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**Representations from CPRE Forest of Dean on the Strategic Option Consultation and Preferred Option**

1. **Introduction**

CPRE the countryside charity was founded in 1926 to campaign to protect the countryside. Today it campaigns for a beautiful and thriving countryside. This ambition aligns perfectly with the Forest of Dean District Council’s vision in the current Core Strategy:

*The Forest of Dean will be a thriving sustainable community with a high quality environment, a developing local economy including tourism, housing which meets the needs of residents (including affordable homes) and safer communities.*

We find that the Strategic Option document does not respond to this vision; rather it appears narrowly focused on how to meet the government’s centrally imposed housing targets. It is less a proposal for a Local Plan than a housing plan, and a market one at that. Despite its claims, in our view it fails to address issues of sustainability in environmental, social and economic terms and so fails to demonstrate how the Plan will enable the Council to achieve its wider corporate objectives. It also fails to put forward proposals that meet the NPPF’s requirement of sustainable development. In the NPPF sustainable development is defined as: *‘meeting the needs of the present without compromising the ability of future generations to meet their own needs’(2.7).* Though well-known it is worth emphasising how this should be achieved:

*a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*

*c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy (2.8).*

The Council has declared a climate emergency and committed that the district will be carbon neutral by 2030. Our analysis shows that the majority of the new houses proposed in the plan will create car-dependent commuter estates. There is little in the Strategic Option paper to suggest how the Council will support local employment or provide affordable or accessible housing to meet its own New Housing Strategy and reverse the trends of the last 10 years.

Our representations, firstly, question the undemocratic way the Council has put forward a Preferred Option to its own Strategic Option paper without waiting for the outcome of the consultation. We then go on to analyse available data on constraints, employment and housing and conclude that the Council should challenge central government housing targets on the basis that they are unsustainable in environmental, social and economic terms and would run contrary to the government’s own commitments and FoDDC’s commitments to address the climate emergency.

1. **Consultation Process**

FODDC is in the second phase of consulting on its Forward Plan. The document released for consultation on 22nd October 2020 is called the Strategic Option Consultation and contains four options on which the council is seeking the views of the public.

However, just a couple of weeks before the consultation was released, a paper (No. 451) was put to FoDDC cabinet and subsequently (15th October) to the Full Council under cover of paper 453. This was called the Local Plan Preferred Option. Although the Strategic Option consultation highlighted pros and cons of the options, the council paper recommended a single option. This was approved by the Full Council ahead of any public responses being received on the consultation document. The consultation document itself does not contain reference to the Council’s decision.

The Council paper 451 also specifically refers to a new settlement site near the junction of the A40/A48, near Churcham. The recent call for sites reveals that site 137 near Churcham is a site of 176 hectares. This is the only site large enough to contain a new settlement. It was proposed by the development company, Robert Hitchin, in March 2020. Two staff members from Robert Hitchin sit on the FoDDC Strategic Housing and Economic Land Availability Assessment Panel, alongside two directors from planning development consultants, Black Box. Site 137 was approved by the Panel as meeting the criteria for inclusion on the list, despite, in our view, failing to meet many of the criteria set out above. Challenged about the specific mention in paper 451 to the Churcham site by John Francis, chair of Churcham Parish Council, the minutes of the Full Council meeting record that Churcham had been used “as an illustration only”.

The discrepancies between the consultation document on the one hand, and the council papers and discussions on the other challenge our understanding of an open consultation process. This appears to be a travesty of local democracy in which the council is paying only lip service to the consultation having already selected an option before receiving views from the public.

In addition, FoDDC appears to have done very limited research on the settlement option, whether at Churcham or elsewhere. For such a major departure from previous practice, we would have expected to see a comprehensive spacial survey of the district, assessing potential sites against criteria. Such an objective study would help convince the public and an inspector that the plan was sound, rather than an attempt to retro-fit an evaluation after the site had been chosen. It is surely the Council’s job to carry out such an assessment, not rely, as is suggested in the Council papers, on the consultation coming up with alternatives or, equally, relying on developers promoting sites to the Assessment Panel.

