

**Forest of Dean Local Plan Review**

**Representations by Churcham, Huntley, Westbury on Severn,  
Blaisdon, Highnam and Minsterworth Parish Councils**

**Final Version**

**5 January 2021**

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## Summary

These representations are made by six parish councils: Churcham, Huntley, Westbury on Severn, Blaisdon, Highnam and Minsterworth. They were approved at meetings of each parish council in January 2021.

In short, the parishes consider that a potential strategy based on the further growth of the District' towns and larger villages has been too lightly set aside, and a strategy based on a new settlement with much less growth at existing settlements has been too readily chosen, without sufficient consideration of the balance of advantages and disadvantages of each.

The parishes therefore **strongly oppose the preferred strategic option** endorsed by Cabinet in October 2020 involving a new settlement in the Churcham area on the grounds that:

- it is not justified
- it may not be effective
- it raises issues about the duty to co-operate which may hinder implementation and could be avoided, and
- it is unlikely to be a sustainable strategy.

These grounds include two of the four tests of soundness set out in the current version of the National Planning Policy Framework (NPPF) at paragraph 35, and relate to another important consideration – the duty to co-operate - referred to at paragraph 24.

The view of the parishes on issues of procedure is summarised as follows:

- The absence of a full plan document makes it difficult to comment
- It is not possible to address all four tests of soundness
- Issues raised by the duty to co-operate are complex and difficult to resolve

On issues of substance, our view is summarised as follows:

- Core planning issues – the alternative strategies are not clearly explained and there are some substantial practical difficulties associated with the new settlement proposal as well as fundamental planning principles
- Natural environment – the various constraints affecting the District are acknowledged but these make it even more important that opportunities for distributing development in accordance with the settlement hierarchy are thoroughly explored. In particular, the issue of flood risk is not adequately addressed in relation to the proposed new settlement
- Traffic and travel – Forest of Dean District will remain strongly dependent on Gloucester for jobs, and congestion on the A40 and A48 will continue. However to

locate major development at their junction will have the greatest adverse effect. Bus services are likely to make very little impact in terms of sustainable transport modes

- Local economy – the Strategic Options document does not give sufficient consideration to this issue, in particular how the local economy could be strengthened in order to reduce levels of out-commuting and thus create a more sustainable future for the District
- In relation to Lessons from Elsewhere, a comparison with the approved development at Twigworth and Innsworth north of Gloucester strongly suggests that the new settlement in the location proposed will in effect be a detached suburb of Gloucester of little benefit to the Forest of Dean. There are important questions about the sustainability of new settlements on a small scale, and many such settlements described as “garden villages” are car-dependent and provide a cramped living environment for residents.

For these reasons, **we strongly recommend that this strategy including a new settlement be abandoned immediately** in favour of an alternative strategy based on a distribution of development broadly commensurate, subject the acknowledged constraints, with the size of the existing towns and the larger and more sustainable villages.

## **1 Introduction**

These representations are made by six parish councils: Churcham, Huntley, Westbury on Severn, Blaisdon, Highnam and Minsterworth. They were approved at meetings of each parish council in January 2021.

The parishes form a contiguous area west of Gloucester stretching from the edge of the City for over ten kilometres to the vicinity of May Hill west of Huntley village. Together they have a population estimated at just over 6,000.

The two last named parishes are in Tewkesbury Borough. The reason for their involvement in making these representations is that a significant proportion of the land identified as Site 137 in the District Council's Strategic Housing and Employment Land Availability Assessment (SHELAA), and a potential location for a new settlement, is located in Tewkesbury Borough. The implications of this are explored below.

## **2 Procedural Matters**

### **The Basis for the Current Consultation**

The parishes acknowledge that there is no full Plan document to comment on and that this round of consultation is non-statutory. We infer that the Council is testing the water for its preferred strategy and will incorporate it - or an alternative - in a fully comprehensive Plan at a later date. Nevertheless the parishes are concerned as there is no substitute in our opinion for such a comprehensive plan containing a complete range of draft policies on all relevant topics so that, as footers to local plan pages often state, plans can be read as a whole. As matters stand we have a Cabinet report of a mere twelve pages and an Options Report of just twenty-eight to deal with perhaps the most important planning decision the Council will make in the forty-six years since it was established.

### **Tests of Soundness**

Despite the prospect of significant change to the planning system arising mainly from the Planning White Paper, we note what the Council says on its website under the subheading Planning Process Changes – that preparation of the new Local Plan will proceed under the present regulations until such time as changes are made.

That means among other things that the new Local Plan will most likely be examined using the four criteria of soundness in paragraph 35 of the NPPF. We consider that two of them, relating to justification and effectiveness, are involved in the Council's proposals. However, our interpretation is that all four criteria or tests have to be satisfied and that nothing is implied by the order in which they are set out.

