



# **Six Parish Communication Group report on the Local Plan ‘Preferred Option’**

## **Abstract**

This Report details the work of the Communication Group on behalf of the Six Parish Action Group in response to the Forest of Dean District Council's consultation period relating to the Local Plan 'preferred option' 2021-2041. This Report provides representations of residents, businesses and other key stakeholders of the Forest of Dean to the proposal to build a new town in Churcham. This Report reveals the Communication Group's exposure to the overwhelming resistance in the community to such a plan and provides the evidence for this.

**This is an official written submission to the Forest of Dean District Council Local Planning Team.**

January 2021

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# Introduction

## 1. Report Overview

This Report details the activities of the Communication Group on behalf of the Joint Six Parishes which object to the Forest of Dean District Council's Local Plan 'Preferred Option'. This Report seeks to:

1. In Part A, outline the Communication Groups' outreach to residents;
2. In Part B, report the feedback we have received from residents and key stakeholders of the Forest of Dean; and
3. In Part C, provide conclusions and recommendations flowing from the feedback we received.
4. Provide the District Council with the evidence base to support the conclusions and recommendations reached by this Report, in both the Addenda (separate files sent alongside this Report) and Annexes (attached to the back of this Report).

Part A outlines the Communication Groups' communication activities. Unfortunately, the District Council's consultation on the largest decision of its existence happened during the height of an unprecedented global pandemic and the Council has shown little flexibility in response. The pandemic has had devastating effects on everyone's lives, the activities of this Communication Group and our ability to effectively engage with the community.

Part B provides the District Council with the Communication Groups' findings and feedback from residents and stakeholders of the Forest of Dean. The economic, environmental, infrastructure and social concerns raised to us have been summarised and detailed in Part B. Chief among our results is that 95% of our Facebook poll respondents object to the District Council's 'Preferred Option'. And in the same poll, 94% of respondents prefer the "disbursement" rather than the "new settlement" strategy to satisfy the housing quota. The economic, environmental, infrastructure and social concerns raised to us have been summarised and detailed in Part B of this Report.

Part C ends the Report by providing some conclusions and recommendations on the basis of the findings detailed in Part B.

The section immediately below provides essential context of this Report and details our concerns regarding the adequacy of the consultation period and the District Council's lack of engagement with the community to raise awareness:

## 2. Necessity/Urgency of this Decision

The need for such an extensive development must be doubted in light of two key considerations. First, the National Government has altered its housing quota algorithm, including doubling down on the prioritisation of brownfield sites to the exclusion of

greenfields.<sup>1</sup> Second, paragraph 5.2 of the Forest of Dean District Council 'Housing Action Plan 2020' provides that:

'The current supply of permissions is sufficient for about 2913 dwellings (31st March 2020). These are the equivalent of about eight years of the annual requirement and cover the number of dwellings which would be required to meet the remainder of the current plan's needs. Although these calculations are simply provided for illustrative purposes, there is not considered to be an overall shortage of sites with permission.'

We recognise the need for a Local Plan. However the Local Plan should be based upon an adequate consultation with the District and based upon extensive research, given the gravity of the decision. The decision to adopt a new settlement strategy, as opposed to the disbursement method, needs to be reconsidered given that 94% of respondents to our Poll preferred the disbursement method<sup>2</sup> - a strategy also proposed by Forest of Dean District Councillors.

Likewise, the Forest of Dean District Council's settlement hierarchy, currently in place, serves as a barrier to any speculative planning application by unscrupulous developers.

### 3. Democracy of FoD District Council & Impact of Global Pandemic

The development of the decision by the FODDC on its 'preferred option' and the voting for that 'preferred option' in a chaotic council meeting is a travesty of local democracy and engagement.

The FODDC embarked on this strategy on the premise outlined in the Issues and Options consultation - September 2019. Four development options were laid out which received a total of 53 responses some 25 were for this preferred large settlement option (3 of whom were FODDC employees or affiliates). An equal number opted for a strategy that spread the development around the Forest of Dean District. The decision that was presented, discussed and submitted to the scrutiny committee did not have any substantive backing or validity.

The earliest knowledge the Parish Council's can detect that discussions were taking place were in April 2020 when a consultant (Simon Drummond Hay) presented the development at Churcham in two phases of 2000 houses giving 4000 houses in total as part of the Economic Viability Assessment.

This development, a new town, is the largest decision undertaken by the FODDC since its inception. There has been no communication to the parishes that this 'preferred option' affects the scale of which could not be integrated into the community but would obliterate it and our way of life due to its sheer size; in population terms 800 people

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<sup>1</sup> See the Official Government Announcement here:

<https://www.gov.uk/government/news/plan-to-regenerate-england-s-cities-with-new-homes>.

<sup>2</sup> See Annex 3 of this Report.

currently reside in Churcham Parish and this could increase to 9600 (2.4 per household). Why was a decision of this magnitude kept from our community and revealed to the Parishes in its present format?

The mantra we hear is 'nothing has been decided' but the only land area allocated for a town of this size is in the parish of Churcham. Churcham Parish Council asks why as a community and a parish were we not engaged and advised?

We have also been made aware of the response of the District Council to an appeal to a Freedom of Information Request, the details of which are included in Annex 11 of this Report for those Councillors who may not previously be aware of this. Given that this has been the subject of consideration for what appears to be some time, the question arises why the District Council have not disclosed that which required an appeal to an FOI response to disclose?

It has been stated throughout that the District Council had not considered potential locations for a new town. The District have repeatedly denied Churcham is the preferred location for the new town, rather they have highlighted that there are three potential settlement areas (though no evidence on this point has been received), and have suggested that mention of Churcham in official Council documentation is simply an illustrative case study.<sup>3</sup>

However, this position is now looking tenuous in light of the details which have emerged from the Freedom of Information Request response. The plan from Robert Hitchins Ltd was submitted to the District Council as early as 26 March 2020. By that time, however, the Council had not approved of the "Preferred Option". We are confused as to how a developer has proposed a site with detailed plans, when the District Council have supposedly given no direction as to where the site would be located. This raises questions as to the purpose of the consultation period which is supposedly inviting responses on a range of options ahead of more concrete final decisions.

The cabinet decision made to support the 'preferred option' followed one presentation by District Councillor McFarling with little or no substantive discussion taking place before going to a full District Council meeting. Where were the impact assessments on the environment, traffic, community, pollution, flooding - all of the considerations needed to come to a reasoned decision? This was mirrored by the chaotic full District Council meeting where the largest decision made by the FODDC was item 10 on the agenda, and which took place late into the night. Councillors (Cllr Burford) requested an adjournment to the vote due to a lack of information. However, this was ignored and it transpired to the vote being pushed through as it was reinforced to Councillors that if they did not make a decision that night, it would leave it open for any speculative application by developers.<sup>4</sup>

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<sup>3</sup> See Annex 12.

<sup>4</sup> See e.g. at 3hrs 13mins into video of 15/OCT/2020 Full Council meeting here: <https://www.facebook.com/FODDC/videos/263386205000718>. And the full minutes which determines that the Council voted on the housing strategy and not any potential location for a new town, see here:

However, we must ask how a decision to create another town the size of Coleford can be made on the basis of little information with a lack of community engagement and be put forward for consultation? The consultation is on a decision that has already been made, so what are people consulting on?<sup>5</sup>

This is all taking place while the country is in the midst of a deadly pandemic. We are, as citizens, not allowed to meet, engage, discuss, canvas support or interact in any way other than the use of digital media. The Six Parish Group have made repeated requests for the extension of the consultation period which has been extended once. Now we find ourselves in another national lockdown, the District Council is contemplating the cancellation of local elections yet the consultation period cannot be further extended. We cannot hold public meetings and now cannot deliver leaflets door to door. The only support and outreach we have received from the FODDC is a letter and two small posters. How do the FODDC expect us to interact with our electorate under such conditions? We note that the FODDC offices are closed during the pandemic yet we are supposed to continue as the consultation deadline moves inexorably towards us.

The District Council have not adopted additional measures and appear to have made little effort to raise awareness in light of the extremely challenging and unique circumstances under which the Public Consultation has taken place.

The use of digital media only serves a proportion of the population. The elderly, those not computer literate or those without access to devices are left unaware of developments and not able to discuss and respond accordingly. Churcham is the only parish in the Forest of Dean that has been overlooked by the Fastershire rollout, there is no broadband in the parish and download speeds are less than 1mbps. The demographic of our community is aging so how do we communicate in the context of a pandemic?

Feedback suggests that residents were left confused by the instructions on the District Council's webpage concerning the consultation phase. We received comments concerning the lack of clarity what the consultation phase corresponded to. This was compounded by the fact that the SHLAA documentation was not provided or connected to the consultation webpage. Indeed, the SHLAA documentation is buried on the District Council website. It can only be found by using the search bar. There is no dedicated link or tag accessible on the website or the consultation webpage.

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<https://meetings.fdean.gov.uk/documents/g2975/Printed%20minutes%2015th-Oct-2020%2019.00%20Full%20Council.pdf?T=1>, esp. P. 29.

<sup>5</sup> See p. 29

<https://meetings.fdean.gov.uk/documents/g2975/Printed%20minutes%2015th-Oct-2020%2019.00%20Full%20Council.pdf?T=1>, Cllr McFarling's comments here: "Cllr McFarling commented that the decision being made tonight was how to ensure the District had the capacity to accommodate around 4000 extra dwellings and not on the location of a new settlement. This option provides the Council with greater flexibility and increased capacity to offer a balanced spread of development across the district".

Apart from an exception site of 9 houses (which took 15 years to achieve) the FODDC has not allowed any building in Churcham Parish since the 1960s repeatedly saying either that Churcham is an unsustainable community or outside the development boundary. Churcham Parish Council has seen numerous housing applications from residents refused. They have made representations to the FODDC to encourage building in a way to address our community's needs with its aging population and fewer children attending our local school. All of these representations have previously been ignored. Churcham is now faced with a proposal to site 4000 houses on a greenfield site with no prior consultation and with legal constraints on our interaction with our residents due to the pandemic while the FODDC shuts up their building and sends us two posters and a letter.

This 'proposed option' is an affront to local democracy and it is no wonder that it has engendered a visceral community response.



# **Part A: Communication Methods**

## *Raising Awareness to Collect Feedback*

### **1. Leaflet distribution**

We designed a leaflet about the Local Plan 'preferred option' and provided contact details on how people could have their say. Alpha Colour - who have endorsed our campaign - printed 10,000 leaflets. In the short period between national lockdowns we delivered them across local towns and villages. This was to ensure that residents were made aware of the proposal considering that no other form of outreach had taken place from the District Council. The distribution of printed information was key since 25% of the population are aged 65 years and older. Our digital presence excludes the majority of this demographic for obvious reasons.

Unfortunately we only had a small window to distribute the leaflets due to the government implementing a national lockdown. We were unable to distribute leaflets to many areas across the District, which has had an impact on the awareness of the Forest of Dean's population, with seemingly no other forms of communication provided by the District Council.

This raises doubts as to the adequacy of the consultation period. Can the District Council claim to have informed their preferred option strategy through thorough public engagement?

However, we have been able to ascertain comments of residents through Facebook and the petition. This is one of the few ways people were able to have their say. We trust that these comments will be carefully reviewed by the District Council in light of the context in which the consultation period occurred.

### **2. Billboards & Banners**

We designed and printed banners and billboards and erected them around the District, sharing our website details so people could then go online to find out more information on the 'local plan' and have their say. However unfortunately during our campaign one of our banners was vandalised with graffiti.

Erecting banners provided a Covid-safe way of campaigning when not faced with lockdowns. However, we were regrettably stifled in our efforts for multiple weeks of the consultation period during lockdowns in November, December and January which meant it was not possible to put up additional banners and continue to raise awareness.

### 3. Press Articles

The Forester, Gloucestershire Live, The Citizen and The Punchline supported our campaign. Each media outlet ran articles on the campaign allowing us to reach an audience and make people aware of the District Council's proposal for the first time.

These methods of communication were given greater importance considering the circumstances of the consultation period. However, during this period we faced editorial pressures in light of national unprecedented news events. This further stifled our ability to make residents aware of the District Council's plan.

#### Gloucestershire Live

- "The Gloucestershire village between the A40 and A48 where a town the size of Coleford will be 'dumped'" [13/OCT/2020]:  
<https://www.gloucestershirelive.co.uk/news/gloucester-news/gallery/gloucestershire-village-between-a40-a48-4604022>
- "Anger over plans to 'dump' town the size of Coleford between the A40 and A48" [13/OCT/2020]:  
<https://www.gloucestershirelive.co.uk/news/gloucester-news/anger-over-plans-dump-town-4600501>
- "Forest of Dean will get new eco village but councillors to fight Government plans for 12,000 more houses" [26/OCT/2020]:  
<https://www.gloucestershirelive.co.uk/news/gloucester-news/forest-dean-new-eco-village-4636924>
- "Christmas flooding shows why plans for new settlement between Gloucester and the Forest will not work say campaigners" [11/JAN/2021]:  
<https://www.gloucestershirelive.co.uk/news/gloucester-news/christmas-flooding-shows-plans-new-4863100>

#### Forester

- "Homes plan 'not fit for purpose' after floods" [6/JAN/2021]:  
<https://forestofdeanhousing.org.uk/wp-content/uploads/2021/01/Forester-Page-2-Jan-2021.pdf>
- "'Bitter disappointment' as consultation hopes dashed" [27/JAN/2021]:  
<https://forestofdeanhousing.org.uk/wp-content/uploads/2021/01/The-Forester-front-page-P2-Jan-27-2021.pdf>

#### Punchline

- "Council's preferred housing option sparks fears of damage to Forest" [DEC/2020]:  
<https://forestofdeanhousing.org.uk/wp-content/uploads/2021/01/Punchline-December.pdf>

### 4. Radio Appearances

We had representation from our Communication Group speaking on local radio stations about the 'preferred option', to raise awareness and highlight how topical issues would impact on a development in the future, such as flooding.

