

Little Malvern and Welland Parish Council Representation to Forest of Dean District Revised Draft Local Plan 2025-2045 (Regulation 18) Consultation

(Approved at the Parish Council Meeting 16th March 2026)

Overview

LITTLE MALVERN AND WELLAND PARISH COUNCIL (LMWPC) welcomes the importance given to climate change and the drive for carbon neutral development in the proposed Forest of Dean District (FoDD) Reg18 Local Plan. We also acknowledge the challenges that the FoDD Council are facing to provide for the increased Local Housing Need quantum arising from the new Standard Method whilst also protecting much valued ecological, cultural, heritage and landscape assets and sites within their district.

HOWEVER, we are deeply concerned about the implications of the scale, location and proposals for Policy RLP60 Glynchbrook Garden Village with regard to its sustainability, viability and effectiveness. We also have further reservations about this and other policies in the Reg18 Plan with regard to the assumptions made in their development (justification) and their consistency with national and relevant local policies.

Little Malvern and Welland Parish Council therefore:

- 1. Strongly objects to the continued inclusion of Policy RLP60 Glynchbrook Garden Village in the Forest of Dean District's Local Plan-making processes.**

Notwithstanding the lack of evidence that mitigation of the acknowledged harms would be achievable, there are more fundamental and significant questions regarding its strategic location, use and sustainability that would not be able to be mitigated through masterplanning.

We therefore ask for the removal of this policy and for the time available for the FoDD in their plan-making processes be given instead to exploring alternative more sustainable and appropriate proposals for the delivery of the housing need for the district.

- 2. Urges the FoDDC to recognise and consider the impacts of their policies outside of the District and to introduce references in the Plan's policies (and their justifications) as to how these should be considered at decision-making stages of development.**

This should include as a minimum more specific references to the Malvern Hills National Landscape and its Management Plan and guidance documents, and also to other relevant national and local policy and guidance that would need to be considered to avoid harm to other protected and locally and nationally values sites and assets outside the FoDD that may be impacted by the Plan's development strategy.

We expand on our specific concerns and justify our response in the remainder of this document.

LMWPC Concerns

- 1. The Reg18 Plan as a whole has NOT acknowledged or given appropriate consideration to potential adverse impacts outside of the FoDD, particularly with regard to impacts to the Malvern Hills National landscape and to nationally protected or locally or otherwise valued ecological features, habitats and species, village character, heritage and cultural assets that are in neighbouring districts.**

Policies in the FoDD Reg18 Plan have been carefully designed to avoid harm to protected ecological and landscape sites within the FoDD, and the RJs for each policy provide context and detail for this. Para 2.6 of the Reg18 Plan states that *“The Local Plan must consider the character of the area, along with the constraints and opportunities that exist and this helps to shape an overall vision of what the **FoDD** [our emphasis] should be like in 2044. Central to this is the need to protect the environment and to enable **the area's** [our emphasis] needs to be met in a more sustainable manner. This means being more resource efficient, protecting the wider environment and supporting nature.”* Also, regarding RLP4, para 4.12 of the Reg18 Plan states that the policy *“is primarily intended as additional guidance to protect the character and environmental qualities of the Forest of Dean”*.

However, similarly protected sites outside of the FoDD are rarely mentioned throughout the Reg18 Plan, and when they are, the FoDD Reg18 Plan does not seek to avoid harm to them, as it has done for its own assets, but instead proposes unsubstantiated assumptions that the harm can be mitigated through landscaping or masterplanning.

This point particularly applies to Policy RLP60 Glynchbrook, but we would suggest also to other policies including RLP4, RLP6 and a number of other site specific policies (such as the Bromsberrow allocations), and also policies for the environment (esp RLP121-127), heritage and landscape and water (esp RLP 131-133).