In the absence of a comprehensive draft Plan the other two tests, whether it is positively prepared and consistent with national policy, cannot easily be addressed. There is so little

detail about the content of either strategy addressed in the Cabinet report that it is difficult to tell at this stage whether they warrant the description positively prepared.

In respect of national policy, we note that the NPPF is not entirely prescriptive about the content of local plans, and that in particular paragraph 72 refers to new settlements as a means of meeting housing and other requirements as an alternative to the further growth of existing settlements. This, essentially, is the choice that the Council has to make. A new settlement would not necessarily be contrary to national policy; but it would nevertheless be a marked departure from the policies pursued in the area since 1974. Attention is therefore focused on the other tests - not only whether the strategy is justified, but also whether it is effective.

### **Cross Boundary Issues and the Duty to Co-operate**

The practical requirements of the duty to co-operate for the District can be examined in terms of its relationship with other areas, clockwise from Gloucester. The duty to co-operate is about procedure but the purpose of the following sketch is to show where the most important cross boundary issues lie.

There is no crossing of the Severn estuary between the A40 at Gloucester and the M48 bridge, inhibiting any interaction with Stroud District. The abolition of tolls on the Severn bridges (M48 and M4) is likely to have increased demand for housing in Chepstow as part of Bristol's hinterland. This may extend into the southernmost parts of Forest of Dean District, as acknowledged at paragraph 2.31 of the Strategic Options document. The A48 is a very important route connecting Gloucestershire and south Wales. Chepstow is a significant employment and service centre, slightly larger than the three main towns in the Forest and much larger than Newent.

Between Chepstow and Monmouth there is only one major road crossing of the Wye, at Bigsweir Bridge. This is where the north-south route (A466) simply switches banks; it does not facilitate east-west movement where in any case the steep slopes on both sides of the river inhibit movement. Similar constraints affect movement across the Wye between Monmouth and Ross. Around the District's northern boundaries, the nearest town is Ledbury but Hereford and Leominster are further away. The most significant of these relationships is thus that with Gloucester, as confirmed by the travel to work data discussed below.

The situation is complicated by the fact that Forest of Dean District does not have a common boundary with Gloucester City. The two administrative areas are separated by a distance of about 3.5km along the A40 from Over Bridge to Beauchamp House, which territory lies in Tewkesbury Borough (and in Highnam Parish). In the opinion of the parishes, the duty to co-operate would involve Gloucester City Council as well as Tewkesbury Council, and would involve the latter even if all the land allocated for the new settlement were in Forest of Dean District, on the grounds of its proximity.

### 3 Core Planning Issues

#### Introduction

This section begins with a review of the Strategic Options document and the Cabinet report.

The six parishes consider that the four options have been unhelpfully described in the summary at paragraph 1.12. It is not at all clear what the first two options actually mean.

The only comprehensible sentence in the paragraph on **Option 1** is the first which is not emboldened. In particular, it is not clear what is meant by the phrase *“a greater scale of development than would otherwise have been the case”*. The timescale for local planning is now so long (twenty years in this instance) that to anticipate what might be required at the end of the plan period is not worthwhile. The setting of housing requirements is still likely to be based on household projections. There is nothing to suggest that these will continue to rise indefinitely, so this strategy (whatever it is) should not be excluded on the grounds that it *“may not be able to provide for the longer term”*.

In relation to **Option 2**, any thorough consideration of alternatives should involve the realistic (rather than ultimate) capacity of settlements. Option 2 is not a do-nothing option; no deliberate strategy, however unsound, should be so characterised. It is also misleading to liken this strategy to the presumption in favour of sustainable development, a phrase which should be used in relation to individual proposals for development which collectively contribute to the overall aim of sustainability. More important still, no strategy which distributes development broadly in accordance with the existing settlement hierarchy should be described as one of dispersal. This term should instead apply to a strategy in which a disproportionate amount of development was allocated to the District’s smaller settlements at the expense of the larger; this would indeed be an unsustainable strategy.

**Option 3** appears to suggest without reference to any supporting evidence that a new settlement would be a sustainable option.

We comment on **Option 4** below in relation to the SHELAA.

We consider, and the Council appears to have acknowledged, that there is not a broad spectrum of potential strategies between one of focusing development at the main existing settlements without relying on a new settlement on the one hand, and making provision for a new settlement with much less development at the main existing settlements on the other. This relates to the minimum worthwhile size for any new settlement. If as we believe the new settlement as proposed is too small to be effective, then this at once eliminates any intermediate point on the spectrum and any new settlement on the scale proposed. This means that a more conventional strategy is the only plausible one.

## The Settlement Hierarchy and Capacity for Development

The fact that areas adjoining or close to Forest of Dean District contain larger and better-connected towns – not just Gloucester, but also Chepstow, Monmouth and Ross on Wye – does not mean that the District’s own settlement hierarchy should be disregarded in plan-making. The hierarchy is well described; what flows from that is the important thing.