## 5. Petition

We created a petition to allow people to sign and provide their objections to building a 5000 house town on Churcham's greenfields. See here: [Petition · Objections to the building of 5000 houses in Churcham Parish on greenfield land · Change.org](#)

The petition has generated a huge amount of support in a short period of time, with over 6000 (6,215 as of 10.00pm, 28/JAN/2021) signatures and hundreds of comments - demonstrating the scale of objection to the proposal. As per the District Council's constitution, having amassed more than the required number of signatures (800) we are now in a position to trigger a debate at Full Council. Please see a letter to this effect which has been sent to the Forest of Dean District Council Monitoring Officer (Julie Jones).<sup>6</sup> And we are entitled to request a Strategic Overview and Scrutiny Committee meeting, which merely requires 400 signatures.

Should we have been able to traditionally campaign, the petition would have been able to reach a much wider audience, though this was prevented by the national lockdown. Hence, it must be recognised that the petition reflects a skewed sample of people who had only had access online. We were not able to canvass and traditionally garner support. The consultation period occurred during an unprecedented global pandemic.

Among the reasons mentioned by signers of the petition to object to the District Council's Local Plan 'preferred option' include: economic, environmental, infrastructure, and social concerns. Please see a summary of our findings in Part B of this Report. Please also find details of the petition signatures in Addendum 1 and comments in Addendum 2.

## 6. Representations of Key Stakeholders

We identified and informed key stakeholders within the Forest of Dean, many of whom were unaware of the consultation prior to our communication. These individuals shared their views on the economic and infrastructure concerns that they foresee should a new town be built in Churcham.

Among those we contacted include Mark Harper MP, local businesses, local business leaders, Mayors, and key organisations such as RSPB, CRPE, NFU, Gloucestershire Wildlife Trust, Gloucestershire Highways Agency, Gloucestershire Emergency Services, Network Rail, The Environmental Law Foundation and more. It is vital that in addition to the feedback of the local population, due weight is accorded to the representations of influential figures across the District. These people are leaders in their fields and represent significant communities within the District.

You can find comments from business leaders in Annex 1, from Mayors in Annex 2 and you can find representations from Mark Harper MP in Annexes 6 and 7. You can also find representations from Network Rail in Annex 10.

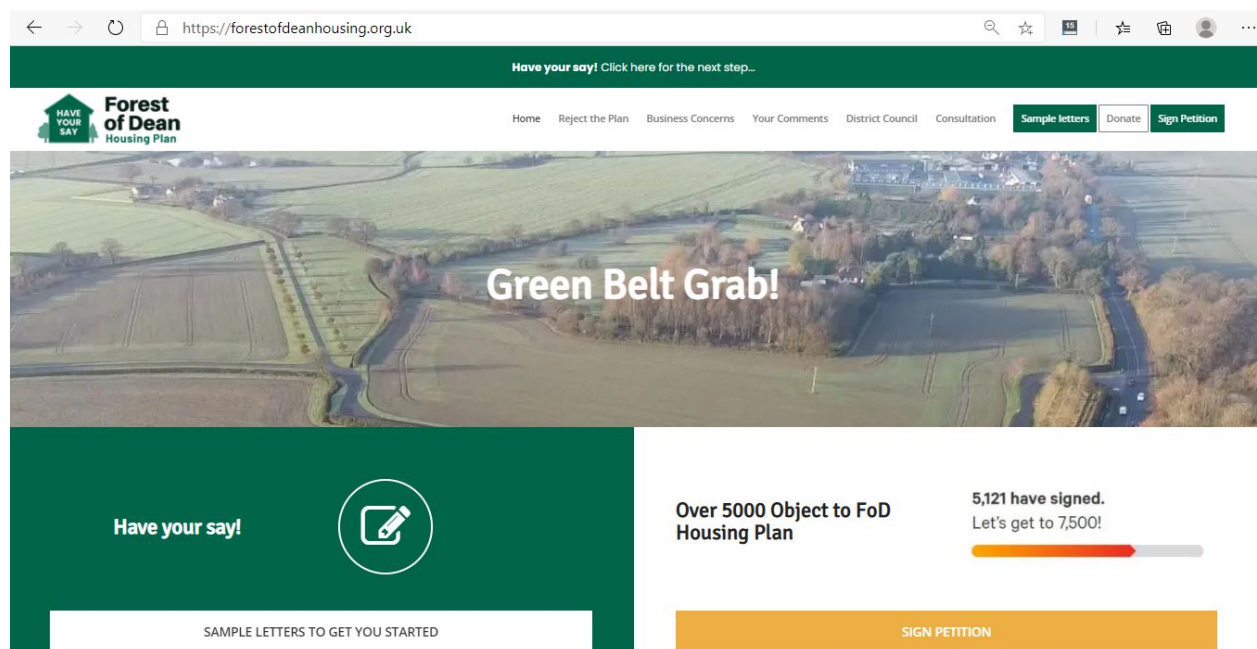
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<sup>6</sup> Please see Annex 13.

## 7. Website

See here: [Forest of Dean Housing | Greenbelt grab! Gridlock! | Your-Say.uk](https://forestofdeanhousing.org.uk)

All of our communication methods aimed to inform and educate the Forest of Dean District on the 'preferred option' to allow them to have their say. We created a website to form an online presence, considering the significance of the internet in non-traditional campaigning. The website provides information on why building a settlement in Churcham is problematic and aims to facilitate responding to the consultation period. Considering the lack of outreach by the District Council this was one of the few means by which people were made aware of the District Council's preferred option. It goes without saying, however, that certain demographics (which make up the majority of the population of the District) cannot be expected to have been aware of our online activities.



In contrast to the Forest of Dean District Council's webpages, the Communication Group provided accessible information and sought to inform visitors of the District Council's Local Plan 'preferred option'.<sup>7</sup>

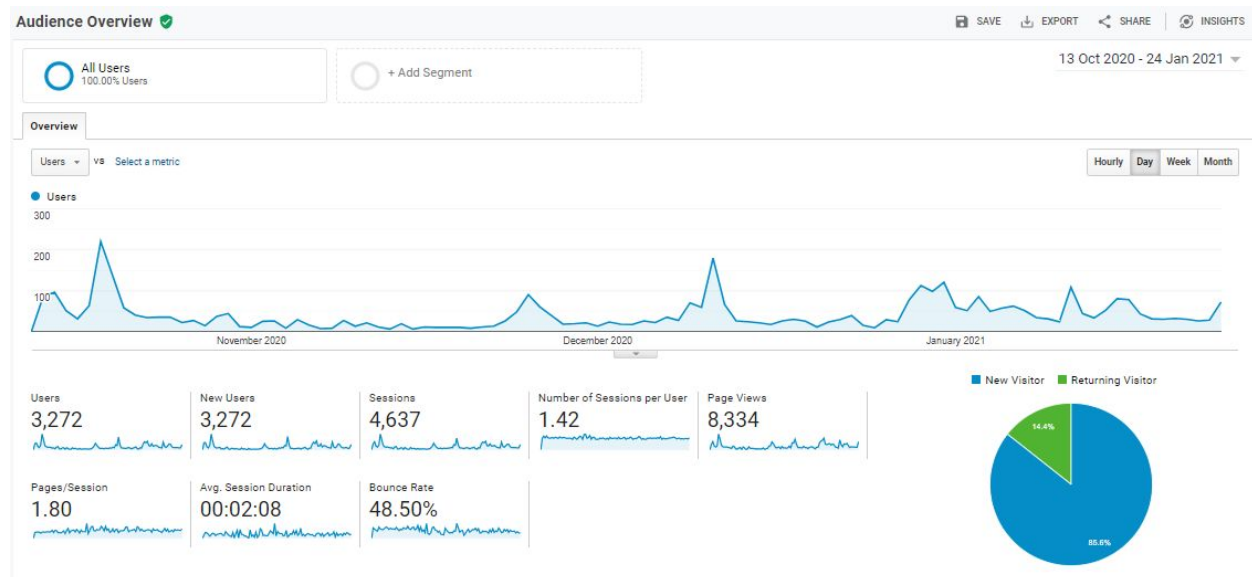
The domain name chosen was forestofdeanhousing.org.uk in order to reflect the aim to inform the general public and encourage responses to the "preferred option" and consultation, rather than mount a negative campaign. This was further enhanced by the purchase of the short and simple domain name "your-say.uk" (which redirects to the forestofdeanhousing.org.uk domain, and the branding of the initiative as "Have Your Say!")

<sup>7</sup> See the above comments regarding the Forest of Dean District Council's webpages concerning the consultation period, in Introduction, Section 3.

Over the last three months content has been added to help inform different stakeholders in the area and facilitate responses through various means including:

- Responding directly to FoDDC through the District Council's online form or by email or letter
- Signing a petition
- Filling in a survey on Facebook
- Publicise people's comments

## Website Statistics



### In a little over 3 months:

- 3,272 different people have visited the website.
- 4,637 separate visits to the site. 14.4% of these visitors are returning visitors.
- 8,334 individual pages viewed on the website.
- An average of 1.8 pages viewed per visit.
- An average of 2 minutes and 8 seconds spent on the website by each visitor.

### The majority of the visitors came to the website from:

- Facebook: 1707 visits
- Direct visits: 900 visits (direct URL searches)
- Google and Bing: 504 visits

This demonstrates that 1,400+ searches were organic, demonstrating people's desires to find out more and have their say - no doubt reflective of current events (such as flooding concerns along the A40/A48) which encouraged engagement.

To labour the point, the scope of website engagement is again restricted to those who

have an online presence. This is exclusive of approximately ~25% of the population of the District, who are 65+ years old and thus far less likely to use social media.<sup>8</sup>

## 8. Social Media Campaign Overview

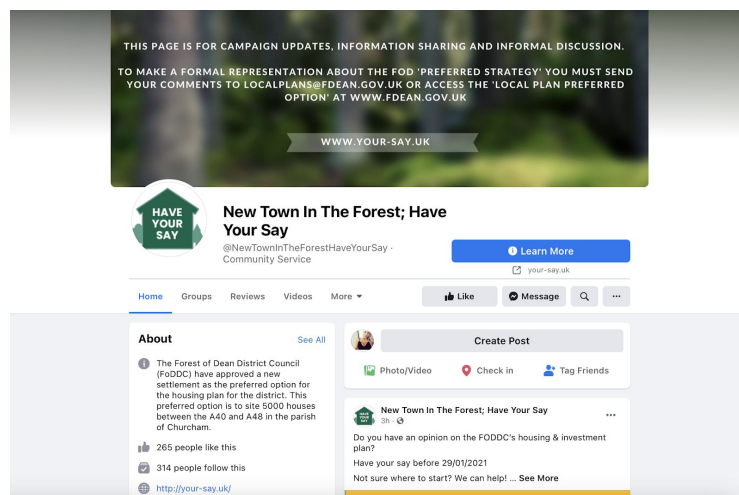
One of our first communication channels was to create a Facebook page where we could share details around the 'local preferred option' and advise people on how they could have their say. We connected with local towns and villages' Facebook pages to maximise reach. See here:

<https://www.facebook.com/NewTownInTheForestHaveYourSay>

It also acted as a forum where individuals could discuss and share views and opinions. We have over 680 active members. A break-down of Facebook engagements and the demographics of our Facebook page visitors can be found in Annex 4. The Facebook page was one of the few communication channels that allowed us to interact with people whilst we were in a national lockdown enforced by the Government.

It is again worth noting that this method of communication is reserved to only those using social media and therefore many people have been excluded from this process across the District.







The Facebook page formed the base of our social media campaign.



We used the Facebook page as a platform to share educational posts, such as press releases, and other general posts to encourage direct feedback into the Local Plan Consultation.

<sup>8</sup> See here: <https://www.gloucestershire.gov.uk/media/2097197/equality-profile-2020-final.pdf> (2018), p. 8.

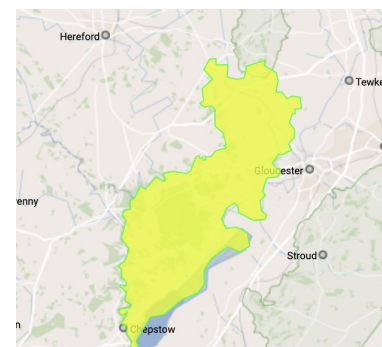


 <b>New Town In T...</b> Wed 1/6/2021 6:54 am P...	 <b>New Town In T...</b> Sun 12/27/2020 8:03 am...	 <b>New Town In T...</b> Tue 1/5/2021 10:11 am P...
<p>Front page of the Forester today... great to see recognition of the impact of</p> 	<p>12 Days of Consultation : Day 3 Go and ask a friend to sign, and help double the total</p> 	<p>Will the Forest of Dean District Council's Preferred Option for 4,000 new homes at</p> 
<b>Total Engagements</b> <b>285</b>	<b>Total Engagements</b> <b>249</b>	<b>Total Engagements</b> <b>219</b>
Reactions <b>57</b>	Reactions <b>9</b>	Reactions <b>18</b>
Comments <b>11</b>	Comments <b>1</b>	Comments <b>2</b>
Shares <b>11</b>	Shares <b>12</b>	Shares <b>9</b>
Post Link Clicks <b>-</b>	Post Link Clicks <b>76</b>	Post Link Clicks <b>44</b>
Other Post Clicks <b>206</b>	Other Post Clicks <b>151</b>	Other Post Clicks <b>146</b>

The communications team worked with a Digital Agency to set up two social media advertising campaigns to reach the local community that uses Facebook, in order to inform them of the Local Plan 'preferred option' and direct them of how they could have their say.

We carefully built an audience, based on geographical location for the FoD to ensure we reached only those relevant to the new FoDDC proposed preferred option. The audience size was approximately 32,000-38,000 (as per Facebook estimation), approximately 36.87-43.78% of the total population.

According to a number of online sources, the approximate population of the Forest of Dean is 83,700<sup>9</sup>.



Below is a preview of each advert, with key metrics. All statistics can be verified via access to Facebook Ads Manager, upon request.

### Glossary to assist your understanding of the metrics below:

Reach: The number of people who saw an ad at least once.

Clicks: The total number of clicks on an ad.

Impressions: The number of times an ad has been displayed/viewed on Facebook.

Post Engagement: The number of actions (including likes, comments, shares, photo views, link clicks, video views) on an ad.

<sup>9</sup> See P. 4, here:

[https://www.gloucestershire.gov.uk/media/1521545/understanding\\_forest\\_of\\_dean-3.pdf](https://www.gloucestershire.gov.uk/media/1521545/understanding_forest_of_dean-3.pdf).