- 2. The Sustainability Appraisal and its updates do not provide evidence or rationale for the assumptions made in order to justify the inclusion of some of the strategic allocations, especially RLP60 Glynchbrook.**

With regard specifically to RLP60 Glynchbrook, many of the objectives set out in the SA Framework document are not met in initial appraisals of this site e.g *To protect and enhance the landscape (SA6)*. Appendix V of the SA for the site is explicit about the constraints on development and the potential adverse impacts and concludes that the site is unlikely to meet the SA criteria as assessed.

However, both Appx V, and Appx VI, then amend the classification to being *“NOT EXCLUDED BY SA CRITERIA subject to masterplanning, appropriate methods of mitigation and planned phasing of development with the necessary infrastructure”*. But the conclusions are inconsistent with previous sustainability appraisal reports, and no new evidence of the practicality, viability or sustainability of the mitigation proposals is associated with these

conclusions, and therefore it is **hard to understand how the site can reasonably be justified** as an allocation in this Reg18 consultation.

Further, there are some adverse impacts for which it is hard to understand how masterplanning can ever provide effective mitigation – e.g. for the loss of rural character and views from elevated positions in the Malvern Hills National Landscape, or the climate impact of a new settlement that located such that there is extensive reliance on private car use.

Finally, it is unclear what, if any, peer review was undertaken for later iterations of the sustainability appraisal. Also what, if any, engagement with appropriate bodies (such as neighbouring authorities, National Landscapes, Severn Trent and Highways) was undertaken prior to making the conclusions in those reports. Plan-making decisions based on such conclusions must therefore be considered less sound than if such consultation and evidence gathering had taken place.

3. Policy RLP60 Glynchbrook will harm the special qualities of the Malvern Hills National Landscape and the inclusion of this site in the Reg18 Plan is contrary to national planning policy and the “Seek to Further” Duty.

LMWPC considers development as proposed in Policy RLP60 in the Reg18 Plan will harm the Malvern Hills National Landscape and its special qualities in the following ways:

- There are clear views of the Glynchbrook site from various key viewpoints in the National Landscape. Policy RLP60 will introduce an urbanising effect of the immediate rural surrounds of the southern hills and will permanently alter the tranquil and rural views from the hills southwards. The rural setting of the National Landscape will therefore be harmed. The Malvern Hills National Landscape Management Plan states that *“Views are a crucial component of setting, being associated with the visual experience and aesthetic appreciation of the wider landscape. Views are particularly important in the Malvern Hills National Landscape. This is because of the juxtaposition of high and low ground and the fact that recreational users value them highly. Without careful management and planning, views and the broader setting of the area may be lost or degraded.”*
- As well as the landscape and visual impacts of the settlement itself, noise, traffic, vibration and light pollution can harm biodiversity and adversely impact the sense of remoteness and tranquillity that are special qualities of the National Landscape. As well as those parts of the National Landscape closest to the new Garden Village, increased vehicle movements along the B4208 accessing Malvern and Worcester, and visitor pressure will impact yet further parts of the National Landscape going northwards. For example, one of the few dark sky discovery sites in Worcestershire (Mill Pond, Castlemorton) would be adversely impacted by visitor numbers and increased traffic flows nearby, as well as potentially from lighting from the new large settlement.
- Glynchbrook Garden Village would introduce potentially 7,000+ regular visitors (walkers, cyclists and dogs) to the National Landscape, most predominantly on the southern hills

and commons. Natural England has argued in other Local Plan examinations that elevated visitor pressure on protected landscapes can cause soil erosion and compaction and harm to protected habitats and species. It should be noted that the Malvern Hills National Landscape provides closer recreational greenspace to the new settlement for the 7,000+ Glyncbrook residents than the Forest of Dean or Wye Valley National Landscape and therefore arguably will receive the greater number of visits from them.

As well as the provisions in the NPPF affording great weight to conserving and enhancing landscape and scenic beauty in National Landscapes, it is a legal requirement (Section 85 of the Countryside and Rights of Way Act) for relevant authorities to seek to further the purpose of conserving and enhancing the natural beauty of national landscapes.