We consider the Strategic Options document is less than clear in a number of respects. The review of constraints in the major settlements begins with Lydney. Paragraph 2.15 refers to what is essentially a marketing constraint, but one which would not prevent other major sites coming forward from about 2030. The paragraphs which follow are vague about the “*very real physical constraints*” to which 2.16 refers, and we disagree strongly with the proposition that “*a period of assimilation*” is required. Market housing will be taken up where demand exists, and affordable housing will come forward where need arises and where the provider has sufficient resources. There may be some pressure on services and demand for jobs – but at least Lydney is an established service and employment centre; the site for the new settlement is not.

The Strategic Options document does not at times distinguish clearly enough between existing commitments for housing and the scope for new allocations. This results in among other things Table 1 of the Cabinet Report being less than convincing in terms of the scope for development at the towns and how the “maximum capacity” has been calculated, and in the case of the larger villages, where it is located. What could be described as a shortfall of 545 dwellings at the foot of the table is not excessive, and would not need “a large number of allocations” to meet it, as the note in the table suggests. Since the threat of a very much greater total housing requirement resulting from the Government’s proposed algorithm has receded, we have a situation in which a new settlement is proposed for want of sites to accommodate merely a quarter of what the new settlement itself might provide. The Government’s retreat from the algorithm should direct the Council to examine more carefully a strategy based on the existing towns and larger villages.

Paragraph 2.32 deals with individual villages or groups of villages, in descending order of size, in no fewer than fourteen bullet points. There is clearly potential scope for allocations at any of them, and collectively, considerable scope. Excessive reliance on them might indeed, as paragraph 2.33 suggests, constitute a strategy of dispersal which on the whole local plans try to avoid. However, in this particular case the question must be asked: would a strategy which did rely on allocations in some or all of these villages be any less sustainable than one including a new settlement?

Finally in respect of this section, we strongly agree with the last sentence of 2.34: “*Overall a strategy that delivers the best portfolio of development options rather than one that simply meets the overall targets is likely to be the most appropriate for the LP and for the FoDD*” [our emphasis]. In our opinion the new settlement option is indeed one which “*simply meets the overall targets*” and has little if any other merit.

## Strategic Housing and Employment Land Availability Assessment

The Cabinet report makes no connection between the principle of a new settlement and the means by which a strategy including such a settlement might be implemented. A connection is implied however in the Strategic Housing and Employment Land Availability Assessment (SHELAA).

We note that the Forest SHELAA, unlike many if not most prepared by other local planning authorities, does not attempt to estimate the capacity of the sites to accommodate housing or other development. For housing, this can be on a straightforward application of a density standard, whatever that is; the exceptions are urban sites where a design-based approach would probably be more appropriate, or at the other end of the scale – for example for a new settlement - where many kinds of land use need to be catered for. The Council's approach has thus made it more difficult for representatives to assess the degree of strategic choice available.

We see that a substantial area of land in the form of Site 190, oddly described in the SHLAA as "*south of A40*" has been put forward in the Redmarley area, and is noted as a "*possible new location for settlement*". Its area, given as 113 hectares, is not great enough to accommodate development which would make a significant contribution to meeting needs in an appropriate location. Indeed, the Council's own observations – "*noise from M50, central areas within Floodzone 3, remote from higher order facilities, concerns over sustainability, as the site is detached from any settlement and there is a lack of infrastructure including public transport*" - are in our view sufficient to rule it out. The fact that Site 137, discussed below, may not have some of these drawbacks does not mean that it is a more suitable site for a new settlement than Site 190. Site 137 has enough drawbacks of its own, addressed below.

Site 137 is by far the largest site included in the SHELAA, with an area given as 176 hectares. The map for this site does not appear to show district or parish boundaries; if it does, they are not clearly visible. Whichever is the case, there is no acknowledgement in the SHELAA that a significant part of this site actually lies in Tewkesbury Borough. Representatives of the parishes have sought advice from Tewkesbury Borough Council (TBC) on this matter. At the time of writing, TBC has advised that it has no knowledge of this potential proposal and has not in any way been consulted.

The parishes have also examined other land in the vicinity put forward in the SHELAA. None of the sites individually is large enough to accommodate a new settlement. No combination of them is contiguous or even close enough together to make up a remotely plausible location for a new settlement. In addition, the SHELAA itself states that some of the larger sites have in any case been excluded from any further consideration.

The land budget for a new settlement is discussed below. What is clear, however, is that the part of Site 137 in Forest of Dean District is nowhere near sufficient to accommodate a new

settlement on the scale envisaged. Assuming for the moment that Site 137 in its entirety is capable of accommodating such a settlement, there are two alternatives:

- Forest of Dean District Council to reach some kind of agreement with Tewkesbury Borough Council that land the latter's territory could be allocated and developed
- If such an agreement could not be reached, then other land in Forest of Dean District would need to be identified and allocated. Land to the west is potentially liable to flood, connections to the south across the railway would be difficult and land to the north is even closer to the RSPB nature reserve at Highnam Woods.