## 1. An awareness campaign to ensure the local community is aware of the proposed FODDC preferred option

**New Town In The Forest; Have Your Say**  
Sponsored (demo) · 🌐

**HAVE YOU HEARD?**  
The Forest of Dean District Council and Cabinet have recently endorsed a 'preferred option' strategy for development in the District. Their preferred strategy threatens damaging, irreversible change to our Forest towns, our communities, businesses and economies. District Council plans include building a new 4,000+ house town across acres of green field land, on the edge of the District between the A40/A48 pinch-point at Churcham/Highnam, with plans for large settlements in Huntley and Beachley too.



WWW.YOUR-SAY.UK  
**Do not miss the chance to have your say!** [Learn More](#)

👍❤️👎 39      25 comments 19 shares

👍 Like    💬 Comment    ➦ Share    🌱

**Alan Reynolds**  
Bit of a joke, we applied to build a house on a brown field site next to us. It was turned down by highways because you couldn't see 45 metres from the driveway that we use anyway. Yet Lidl manage to build a supermarket in Coleford, coming out of there... [See more](#)  
Like · Reply · Message · 4 d

**Eric William Knight**  
Great place to get flood then ...  
Like · Reply · Message · 2 d

**Elizabeth Goode**  
The current infrastructure will not cope potentially another 4000 cars trying to get to Gloucester how crazy????? [👍 3](#)  
Like · Reply · Message · 2 w  
↳ 2 replies

**Richard Hughes**  
Lock like stilts lane next to drowning street! [👍 1](#)  
Like · Reply · Message · 1 w

### Key Metrics:


- Reach: 39,649 people
- Impressions: 112,568
- Clicks: 5,537 people
- Percentage of total audience reached: 100%



## 2. A poll to ask for feedback/thoughts from the local community on the proposed FODDC preferred option

**New Town In The Forest; Have Your Say**  
Sponsored (demo) · 🌐

Do you support the FoDDC preferred option is to site 4000+ houses between the A40 and A48? This development strategy will also take investment away from Forest towns.  
Provide your feedback for us to submit to the District Council by 29th Jan 2021.



FORM ON FACEBOOK

**Provide your feedback for us to submit to the District Council** [Sign Up](#)

👤 You and 42 others 73 comments 16 shares


👍 Like 💬 Comment ➦ Share 🏠

**Diane Docherty**  
What time are we going to have to get up to get to work in Gloucester. The traffic into Gloucester on A40/48 is appalling in the mornings. How on earth can the council justify increasing this misery for commuters. Just before Lockdown queues were forming at 6.45 a.m. What is being proposed to alleviate this congestion? (I would never move into FOD because of traffic problem). Potential buyers need to be aware of this 😞  
Like · Reply · Message · 5 d

**Mike Cox**  
Its absolutely ridiculous to put houses on a flood plane not to mention the traffic. Also were is all the run off and sewerage going.  
Like · Reply · Message · 4 d

**Harrison Gerald Macey**  
No way. The majority of people moving here are from urban areas e.g. Bristol and Gloucester. Local communities have changed in a negative. There has been degradation of areas and lack of jobs and services in the forest without more people.  
Convert old brownfield sites instead of ruining our beautiful piece of Eden.  
Like · Reply · Message · 1 w  
👍 12  
➦ 16 replies

**New Town In The Forest; Have Your Say** ✕



# Forest of Dean Housing Plan

**HAVE YOUR SAY!**

The Forest of Dean District Council (FoDDC) have approved a new settlement as the 'preferred option' for the District's housing plan. This 'preferred option' is to site 5000 houses between the A40 and A48 in the parish of Churcham, and create large developments in Huntley and Beachley. The extent of this development, if approved, will cover an area of 470 acres of greenfield land.

**We'll use your information to contact you by email. We will also share your data as a collated response to the FOD Council.**

[Next](#)

**New Town In The Forest; Have Your ...** ✕

Are you aware of the Forest of Dean's Local Plan? ▾

How do you feel about the future of the Forest of D... ▾

Do you think the Forest of Dean provides employ... ▾

Do you think towns and businesses in the Forest of... ▾

If you have grown up in the Forest of Dean, would y... ▾

Across the FoD District there is enough brownfield ... ▾

There are two broad solutions to the FoD's housing... ▾

Do you agree/object with the FoDDC 'preferred opt... ▾

Please provide your reasoning:

**Email address** ⚠️  
Please enter valid information to proceed.

**Full name** ⚠️  
Please enter valid information to proceed.

Date of birth  
26 November 1989

Street address

[Next](#)

### Key Metrics:

- Reach: 20,715
- Impressions: 142,980
- Clicks: 12,248
- Post Engagements: 2,171
- Percentage of total audience reached 64.7% (limited by time)
- Total response submissions: 541

## Summary:

Page ▲	Fans	Net Page Likes	Published Posts	Impressions	Engagements	Post Link Clicks
<b>Reporting Period</b>	<b>265</b>	<b>225</b>	<b>30</b>	<b>247,151</b>	<b>16,584</b>	<b>2,545</b>
Dec 1, 2020 – Jan 23, 2021	-	↗ -	↗ -	↗ -	↗ -	↗ -

As you can see from the image above, through our Facebook Page, Posts and geographically-targeted educational Adverts, we have just shy of **250,000** impressions (views) from people in and around the Forest of Dean.

The poll generated some key findings. Of 541 respondents to our Facebook poll:

- **40%** were not aware of the Local Plan consultation prior to our Facebook outreach
- **91%** are worried, concerned, and have negative feelings about the future of the Forest of Dean
- **85%** do **not** think the Forest of Dean provides employment opportunities
- **97%** believe that the towns and business in the Forest of Dean require more investment to make them future-proof
- **93%** do **not** agree with the Council's strategy to build on greenfield sites, and would prefer the regeneration of brownfield sites
- **Only 6%** support the creation of a new settlement
- **94%** prefer the disbursement method as opposed to the building of a new settlement
- **Only 5%** support the current Local Plan 'preferred option' of the District Council
- **95%** object to the current Local Plan 'preferred option' of the District Council

In addition, all 541 respondents of our poll provided us with valuable comments and insights. These comments can be found in Addendum 4.

We believe that engagement from 541 individuals is very significant considering that this number dwarfs the number of representations made to the District Council during previous consultation periods. For example, only 53 people responded to the earlier consultation on whether to adopt a new settlement or disbursement strategy. This raises questions about whether the District Council solicited feedback from the public concerning this.

All 541 respondents submitted to us their contact details, therefore their representations should be given the same weight as any other submission made to the District Council during this consultation period. All details can be found in Addendum 4.

You can find the details of our Facebook campaign below:

1. Addendum 3: Facebook Page Comments - this relates to feedback we have received on educational posts;
2. Addendum 4: Facebook Poll Results and Comments;
3. Annex 3: Facebook Poll Results;
4. Annex 4: Details of the Campaign Facebook Page.

## Part B: Research Findings

Through our communication channels we have gathered feedback on the following:

### 1. Economic Viability

The economic impact of a new 5,000-home township on land where the Forest of Dean's main arterial roads, the A48 and A40, converge at Highnam Roundabout could have a deeply damaging effect on the District's economy.

#### **Transport<sup>10</sup>**

The FoDDC's Preferred Option for a Coleford-sized settlement on prime farmland at Churcham could effectively cut off the Forest by creating gridlock along the A40 between Highnam and Over.

The development would add at least 8,000 extra vehicles to the 10,000 plus currently travelling daily along that link to Gloucester, the M5, Cheltenham and Ledbury. The logistics of using that route for commuters, businesses and emergency services alike would become untenable. The highways infrastructure in that vicinity is also not fit for purpose and is frequently hit by flooding from run-off and the River Severn bursting its banks. This means that the economic viability of commercial enterprises using that route would be under threat and the free flow of other traffic severely hampered, more than it is already in rush-hour.

#### **Market towns hit<sup>11</sup>**

The siting of 5,000 homes on the periphery of the Forest District adjacent to an urban centre like Gloucester would mean that any potential benefit from the new residents using Forest towns for shopping or services would be unlikely. Residents of a town located in Churcham would naturally gravitate for all their needs to Gloucester and Cheltenham. This would deprive the Forest's four market towns of much-needed trade. A lot of feedback has highlighted that people see the Forest towns as declining and as undesirable places to live and work, this is a real shame as the Forest of Dean has got huge potential. The investment needed to create a new town could be used to regenerate the existing areas and to provide impetus for their renewal. Such a method would be to regenerate the brownfield sites.

#### **Little financial benefit to District<sup>12</sup>**

It seems unlikely that any developer's levy would benefit the Forest District as a whole because a multi-million infrastructure would be needed to raise the A40 and A417 to

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<sup>10</sup> See the representations of business leaders in the Forest of Dean in Annex 1 of this Report. And see section 1 of Part B of this Report.

<sup>11</sup> See the representations of business leaders in the Forest of Dean in Annex 1 of this Report. See the representations of Mayors in the Forest of Dean in Annex 2 of this Report.

<sup>12</sup> See the representations of business leaders in the Forest of Dean in Annex 1 of this Report. See the representations of Mayors in the Forest of Dean in Annex 2 of this Report.

prevent them flooding - or even another River Severn crossing - to make this scheme viable in the first place. This would be coupled with the infrastructure needed for a self-contained township within the site of the settlement itself, which is surrounded by floodplains. Roads, schools, surgeries, shops, a community centre plus attenuation ponds, drainage and all the normal services are just a few of the essentials that would be required.

\*It should be noted that the Local Plan Economic Viability Assessment findings state that investing in housing, businesses and infrastructure on brownfield sites across the Forest market towns is economically unviable for developers. Analysis has shown, however, that there is enough brownfield land to meet the District's housing quota. Existing homes and villages are deemed unattractive and unworthy of improvement by this report, in favour of developers' new builds, it states.

### **Agricultural Land**

Churcham is the site of prime agricultural land. The combination of the floodland and the soil type makes it so. The Communication Group has received Forest of Dean residents' fears that building upon such land will make the District and the Nation as a whole worse off when it comes to the sustainability of the rural economy.<sup>13</sup> This has, no doubt, been emphasised by the recent moves both following the UK's exit from the European Union and the Covid-19 pandemic to provide for more sustainable national food sources.<sup>14</sup> This supports the conclusion that brownfield sites should be explored first, but that the greenfields of Churcham are especially unsuitable in light of their prime agricultural quality.

## **2. Brownfield Prioritisation and Green Regeneration of the District**

Feedback has shown that brownfield availability should be explored first, prior to the alteration of greenfields. 93% of respondents to our Facebook Poll disagree with building on greenfields while brownfield land is available.

The Government's strategy to significantly reduce carbon emissions involves a plan to provide investment to transform homes and make buildings greener.<sup>15</sup> This presents an opportunity to regenerate existing settlements and transform existing homes in the Forest of Dean to make them greener. Likewise, this presents an opportunity to invest in communities and meet housing need, through increasing housing density and improving the conditions for people living in the Forest of Dean.

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<sup>13</sup> This has been made clear in the petition comments, see Addendum 2. It has also been raised to us through social media, please see Addendum 3.

<sup>14</sup> See recent announcements from supermarkets, for example: <https://www.yorkshirepost.co.uk/business/consumer/aldi-buy-ps35bn-more-food-british-farms-and-suppliers-3081184>; <https://www.herefordtimes.com/news/18993813.aldi-wants-back-british-farming-even-year/>; <https://www.morrisons-corporate.com/cr/farming-programme/>.

<sup>15</sup> See point 7 of National Government's 10-point-plan to Build Back Green: <https://www.gov.uk/government/publications/the-ten-point-plan-for-a-green-industrial-revolution/title>.

### 3. Green Party building on Greenfields

Residents expressed their confusion that the Green Party would be complicit in a scheme to destroy a distinctive natural area of the Forest of Dean. The electorate have voted Green Party representatives into the District Council to protect areas such as Churcham for environmental reasons. Residents have complained that this appears to be a hypocritical position of Green Party District Councillors. Churcham has particular environmental considerations which should rule it out as the site for extensive development.

Please see Annex 8 of this report: This letter was sent to District Councillors for their consideration to raise awareness of the environmental and wildlife characteristics of the area, such as the proximity of RSPB Highnam Woods (home to protected species) and the internationally recognised RAMSAR site located in Churcham Parish. The letter also makes the point that greenfields should be used only as a last resort option (this is consistent with the National Government Planning Framework) and this is something which we had hoped would garner political consensus but would find most enthusiastic support among Green Party Members. The letter invites the District Council to reflect and reconsider selecting Churcham as the location for substantial development on environmental grounds.

### 4. Environmental Concerns

The Forest of Dean District Council's creation of a 4,000+ home settlement town as part of the 'preferred option' will have significant environmental consequences. Our engagement with people across the Forest District during this time has highlighted great strength of feeling about the environmental viability of the District Council's chosen strategy.

The following points present a summary of key concerns about the environmental implications of a new settlement in Churcham.

These concerns are tested against the District Council's commitments to the environment in its Strategic Option Consultation document:<sup>16</sup>

**“Plan must ‘avoid flood risk; take account of flood risk and likely changes to risk including changes in sea level, increase in extreme events’”<sup>17</sup>**

The selected location, between the A40/A48, would result in building homes on fields flanked by flood plains. As recently as December 2020 the A40, the road that would principally serve this new settlement, was flooded and impassable. Natural irrigation afforded by the fields earmarked for the new settlement undoubtedly mitigated the severity of the flooding, this time.

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<sup>16</sup> See here: <https://www.fdean.gov.uk/media/0wybojag/strategic-option-consultation.pdf>.

<sup>17</sup> See P.6 here: <https://www.fdean.gov.uk/media/0wybojag/strategic-option-consultation.pdf>.

As the climate emergency worsens, and sea levels rise, future development must take account of flooding precedent. There are additional concerns that should building take place between A40/A48, during increasingly frequent flooding instances, water will be pushed towards Highnam and beyond.

During December 2020's flooding crisis District Councillor Chris McFarling made the following comments which appear to contradict the choice of settlement location: *"I would plan to avoid areas that are prone to flooding now, and likely to be so in the future...I note that flooding zones will increase as the rain and sea levels increase. That should indicate where large developments should and should not be built"*. For the full comment please see item "a)" in this Section's bibliography.

Photographic evidence of the extent of flooding at the chosen settlement location suggests that this site does not meet the District Council's test to 'avoid flood risk'.<sup>18</sup> Please see our press releases highlighting the immediate flooding issue in relation to the 'preferred option' published in both *The Forester* and *Gloucestershire Live* in Annex 5.