The Malvern Hills National Landscape Management Plan explains that the ‘seek to further’ duty is intended to ensure that the natural beauty of protected landscapes (including national landscapes) will be enhanced (i.e., left in a better state) because of relevant authorities exercising or performing their functions.

The Malvern Hills National Landscape Management Plan also notes that Natural England (in its December 2023 advice during the examination of the Lower Thames Crossing) has stated that:

- *The duty to ‘seek to further’ is an active duty, not a passive one. Any relevant authority must take all reasonable steps to explore how the statutory purposes of the protected landscape (A National Park, the Broads, or an AONB) can be furthered.*
- *The new duty underlines the importance of avoiding harm to the statutory purposes of protected landscapes but also to seek to further the conservation and enhancement of a protected landscape. That goes beyond mitigation and like for like measures and replacement. A relevant authority must be able to demonstrate with reasoned evidence what measures can be taken to further the statutory purpose. If it is not practicable or feasible to take those measures the relevant authority should provide evidence to show why it is not practicable or feasible.*

Natural England’s view is also that the proposed measures should align with and help to deliver the aims and objectives of the designated landscape’s statutory management plan, and that the relevant protected landscape team/body should be consulted

The FoDD Reg18 Plan however relies on mitigating harm to natural beauty rather than avoiding it for a number of sites and this is - by definition - not consistent with an intention (and active duty) to enhance and is contrary therefore to national policy.

Furthermore, there is no evidence, let alone reasoned evidence, in the consultation documents provided of the measures that would be taken to further the statutory purpose. Where mitigation has been proposed to justify inclusion of a site (for example with RLP60 Glyncbrook it is proposed that landscaping and masterplanning would provide sufficient mitigation to “ameliorate/remove some of the more significant impacts on sustainability”),

no evidence or detail of the practicality or viability of this is provided and the conclusion that a site is suitable for inclusion in the Reg18 Plan is not substantiated.

Finally, there is no evidence that the Malvern Hills National Landscape Partnership has even been consulted in the early stages of consideration of sites such as that for Policy RLP60 Glynchbrook, nor that the provisions in its Management Plan and associated guidance documents such as its Landscape-led Development Position Statement for development affecting the National Landscape and its setting have been considered in the Sustainability Appraisal for sites such as Glynchbrook. This suggests the Plan has **not been positively prepared** for sustainable development and is **inconsistent with national policy expectations and objectives**.

4. RLP60 Glynchbrook Garden Village is not in a sustainable location and the rationale to include it in the Reg18 Plan to meet FoDD housing need is unsubstantiated.

The proposed new Glynchbrook Garden Village would be poorly connected to principal towns in the FoDD and no evidence has been provided that it would provide housing in the right place for the residents of the FoDD. The site may be one that is available for development, but this alone does not make it suitable or sustainable socially, economically or environmentally.

Table 17: SA of Strategic Options to Deliver the Additional Housing Requirement (2025) suggests that the principle of negotiating agreement for some of the FoDD's housing need to be met in neighbouring authorities was primarily rejected as it was considered this would lead to development that would not be located in the right location to meet local FoDD community housing needs.

However the new settlement at Glynchbrook, that would - with the deemed 30% of the homes onsite being affordable - ostensibly deliver 47% of the affordable housing need for the whole district for the Plan period, has been sited at the very edge of the district, furthest away from any of the principal FoDD towns and with limited or no established frequent public transport for the demographic least likely to own a car.

It is difficult to understand how the location of this settlement is perceived as being any better for the FoDD communities than having this housing need met through agreement with neighbouring authorities given its rural location at the very edge of the district.

We also suggest that – when considered against existing and emerging national policy expectations for sustainable development – it is hard to justify why some other sites in the SA with fewer constraints on development than Glynchbrook, have not been taken forward for consideration in the Reg18 consultation instead of Glynchbrook when they are closer to the existing railway line and/or to principal settlements within the FoDD.