The first alternative raises three more issues. First, it is by no means clear which district's housing requirements the new settlement would contribute to. If for example two fifths of the required housing were built in the Tewkesbury side of the boundary, then 800 dwellings could possibly be counted towards meeting the Borough's requirements, not the Forest's, leaving FoDDC (other things being equal) to find sites for another 800 dwellings.

Secondly, the development plan for Tewkesbury Borough currently consists of the Joint Core Strategy for Gloucester, Cheltenham and Tewkesbury (JCS). This is under review, but the adopted document makes no provision for major development in this area. The Tewkesbury Borough Plan has been submitted to the Secretary of State for Examination. It does not make a provision for major development in this location either, and it is most unlikely that any such proposal would or could come forward through the process of plan modifications.

Thirdly, the development plan for this particular part of the Borough also includes an adopted neighbourhood development plan. The Highnam NDP, which covers the whole civil parish, and therefore also a substantial part of site 137, makes no provision for major development in this area.

Finally, we note what the Strategic Options document itself says about **Option 4**, described as a "*negotiated agreement that some development will be passed to adjoining authority(ies)*". Paragraph 1.14 states: "*...[option] four is really an alternative strategy that LAs are able to consider only under specific circumstances. It is considered unlikely to be able to proceed*" [our emphasis]. The key point is that a new settlement under Option 3 in the location suggested and involving only the land of Site 137 of the SHELAA necessarily also involves Option 4, that is, partly meeting the needs of the District in the territory of another. This alone is a major disadvantage of Option 3, sufficient in the view of the six parishes that it should be ruled out altogether at this stage of the plan-making process.

### **Land Budget and Masterplan for any New Settlement**

Unless there is other land not included in the SHELAA potentially available, only Site 137 is a plausible location for a new settlement. However, no attempt has been made at a land budget. 2,000 houses at 30 dwellings per hectare net would (for example) require 67 hectares. This could reasonably be regarded as a minimum figure if good standards are to be

achieved; see below under the heading Lessons from Elsewhere for more detail on this subject. Provision would also need to be made for a district/local centre, possibly two primary schools equivalent to 3 forms of entry, some land for employment uses, and public open space. Any land budget would need to take account of the existing woodland and the almost certain need for a buffer zone alongside the railway to mitigate noise. Taking the strategic allocations in the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) at Twigworth and Innsworth as the nearest exemplar (to which more detailed reference is also made below), much space might also need to be devoted to green infrastructure. It is therefore far from certain whether 176 hectares would be sufficient for a new settlement on the scale envisaged.

Local planning authorities seldom produce masterplans, almost always relying on developers to do so. In this instance FoDDC would depend on the potential developers of this site to produce such a plan, which would then need to be assessed for its practical suitability. These requirements would have to be satisfied as well as any procedural and broader strategic planning issues resolved.

## **4 The Natural Environment**

### **Environmental Constraints**

The Strategic Options document rightly draws attention to the extent of environmental constraints in the District. It refers to one in particular which if not unique to the District is certainly not universal: the statutory forest, covering 17% of the District. Other designations for example the Wye Valley AONB also cover large areas.

However, the very extent of these areas makes it even more important that a diligent search for development opportunities is carried out at the local level. The six parishes are not persuaded that this exercise has been carried out thoroughly enough.

### **Flood Risk**

One particular environmental constraint which has become increasingly important in recent years is flood risk. Although Government advice has broadly remained the same since PPS25 was first published in December 2006, the extent of areas defined as being in Flood Risk Zones 2 and 3 has increased in many parts of the country. This is particularly true of Gloucestershire in the aftermath of the flooding in 2007.

The most recent Strategic Flood Risk Assessment for Forest of Dean District was prepared by Halcrow and is dated 2008. It acknowledges the events of the previous year but may be out of date in some respects. The events of the last two or three years must be taken into account. In February 2020 the A40 and A48 flooded from the Highnam roundabout to Birdwood on the A40 and to the Severn Bore public house on the A48, cutting off both roads under several feet of water. The A40 from Highnam roundabout to Over Farm also flooded so all routes east from the Forest of Dean were cut.

Much of the area in the vicinity of Churcham is low lying. It is drained by Ley Brook and Long Brook together with a number of other significant water courses. These all flood with heavy rain and the area serves as a floodplain and flood storage area for the River Severn. The underlying geology consists of marl made up of mudstone and clays which are not especially permeable. The land is frequently saturated with standing water across the floodplain making the land prone to flooding as rainfall is slow to drain away. This geology makes the area susceptible to localised flash flooding even when the River Severn itself is not in flood.