### **"Green infrastructure - GI policies to identify land and principles"**

The District Council's Green Infrastructure policies promote the preservation and safeguarding of biodiversity.<sup>19</sup>

Biodiversity, the desirable and important presence of a variety of plants and animals in a habitat,<sup>20</sup> will undoubtedly be displaced by a new town settlement in Churcham. The overall impact of concreting over 470+ acres of greenfield land aside, the selected settlement location enjoys close proximity to the RSPB Highnam Woods reserve, home to pairs of a carefully cultivated population of nightingales. Nightingales are sensitive to light pollution and thus their continued existence at Highnam Woods would not be compatible with such a development.

There is concern that the District Council's 'preferred option' falls short of the duty it owes to protected nature reserves and species. In a recent report, the Social Science Research Network suggested that conservation efforts should focus on *"reducing the number of fixtures installed in and around ecologically vulnerable areas"*.<sup>21</sup>

For more information about the impact of light pollution on species including the nightingale please see items "b)" and "c)" in this Section's bibliography below.

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<sup>18</sup> See, <https://www.fdean.gov.uk/media/0wybojag/strategic-option-consultation.pdf>.

<sup>19</sup> See AP7 (3.28); AP8 [https://fdean-consult.objective.co.uk/portal/planning/adpd/allocations\\_plan\\_publication\\_version/appv?pointId=1409215297358#ID-3093419-POLICY-8](https://fdean-consult.objective.co.uk/portal/planning/adpd/allocations_plan_publication_version/appv?pointId=1409215297358#ID-3093419-POLICY-8).

<sup>20</sup> See here: <https://www.greenfacts.org/en/biodiversity/l-3/1-define-biodiversity.htm>.

<sup>21</sup> See here: <https://www.ft.com/content/9953e818-2024-11ea-b8a1-584213ee7b2b>.



**“Protection and enhancement of the landscapes, identification of locally valued landscapes ; maintaining the quality of the environment and seek improvements where possible ; supporting an environment resilient against climate change”**

Feedback from engagement with the public reflects grave concerns for the future of the landscapes we live in due to the District Council’s greenfield development plans, coupled with frustration at the District Council’s refusal to grant permissions to develop existing brownfield sites.

It is near impossible to reconcile the protection and improvement of local landscapes and the future-proofing of the landscape in light of the climate emergency with the District Council’s apparent determination to pursue profit ahead of considered and sustainable investment.

**“Key considerations ahead of building on 470+ acres of green land”**

Air quality: Replacing the existing pasture landscape with a town, and high-density housing, will exacerbate the already dangerous air quality status accorded to the Forest of Dean and Gloucester. Losing this acreage of green space will reduce the sequestration of carbon and nitrogen, naturally provided by farming the land.<sup>22</sup> Further, the resulting increase in vehicles on the road and traffic congestion along the A40/A48 will also give rise to an increase in NO2 toxin levels.

The stark implications of a large settlement, in terms of housing density, the outputs from construction, and vehicular emissions, will be difficult to mitigate by proposals for ‘eco’ homes.

For evidence of public concern regarding the imminent destruction of local landscapes should the ‘preferred strategy’ be pursued, please refer to item “d)” in this Section’s bibliography, and to Addendum 3.

**“Previously developed land - make best use of. Policies to support and bring forward previously developed land”**

The District Council’s Strategic Option Consultation Document in theory suggests development decisions should promote the regeneration of previously developed, or ‘brownfield’, sites. In practice, however, brownfield sites have been dismissed and deemed economically ‘unviable’ for development by housing developers, as outlined in the HDH Consultants’ Economic Viability Report.

It is clear that considered and sustainable development, through building and investing in proposed sites across the District, is being overlooked in favour of profits for housing developers.

The promotion of greenfield building is at odds with the District Council’s commitment to environmentally and economically-conscious investment, and drives a clear departure from its own principles of making best use of previously developed land.

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<sup>22</sup> See here: <http://www.fao.org/soils-portal/soil-management/soil-carbon-sequestration/en/>.



We have gathered feedback from the public regarding the refusal to develop existing sites - please see item “e)” in this Section’s bibliography and Addendum 3 for a snapshot of comments from across the Forest of Dean District.

## Summary

In short, we are not convinced that the District Council, and strong Green Party representation therein, is holding true to putting ‘the environment ‘at the heart of everything we do’.<sup>23</sup>

## Environment Section bibliography:

a) Full comment from Councillor Chris McFarling:



b) “The scientists who only come out at night”:

<https://www.theguardian.com/science/2016/aug/14/scientists-secrets-dark-night-time-research-sleep-circadian>

c) How light pollution affects the lives of garden creatures’:

<https://www.ft.com/content/9953e818-2024-11ea-b8a1-584213ee7b2b>

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<sup>23</sup> See here: <https://www.greenparty.org.uk/green-guarantee/protecting-our-environment.html>.

#### d) Feedback from the public on environmental issues - collated from Social Media internations:

Enrironmental concerns
Comment
Turn some of those huge now redundant shops into extra schools or colleges, and some into apartments to take pressure off building and keep town centres looking decent instead of looking run down. I expect the building will go ahead whatever is said but once more people move into the countryside the Forest of Dean itself will be overrun with people and the wildlife will stand no chance.
No more houses the whole county is bring concreted over
It would mean even more traffic. And more cement, so less natural drainage and more flooding..
This is a ludicrous idea, before you go putting up thousands of houses you need to ensure the infrastructure is in place. No building on flood plains, they are called flood plains for a reason! Bring the roads up to standard to accommodate all the extra vehicles that will increase the capacity of safe and easy travel for everyone no more bottle necks and jams going in and out of Gloucester. More schools to take the additional children in the area your building on. Local additional transport provided. Local amenities and jobs. But most of all protection of our rural way of life, our wildlife and countryside first and foremost
We won't have a forest before long we'll be living in a concrete jungle and it will called the concrete jungle of Dean
NO more housing! Left feedback. Don't want the rest of the forest to be like Lydney.. massive housing estates. Losing wildlife and woodland areas. We are called the Forest of Dean for a reason!
Is this to be in prime agricultural land? At a time when we now need to be much more self sufficient for food etc (since leaving EU). It's not just the green land we will lose it's the infrastructure in terms of roads and services that will need to be provided too - yet more agricultural land to be turned into a concrete jungle!!
I know we need new houses, a lot people are homeless. Would like the roads repaired also specially the one going passed the bus station in Lydney it's terrible full of pot holes and some other roads in the forest. We would also need more jobs in the forest to help, otherwise the roads to Gloucester are going to get busy and I thought we was trying to get less cars on the roads to help the environment.

#### e) Feedback from the public on the development of green field vs brownfield sites - collated from Social Media interactions:

Regeneration and brownfield sites
Comment
Turn some of those huge now redundant shops into extra schools or colleges, and some into apartments to take pressure off building and keep town centres looking decent instead of looking run down. I expect the building will go ahead whatever is said but once more people move into the countryside the Forest of Dean itself will be overrun with people and the wildlife will stand no chance.
Yes we need houses . But why aren't they letting small plots instead off building mass for the big builders£££ first
I bet the people who support it live nowhere near Churcham/Huntley. These houses should be built on Brownfield not Greenbelt its disgusting
Absolute joke. My strong objection input to the website. Brownfield is the ONLY way to improve. And add more infrastructure anyway.
Maybe decide to build on land in the towns around the forest, that aren't used/ are rubble or develop on industrial estates that are derelict and under used. If we keep urban sprawl going onto our countryside then the Forest of Dean will loose it's attraction and countryside quickly.
Why can't they support more investment to the three towns we already have - I moved here in 1985 and Lydney was a nice small town it then went to a dead and alive place now it going towards a dead place - it needs investment!!
Regenerate what's being neglected here, rather than building new unaffordable matchboxes on a floodplain ffs. No infrastructure, no shops, no schools or Drs etc, just another barren dormitory with no soul.
Build extra houses on old hospital sights, also old Dockham surgery, plus 2 surgeries in Coleford and Lydbrook, lots of old redundant industrial sites in FOD that could be built on without having to build extra infastructure.
Is this housebuilding ever going to stop? Our town and city centre shopping centres are collapsing. There is plenty of property and land there for the taking. Builders probably won't like it though!!
All builders know it's cheaper to build on flat land they couldn't care less about floods
Great idea let's build on another flood plane. Idiots . Leave the green belts alone have we learnt nothing there are plenty of old town buildings they could use. They have got their hands on our two hospitals which belong to the people of the forest of dean which should never have been allowed. The council always do what they want regardless of what we think must be some brown envelopes flying around again. The services can't cope now a bunch of morons.

## 5. Infrastructure Concerns

### Road Pressures

Residents of the Forest of Dean have expressed their concerns regarding the infrastructure pressures that building a new town in Churcham would cause. Feedback

of residents strongly contend that Churcham is an unsuitable location for a new town because of infrastructure concerns at its location—specifically concerns over traffic along the A40 and A48 and a lack of capacity to absorb additional traffic in the immediate vicinity.

A pertinent point from the feedback of residents to our communication group is that if the new town is located in Churcham there are concerns that the proximity of it to existing cities including Gloucester and Cheltenham would encourage, rather than dissuade, additional commuters. A new town just a few moments from Gloucester and Cheltenham would induce demand from house buyers seeking commuter settlements. Whatever amenities a new town may produce, it would be difficult to compete with the pull of a city. Being moments from a city would undermine the desire to create a self-sustained town.

We received overwhelming feedback that residents of the existing settlements already face challenges using the existing road infrastructure and object to the prospect of heavy additional road use immediately along the A40 and A48. We received a significant number of comments objecting to locating substantial additional housing at Churcham considering it is located at the epicentre of the convergence of most of the traffic from the Forest of Dean into Gloucester and Cheltenham. A significant number of residents expressed their fears that the additional road use would create pressures and congestion on the roads. The location of a new town would create demand right at this traffic epicentre. It would also pose significant challenges in preventing the traffic bottleneck that already exists, extensive alterations to improve road capacity would need to occur. Business leaders within the Forest of Dean have commented to us that the prospect of increased traffic congestion and backlogs along the A40 and A48 pose a serious risk to the viability of their businesses or at least “make their lives very difficult indeed” (direct quote).

Another common concern of residents shared with the communication group is the fear of a traffic spill-over effect on existing rural farm lanes in the approximate area of Churcham. It goes without saying that these lanes are not suitable for an increase in traffic. They serve as vital rural lanes for the rural economy and community.

The A40 and A48 floods. A notable flooding incident occurred in the immediate run up to Christmas 2020 which led to the A40 being closed. Feedback from residents indicate a concern that altering the landscape from fields to a hard town landscape will exacerbate a pre-existing flooding issue across Churcham Parish. A comment of one of the petitioners speaks to this issue and is particularly emotive: “I took 8 hours to get home to Drybrook from my job in Eversham[sic] where I work as a nurse due to floods” (direct quote). The existing road infrastructure around Churcham is susceptible to flooding. The land and environment are sensitive to change.

Feedback from residents object to the location of Churcham for the new town due to Churcham’s infrastructure proximity to flood land, its susceptibility to flooding, its susceptibility to traffic congestion and its vital role serving as the main arteries of travel

from the urban areas into the Forest of Dean relied on by businesses, emergency services and residents.

### **Rail Station Declined**

Central to the notion that Churcham would be a suitable location for a new town was the suggestion that a new rail station could be sited there. This has now been rebuffed. We have received communication from Network Rail that torpedoes the idea for both financial reasons and for the difficulty in altering the network across the system.<sup>24</sup>

## **6. Social Impacts**

### **Being Left Behind**

The Forest of Dean District Council's Local Plan 'preferred option' is a once-in-a-generation chance for the District Council to bring marked improvement to the lives of people in the Forest of Dean for years to come. To create a positive, lasting legacy, the Local Plan housing and investment strategy should be underpinned by the input and interests of people, young and old. The scope of the Local Plan spans 20 years, to 2041, and yet there is little evidence of the District Council making any effort to solicit the ideas and comments of the generations whose futures will be impacted by decisions made today.

Have the District Council considered how creating a new settlement on the edge of Gloucester will contribute in any way to the levelling-up of Forest towns, how the 'preferred strategy' will in any way help people living in towns like Mitcheldean and Cinderford feel more connected to job opportunities, and help to make such towns vibrant hubs where people can thrive?

The Forest of Dean District Council currently ranks at 303rd of 324 District Councils across the UK in terms of social mobility.<sup>25</sup> Only 21 District Councils across the country record lower scores for improving the quality of life, education and employment opportunities, and living standards of their communities.

Analysis of social mobility across the UK reaches stark conclusions with regards to the correlation between living in former industrial areas and a lack of social mobility. The State of the Nation 2017 report notes that most former industrial areas have suffered from a lack of regeneration, and that as a result, they often have relatively limited job opportunities and clusters of low pay.<sup>26</sup>

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<sup>24</sup> Please see Annex 10 of this Report.

<sup>25</sup> See here:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/662744/State\\_of\\_the\\_Nation\\_2017\\_-\\_Social\\_Mobility\\_in\\_Great\\_Britain.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/662744/State_of_the_Nation_2017_-_Social_Mobility_in_Great_Britain.pdf).

<sup>26</sup> See here, P.14

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/662744/State\\_of\\_the\\_Nation\\_2017\\_-\\_Social\\_Mobility\\_in\\_Great\\_Britain.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/662744/State_of_the_Nation_2017_-_Social_Mobility_in_Great_Britain.pdf).

The Forest of Dean District, a former industrial area has itself fallen victim to a lack of fiscal investment, let alone thought-out regeneration. Opportunities to bring vibrancy, footfall and prosperity to the Forest of Dean have been overlooked, and will continue to be if the current 'preferred strategy' is pursued.

A well-researched, needs-based strategy to investment and housing should be applied in place of the existing approach. Upward, and sustained, social mobility will only occur when decision-makers and those in authority take a genuine interest in the lives and futures of those they have a duty to represent, and when public interests are translated into plans that endeavour, at every turn, to better the prospects of communities whose outlook is ever fading.

