

Castlemorton Parish Council Response to the Consultation on the Forest of Dean District Revised Draft Local Plan 2025 – 2045, February 2026: Objection to Policy RLP60 Glynchbrook Garden Village (Redmarley Parish).

1 Introduction

Castlemorton Parish Council represents a community of 650 residents. The Parish is rural and contains about 250 dwellings. The B4208 divides the Parish into two more or less equal areas. Land to the west of the B4208 is designated as part of the Malvern Hills National Landscape. The boundary of the Parish is only 3 miles from the proposed allocation in draft policy RLP60.

The proposed location is at the edge of the Forest of Dean District on the borders of Gloucestershire, Worcestershire and Herefordshire. This complicates planning of sustainable access to services such as education and health. A large development close to our Parish boundary is likely to affect the Highways Network and commuting by car across the County boundary into our Parish.

Castlemorton Parish Council resolved at their meeting of the 5 March to object to the proposed allocation.

Our objection relates to:

- The likely impact of the development on traffic levels using the highway network into and through our Parish.
- The potential impact on the highly valued Malvern Hills National Landscape and particularly on the sustainable management of Castlemorton and Hollybed Commons within our Parish.
- The lack of evidence that the proposed allocation would be viable and could be delivered in a way that satisfies ‘Garden Village principles’ as required by the draft Policy.

2 Highways

The promotional website for Glynchbrook Garden Village by Black Box Planningⁱ makes a point of showing the distance to urban centres *including* Malvern and Worcester. This reinforces the impression that the promoters see this as a development that could be attractive to commuters to these locations. It seems likely that development in this location would serve largely as a commuter village rather than a sustainable self-contained community.

Commuter routes from the allocation site to Malvern and the Worcester City (south and central areas of the City) would run through Castlemorton Parish along the B4208 accessed from the minor road that links the A417 to Camers Green. There is no evidence provided on the likely effect of the allocation on the use of the local road

network and the effect this would have on our community in terms of increased traffic, noise and loss of amenity.

The minor road from the B4208 to junction 2 of the M50 is narrow where it crosses the Glynch Brook and is in effect single track over the bridge. When in flood the Glynch Brook makes this road impassable and local traffic frequently makes use of Pendock Road to get to the A417. Although outside our area these minor roads are used by local residents to access the M50.

The roads through the Parish are used by slow moving agricultural vehicles as well as recreational cyclists and horse riders. We are concerned about the risk to livestock and road users of increased traffic on and close to the areas of open common land in our Parish. The allocation could add thousands of additional vehicle movements with increased risk of congestion and livestock casualties.

3 Malvern Hills National Landscape – including Castlemorton and Hollybed Commons.

The Malvern Hills and Commons are highly valued by many of our residents and contribute to the overall quality of life. They also underpin several small-scale tourism businesses in our Parish. We are concerned that the proposed allocation will have a negative effect on the Malvern Hills National Landscape and on the designated Sites of Special Scientific Interest and will change the character of the Southern Hills and Commons.

Of particular concern are:

- The possible impact on views from the (southern) Malvern Hills and the setting of the National Landscape. No evidence is provided on sightlines and visibility.
- Reduction in the sense of tranquillity – the subject of Malvern Hills National Landscape Management Plan Policy PL3ⁱⁱ.
- Impact on dark skies – the subject of Malvern Hills National Landscape Policy PL4. Castlemorton includes one of only two dark skies discovery areas in the National Landscapeⁱⁱⁱ.
- Increased recreational pressure on the Malvern Hills – and particularly on Castlemorton and Hollybed Commons – with consequences for their sustainable management.

Forest of Dean District Council has a duty under the Countryside and Rights of Way Act 2000 as amended by S245 of the Levelling Up and Regeneration Act 2023 to further the statutory purposes of the National Landscape. They should comply with this duty when preparing Local Development Plans. However we can see no evidence in the plan or Sustainability Appraisal of how the Glynchbrook option has been considered against other possible and reasonable alternatives in relation to this duty and against the

objectives set out in the Malvern Hills National Landscape Management Plan. The initial Sustainability Appraisal highlighted the proximity of the site to the National Landscape as a negative factor which contributed to the overall negative appraisal of this location and should have decisively screened out this option.