It is suggested that the inevitable congestion at the proposed site at the junction of the A48/A40 can be avoided by introducing new transport options, such as a new rail station, transport hub or walking/cycling options. Has FoDDC discussed this with Network Rail? Network Rail policy documents suggest that a new rail station will only be considered when it is servicing a sizeable residential population and is likely to cost upwards of £6m (reference Cranbrook, Devon 2015). And will green transport into Gloucester answer the need? Data from the 2011 Census shows that only 50% of commuters from the north of the Forest went to Gloucester (the remainder going to Cheltenham, Tewkesbury or Stroud). Furthermore, changes in the location of business over the last 25 years has increasingly moved employment to the periphery of the city, for which the central station is of little, use.

Whilst of course we acknowledge that detailed and expensive work on the viability of a site must follow, we find it worrying that FoDDC appears to have pre-empted its own consultation through a flawed decision-making process that effectively disenfranchises the local people and that the preferred option was selected with no background research to suggest that a new settlement at Churcham would meet the Council’s stated corporate objectives. CPRE is not against the idea of a new settlement in principle, but insufficient evidence is put forward to support the preferred option, or, as an alternative, to dismiss the development of existing settlements.

**3. Central Government housing targets and sustainable development.**

Although we are critical of the limited nature of the Strategic Option document, we acknowledge that the Council is in a difficult position. Current housing targets are calculated using the standard method. Although the algorithm proposed in the recent government consultation ‘Changes to the current planning system’ would have increased the target for many rural areas, this was abandoned following the consultation and the government has now reverted to the standard method, but with an uplift for urban areas.

The revised schedule and advice published by the government on 20th December 2020 still indicated an Indicative Local Housing Need for the Forest of Dean of 370 new houses per year; that is 7400 by 2041. However, in the government’s response to the consultation the following statements were also made:

*“Many respondents to the consultation were concerned that the ‘targets’ provided by the standard method were not appropriate for individual local authority areas. Within the current planning system the standard method does not present a ‘target’ in plan-making, but instead* ***provides a starting point*** *for determining the level of need for the area, and it is only after consideration of this, alongside what* ***constraints areas face****, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in*[*Paragraph 11b of the NPPF*](https://www.gov.uk/guidance/national-planning-policy-framework/2-achieving-sustainable-development#para011)*or our strong protections for the Green Belt.* ***It is for local authorities to determine precisely how many homes to plan for and where those homes most appropriately located****.”*(our emphasis).

It is therefore possible for a local authority to agree with central government a lesser number of houses to be built in line with other national and local policies and taking into account constraints in the district. It is our contention that not only do the constraints of the Forest mean that accommodating 4000 additional houses (on top of the 3500 already allocated but not built) will be both difficult and harmful, but, given the pattern of employment in the Forest, it is also contrary to national and local policies designed to address the climate crisis through sustainable development.

We encourage the Council to challenge the standard method targets on the basis of their unsustainability as defined by the NPPF and that they contravene both local and national climate emergency commitments.

1. **Constraints**

Much is made in the Strategic Option consultation of the constraints faced by the Council in preparing the new Local Plan, but mainly, one suspects, to support the case for a new settlement. The argument is that because it is so difficult to develop around existing settlements, the only course of action is to build a new settlement.

CPRE has undertaken a detailed analysis of these constraints. We agree that the geographical constraints are considerable, ranging from the designated Forest, the Wye Valley AONB through to the flood-risk land bordering the River Severn and sites designated for nature conservation. Pulling all these constraints together suggests that far from the Forest of Dean having a developable land area of 527 sq km, it is more like 283 sq km. Moreover, this figure does not take into account the land already developed and built on for housing and employment in towns and villages.

In addition, the Forest of Dean District has significant areas of ‘best and most versatile' agricultural land, including nationally scarce grades 1 and 2, which were identified in detailed surveys around several of the main settlements.This land is a resource that cannot be renewed and which, as we come to realise the impact of our intensive agricultural practices on our soils, is the basis for all life on earth, let alone being essential to guarantee our food security. The government’s recent Planning White Paper made no reference to land as an important factor in planning, but understanding the inherent value of land is central to making the right decisions about where to build. As a society we have treated this finite resource with casual disregard, but it will be seen to be ever more precious in decades to come. Planning policy in the Forest of Dean has been no different from anywhere in the country, with, for example, housing development to the east of Lydney allowing house building on good grade 1 and 2 agricultural land. We believe no major future development sites should be proposed without detailed agricultural land quality (ALC) assessments.