The Local Plan 2021-2041 should not be met with the Council's current superficial, quick-fix approach that fails to delve into, understand, and address the complex challenges and opportunities facing people living in the Forest of Dean. Instead, the 'preferred option' should reflect a long-term strategy for improving social, community and family prospects in the Forest of Dean.

The following feedback collected from people living in the Forest of Dean echos the damning conclusions regarding social mobility in the District reached in the State of the Nation Report:

### **Drawn from Annex 3:**

**91%** of 541 people who responded to the poll feel '**worried/concerned/negative**' about the Forest of Dean's future.

**85%** of 541 people who responded to the poll do **not** think the Forest of Dean provides **employment opportunities**.

**97%** of 541 people who responded to the poll **agree** that the **towns** and **businesses** in the Forest of Dean **deserve more investment** to make them **future-proof**.

### **Distinctive Historical Circumstances of Churcham**

Local history is an important aspect of the well-being of a community, its identity and its distinctiveness.<sup>27</sup> Evidence shows that Churcham is among the earliest settlements in the history of the Forest of Dean District. It was previously named Ham Saxon and Churcham Church was built in 1040AD. Bulley's Church was built in 1100AD. There are Saxon burials near the Railway line that runs through Churcham Parish.

Local residents are aware of this distinctive local history and are fearful that the District Council will overlook a regional historical treasure in favour of the building of a new town, which could otherwise be situated in Churcham's more modern counterparts.

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<sup>27</sup> See here for example: <https://journals.sagepub.com/doi/pdf/10.1177/0146167212458125>.

We would also remind the District Council that it has set itself the task of approving a Local Plan that is responsive to the unique character of the landscape, including locally valued landscapes.<sup>28</sup> The historic nature of Churcham is a key consideration in this context. Please see Mark Harper MP's representations in Annexes 6 and 7 on this point.

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<sup>28</sup> See here: <https://www.fdean.gov.uk/media/0wybojag/strategic-option-consultation.pdf>, p.6.

# Part C: Conclusions & Recommendations

## Conclusions

Following the feedback we have received, the Communication Group concludes that:

1. The strategy to fulfil housing quota through the means of the creation of a new town (in any location) as opposed to the disbursement method raises the following issues:
  - a. Economic siphoning into a new settlement from existing settlements. Fears are that this would produce an economic disconnect with the existing Forest settlements including a lack of investment both from local government and businesses. This will increase the economic and social decline of the existing Forest settlements, which we are sadly witnessing already.
  - b. Availability of brownfield alternative sites. The National Planning Policy Framework and the direction of the National Government has been to prioritise brownfield sites for development and that greenfields are to be used only in exceptional circumstances once all other means to fulfil the quota have been explored. The feedback of residents and the work of others reveal the people's endorsement of this approach.
  - c. Detrimental social effects on existing Forest Towns, including the allocation of medical resources to existing settlements.<sup>29</sup> Fears are that the new town would be the priority of both inward and internal investment, not only financially but also in terms of services such as health, education, transport and infrastructure developments to the detriment of the existing settlements.
2. Should the strategy to build a new town continue to be favoured, the location of Churcham is an inappropriate location for it, for the following reasons:
  - a. Proximity to Gloucester. Fears are that this would ensure that it is a commuter settlement. It would attract homebuyers looking for such a location out of the cities but close enough to facilitate the commute. Choosing Churcham as the settlement location will funnel custom, investment and business out of the Forest of Dean, considering its immediacy to Gloucester and Cheltenham.
  - b. Infrastructure concerns. Residents are concerned that a development of the scale proposed between the A40 and A48 would exacerbate traffic

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<sup>29</sup> Please see the representations of business leaders and Mayors of the Forest of Dean in Annexes 1 and 2 of this Report.



pressures on two vital traffic arteries from Gloucester and Cheltenham into the Forest of Dean. Business leaders have expressed their concerns that such a development at this location would be prohibitive and detrimental to commuters from the existing settlements.

- c. Particular environmental considerations. Churcham enjoys particular environmental conditions that ought to prevent wide-scale development. It is flanked by RSPB Highnam Woods, and an internationally recognised RAMSAR site.
- d. Flooding concerns. The identified land in the Churcham Parish is flanked by recognised floodzones. The A40 and A48 flooded over Christmas 2020 during the consultation period. It is feared that the proposal will remove crucial soakaway land from an already hydrologically strained area thereby exacerbating the flooding Churcham is increasingly subject to. This is also consistent with the science that signals a climate crisis and an expansion rather than a reduction in the scope of existing floodland.
- e. Landscape concerns. Fears are that the distinctiveness of the Forest of Dean will be lost if Churcham becomes urbanised. The Forest of Dean District Council have previously identified Churcham as an area “sensitive to change”. Crucial to the distinctiveness and beauty of the Forest of Dean is its three distinctive landscapes. First, is the statutory forest. Second, is its historic coal towns and settlements in the Forest plateau. And, third, is its lowlands characterised by settlements without defined settlement boundaries and their distinctive connection with the floodland expanse adjoining the River Severn. Residents are concerned that Churcham in its current relatively untouched form is an integral aspect of the Forest of Dean and that should this be altered, so would the nature of the entire District. Residents have also raised concerns that Churcham is too close to Gloucester and development in Churcham would amount to Gloucester urban sprawl.
- f. Agricultural land degradation concerns. Churcham is a site of prime agricultural land. The District and country are better served locating development upon land that is not suitable for agricultural use if the goal of a nationally resourced sustainable food supply is to be achieved.

## Recommendations

In light of the above, as a Communication Group we recommend the District Council:

1. Carefully, thoughtfully and arduously review this submission and other submissions of residents - including the detailed independent Consultant's (David Coats') Report and adjoining Legal Appraisal of Bob McGeady of Ashtonslegal



(supported by Meyric Lewis, barrister-at-law, Francis Taylor Buildings, London) submitted by the Six Parish Action Group of which Churcham Parish leads.

2. Reflect upon the adequacy of the consultation period in light of the legal requirement for land allocations for new housing to be based upon sufficient “community engagement”.
3. Adopt a disbursement strategy along redeveloping brownfield sites, instead of a new settlement approach.
4. Exclude Churcham as the site for the new settlement, should the new settlement approach continue to be the preferred strategy of the District Council.
5. Address how the District Council will consider the National Government’s alternation of the housing algorithm<sup>30</sup> will impact upon the Local Plan strategy.
6. Provide regular detailed updates of how the contents of this Report and the Submissions of the Joint Six Parish Group (including the independent Consultant’s Report and adjoining Legal Appraisal) have been taken into account by the District Council.
7. Ensure that the next steps of the Local Plan process is proactively communicated to the population of the Forest of Dean District, including engaging with key stakeholders (such as businesses, emergency services and local Town and Parish Councils).

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<sup>30</sup> See the Official Government Announcement here:

<https://www.gov.uk/government/news/plan-to-regenerate-england-s-cities-with-new-homes>; And here, for example:

<https://www.theguardian.com/commentisfree/2020/dec/16/jenrick-mutant-algorithm-win-localism-centralised-planning-u-turn>;

<https://www.building.co.uk/news/jenrick-abandons-mutant-housing-algorithm-to-focus-on-urban-development/5109569.article>.

# Addenda

All of these additional files have been submitted in writing alongside this Report via a single email to the Local Planning Team's consultation email address ([localplans@fdean.gov.uk](mailto:localplans@fdean.gov.uk)) and to all District Councillors.

## Addendum 1: Petition Signatures

Please see Microsoft Excel Document entitled: "A1 Petition Signatures"

## Addendum 2: Petition Comments

Please see Microsoft Excel Document entitled: "A2 Petition Comments"

## Addendum 3: Facebook Page Comments

Please see Microsoft Excel Document entitled: "A3 Facebook Page Comments"

## Addendum 4: Facebook Poll Results and Comments

Please see Microsoft Excel Document entitled: "A4 Facebook Poll Results and Comments"

# Annexes

## Annex 1: Forest of Dean Business Representations

Brian Bennett: Chairman of Vantage Point Business Village, Mitcheldean

*“The new township idea at Churcham is a sell-out by our planners. It will make the Forest more and more economically isolated when it’s already dying on its knees.*

*The district urgently needs more factories and more employment to keep young people in the area. It needs more infill - homes around existing settlements to boost our towns and villages and enable future generations to get on the housing ladder.*

*Commuter towns aren’t a sustainable option for the Forest. They will drain resources and give nothing back to the community. Churcham new town residents will look to Gloucester for jobs and services, not the Forest.*

*Building a settlement this size surrounded by flood plains is asking for major drainage problems, which can only be exacerbated by climate change, something we are already experiencing.*

*And to site it at the pinchpoint between the Forest’s two main arterial roads, the A40 and the A48, at Highnam Roundabout, will effectively cut off the Forest. Traffic gridlock is a rush-hour issue here already and has been compounded by recent spells of flooding which have completely closed these roads.*

*It’s just not organic thinking by the Forest of Dean District Council. They are taking the easy option by putting the housing allocation effectively in one place. It’s a cynical attempt to fulfil their obligations. And using big developers doesn’t help the local economy one bit – it’s putting the small local contractors out of business.*

*In my view the whole process is broken.”*

John Thurston DL, Chair of Watts of Lydney Group Ltd based in Lydney:

*“The natural area to develop further in the Forest would be Lydney, rather than a site like Churcham. But the Lydney option is mainly limited by the developers’ desire not to have unsold stock, coupled with the FoDDC’s failure to support development of local infrastructure and services. The rate of development could be accelerated if properly supported. Lydney could up its expansion if the Council moved focus to Lydney with active support.*

*One option was for a Bridge to link the Forest of Dean with the M5 and the east of the County. This option included a new settlement in Lydney. As the old Severn railway bridge took this route it would fit in naturally with the existing A48 bypass - it could help to relieve the A48 bottlenecks in Chepstow and Gloucester, which will only be exacerbated by the siting of new townships in Churcham or near Chepstow. Neither of these peripheral options would benefit the Forest’s economy, whereas enhancing Lydney as a vibrant urban centre would be beneficial to the whole Forest.”*

Gary Jones, MD Glevum Windows and Conservatories based at Broadoak, Newnham-on-Severn:

*"We all recognise the need for new homes and that they have to go somewhere. However, a new major road infrastructure must come first before any serious consideration is given to the new town development plans at Churcham.*

*In reality that infrastructure is already needed now - as motorists using the Forest's main routes, the A40 and A48, know. The hours and hours of time wasted in traffic jams at rush-hour and, more recently, when the A40 at Over was flooded just show that a major problem already exists.*

*To add another 8,000 cars to that stretch of road from Highnam to Over roundabout will just exacerbate an existing problem and at times effectively cut off the Forest.*

*For the past 30 years I have been running my business, based at Broadoak, and I am planning to expand it. Our transport links into Gloucester and the M5 are critical. The traffic situation on the A40 is already problematic and to stick a new town on the land at Highnam Roundabout would cause potentially dangerous gridlock.*

*I would personally think that it would be far more beneficial to the district to develop the brownfield sites in the Forest's market towns.*

*One obvious solution would of course be to build a new bridge over the Severn but that clearly is a very major undertaking and is unlikely in the foreseeable future."*

Neill Ricketts, MD Versarien, Chair Forest Enterprise Partnership, Director Gfirst LEPs:

*"This is a very emotive and difficult problem to resolve, we need to house more people but no one wants to see it in their back yard, including me.*

*We need to match the needs of the towns with that of the needs of the people and that of businesses. We also need to maintain the character of the area and be attractive to new people.*

*Overall, it will be impossible to resolve. I can see both sides of the argument, transportation links still create natural bottlenecks at both ends of the area - the A40 and A48 are no longer fit for purpose."*

Ruth Snell, MD Greenfields, Kites Nest Yard, Kites Nest Ln, Gloucester:

*Business objections to proposed development at Churcham.*

*Being the joint owner of Greenfields Ltd, I thoroughly oppose the proposed scheme on the following points:*

**Traffic** - *Once Covid-19 has passed us by, the traffic will return to the usual two-mile queues from Highnam roundabout, towards The Forest. It can take up to an hour to get from Bulley Lane to Over roundabout.*

**Employment** – *We currently employ over 35 staff, the majority of which live in The Forest. If this development goes ahead, we will definitely relocate our business to Gloucester/Cheltenham, as it is not going to be economic to spend quarter of a day in traffic. This will result in inevitable Forest-employee job losses.*

**Forest Suppliers** – *With a £3.3 million annual turnover, we spend a considerable amount of money with Forest suppliers. If we relocate, we will use suppliers from Gloucester/Cheltenham.*

*In conclusion, I would suggest that this proposal is led by the greed of farmers and developers, and a council that has no hindsight as to the effect it will have on the existing Forest economy and towns.*

## Basil Freeman & Son Transport Ltd, Churcham, Gloucester

*“Basil Freeman and Son Transport Ltd have been trading out of the Forest of Dean for 50+ years. Over these years the declining industry is clear to see ,we are based on the western side of the Forest of Dean so the development at Churcham Will have major concerns for us.... On the 28th Jan 2021 Robert Hitchens development plan shows no sign of any new infrastructure only adding two roundabouts on the A40 which will just cause more chaos not only for vehicles going out in the morning but for the vehicles returning in the evening, also for the drivers coming to work and going home from work.*

*We still work for a major company in Cinderford and before the pandemic we had to allow at least an extra hour to hit our delivery target, times this by several vehicles a day and you are talking a lot of money. We will have to seriously consider relocating to the other side of Gloucester which will then put our Forest of Dean drivers' jobs in jeopardy because of getting to work.*

*We personally do not see the demands the government are putting on the council for all these extra houses as a problem but more as the opportunity to develop the Forest of Dean and spread the houses and the people out to help the local communities, local schools, local shops and make more opportunities for businesses to open.*

*The building of the houses on brownfield sites should be made easier for local builders and developers to do as the council could help by not making them jump through so many hoops to get the planning permission as they do at the moment. We hear so many times people apply to build a house and are turned down with the most used reason being traffic.....*

*And what about the existing bottleneck at Over roundabout? With new housing already adding to the A38 queues, the expansion of Hartpury college and only one Westgate bridge to get over the river.”*



Paul Starkey, MTP Services, Unit 1, Ladygrove Business Park, Mitcheldean:

*"We are extremely concerned about the proposed new developments in the Higham area, for us, two main areas are of concern.*

*The first is flooding, it is obviously well known to all, the problems that occur when the area in question floods.*

*Even as recently as Dec 23<sup>rd</sup> 2020, despite modern drainage been[sic] installed, the A40 flooded, along with almost every other road allowing access to Gloucester. Clearly, you don't have to be a land drainage expert to realise that this is an inappropriate[sic] area to site an entirely new town.*

*The second is general transport links, anyone who uses the A40 in rush hour, already knows that the road system in that area is extremely congested, if the delays get worse due to increased traffic, we would have no choice but to relocate between Gloucester and Cheltenham to avoid the delays that would occur.*

*I can only assume that the people who wish to develop the area have no practical knowledge of day to day commuting in the area.*

*I have been commuting along this route for 30 years and so I think that I have a fair idea of the problems that will develop if the project is given the go ahead."*

Karen Miller, Arvid Pallets, Ross Road, Longhope:

*"Making the A40 busier will make life more difficult for us."*

## Annex 2: Forest of Dean Mayors' Representations



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### ~~Coleford~~ Town Council

Telephone: 01594 832103

Email: [ctcoffice@colefordtowncouncil.gov.uk](mailto:ctcoffice@colefordtowncouncil.gov.uk)

[www.colefordtowncouncil.gov.uk](http://www.colefordtowncouncil.gov.uk)

23 December 2020

#### ~~Coleford~~ Town Council response to ~~FoDDC~~ Local Plan (LP) strategic options

Dear Forest of Dean District Council

Please find the following comments based on the order of the document.