Given the topography and geology of the area, much of it is also in Flood Risk Zone (FRZ) 3. Significant flooding has occurred in the area twice in the last three years. So bad is the situation much of what flooded lies in FRZ 1.

In the light of what has happened recently, and what may occur in the future as a result of global warming, the six parishes are concerned about the rather bland dismissal of this issue in paragraph 2.6: *“These areas [at risk from flooding] limit the scope for development though not to a great extent”*.

#### **Recent Events**

These issues have been brought into even sharper focus by the events over the Christmas period 2020. These events draw attention to the increasing inadequacy of road infrastructure in the area. The A40 between Over and its junction with the B4215 flooded on Wednesday 23<sup>rd</sup> December and was impassable for about 24 hours; flooding also occurred on parts of the A40 between Huntley and the A40/A48 roundabout. These are representative of events which until relatively recently took place once every few years, whereas now they take place every year, more than once. Among other things this will have an increasing impact on the local economy.

At the same time, the A417 between the Over roundabout and Maisemore flooded. The road runs parallel and close to the western arm of the Severn for over a kilometre and has been a problem for some years. When flooding occurs, traffic on the A417 from the Ledbury direction usually takes an alternative route via Upleadon and the A4215, increasing congestion at its junction with the A40. Resolution of this problem is now even more urgent and will require substantial expenditure by the relevant authorities.

Flood events such as these likely to become more frequent and severe. They will continue whatever the amount and distribution of development in Forest of Dean District in the next twenty years. However, a strategy based on a new settlement in the location proposed will make matters worse. Not only is the development itself likely to be susceptible to flooding, but problems could also be created in surrounding areas as a result of an increase in the amount of impermeable surface, increasing the peaks of run-off of surface water.

This is clearly a vitally important issue in itself. When considered alongside that of traffic, it becomes more important still. First, a Local Plan strategy based on the existing towns could stabilise or even reduce the dependence of the southern and most populous part of the

District on Gloucester for employment and shopping in particular, thereby stabilising or even reducing the amount of traffic on the strategic road network. Secondly, a new settlement in the Churcham area would add large numbers of local traffic movements to the existing strategic flows, especially if its degree of self-containment is not great. This is likely to seriously exacerbate existing difficulties.

The Gloucestershire Local Transport Plan (2015-2031) Policy Document 4 Highways states that the County has about 80 miles of motorway and trunk road, but does not define the latter. However, Figure E shows the A40 west of M5 junction 11 as a “national link”, and paragraph 12.1.1 describes the Highnam bus lane as implemented and maintained by Highways England. This implies that national rather than local funds would be needed to bring about necessary and probably very expensive improvements to this part of the A40.

This in turn raises the question of the viability of any new settlement. Infrastructure requirements of all kinds will be considerable, whatever the source of funding; but the extent to which these will legitimately come through Section 106 agreements may make the prospects less attractive. Such difficulties could be largely avoided by a strategy based on the existing towns.

In the opinion of the six parishes, no strategic option involving a new settlement in the broad location proposed should be pursued any further until such time as a comprehensive update of the Halcrow report of 2008 is undertaken to incorporate the recent events and the latest scientific evidence and predictions on global warming, extreme weather conditions and rising sea levels. The increased risk of flooding to existing communities due to run-off and water table shift resulting from a new settlement also needs to be addressed in any report.

Similarly, given the recent events of all roads being cut off in the Churcham area due to flooding, no strategic option involving a new settlement should be pursued further until a credible flood evacuation plan for 2,000 homes is formulated and published including how such a new settlement in a low-lying area can be made flood defensible.

This of course is independent of any of the other in-principle objections set out in these representations.

## **6 The Local Economy<sup>5</sup> Traffic and Travel**

### **Traffic**

Severe congestion in peak periods has been a problem on the approach to Gloucester from the west on the A40 and A40 for many years. The City, and to a certain extent Cheltenham and Tewkesbury Boroughs, are sources of employment for many of the Forest’s residents; the next subsection discusses the travel to work data from the 2011 Census. We acknowledge

that congestion is likely to remain a problem whatever strategy for the distribution of development is chosen.

However, to locate a major development at one of the major pinch points, the A40/A48 roundabout near Highnam, is likely to have the greatest adverse impact. The location of the potential site for a new settlement between the A40 and the railway line will make providing direct access to the A48 across the railway difficult and expensive. If such access could not be provided, any traffic wishing to go south on the A48 would still have to use the A40/A48 roundabout.

### **Travel to Work Patterns**

From an assessment of the evidence base the Council appears to have undertaken no analysis of the travel to work (origin and destination) data from the 2011 Census. The paper Sustainability and the Settlement Hierarchy published in 2011 is based on Census data from 2001, now nearly twenty years old.