Castlemorton and Hollybed Common are still grazed by local farmers as they have been for hundreds of years. Maintaining these as ‘working commons’ grazed by livestock is seen as an important element of the Parish’s culture and character. Much of Castlemorton Common is designated as Site of Special Scientific Interest and Natural England’s Views on Management^{iv} (which forms part of the SSSI notification) identifies livestock grazing as necessary to maintain the special interest. The indirect effect of development on SSSI management should be considered in the development plan.

The interaction between road traffic and grazing animals is a cause of concern in terms of livestock casualties and risk to road users in the Parish. (As a Parish Council we want to see better signage and a reduction in speed limits.) We are concerned that the allocation could significantly increase these risks and adversely affect the sustainable management of the SSSI and non-SSSI Commons. We can see no evidence that the direct and indirect traffic implications for our Parish have been modelled or considered.

4 Garden Village Principles and Sustainability Appraisal

The published Sustainability Appraisal of the proposed allocations (Appendix v page 429) notes that this option was unlikely to meet the Sustainability Criteria as assessed. Conflicts with national policy that were identified include:

- Distance to Ledbury Town Centre.
- Distance to a Primary School.
- Distance to a GP surgery.
- Likely reliance on car transport.
- Loss of good agricultural land.
- Location relative to flood zones.
- Proximity to the National Landscape and impact on its setting.

It was stated that:

‘Although in close proximity to the M50, site could cause landscape harm and potential harm to heritage assets. Could lead to high reliability on transport by car. 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. Potential may be limited as a new settlement.’

The revised Sustainability Appraisal then modifies this conclusion to:

‘NOT EXCLUDED BY SA CRITEIRA [sic] subject to masterplanning, appropriate methods of mitigation [sic] and planned phasing of development with the necessary infrastructure’.

The policy refers to the allocation being developed according to Garden Village Principles although the Sustainability Appraisal is silent on their application and refers only to mitigation measures. We think the revised Sustainability Appraisal is inadequate because:

- There is no evaluation or assessment of the option against the Garden Village Principles which is a stated aim of the policy.
- There is no strategic evidence that the mitigation measures proposed in the Sustainability Appraisal are feasible or deliverable in a way that achieves a sustainable community. We doubt that the location, scale and physical constraints of the site are likely to support the range of measures necessary to enable a development following Garden Village Principles.
- Some of the factors leading to the site being found unsuitable are not capable of modification or mitigation – for example the option remains on the edge of the National Landscape, 9km from Ledbury, and of a scale too small for provision of GP services.
- There is every likelihood that if the development progressed through masterplanning into phased development that the application of Garden Village Principles would be challenged as unrealistic and undeliverable and ultimately set aside by developers (and the local planning authority). Local Government Association Good Practice Guidance notes that only options that can be delivered should be included.
- We believe a more extensive feasibility study (as with other Garden Village projects) would be necessary to establish whether a Garden Village is viable at this scale and location.
- We also question whether this is the most suitable location in the Forest of Dean for a Garden Village if the Council judge that such a development is the best way to deliver part of their housing strategy.

5 Conclusion

Castlemorton Parish Council objects to the proposed allocation set out in Policy RLP60 and urge that it be withdrawn.

ⁱ <https://www.blackboxplanning.co.uk/glynchbrook/> accessed 12 March 2026

ⁱⁱ <https://www.malvern-hills-nl.org.uk/wp-content/uploads/2025/05/2025-30-MHNL-Management-Plan-FINAL-INC-Chair-Foreword.pdf> accessed 12 March 2026

ⁱⁱⁱ <https://www.malvern-hills-nl.org.uk/wp-content/uploads/2025/05/2025-30-MHNL-Management-Plan-FINAL-INC-Chair-Foreword.pdf> accessed 12 March 2026

^{iv} <https://designatedsites.naturalengland.org.uk/PDFsForWeb/VAM/1003434.pdf>