Finally, the unique geography of the Forest gives it two further significant constraints, namely the two access routes out of the Forest across the River Severn. As we describe below, this constraint makes the Forest of Dean almost like an island and that isolation makes the decisions taken about development all the more crucial.

It would, of course, be facile to claim that these constraints make development impossible, but CPRE contests that, in line with government guidance, these constraints which make development difficult actually point to the qualities that make the Forest special, namely its geography, landscape, communities and biodiversity. Developing the Forest in line with these qualities, which is logically what the District Council’s Vision demands, would lead to a sustainable future.

We encourage the Council to look at the constraints on development as assets and to base its broader development proposals on protecting and enhancing these.

1. **Employment and travel to work**

CPRE has carried out research into employment patterns in the Forest of Dean over the past decade. The baseline data is the 2011 Census and this is still used by government agencies in policy development despite it being nearly 10 years out of date. We have, in addition, looked at the NOMIS Official Labour Market Statistics (2019); GCC’s *Population Profile 2019*; and GCC’s earlier *Understanding the Forest of Dean (2015).* None of the figures in the latter reports are entirely consistent, but it is possible to make some general statements.

Broadly speaking, we see a significant net outflow of people leaving the Forest every day to work either to the north-east (Gloucester, Cheltenham, Tewkesbury); south-east (Bristol) or into Wales. The 2011 Census records that of the 30100 residents in employment, 14,627 commuted outside the district to work, i.e. nearly 50%. The NOMIS statistics for 2019 record 36,500 residents in employment. Of this additional 6500, we cannot demonstrate conclusively the percentage who commute to work outside the Forest, but traffic flows can give us a reasonable indication.

Even in 2011, the date of the Census, the mean daily work-day traffic numbers at Highnam were 27,335; on the dual carriageway at Over, after traffic on the B4125 Newent Road has joined, this figure rose to 39,198. Anecdotally and drawing from a petition on Change.org in 2019 which attracted 4300 signatures and many comments, traffic towards Highnam and through Chepstow has increased significantly over the last decade from what were already high numbers. This results in major tailbacks and significant pollution problems in Chepstow and such congestion on the A48/A40 that journeys of 5 miles can take well over an hour (and this despite two major road improvement schemes). This is entirely due to the district’s geographical constraints which necessarily result in a traffic concentration rather than a dispersion pattern as it applies to commuting. An additional approximately 8000 new houses will generate 1000s of new car journeys, both north and south. As stated above, there is little to suggest that alternative transport will alleviate this increase because of the current working patterns. The environmental impact of these increases must be taken into account in future planning decisions, not least in the way the government sets its housing targets.

Clearly a more sustainable picture would be where population increases were driven by increased employment within the Forest. There is little evidence to suggest that past policies have made this the case. Take-up of land for employment in FOD Allocation Plans over the last decade appears to have been limited. The relative isolation of the Forest does not lend itself to large scale employment that requires good highway connectivity. The consultation acknowledges this difficulty (2.16) when it states that “*policies to support and bring forward additional employment services and other facilities will need to be reviewed and are expected to be part of the new plan alongside the continuation of the regeneration theme”.* The regeneration theme has suggested that by building houses, employment will follow. This has not been the case. The Forest is not seeing significant investment in employment and, conversely, it is evident that the increase in housing is not being driven by employment demand and activity.

Further data that supports our analysis of this employment pattern is the NOMIS report for 2020 where we see that pay rates for those living in the Forest are higher than the rates for those working in the Forest. This is illustrated below:

**NOMIS Labour Market Profile - Forest Of Dean**

Earnings by place of residence (2020)

|  | **Forest Of Dean (Pounds)** | **South West (Pounds)** | **Great Britain (Pounds)** |
| --- | --- | --- | --- |
| **Gross Weekly Pay** | | | |
| Full-Time Workers | 546.8 | 558.4 | 587.1 |
| Male Full-Time Workers | 548.5 | 584.3 | 622.9 |
| Female Full-Time Workers | # | 506.5 | 544.3 |
| **Hourly Pay - Excluding Overtime** | | | |
| Full-Time Workers | 12.47 | 14.16 | 15.18 |
| Male Full-Time Workers | 13.49 | 14.56 | 15.64 |
| Female Full-Time Workers | # | 13.29 | 14.42 |
| Source: ONS annual survey of hours and earnings - resident analysis  #   Sample size too small for reliable estimate [(see definitions)](https://www.nomisweb.co.uk/reports/lmp/la/1946157374/report.aspx?town=Forest%20of%20Dean#supply)  Notes:   Median earnings in pounds for employees living in the area. | | | |