##### Introduction:

1.2 We note this LP provides for 4000 homes, in addition to the number already ~~allocated~~ with permission ie 7440 running total over 20 year period. This does not take into consideration the Government's possible new calculation which could have taken this number to a possible 12000. We now believe Government will not be taking this forward. ~~Coleford~~ Neighbourhood Development Plan (CNDP) guides the place-shaping for this area. There are significant allocations in CNDP which have not been built yet. CNDP does not sit easily with the ideas within the Planning for the Future White Paper, which would decrease areas of protection and anonymise the distinctive character of the parish.

1.6 We recognise that the LP must perform well in supporting the economy, the community, addressing climate change, ~~but also the historical and natural environments.~~

1.7 Re: ~~FoDDC's~~ key issues and what LP needs to do to address them.

Following the order of your table, please see additions we have included, ~~in red~~, and alterations with deletions.

Plan issues with key <del>FoDDC</del> ones in heavy type	What LP needs to do, with <del>additions/modifications in red</del>
Overall issue: a sustainable long term outcome	Prioritise and promote sustainable future and deliver on sites and by strategy (enable delivery). NOTE: a sustainable future includes delivery of development that is compatible with climate change and promoting actions that reduce carbon emissions in recognition of the <del>declared and acknowledged climate emergency</del>

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<b>Access</b>	<b>Policies to ensure good physical access and digital access/ connectivity overall and for identified development locations</b>
Access to facilities	Ensure efficient and effective access to facilities/ services from new and existing development locations- physical and electronic access
Access by a variety of means of transport, <b>including affordable public transport</b>	Policies to use public transport, walking and cycling and to encourage <b>better</b> provision to enable walking/ cycling as well as promoting/ allocating sustainable locations . This is <b>especially needed where existing pavements are too narrow for buggies, wheelchairs, mobility scooters</b> (see examples on Lords Hill by the Marshes and bollards by Mills Newsagents into Newland St).
Access to employment opportunities	Provide a mix of housing and employment and other development, alongside recreation opportunities and community facilities
Create and retain balanced communities	Plan to be able to cope with some degree of change including new initiatives and designations. Facilitate appropriate exemplar schemes
Ability to adapt and innovate	Support conservation through policies and proposals.
Conservation- built environment	Policies to achieve good overall function, appearance/ quality of design/ energy efficiency and resilience. <b>Publicise the location and advice on how to retain/enhance Conservation Areas</b>
Design	Policies to ensure accessibility within development for a variety of means of transport, <b>and maintain distinctive character</b>
Design accessibility	Policies to ensure accessibility within development for a variety of means of transport
Design durability	Need for long term enduring designs and plans, <b>following CNDP distinctive character assessment and/or any new Coleford design code/statement</b>
Design inclusive	Ensure the design of inclusive development (reference in policy)
<b>Economy</b>	<b>Promote a more diverse and robust economy support and promote a range of opportunities (sites and activities)</b>
Economy widen range as appropriate	Identify range of employment opportunities <b>including telecottage opportunities</b>
Economy employment range of sites	Provide a range of sites
Economy support for enterprise	Policies to support new and existing enterprise
<b>Economy- sustainable tourism</b>	<b>Promote to increase overall benefit/ quality/extent</b>

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Economy- response to evolving tourism trends	Allow scope for overnight parking of motorhomes in an existing car parking area, and include electric vehicle charging in such, and in all new developments
Education	Access to educational opportunities and ensure provision where there is new development, including provision at all ages from nursery to 18+
Education new opportunities	Facilitate new and improved educational opportunities
Environment	<b>Enhance sustainability in a longer term context. Audit resources. Apply environmental policies to conserve and enhance natural environment. Pay specific attention where new developments are concerned. Net-gain principle applied to carrying capacity and protection; overall sustainability</b>
Environment avoid flood risk	<b>Safeguard against</b> flood risk and likely changes to risk including changes in sea level, increase in extreme events. <b>Mitigation against flood risk in/from new developments must be put in place and monitored effectively NB <del>Thurstan's</del> Rise</b>
Environment- green infrastructure	GI policies to identify land, <b>conserve, and enhance. principles</b>
Environment- landscape protections and enhancement	Protection and enhancement of the landscapes, <b>skylines, water bodies. identification. Apply and enforce</b> locally valued landscapes, <b>and CNDP CNE1,2,3.</b>
Environment quality of allocations	Allocations that maintain the quality of the environment and <b>gain</b> improvements where possible
Environment quality overall	Aspirational policy for improvement/ enhancement and overall approach
Environment resilient against climate change	Policy to promote resilience of allocations <b>applied consistently to all applications.</b> Policies to support and encourage renewable energy, additional tree planting for sequestration, <b>addressing drainage and future flooding issues as above</b> etc.
Housing	<b>Mix of types and overall delivery sufficient to meet needs based on existing</b> calculations. Deliver/construct Affordable Housing and Lifetime Homes all to be sustainable in the long term and with appropriate location, <b>including for employment. Infrastructure improvements must precede new housing development.</b>
Housing AH addresses local needs	Allocate sites that can provide affordable housing to address local need <b>reflecting the demographic structure.</b> <b>Continue the local connection criteria for affordable housing.</b> Enable "exceptions" sites. Allocations and delivery policies provide housing as far as possible where it is needed.

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Housing AH in locations to benefit from services	AH in locations which benefit from and support local services
Housing numbers	Allocations must be deliverable/ developable- adequate overall housing supply 5 year and plan period
Housing type	Housing availability by type including self-build and tenure <b>Increase proportion of lifetime homes to allow for access needs.</b>
Previously developed land- make best use of	<b>Prioritise</b> policies to support, allocate and <b>redevelop</b> previously developed land
<b>Spatial strategy that is supported by residents</b>	<b>Continue support of Neighbourhood Development Plans and their monitoring/Review</b>
Spatial strategy <b>and process</b> is consulted upon and accepted by community	Planned changes, <b>and how they are put into action</b> need to be explained and understood/ accepted by community
Town centres- support and vibrancy	Effective TC policies for sustainable active places (mixed development) <b>which reflect NDP policies in place</b>
<b>Other Major site specific issues</b>	
A48 connectivity	Addressing the constraints imposed by A48 <b>and A40</b> at Gloucester, and A48 <b>&amp; B4228</b> at <b>Jutsbilk</b>
<b>Five Acres site</b>	<b>Deliver Five Acres development to improve leisure facilities for both <del>Coleford</del> and Berry Hill. This should reflect community needs as represented in BOTH Berry Hill and <del>Coleford</del> NDPs</b>
Gaining positively from West of England and South East Wales City regions	Plan policies which take advantage of nearby major strategic plans and strategies
Gaining positively and being part of the Gloucestershire Plan (benefitting from it and contributing to it)	

1.11 The LP will need for example to promote Green Infrastructure, using effective protective and supportive policies. This will include policies directed to increasing renewable energy provision and will embrace gain in biodiversity, and sustainable management. Particular policies here such as CNE1, CNE2, CNE3, CC4 **must be incorporated for ~~Coleford~~.**

1.12 From issues and options outcomes, 4 options result: they are

1. **Selective planned expansion of existing settlement(s).** ~~Coleford~~ does have restraints, as noted (and for also for protection of the historical environment). If there should be further limited expansion then there **must be improved infrastructure and major mitigation re environment.**

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2. **Maximum incremental change to the extent of absolute constraints.** This is almost tantamount to having no local input on planning at all – NPPF would be applied alone. This is not what CNDP shows, nor what the consultation of our residents/businesses want.
  3. **Planned new settlement(s).** This option would mean that improved infrastructure would necessarily precede any planning permissions. It would give focus on community and economy. It would need to be carefully located to mitigate environmental effects.
  4. **Negotiated agreement that some development will be passed to adjoining authority(ies).** Given the adjoining Welsh border, and the integration of Tewkesbury with Cheltenham and Gloucester in JCS terms, this is highly unlikely to be agreed by other authorities.
- 1.15 The “blurring” of these options from a straight choice is recognised, but should be subject to sustainable and democratic challenge and delivery at each stage of this LP process.

## 2. Constraints and opportunities

2.2 **Statutory Forest** – most of the Eastern Arc and half of the Southern Arc are inside the statutory forest boundary. The AONB is over the edge of the north and western side, Locally Valued Landscapes comprise the north and east parts of Green Ring around ~~Coleford~~.

2.2 ~~Coleford~~ **Town Council** agree with our town’s summary. “Aside from the current opportunities identified in the AP there may be some scope for additional housing but after initial consideration it would appear limited. Although this approach could be changed to enable the development of land between ~~Coleford~~ and the surrounding settlements this would be a fundamental change leading to a less easily interpreted landscape and also a much less attractive and locally distinctive one. The approach would be contrary to national and local policy. Development proposing this change would need to demonstrate that it would add to the overall quality of the area, and that it was sympathetic to local history and the local and wider landscape. These requirements are considered very unlikely to be able to be met by development of any scale.” We would add that the importance of designated and undesignated, valued heritage and especially the Conservation Area in ~~Coleford~~, needs to be explicitly included, as it is for Newent.

2.24 At the rate of development, expansion into current AP/NDP areas may go on longer than the existing AP, seen as complementing other towns.

2.30 ~~Tutshill, Beachley and Sedbury~~ may expand, and if so their effect on the Chepstow Transport Study must be linked in. The access routes for tourism into the Forest through there must be addressed.

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2.33 Some of the larger villages could have limited allocations, but some still have unfulfilled allocations, and a number have limited services/access. The scale and nature of development must be in proportion to and reflect distinctive character of that village. If NDPs exist, then they must be taken into account.

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". Democratic access to the second stage of planning via FoDDC Planning Committee is absolutely required.

### 3 Strategic options

3.3 The LP options will need to be evaluated against the following:

- **climate change/ carbon reduction**
- **landscape:** see CNDP policies CNE1,2,3 see especially
- **locational strategies:** many LPs have an underlying strategy of supporting and promoting new development in keeping with the available services. The outgoing FoDD AP does this with its emphasis on the towns, then major villages, although the actual allocations are made in a manner which provides for greater change in one town, in order to deliver a mixed form of development in the most sustainable location.

Neighbourhood Development Plans **must be taken into consideration.**

Coleford Town Council agree with the inter-relationship between services and infrastructure, employment and housing.

- **timing and pacing of development-** may be phased (see above)

### Evaluation

Any LP is about the overall delivery of a suite of policies and proposals and needs to be assessed as such (3.8): **to emphasise, it is not just about housing.**

**Option 1 selective expansion:** this effectively continues doing the same thing as now, but will not cope with sustainability given the degree of expansion, the time frame and developer power. It will not fully associate the appropriate level of enhanced provision of services with housing permissions.

See 3.11 The likelihood of **option 1** fulfilling the numbers indicated is difficult to achieve, as Newent could have 1000 houses alone. Whilst a smaller number of houses could be proposed per town/ in villages (as illustrated by the table) this still would not meet the requirement, and constraints would still apply as described. A phased approach would enable the short/medium term requirements to go ahead.

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whilst potentially having appropriate time to plan the infrastructure ready for any new settlement.

**Option 2 maximum incremental development** is unlikely to give a clear pattern which is acceptable to local residents or councillors. Additional development will become more dispersed so potentially less infrastructure will be delivered. NB In either option 1 or 2 the development for ~~Beachley~~ would be made sustainable by mixed development not solely housing. However, it is worth noting that a change of decision by MOD at ~~Ashchurch~~, Tewkesbury, made planning and phasing very difficult there.

The loss of local landscape policies would detract from option 2, as would the lack of services, especially public transport as no additional hub would be planned.

**Option 3 planned new settlement(s)** would still include ~~Beachley~~ and some other continuity allocations in larger settlements, but would feature the new settlement with appropriate infrastructure and its own identity (3.15). That identity would need to be planned as distinctive for the new place. It is more sustainable, as planned as a whole, with appropriate infrastructure and community/employment focus. However, a complete settlement is likely to have a greater environmental impact at that location. The scale of that depends on population number and exactly where that location is. We recognise the number of households will have to be enough to make a settlement viable, but respect the general levels for villages/towns in the Forest District. It will also be necessary to effect mitigation to offset this as much as possible, so increasing sustainability.

We would wish to know the location of the new settlement in option 3, based on the criteria explained, so as to be able to comment more specifically. In any case, the democratic process would need to be gone through thoroughly and the settlement's major planning study would need to evidence the advantages of such type of planning and mitigation required.

### Conclusions

Based on the total number of households required indicated in this strategic options document, and this breakdown of how that is to be applied by area/town, ~~Coleford~~ Town Council is broadly in support of option 3. This will allow for some extension of numbers in ~~Coleford~~, much of which can be taken up by developing the existing allocations which have not yet happened. Our preference will always be to support the essence of the CNDP. The green areas noted should be protected, and not encroached upon, hence the reason for policies such as CNE2 Green Ring. Where sites have been allocated they should be built first: any employment sites that are

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not built on should be reviewed and consulted upon, possibly to be used for other purposes.