The old report is nevertheless useful, particularly Figure 4 which shows the wards which are least self-contained – north of the A40 and east of Huntley, and in the vicinity of Chepstow. This is consistent with the map of Travel to Work Areas (TTWAs) based on the 2011 Census data. This shows that the Cinderford and Ross on Wye TTWA excludes these areas. This TTWA has at least survived. Other Gloucestershire TTWAs, Stroud and Cirencester, disappeared as they were absorbed into others (mostly Bristol and Swindon respectively) as the trend towards longer journeys to work resulted in fewer but larger TTWAs across Britain. The Cinderford and Ross TTWA is in fact larger than it used to be, now extending some way west of Monmouth, but this does not mean that Forest of Dean District is necessarily any less dependent on adjacent areas for employment.

A TTWA is a collection of wards in which at least 75% of the resident economically active population actually work in the area, and at least 75% of everyone working in the area also lives in it, subject to a minimum number of people. This says nothing about the detailed nature of the flows within an area so defined. It is likely that there are two functional areas within the TTWA, divided by the River Wye, in which the speed of travel by road differs markedly. For example, from Raglan to Ross via Monmouth on the A40 it is 18 miles (about 30 km) a distance which can be covered at legal speeds in about twenty minutes. No such ease of movement is possible within the Forest itself.

Turning to the raw data from the 2011 Census, it is clear that there is a net outflow of workers from the Forest of Dean District to adjacent or nearby areas in every case. The headline figures are as follows: while 6,015 people travelled into the District to work, 14,627 travelled out, meaning a net outflow of 8,612 people, equivalent to about 22% of the resident workforce. In relation to Gloucester, 1,054 workers travelled from the City to the Forest of Dean, but 4,038 went the other way. This means a net outflow from the Forest to Gloucester of 2,982 workers, accounting for more than a third of the total net outflow of 8,612 people. Almost all

of the net outflow is accounted for by Gloucester, Tewkesbury, Cheltenham, Monmouthshire and Herefordshire. We comment further on this topic in the next section.

### **Provision of Public Transport**

Paragraph 2.12 of the Strategic Options document acknowledges that the only railway station in Forest of Dean District is at Lydney. This focuses attention on bus services. Many parts of the District have long enjoyed a better bus service to Gloucester and the centre of the County than many other peripheral parts. Current services provide hourly buses from Cinderford, Coleford and Lydney, in other words of a standard which is considered “commutable”. Despite this, however, the use of the bus for travel to work, the most important regular journey economically active people have to make, is very limited. Data from the 2011 Census show that of the 39,068 people resident in the District and in employment, only 907 (2.3%) used the bus to get to work, compared with 27,861 (71.3%) driving a private car or van.

In practical terms, most bus routes approach Gloucester along the A48 rather than the A40. Bearing in mind the location of Site 137 and its southern boundary of the railway, it is difficult to see how these services could readily be adapted to serve any new settlement in this location. Services along the A40 itself from the Huntley direction are less frequent and services from Newent do not pass through the A40/A48 junction.

It is also a question of where employment opportunities in Gloucester are located. They have to a great extent decentralised. Gloucester Royal Hospital has long been the City’s biggest employer and is located within reasonable walking distance of the bus station. However, other public sector employment concentrated in or near the centre, for example at the County and City Councils, has declined. Retail businesses and with them the jobs have also dispersed, to the Quays and Eastern Avenue, besides all the major out-of-centre supermarkets. Other employment areas such as Barnwood lie to the east of the City centre and are not therefore well located for anyone travelling by bus from the west. The inbound bus lane between the Highnam traffic lights and the Over roundabout will provide little benefit.

Taking all three factors - evidence of actual bus usage, the extent to which existing services could be adapted to serve any new settlement, and the location of jobs in Gloucester – into account, it can reasonably be concluded that public transport will not make much of

### **Inward Investment**

Changes in the national economy in the last forty years have not favoured Forest of Dean District. Manufacturing, on which the District once depended heavily, has declined. The fortunes of one company have had a significant effect. At the end of the 1970s, Rank Xerox at Mitcheldean employed nearly 5,000 people. Although the entire site has been redeveloped or adapted for continued business use, and Mitcheldean remains one of the District’s main centres of employment, far fewer people now work there. Some land at the Forest Vale Industrial Estate at Cinderford remains undeveloped despite having been allocated for

employment uses decades ago. Lydney is in some ways the best (or least badly) connected town in the District. The Allocations Plan was adopted as recently as 2018 but had been many years in preparation. It is unfortunately less than clear about whether allocations at Lydney represent a reaffirmation of existing uses or new land. Even so, it would have been surprising if the Council had resisted in principle planning applications to develop any land identified for employment uses in advance of formal adoption of the Allocations Plan, and take up appears to have been limited. Industry and commerce increasingly require large areas of flat land adjacent or at least close to major roads, motorways in particular. Forest of Dean District is not well placed to meet these requirements, nor will it be. Inward investment will continue to be difficult to attract.

