Lydney Design Code & Guidance (referred to in policy LYD ENV4), noting that it is an "informed document" that can help ensure future development reinforces the area's physical identity.

## **Other Local Organisations**

### **Forest of Dean Integrated Locality Partnership (ILP)**

The ILP consider the LNP a strong framework to promote the future of the town and is supportive of its strategic direction. It recognises the proposals seek to make Lydney a strong and vibrant community.

It encourages the Town Council to embed wellbeing generating initiatives into developing communities and, where possible ensure that such opportunities are also offered to existing areas through use of thoughtful use green spaces and other amenities.

*LNP vision and objectives aim to deliver equal opportunity across the communities of Lydney to benefit from existing and improved wellbeing, amenities and facilities .  
Policy LYD ENV2 in particular sets standards to protect existing landscapes and GBI whilst facilitating development.*

*Policy LYD HC2 protects and promotes existing and enhanced community facilities. It specifically identifies support for  
b. Places to meet and socialise;  
c. Facilities for young people, for*

*example a wheels and skate park;  
d. Additional health services and  
facilities*

*Whilst not directly policies, Community Projects have been bolstered to reinforce the commitment to 'Supporting cultural events and activities that increase community cohesion and wellbeing.'*

### **Churches Together Lydney**

CTL are supportive of the Neighbourhood Plan and its approach and policies.

New housing - we consider it is vital to ensure that future developments provide meaningful 'meantime' and 'oasis' spaces for informal play, meeting and greeting etc to develop social identity cohesion and integration - and for that to happen requires tougher policies in relation to the timing and delivery of these 'meantime' spaces early on.

Active travel and green corridors - more explicit prioritisation of green connections from new development to the open countryside/Forest and green lungs into the town centre - for exercise and mental wellbeing early on in the development phasing.

*Policy LYD TRAN2 specifically aims to ensure that identified network of public rights of way connecting wildlife and local people with the natural environment and countryside are protected and enhanced in the context of strategic housing growth.*

More emphasis on accessibility to Lydney train station and specific placemaking improvements at the station

*LNP is aligned with and references FoDDC prioritisation of improving Lydney Railway Station through a master planned approach. Within the limitations of a non-strategic plan, LNP seeks to secure enhanced connectivity across the town between communities and facilities. Policy LYD TRAN1 specifically promotes 'Assist with the development of a sign-posted network of public rights of way connecting the town centre, the railway station, the harbour and leisure areas.*

Community projects section 4, LCT considered that more could be added into this section around community activity, the value of social integration and 'pop up' events in new developments

*Policy LYD HC2 seeks to protect and increase community facilities and includes the prioritisation of enabling new meeting places by supporting programmes of cultural activities to increase wellbeing and cohesion. The town centre policy LYD ET2 particularly supports development where it would:*



*‘Diversify the range of uses within the town centre, to fill gaps in local provision, including those with a focus on the cultural/ creative industries, entertainment and leisure, the provision of multi-functional uses such as performing arts, bike café, arts centre, temporary performance space, meeting spaces and small independent businesses and retailers;’*

*These policies are complimented by LTC’s ongoing commitment to ‘supporting cultural events and activities that increase community cohesion and wellbeing.’ In the Community Projects section of LNP.*

## **Wyedean Housing Association**

WHA consider LNP a thoughtful, forward-looking plan that clearly reflects local priorities and a strong commitment to sustainable and inclusive growth. It supports the Plan’s strategic objectives and policies. It believes the Neighbourhood Plan will provide a strong and positive framework for managing growth and development in Lydney and ensuring that it continues to be a vibrant and sustainable town.

As a housing association with a long-standing commitment to supporting affordable and high-quality housing across the Forest of Dean, we are particularly encouraged by the plan’s focus on:

- Providing a mix of housing types and tenures
- Promoting well-designed, energy-efficient developments
- Supporting infrastructure, active travel, and local employment opportunities
- Recognising the importance of affordability and accessibility

*LTC welcome the comments and opportunity for ongoing collaborative work.*

## **Community Feedback Summary Key Points (See also Spreadsheet)**

Community comments are collated within the associated Reg14 response spreadsheet. Below is a summary of key matters raised and associated responders within the submission LNP. Community feedback was wide-ranging across LNP topics and policies. There were also helpful comments to update evidence and address errors in the Reg 14 document.

The majority of feedback continued to express issues and aspirations for the plan to address. These largely reinforce

## **Environment**

### **Green Spaces:**

The ongoing management of new green spaces, once created, was highlighted as an issue as it is considered they are often neglected and a plan is needed for their long-term maintenance and the need for more litter bins, particularly for dog waste, to keep the area tidy.

*These points are noted. Management of newly created green and recreation spaces is addressed through planning conditions associated with development consents. Emerging FoDDC Policy relating to the provision of open space addresses strategic criteria which may be influenced through ongoing consultation to include management clauses. It is not proposed to address this matter directly in the LNP revisions.*

### **Heritage:**

The "Heritage Trail" is mentioned as needing to be updated with new historical facts and photographs.

*LNP Policy LYD ET4 supports the development of investments that promote tourism. The particular value and protection of Lydney's heritage assets is reinforced by policy LYD ENV3 that provides strengthened protection to Non-designated heritage assets and LYD ET3 that supports ongoing regeneration of Lydney Harbour scheduled monument. The opportunity to develop a heritage trail is complimentary to these policies but does not in itself require a development policy.*

### **Renewable Energy:**

The plan should consider renewable energy and a transition away from fossil fuels, including the use of renewable energy for new dwellings.