However should the numbers cited in LP strategic options change, then ~~EoDDC~~ should bring that back for further consultation before changes in policy are agreed.

In 4.8 more emphasis MUST be placed on the need for infrastructure to be ready in advance of development. This includes educational and health infrastructure, economic and area highways/utilities infrastructure as well as site - specific works. The mix of development must be carefully planned to ensure sustainability for those living in ~~Coleford~~ parish and the Forest, both before and after it is ~~effected~~.

Yours faithfully

Chris ~~Haine~~  
Assistant Clerk

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Mr Chris ~~Haine~~ Assistant Clerk

~~Coleford~~ Town Council Working for You

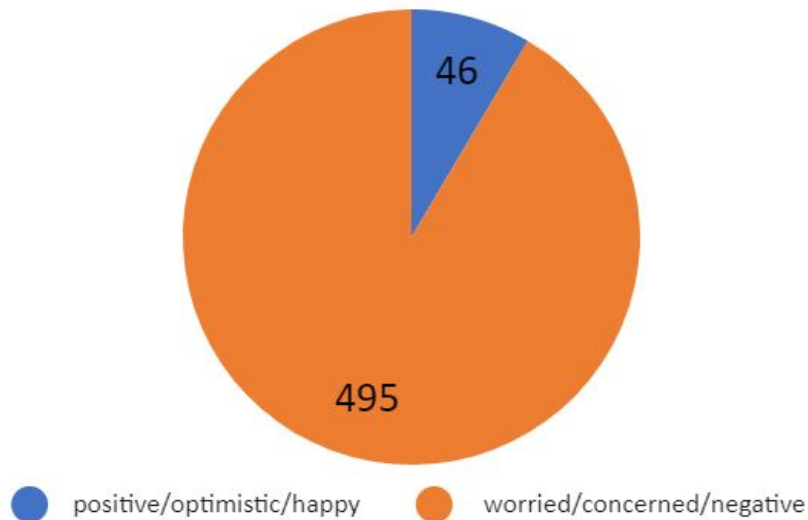
Page | 8

## Annex 3: Facebook Poll Results

Are you aware of the FoD local plan?	No	Yes	Total
	216	325	541
	40%	60%	

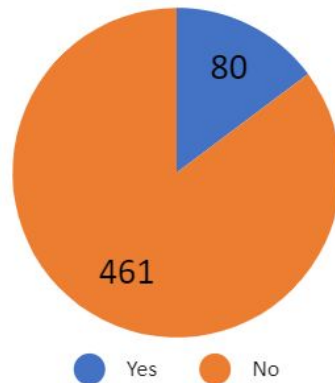
How do you feel about the future of the FoD?	positive/optimistic/happy	worried/concerned/negative	Total
	46	495	541
	9%	91%	

How do you feel about the future of the FoD?



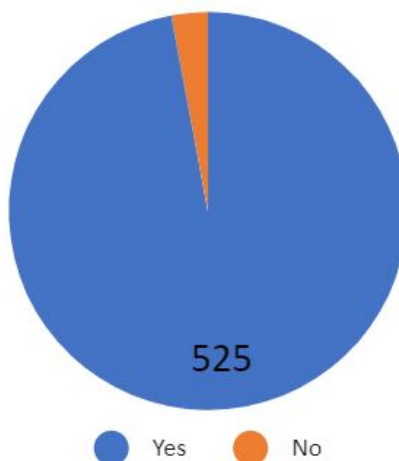
Do you think the Forest of Dean provides employment opportunities?	Yes	No	Total
	80	461	541
	15%	85%	

Do you think the Forest of dean provides employment oportunities?



Do you think towns and businesses In the FoD deserve more investment to make them future proof?	Yes	No	Total
	525	16	541
	97%	3%	

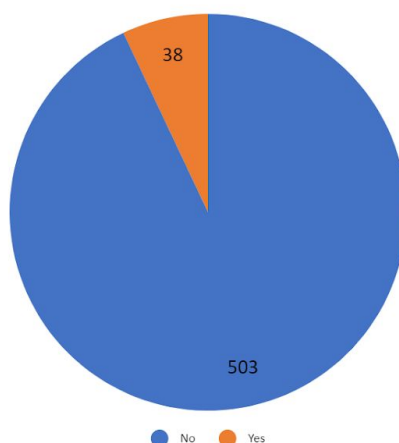
Do you think towns and businesses In the FoD deserve more investment to make them future proof?



If you have grown up in the FoD would you like to be able to buy your first home in the area?	N/A	No	Yes	Total
	348	22	171	541
	64%	4%	32%	

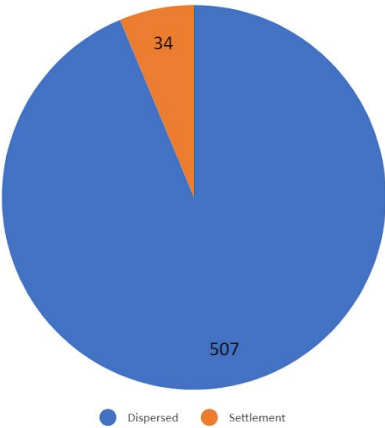
Across the FoD district there is enough brownfield land (land which has been built on/used before) to satisfy the district's housing quota. The foddc's current plan promotes building on greenfield land simply because this is more profitable for housing developers. Do you agree with the council's strategy to build on greenfield land?	No	Yes	Total
	503	38	541
	93%	7%	

Across the FoD district there is enough brownfield land (land which has been built on/used before) to satisfy the district's housing quota. The foddc's current plan promotes building on greenfield land simply because this is more profitable for housing developers. Do you agree with the councils strategy to build on greenfield land?



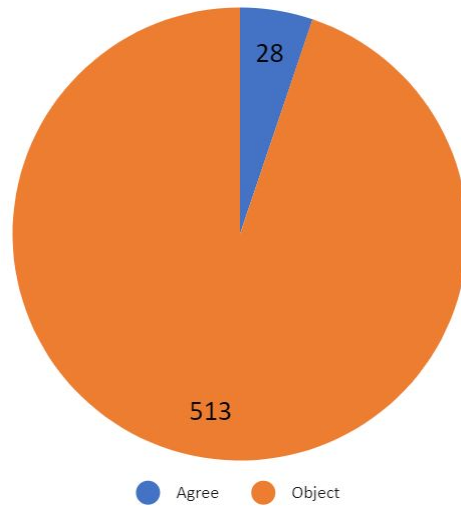
There are two broad solutions to the FoD's housing quota needs: a) dispersed method: develop brownfield sites across the district, regenerating many towns and guaranteeing the future of forest towns and businesses b) settlement method: build one town on greenfield land, on the edge of the forest district nearest gloucester, leaving forest towns to decline and funnelling investment and footfall into gloucester which option would you prefer?	Dispersed	Settlement	Total
	507	34	541
	94%	6%	

There are two broad solutions to the fod's housing quota needs: a) dispersed method: develop brownfield sites across the district, regenerating many towns and guaranteeing the future of forest towns and businesses b) settlement method: build one town on greenfield land, on the edge of the forest district nearest gloucester, leaving forest towns to decline and funnelling investment and footfall into gloucester which option would you prefer?



Do you agree/object with the foddc preferred option??	Agree	Object	Total
	28	513	541
	5%	95%	

Do you agree/object with the foddc preferred option??





## Annex 4: Details of the Campaign Facebook Page



### Facebook Pages for **New Town In The Forest; Have Your Say**

December 1, 2020 – January 23, 2021

Determine your impact on Facebook by analyzing your Facebook Page activity.

Facebook Performance Summary

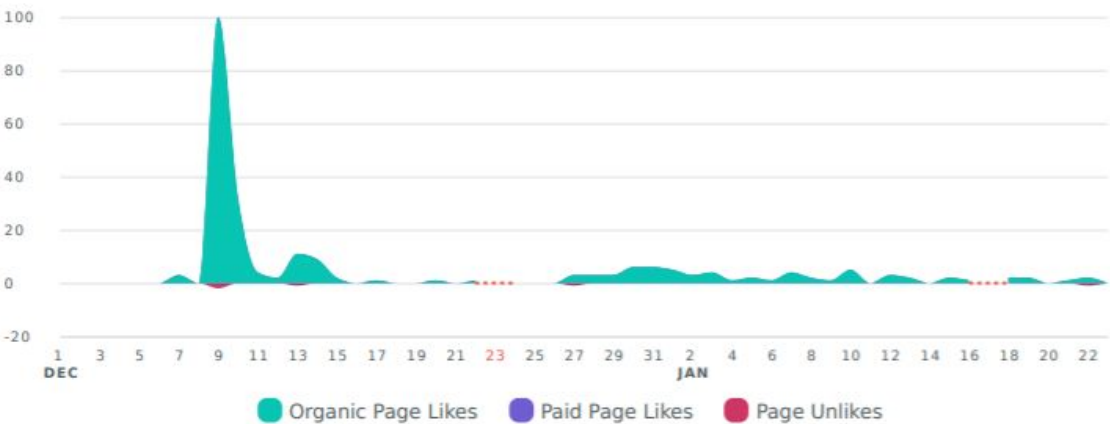
View your key profile performance metrics from the reporting period.

Impressions	Engagements	Post Link Clicks
247,151 ↗-	16,584 ↗-	2,545 ↗-

Facebook Audience Growth

See how your audience grew during the reporting period.

Net Page Likes Breakdown, by Day

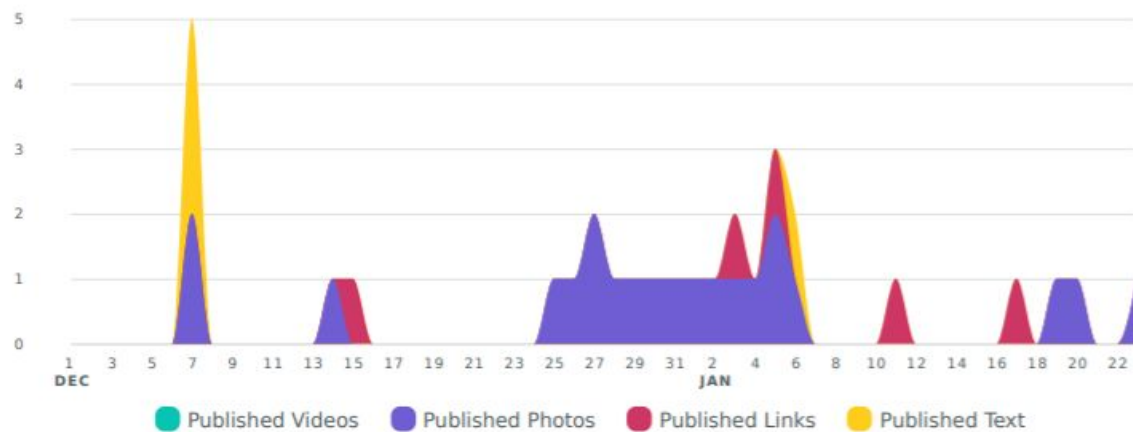


Audience Metrics	Totals	% Change
<b>Fans</b>	<b>265</b>	-
<b>Net Page Likes</b>	<b>225</b>	↗ 100.00%
Organic Page Likes	230	↗ 100.00%
Paid Page Likes	0	→ 0.00%
Page Unlikes	5	↗ 100.00%

## Facebook Publishing Behavior

View the different types of posts you published during the selected time period.

Published Posts Content Breakdown, by Day









Publishing Behavior by Content Type	Totals	% Change
<b>Total Published Posts</b>	<b>30</b>	<b>↗ -</b>
Published Videos	0	→ 0%
Published Photos	21	↗ -
Published Links	5	↗ -
Published Text	4	↗ -

## Facebook Top Posts

Review your top posts published during the selected time period, based on the post's lifetime performance.

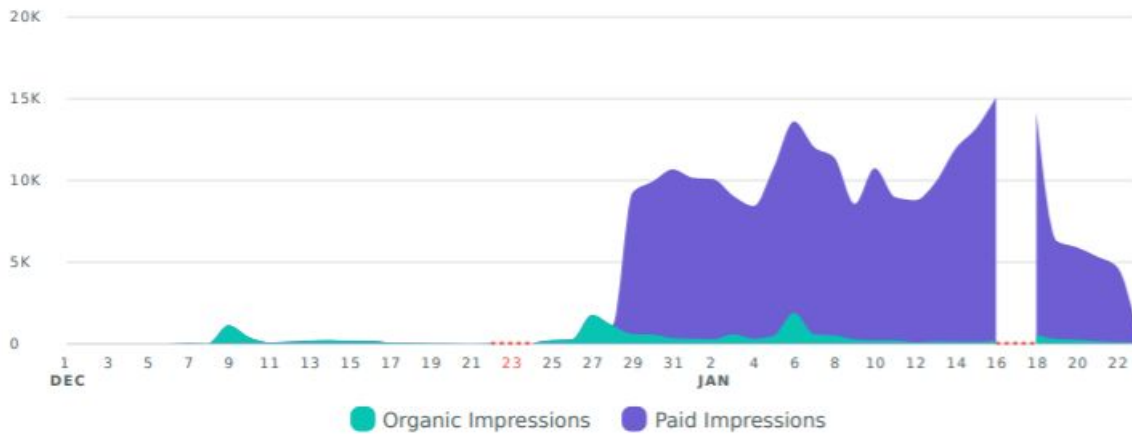
By Lifetime Engagements

 <b>New Town In T...</b> Wed 1/6/2021 6:54 am P...	 <b>New Town In T...</b> Sun 12/27/2020 8:03 am...	 <b>New Town In T...</b> Tue 1/5/2021 10:11 am P...
<p>Front page of the Forester today... great to see recognition of the impact of</p> 	<p>12 Days of Consultation : Day 3 Go and ask a friend to sign, and help double the total</p> 	<p>Will the Forest of Dean District Council's Preferred Option for 4,000 new homes at</p> 
<b>Total Engagements</b> 285	<b>Total Engagements</b> 249	<b>Total Engagements</b> 219
Reactions 57	Reactions 9	Reactions 18
Comments 11	Comments 1	Comments 2
Shares 11	Shares 12	Shares 9
Post Link Clicks -	Post Link Clicks 76	Post Link Clicks 44
Other Post Clicks 206	Other Post Clicks 151	Other Post Clicks 146

## Facebook Impressions

Review how your content was seen by the Facebook community during the reporting period.