Despite the unpromising prospects the Strategic Options document says very little about the local economy and what could be done through the planning system to strengthen it. The statement at paragraph 2.16 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”* is inadequate in itself and in relation to the space devoted to the distribution of housing. This is a major shortcoming.

### **Effects of the Pandemic**

One of the effects of the coronavirus pandemic has been to bring into sharp focus the extent to which Britain’s economy depends on the retail and hospitality sectors. Long before, it became clear that one of the characteristics of most of the New Towns designated under the 1948 Act is that despite their age and substantial size they still provide more limited facilities in either sector than comparable well-established towns. Provision of such facilities in any much smaller settlement are likely to be very limited (see below on the subject of Twigworth and Innsworth). This will give rise, other things being equal, to greater levels of travel, most likely by private car and therefore less sustainable. In this context it would be better to locate new housing at existing settlements where such facilities already exist and can be better supported. This is considered even more important in the light of long-term trends such as the proportion of retail sales online.

### **Looking Ahead**

It is most unlikely that Forest of Dean District will ever provide as many jobs as there are economically active residents, in other words to be on balance self-sufficient in jobs. It would be a major success if more jobs could be created in the District and the numbers of people obliged to seek work outside it reduced. However, a new settlement in the location proposed will probably make matters worse. Even if sufficient land were allocated there for employment uses to match the numbers of economically active residents working in relevant sectors (and this would in itself put pressure on the land budget), take up is not guaranteed.

A more appropriate strategy in our opinion would be to build where possible on the strengths of and opportunities for the existing economy, particularly in the main towns.

## 7 Lessons from Elsewhere

### Twigworth and Innsworth

The potential new settlement at Churcham can be compared with the strategic allocations made in the JCS, particularly at Twigworth and Innsworth. The term “strategic allocation” is fairly neutral (the terms urban extension and new settlement are not used), but the JCS makes it clear at paragraphs 2.8 and 2.15 that needs arising from Gloucester and Cheltenham cannot wholly be met within their administrative areas as there are no longer sufficient opportunities; paragraph 2.34 summarises the possible solutions. Although nearly all located in Tewkesbury Borough, the strategic allocations therefore do provide for needs arising from the two large towns and not from Tewkesbury Borough itself.

JCS Policy SA1 treats these two sites, although separated by Hatherley Brook and its floodplain, as a single entity, providing (i) approximately 2,295 new homes, (ii) approximately 9 hectares of employment generating land, (iii) a local centre, (iv) education facilities (v) green infrastructure, and so on.

It is significant that the main entrance on the A38 to the Twigworth part of the allocation is about 3.5 km from Gloucester Cross. This is the same distance as from Gloucester Cross to the A40/A48 roundabout, the easternmost point of Site 137 in the SHELAA.

The 2,295 dwellings proposed at Twigworth/Innsworth would give rise to about 3,200 economically active people at a ratio of 1.4 such people per household. This clearly indicates that the provision of 9 hectares of land for employment uses is a token gesture; even if this land were to provide jobs at 100 workers per hectare (a relatively high density) this would mean only 900 jobs, or about 28% of the 3,200. The land allocated for this purpose will be easily accessible from a new junction on the A40 Gloucester Northern Bypass, and will therefore be much better related to the strategic road network and the M5 in particular than land in the vicinity of Churcham. Even so it remains to be seen whether there will be any commercial interest in the land at Innsworth. It raises questions of how commercially attractive any land for employment purposes at Churcham might be and thus the extent to which any kind of balance between economically active people and jobs might be achieved.

The case of Twigworth/Innsworth and its parallels with Churcham in terms of its scale, location in relation to Gloucester and balance of land uses again lead strongly to the conclusion that a new settlement in the Churcham area would in practice be a detached suburb of Gloucester of little benefit to the Forest of Dean.

## Progress of Comparable New Settlements

The proposed new settlement at Churcham based on 2,000 houses is smaller, in many cases much smaller, than have been put forward in other parts of England.

The most instructive case we are aware of elsewhere is in Uttlesford District in Essex. The District has a population of about 80,000, a little less than that of the Forest of Dean. The draft Local Plan proposed no fewer than three new settlements, all of them larger than proposed in the Forest of Dean. Following the Local Plan Examination, the letter of February 2020 from the Inspectors to Uttlesford DC stated at paragraph 113 that the Plan was unsound and summarised their concerns in no fewer than thirteen bullet points, all of which were either directly or indirectly related to the proposed new settlements. Clearly, circumstances are different in every district (the main distinguishing feature of Uttlesford District is that it contains Stansted Airport) but many of these concerns are widely applicable. Forest of Dean District Council should have full regard to these concerns before pursuing a strategy involving a new settlement any further.