5. RLP60 Glynchbrook is too small to be self-sustaining, and therefore its isolated location is not sustainable

The SA for the site suggests that the location is “..*Poorly located for low carbon access to services. Evaluate against other potential new settlement sites. Near National Landscape. Development would need to demonstrate a high degree of self containment in respect of services and employment.*” And then concludes “*Good design, landscaping, ecology mitigation, sustainable drainage methods, etc along with securing funding/contributions for the relevant infrastructure and ensuring that the development is phased in the most appropriate way to provide as much self-containment within a new settlement as possible.*”

Glynchbrook - Black Box Planning suggests that the new settlement will comprise a mix of up to 3,000 homes, and workspaces to support a range of circa 3,000 new jobs, as well as community, education, recreational, health and retail facilities. And Policy RLP60 in the Reg18 Plan suggests an onsite surgery, primary (and potentially secondary) school, retail, 3,500 homes and 9ha of employment space.

However, there is substantial evidence, including in the UK government’s own New Towns Programme guidance ([New Towns Taskforce: final report](#)), that new settlements need to be a minimum of 10,000 homes to be sustainable. And, in their New Settlements Assessment (as at Preferred Options) South Warwickshire Local Plan November 2024 ([SWLP PO Growth Strategy New Settlement Paper 201124.pdf](#)), the local authority states that “...*assumptions have been utilised as evidenced thresholds, necessary to enable residents to access key facilities within the new settlement and thus minimise the need for longer trips to other towns. This is known as ‘internalisation’ of trips. New settlements are generally no less than 6,000 dwellings in size (this is the minimum size of development which can support a Secondary School and GP Surgery) with an ideal minimum of 10,000 dwellings*”

The viability of self-containment required in the SA report, and sustained delivery of sufficient services and facilities at Glynchbrook (to reduce reliance on a private car to access day to day needs and employment outside of the settlement) is therefore highly questionable. And the routes and distances to towns that do have the facilities that the Garden Village residents would need means that there will be adverse impacts on social cohesion as well as climate and other environmental harms.

The potential for impact on existing local schools and the provision for and wellbeing of pupils that would live at the new Glynchbrook Garden Village has also not been adequately considered. Potential impacts or pressure on existing local primary and secondary schools (that may lie outside the FoDD but be spatially closer to Glynchbrook than FoDD schools e.g. Hanley Castle) need urgently to be understood. The remote location of Glynchbrook also has serious implications for the site’s own young residents that would need to be bussed long distances to access education, including special education. The uncertainty of viability of provision onsite and the potential impact of dispersed education provision on their wellbeing and social development must be considered.

Although a surgery is planned on site (with questions as to its viability), other local healthcare providers in Ledbury, Malvern and Gloucester are more local than any of the major FoDD towns. Dentists, hospitals, and care homes in these settlements are therefore more likely to experience pressure to accommodate the need arising from Glynchbrook, and again with unsustainable transport links and a reliance on the private car to access these.

Indeed, it is a fact that most of the closest amenities, including for greenspace and recreation, for Glynchbrook Garden Village residents and workers will be outside of the FoDD. Therefore, the costs, pressures, traffic and impacts on services, authorities and nature associated with the community at the new Garden Village will also more likely be incurred by those in neighbouring authorities than by those in the FoDD area. There is a risk that school and health and other services will experience increased pressure without any corresponding funding and increases in capacity.

These impacts should have been more appropriately explored at an earlier stage with neighbouring authorities and other relevant bodies under the Duty to Cooperate.

6. RLP60 Glynchbrook is poorly connected, contrary to existing national and emerging national policy for sustainable transport (especially centred on a rail network) for new development .

There has been insufficient (or indeed any) modelling to understand the transport needs and traffic implications of siting 9ha of employment land (the Plan suggests 3,000 potential employment positions) and 3500 houses on that site. The cumulative impact of other developments (e.g. at Staunton and Bromsberrow) on the A417 and Junction 2 of the M50 do not seem to have been considered.