Earnings by place of work (2020)

|  | **Forest Of Dean (Pounds)** | **South West (Pounds)** | **Great Britain (Pounds)** |
| --- | --- | --- | --- |
| **Gross Weekly Pay** | | | |
| Full-Time Workers | 437.0 | 550.1 | 586.7 |
| Male Full-Time Workers | 435.6 | 574.9 | 622.9 |
| Female Full-Time Workers | 431.3 | 503.1 | 544.0 |
| **Hourly Pay - Excluding Overtime** | | | |
| Full-Time Workers | 10.38 | 13.93 | 15.17 |
| Male Full-Time Workers | 10.53 | 14.35 | 15.63 |
| Female Full-Time Workers | 10.35 | 13.22 | 14.41 |
| Source: ONS annual survey of hours and earnings - workplace analysis  Notes:   Median earnings in pounds for employees working in the area. | | | |

This demonstrates that not only are the pay rates of those working in the Forest low, but that in order to earn a good wage, people are commuting to work outside the Forest. In fact, the latter group is earning higher than the national average because the figure (£546 for full-time workers) is dragged down by earnings of those living and working in the Forest (£437) who are employed in a range of lower-paid work. This is supported by further data on employment by occupation from the NOMIS report which shows that 38% of those working in the Forest are in lower-paid work. This distribution becomes important when we look at the type of housing provided in the Forest (Section 5).

The Forest has a reputation for a strong self-employed and small business sector. The UFD 2015 reports 6,700 people were self-employed as against a total of 23,400 employed workers. At the same time 3,690 businesses were registered in the Forest of Dean District, 77% of which employed not more than 4 people. The three-year survival rate of these businesses was significantly higher than the national average, but business growth between 2011 and 2015 was only 2.8% as opposed to 8.1% for Gloucestershire as a whole.

Overall, a picture emerges of an increasing proportion of the resident workforce commuting outside the Forest for better-paid work. It seems that many sites allocated for employment within the District have not been developed. However, there is a robust but not hugely growing small business sector that needs support to create a more sustainable employment environment within the District. There is virtually nothing in the consultation document to support this.

1. **Housing**

The 2009 Housing Needs Assessment for the Forest of Dean concluded that the mix of affordable and market housing needed be a 50/50% split with a need over the following 5 years for 705 units per year of affordable housing for the existing population. The current adopted Local Plan puts the council’s ambitions for affordable housing at 40%. However, the recently adopted New Housing Strategy for the Forest of Dean states that only 721 affordable units have been built in total since 2012 and, of these, 345 were through S106 agreements with developers. It is difficult to extrapolate the numbers of new social housing. In contrast, the total number of houses built over the same period was around 2600 units. This means that only 27% of houses built were affordable; the remaining 1900 or 73% was market housing. This supports our employment data above to suggest that house building has been dominated by an increase in commuter estates.

The New Housing Strategy also states that the District has, compared to the South West, a lower-than-average provision of 1- and 2-bedroom properties, but comparable levels of 3-, 4- and 5-bedroom properties. The Strategy’s second objective is to improve the provision of accessible houses for the elderly. The over-65s currently make up 25% of the population of the Forest and this is forecast to rise to 33% by 2041. We can see no evidence in the Strategic Option paper that the Council plans to put in place policies that will reverse the trends of the last decade to address the need for affordable and accessible housing. Even the Housing Strategy, with its excellent objectives, reveals a lowering of ambition. It states that it wants to see 240 – 320 affordable houses built over the period of the plan (2020 – 2024). The standard method requires the Council to build 370 houses a year, that is, 1480 over the same period. The affordable housing provision would therefore be 16-20% of total build, down from the 50% aspiration in 2009. Whilst this might reflect a general rise in prosperity over the last decade, the employment figures above do not suggest this is entirely the case. The new housing development of 80 homes north of Newnham, for example, has provision for over-55s: these houses will sit within a gated community with prices starting at £360,000. If the Local Plan is to address the challenges set out in the Housing Strategy a significant change in policy will be needed to provide affordable and accessible housing for the elderly and those on lower incomes.