## “Garden Villages and Garden Towns: Vision or Reality”

This report was published by the Transport for New Homes Association in 2019. We address it in a separate section as it draws together many of the issues discussed above and provides an appropriate framework to assess the sustainability or otherwise of a potential new settlement. The report examined twenty garden villages or towns of varying sizes from Cullompton in Devon to Carlisle.

In some cases, “garden” is clearly a misnomer. Housing has been built at relatively high density with small gardens. In the public realm there is much hard surfacing and little greenery, compared with not only the two pioneer garden cities at Letchworth and Welwyn but also most postwar development, whether in designated New Towns or not, until relatively recently. This creates a less attractive living environment and in particular a greater proportion of impermeable surface giving rise to problems of runoff of storm water. To provide more appropriate standards to warrant the name garden, more land would be required, creating its own problems of encroachment into the countryside and in the particular case of Churcham, serious constraints on where any additional land might be found.

The report refers to the Government’s own Garden Towns Prospectus (2018). It found significant gaps between the aspirations and what was actually happening under five important headings: sustainable scale, functioning centres, mixed uses, integrated transport and healthy places.

In particular, in respect of the first consideration:

*“The Prospectus asks for a Sustainable Scale. ‘Proposals can be for a discrete new settlement, or take the form of transformational development of an existing settlement, both in nature and in scale. All proposals must be of sufficient scale to be largely self-sustaining and genuinely*

*mixed use... built at a scale which supports the necessary infrastructure to allow the community to function self-sufficiently on a day to day basis, with the capacity for future growth to meet the evolving housing and economic needs of the local area’ “ [our emphasis].*

The BBC reported on 16<sup>th</sup> December 2020 that the Government intends to revise the formula it had proposed (the algorithm) for calculating the number of houses which should be built in each local authority area, with greater emphasis on cities and urban areas in the North and Midlands. As a result, the prospect of the higher residual housing requirement of about 8,000 dwellings referred to in the Cabinet report has substantially diminished, if not disappeared altogether. This undermines any case for a new settlement in Forest of Dean District. It means that the Council will almost certainly not have to consider a residual housing requirement of any more than 4,000 dwellings for the new Plan period to 2041. It also means that the case for a new settlement capable of further expansion and thereby meeting requirements beyond 2041 is also undermined.

This turns attention back onto the scale of new development needed. In the view of the six parishes, a new settlement on the scale proposed will almost certainly be incapable of matching the requirements of the Prospectus quoted above,

The question of scale takes in the other four headings. We consider the third to be particularly important:

*“The Prospectus expects Mixed Use, including employment: ‘vibrant mixed use communities that support a range of local employment types and premises, retail opportunities, recreational and community facilities.’*

*“There was little evidence of any of the garden settlements providing employment integrated with the new homes...” [our emphasis].*

The report also makes the important point that transport assessments, normally required for residential developments starting at a very much smaller scale (around 100 dwellings) are so limited in their scope. They may well demonstrate that local road junctions can cope, either with or without some improvements, with the traffic arising from a new development. What they do not do is to promote sustainable travel, and indeed may be inimical to it. Travel plans are also a requirement for major developments and are often drafted by the same consultants. Their practical effect is generally regarded as negligible.

One of the characteristics of the more successful projects reviewed in this report is that they have a well-used railway station connected to a large urban centre. Since the Beeching report in the 1960s which led to the withdrawal of local train services and the closure of hundreds of stations throughout Britain and a great many in Gloucestershire, only two stations have been reopened in the County. Both of these, at Cam/Dursley and Tewkesbury/Ashchurch, serve very much larger populations than would result from a new settlement at Churcham. While they are undoubtedly a public good, neither makes much of a contribution to modal shift, particularly for travel to work. Thus, even if all the difficulties associated with providing

a new station could be overcome, any practical benefit of such a facility on the Gloucester to Chepstow railway line as part of a new development would be very small.

It can reasonably be concluded that a new settlement in the location proposed is likely to be as car-dependent as the worst examples contained in this report.

## 8 Conclusion

The six parishes conclude that the District Council's apparent preferred option is fundamentally flawed. In terms of the tests of soundness, it is not justified and most unlikely to be effective. It raises serious practical difficulties relating to necessary procedures, jeopardizing a tight timescale. Above all it is most unlikely to produce development which can genuinely be regarded as sustainable.

We are not suggesting that the practical issues related to development outside the District's territory, addressed in some detail in these representations, are insuperable. They are nevertheless very substantial, and would all have to be overcome to ensure that a new adopted Local Plan for the Forest of Dean District was in place in good time.

For these reasons **we strongly recommend that this strategy be abandoned immediately** in favour of an alternative strategy based on a distribution of development broadly commensurate, subject the acknowledged constraints, with the size of the existing towns and the larger and more sustainable villages.