Assumptions have been made in Policy RLP60 for public transport routes (bus services to Ledbury and Newent), but no provision for services is made to other centres such as Gloucester, Worcester and Malvern, which are likely to be the larger and more desirable education, entertainment, retail and employment centres. Likewise the policy does not consider the potential demand for the use of the Malvern Hills and commons as the closest recreational green spaces. These are all likely to be popular destinations and will significantly rely solely on private car use.

It is also questionable as to how effective any resultant public transport (bus/coach) services would be, with sufficient frequency, destinations and timings to be practical for the Garden Village residents and employees, and whether these services would be able to be secured at all, let alone sustainable in the long-term.

There is no railway link and only the M50 is suitable for high volumes of traffic. The A417 towards Gloucester already experiences congestion. Trips north to the Malvern Hills and commons, Malvern or Worcester would use direct routes (and would most likely be directed on such with satnav) that consist of small, narrow, winding rural lanes that are prone to flooding, slow moving farm vehicles and free roaming livestock. Collisions with livestock

are frequent, especially by drivers unused to the local conditions. There is therefore a significant human safety and animal welfare consideration.

Substantial investment will also be required to make access to and from the A417 and Junction 2 of the M50 safe. The proposed principal entrance to Glynchbrook Garden Village is located on the A417 not far from the small lane that community members in villages such as Birtsmorton, Castlemorton and Welland use to access the M50 Junction 2. Access onto the A417 has limited visibility from that lane; likewise, vehicles exiting the M50 westbound or eastbound onto the A417 find themselves with severely restricted visibility. The new settlement will add thousands of vehicle movements per day to that road, making egress extremely difficult, unsafe and could cause delays and congestion for both existing users and residents/employees in the new Garden Village.

Furthermore, the slip roads onto the motorway itself at Junction 2 of the M50 are very short indeed and would need extensive improvement for safety reasons.

7. RLP60 Glynchbrook policy is not sustainable with regard to its use or impact on natural resources

Specifically, LMWPC has concerns that the proposals for, and scale and location of development at, Glynchbrook will:

- harm local SSSIs such as Castlemorton Common, due to increased visitor numbers and the effect of increased through traffic on the B4208. Other SSSIs that may be affected include Burley Dene Meadows, Rye Street Meadows and Merries Farm Meadows (all of which have PRoW through or next to them).
- The Malvern Hills SSSI Recreation Mitigation Strategy (2022) notes adder are present in the southern and central sections of the Malvern Hills. Increased visitor pressure such as that which will arise from the new Garden Village could easily affect this species as they are vulnerable to disturbance, especially by dogs.
- cause more localised flooding as a result of insufficient capacity for effective drainage systems in already saturated ground (the site including areas known to be subject to frequent flooding)
- pollute local and wider watercourses (including the internationally important and functionally linked Severn Estuary and associated sites) through insufficient capacity, lack of viable solutions, and insufficient infrastructure investment to treat and contain waste water and sewage. Increased sewage processing capacity and infrastructure is not mentioned in the Plan nor consideration of such to accommodate the additional need in policy RLP60.
- not have access to adequate water supplies. Currently the area is fed by the limited Bromsberrow aquifer and LMWPC understands that there are no provisions in the Severn Trent Plans to 2050 to increase supply to the area.
- The SA report for the Reg18 consultation acknowledges that the Glynch Brook aquifer is already considered to be over abstracted.
- Will result in the loss of productive agricultural land (Grade 3)

The SA and HRA for the Reg18 Plan has not consistently, sufficiently or coherently considered these impacts, nor whether any negative impacts can be appropriately mitigated.

8. RLP60 Glynchbrook will harm historic features and assets and the character of existing villages

For the reasons given previously, Welland and neighbouring villages such as Castlemorton and Hanley Swan are likely to experience increased traffic volume expected due to journeys north to Malvern and Worcester.