The Strategic Option Consultation forecasts a need for 4000 new houses in addition to the 3500 already built into current allocations before 2041. All the above data, however, demonstrates that this forecast is not built on a natural increase in the resident population, nor on meeting housing need for increases in employment, but simply reflects an increase in population resulting from the increase in the building of market housing in the Forest. Although housing in the Forest is still relatively cheap in comparison with areas such as Bristol and offers a high standard of living because of its high-quality natural environment, recent research by Zoopla shows that house price inflation in the Forest is second highest in the country as the market responds to inward migration. Increasing the supply, as envisaged by the government, would, on the principle of simple supply and demand, stabilise the price of houses. But the housing market does not work in this way as developers drip feed completions onto the market, thus maintaining prices and profit. We cannot avoid the conclusion that, if the past few years are anything to go by many of these new houses will be taken up by households who will be leaving the district to work. Inward migration is to be welcomed as it supports the vitality of communities, but where a majority of people leave the area to work, they increase the number of car journeys with all its environmental impacts and put pressure on the existing infrastructure. As an example, the new Community Hospital planned for Cinderford will reduce the total hospital beds in the Forest over current provision at the same time as we are anticipating a huge uplift in population.

In short, this is ‘cart-before-horse’ policy making. Population growth is being fuelled by the increase in house building and the Housing Needs Assessment embeds that increase to demand ever more housing. On the other hand, because the market is being driven by inward migration, it is making it increasingly impossible for many local people to find affordable housing. Also, since pay levels for those working in the Forest are significantly below the pay levels of many of those who commute to work elsewhere, a double whammy is being created for a significant proportion of local people. Whilst it can be argued that restricting development in the Forest would merely shift demand elsewhere and increase prices in the District, we have made the case that to continue as now would go against the NPPF definition of sustainable development. Yes, the prices for the sort of market housing we have seen over the past decade would increase, but we would soon see equilibrium established with more expensive areas to the east of the River Severn, thus tempering demand and leading to housing provision nearer major centres of employment.

All this seems to us to be confirmation that the Strategic Option Consultation is less an early draft of a Local Plan and more just a plan to deal with the government’s housing targets. To produce a proper Local Plan we believe it should be built, bottom up, to create employment and housing so as to enable people to live and work in the Forest. In this way, traffic will be reduced, communities will thrive and the environment will improve. The Strategic Options Consultation does nothing to address any of this complexity.

1. **Conclusions**

In January 2020 the Forest of Dean District Council declared a climate emergency and approved an action plan for the Forest to become carbon neutral by 2030. The UK Government has committed, via its signature to the Paris Agreement (2015) and its 2019 pledge to reduce greenhouse gases to zero by 2050. The Strategic Option Consultation claims to respond to these imperatives but fails to demonstrate that its proposal for a new settlement at Churcham will achieve these ambitions. Driven by the government’s housing targets, the consultation document is less a draft towards a new Local Plan than simply a house building plan. This will self-evidently lead to more unsustainable car travel with all its environmental impacts. As a consequence, the Council has failed to create a plan based on the assets of the Forest, a plan to protect and enhance its natural environment, to grow small scale businesses and meet the housing needs of the local population through affordable and accessible housing. Instead, it has created a developer’s charter that will see more commuter estates built. And even if these market housing estates are not in the form of a new settlement, the huge increase in numbers of houses will impact on the character and social and economic sustainability of existing settlements.

MPs from rural constituencies in the South-East and the Isle of Wight successfully challenged the government over its proposals for a new housing algorithm that would have seen an enormous increase in housing targets in rural areas. They stood up for their constituencies and were successful. We are not advocating no new market housing: all communities need new blood to remain vibrant, but the current plan will not achieve a balanced result. We ask that the Council appeals to our MP to intervene and support efforts to reduce the centrally imposed housing target, support efforts to create more affordable housing and ways of encouraging more small and medium-sized businesses to locate to the Forest of Dean. Such a plan would be, what it says on the tin: a Local Plan and a plan that meets the NPPF’s requirements for sustainable development.