*Alongside FoDDC emerging Local Plan renewable energy policy LP14, LNP policy LYD ENV5 seeks to harness the particular local opportunities for renewable energy production whilst ensuring any proposals address the protection of Lydney's international and national protected landscapes in accordance with Habitats Regulations.*

A recent tidal power report on the Severn Estuary raises doubts over the practicality of such schemes owing to silting, fish movement and navigational problems especially to the ports such as Portbury, Avonmouth and Sharpness.

*Noted. LNP supports all renewable energy development, but does not undertake viability assessments.*

### **Flood Risk:**

*Whilst flooding is a key issue for Lydney, it received a small amount of feedback. Revisions to the plan in response to statutory consultees on this matter are addressed above.*

## **Housing**

No more houses should be constructed without additional places of employment.

Housing Mix and the need for a good mix of housing sizes and types.

*Whilst strategic housing and employment land delivery is addressed by FoDDC Local Plan, LNP Policy LYD HC1 provides the basis for strategic housing growth to meet local needs evidenced by the Lydney Housing Needs Assessment (2024). Policy LYD ET1 also seeks to protect and support the increase and diversification of employment opportunities within the town to minimise the need for travel out of Lydney to work.*

## **Community Facilities**

Doctor's Surgeries Merger: The issue is of significance to Lydney but the quoted timeline of 2025/26 for the new facility is questioned as unrealistic. A key issue is the need for more realistic timescales.

*Supporting text to Policy LYD HC2 highlights the significant issue and references known information at the time of drafting. It does not form part of the policy framework. The delivery of healthcare is beyond the direct influence of LNP.*

*The perceived poor quality of choice and need to travel education particularly for secondary and higher education was raised. This reflects GCC comments. This matter is primarily addressed at the strategic level. However, LTC continues to commit to supporting and enabling improvements through partnership working in Community Projects.*

## **Economy and Employment**

Business Support: Support for local businesses to encourage them to stay and thrive, and a concern that a focus on "high-tech" or "super-specialist" industries might be too narrow.

The imbalance between housing and jobs and need for commuting to work was identified as an obstacle to building a more vital and balanced community addressing poverty and inequality.

*Policy LYD ET1 aims to support all existing employment and economic activity within the town. It does not state an exclusive focus on 'high tech' or 'super specialist';*

*industries but does seek to retain and broaden the opportunities and diversity of the urban and rural economy.*

*It specifically aims to protect and build upon the opportunities for local employment including hybrid and home working patterns to reduce the need for travel for work within the community.*

### **Tourism & Local Attractions:**

The comments suggest promoting local tourism by mentioning the Forest Brewery and the new Severn Way West walking route.

*Policy LYD ET4 that supports the visitor economy recognises Lydney's 'Forest Gateway' role and the connections it makes to surrounding attractions. A basket of these are referenced including Taurus Crafts where the Forest Brewery is located. However, policy must focus on Lydney.*

### **Town Centre**

Addressing closure of shops, poor quality of choice and condition of the town centre was raised and suggestions focused on attracting a diversity of businesses.

*Policy LYD ET2 supports Lydney Town Centre. 'Development will be particularly supported where it would: a. Diversify the range of uses within the town centre, to fill gaps in local provision,....' The policy is underpinned by the Lydney Town Centre Master Plan Framework (2024) that sets specific objectives and initiatives to address regeneration and decline within the town centre.*

### **Transport**

Traffic: There is significant concern about the increasing number of traffic accidents in Lydney, especially with the plan to add 700 new dwellings. A key point is how the plan will address this.

Pedestrian Safety: A specific issue raised is the need for a pelican crossing at the Rodley Manor Way and Highfield Road junction.

Connectivity: There are multiple points about improving transport links, particularly for young families and those without cars. The need for better public transport to the Dean and surrounding areas is highlighted.

*LNP is. Non-strategic development plan document. It has limited policy power to influence transport planning and road safety. However, submission plan policies*

*optimise the ability of LNP to influence how strategic levels of development and infrastructure provision can address highway safety, connectivity and transport service provision at the local level.*

*Policy LYD ENV1 reinforces the requirement for all new development to be in locations that are well-connected by sustainable transport to local services and facilities. Policy LYD TRAN1 sets an expectation that development will address highway safety and make connections to the transport network.*

No solutions to ever larger HGVs entering and passing through the town. Should a western relief road be suggested to link the Bream Road with the Bypass? This would take all the traffic heading to and emanating from the Coleford area and not visiting Lydney with massive environmental gain to the town.

*This is a strategic transport matter to be addressed in the Local Plan/GCC transport plan. LNP cannot promote such schemes if not part of the development plan  
However Community Projects commit to partnership working to address transport issues in the town centre.*

Provision should be made for coach parking, camper van parking and toilets at the Bus and Railway Stations. Should seek extra car parking and environmental enhancements at the railway station.

*LNP supports tourism development and sets criteria for infrastructure including transport provisions. LNP supports transport interchange master planning that can consider detailing*

## **Corrections and Images**

Changes to National and FoDDC Local Plan contexts were identified and have been addressed in the submission text.

The closure of the vertical farm and the hospital was identified as changes ending to be referenced in the submission plan.

Some photographs were considered needing replacement including the town centre and harbour images.