In Welland, these increased vehicle numbers will cause localised congestion on Gloucester Rd and Drake Street, affecting air quality and noise for pedestrians and community members visiting the school, playground, shop, hall and church and the amenity of residents accessing the road to and from their homes. The current closure of the road to British Camp has provided the Parish Council with evidence of how increases in traffic along the A4208 causes daily congestion in the village centre.

The increased traffic will affect the tranquillity of these village/s and the Malvern Hills National Landscape which extends to the A4208.

The adverse impact of RLP60 on other historic and rural villages and communities and their settings has also not been sufficiently considered e.g. the Lowbands and Redmarley Conservation Areas, Chartists settlements, the Listed Buildings adjacent to the site, the Moated Enclosure and Fishpond Ancient monument to the south, Midsummer Hill scheduled monument. The allocation is also on the site of a notable civil war battle and may be of archaeological importance. There are no evident heritage assessments in the Reg18 Plan documentation nor of cumulative effects of development on heritage assets.

9. Policy RLP60 Glynchbrook is not associated with evidence that cumulative effects have been considered.

The Reg18 Plan and the consultation documentation available do not provide evidence that the cumulative impact of Policy RLP60 with other proposed allocations in the Reg18 Plan, and existing resources and services, including natural capital, is sustainable or even that it has been considered.

For example, it would be important to understand the cumulative impact of vehicle movements associated with the new development when added to existing vehicle movements on the M50 and A417, and also the proposed allocations at Bromsberrow and Staunton etc. This will significantly affect any conclusion on the viability of these roads, and their junctions, to accommodate these strategic allocations.

Likewise, the cumulative impact on water supply - from the Glynchbrook Garden Village when considered alongside existing settlements and also other nearby new development

proposed in the Reg18 Plan needs to be urgently understood to understand if the site is viable.

10. Policy RLP60 Glynchbrook is inconsistent with the FoDD Reg18 Plan's objectives, and incompatible with other policies in the Reg18 Plan.

For the reasons provided in this section, Policy RLP60 Glynchbrook is inconsistent with the Reg18 Plan's objectives, particularly SO1, SO5, SO6, and SO7

We also suggest RLP60 Glynchbrook is inconsistent with and contrary to provisions in Policy RLP1 (especially 2, 4 & 6), Policy RLP4 (i & ii and Para 4.12, 4.13), Policy RLP110, Policy RLP111, Policies RLP121-123, Policies RLP125-126, and Policies RLP130-134.

Conclusion

LMWPC is supportive of Local Plans that provide homes and employment opportunities in the right places and that are sustainable economically, environmentally and socially, and that meet a demonstrated local need.

However, the evidence presented in the consultation documents is either missing or insufficient to justify Policy RLP60 Glynchbrook as a sustainable or appropriate location to effectively deliver the strategic scale growth that the FoDD needs.

RLP4 para 4.12 of the Reg18 Plan states that "*The location and the use as well as the nature of the development itself will be material*". This is a key point regarding RLP60. The Reg18 Plan suggests masterplanning would be able to address a number of negative impacts identified in the Sustainability Appraisal, but these would most likely be associated with the nature of the development. Therefore, even if evidence were subsequently to emerge that such mitigation would be viable and effective, other conflicts with national policy arising from the location and the use (including scale) of the Garden Village development are significant and would preclude the inclusion of this allocation in the Plan.

Further, there has been insufficient consultation with other authorities and relevant bodies, and the Reg18 Plan and associated consultation documents do not provide sufficient consideration of the impacts to protected and valued sites and assets, communities and services outside of the FoDD. This has resulted in a Reg18 Plan that if submitted would deliver decision-making that could be inconsistent with national and relevant local policies and guidance.

In conclusion therefore, LMWPC strongly objects to the continued consideration and inclusion of RLP60 Glynchbrook Garden Village in the Local Plan. We also ask for any remaining policies to be reviewed in the context of their cumulative and individual potential impacts outside of the FoDD and appropriate reference to relevant considerations and guidance be introduced to the policies in the Plan.