Impressions Breakdown, by Day

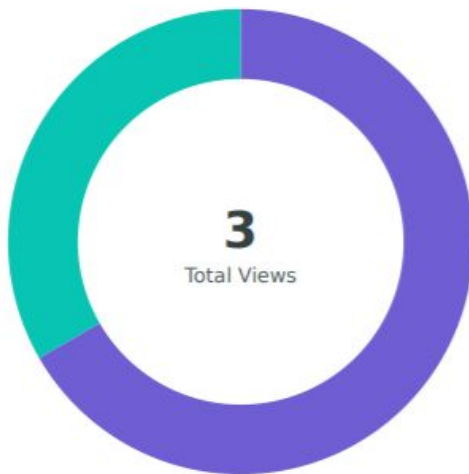


Impression Metrics	Totals	% Change
<b>Total Impressions</b>	<b>247,151</b>	<b>↗ 100.00%</b>
Organic Impressions	13,937	↗ 100.00%
Paid Impressions	230,523	↗ 100.00%
<b>Average Daily Impressions per Page</b>	<b>4,576.87</b>	<b>↗ 100.00%</b>
<b>Average Daily Reach per Page</b>	<b>3,616.5</b>	<b>↗ 100.00%</b>

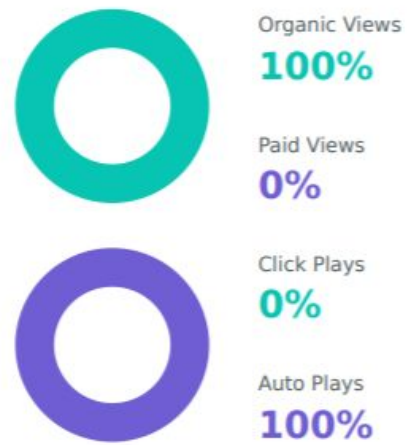
## Facebook Video Performance

View your aggregate video performance during the reporting period.

### View Metrics



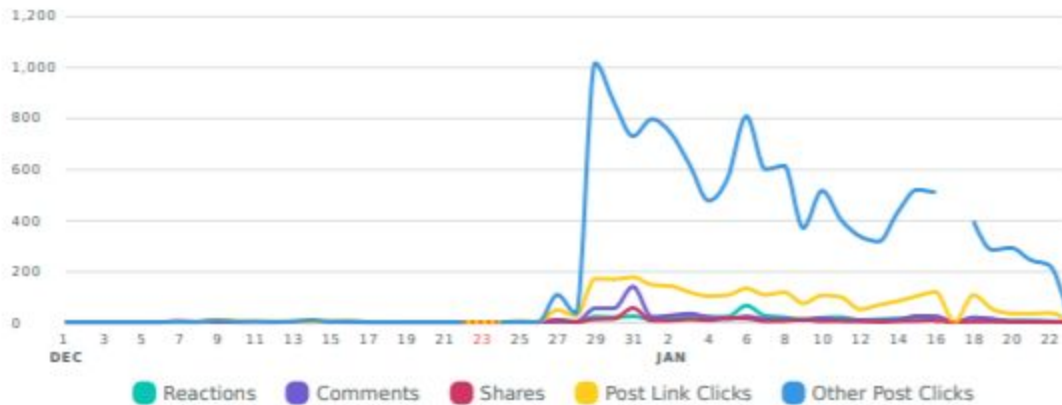
### Viewing Breakdown



## Facebook Engagement

See how people are engaging with your posts during the reporting period.

Engagements Comparison, by Day



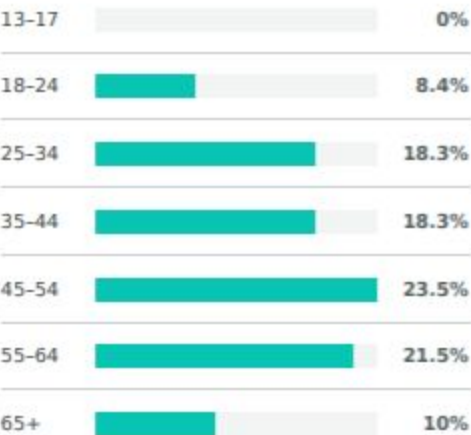
Engagement Metrics	Totals	% Change
<b>Total Engagements</b>	<b>16,584</b>	<b>↗ 100.00%</b>
Reactions	445	↗ 100.00%
Comments	534	↗ 100.00%
Shares	213	↗ 100.00%
Post Link Clicks	2,545	↗ 100.00%
Other Post Clicks	12,847	↗ 100.00%
<b>Engagement Rate (per Impression)</b>	<b>6.7%</b>	-



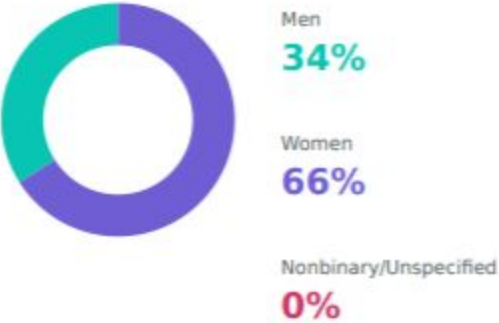
Facebook Page Fan Demographics

Review your audience demographics as of the last day of the reporting period.

Audience by Age ⓘ



Audience by Gender ⓘ



**Women** between the ages of **45-54** appear to be the leading force among your fans.

Audience Top Countries

 <b>United Kingdom</b>	<b>250</b>
 United Arab Emirates	1

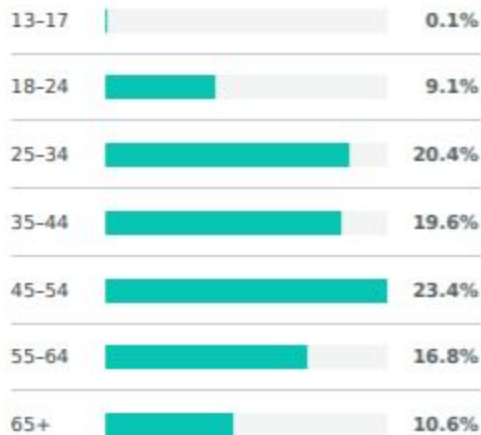
Audience Top Cities

<b>Gloucester, UK</b>	<b>77</b>
Cinderford, UK	22
Longhope, UK	21
Cheltenham, UK	18
Huntley, UK	18

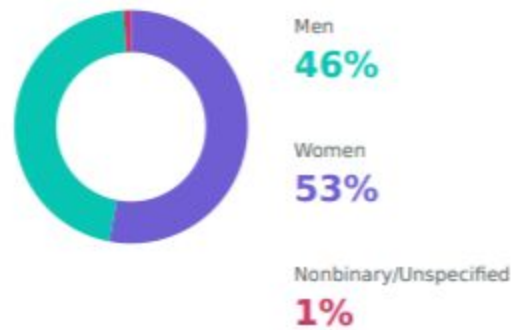
## Facebook People Reached Demographics

Review the average daily user demographics of the people reached during the reporting period.

### People Reached by Age ⓘ



### People Reached by Gender ⓘ



**Women** between the ages of **45-54** have a higher potential to see your content and visit your Page.

### People Reached Top Countries

	Daily Average
<b>United Kingdom</b>	<b>5,057.61</b>
United States	1.91
Australia	1.52
Isle of Man	0.87
Canada	0.57

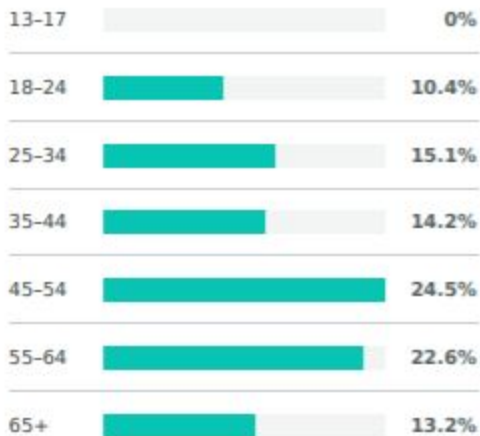
### People Reached Top Cities

	Daily Average
<b>Lydney, UK</b>	<b>1,631.52</b>
Cinderford, UK	1,441.65
Coleford, UK	1,048.52
Longhope, UK	191.04
Gloucester, UK	109.57

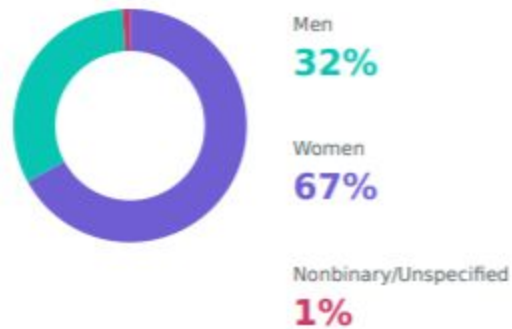
## Facebook People Engaged Demographics

Review the average daily user demographics of the people who took action on your page during the reporting period.

### People Engaged by Age ①



### People Engaged by Gender ①



**Women** between the ages of **45-54** are most likely to engage with your content.

### People Engaged Top Countries

#### Daily Average

 <b>United Kingdom</b>	<b>105</b>
 United Arab Emirates	1

### People Engaged Top Cities

#### Daily Average

<b>Gloucester, UK</b>	<b>49</b>
Longhope, UK	11
Cheltenham, UK	9
Newnham, UK	6
Cinderford, UK	5

## Facebook Pages

Review your aggregate page metrics from the reporting period.

Page <sup>▲</sup>	Fans	Net Page Likes	Published Posts	Impressions	Engagements	Post Link Clicks
<b>Reporting Period</b> Dec 1, 2020 - Jan 23, 2021	265	225 ↗ -	30 ↗ -	247,151 ↗ -	16,584 ↗ -	2,545 ↗ -
<b>Compare to</b> Oct 8, 2020 - Nov 30, 2020	-	0	0	0	0	0
 <b>New Town In The F...</b>	265	225	30	247,151	16,584	2,545

## Annex 5: Press releases

### Gloucestershire Live

- “The Gloucestershire village between the A40 and A48 where a town the size of Coleford will be ‘dumped’” [13/OCT/2020]:  
<https://www.gloucestershirelive.co.uk/news/gloucester-news/gallery/gloucestershire-village-between-a40-a48-4604022>
- “Anger over plans to ‘dump’ town the size of Coleford between the A40 and A48” [13/OCT/2020]:  
<https://www.gloucestershirelive.co.uk/news/gloucester-news/anger-over-plans-dump-town-4600501>
- “Forest of Dean will get new eco village but councillors to fight Government plans for 12,000 more houses” [26/OCT/2020]:  
<https://www.gloucestershirelive.co.uk/news/gloucester-news/forest-dean-new-eco-village-4636924>
- “Christmas flooding shows why plans for new settlement between Gloucester and the Forest will not work say campaigners” [11/JAN/2021]:  
<https://www.gloucestershirelive.co.uk/news/gloucester-news/christmas-flooding-shows-plans-new-4863100>

### Forester

- “Homes plan ‘not fit for purpose’ after floods” [6/JAN/2021]:  
<https://forestofdeanhousing.org.uk/wp-content/uploads/2021/01/Forester-Page-2-Jan-2021.pdf>
- ““Bitter disappointment’ as consultation hopes dashed” [27/JAN/2021]:  
<https://forestofdeanhousing.org.uk/wp-content/uploads/2021/01/The-Forester-front-page-P2-Jan-27-2001.pdf>

### Punchline

- “Council’s preferred housing option sparks fears of damage to Forest” [DEC/2020]:  
<https://forestofdeanhousing.org.uk/wp-content/uploads/2021/01/Punchline-December.pdf>

## Annex 6: Letter from Mark Harper MP



THE RT HON MARK HARPER MP  
*Working for Gloucestershire West of the Severn*  
HOUSE OF COMMONS  
LONDON SW1A 0AA



9<sup>th</sup> November 2020

Thank you for contacting me regarding the proposed suggestion of building 2,000 houses in the vicinity of the A48/A40 close to Churcham.

My starting position for the development of the next Local Plan, which sets out where future development should take place from 2026 onwards, is that any new housing should be in keeping with the surrounding area, both in style and scale.

However, any significant new settlements are best targeted at already developed brownfield sites. The Forest of Dean District Council (FODDC)'s recent suggestion of building 2,000 houses in the vicinity of the A48/A40 close to Churcham doesn't seem to pass that entirely reasonable test. This is especially true given the very well-known significant traffic congestion which occurs at the A40/A48 junction quite frequently.

The Council's proposals are currently out for consultation. So, if you have a view on this matter, I would strongly suggest, in the first instance, that you respond to the consultation issued by the FODDC. The consultation runs from Thursday 22<sup>nd</sup> October to Thursday 17<sup>th</sup> December 2020.

The feedback you give will help FODDC to examine just how this strategy can be delivered, as well as the case for or against development in specific areas of the district. Representations must be in writing and may be made online at:

<https://www.fdean.gov.uk/LocalPlanPreferredOption>

or via email at:

**localplans@fdean.gov.uk**

or by post to:

**Local Plans, Forest of Dean District Council, Council Offices, High Street, Coleford,  
Gloucestershire, GL16 8HG**

It is extremely important that you contribute to the public consultation. This is the only way that you will ensure that your views are taken into account. Once a decision has been made it will be too late. A final decision will not be made until the plan is examined by an independent Inspector.

I hope this is useful. Thank you for taking the time to contact me.


Yours sincerely

  
The Rt. Hon Mark Harper MP

Constituency Office: 01594 823482  
mark.harper.mp@parliament.uk www.markharper.org  
@Mark\_J\_Harper facebook.com/mark.harper.fod



## Annex 7: Mark Harper Facebook Posts detailing his Objection



**Mark Harper** ✓  
@mark.harper.fod

Home

**Posts**

Videos


Photos

About

Community

Create a Page

Like Share Block Page ...

**Mark Harper** ✓  
23 hrs · 🌐

👉 THREE DAYS LEFT - HAVE YOUR SAY ON LOCAL PLANNING 👉

The Forest of Dean District Council (FODDC) is currently seeking the views from all of us who live in the Forest of Dean on its latest proposals for the District's new Local Plan. In particular, the Council's proposed suggestion of building 2,000 houses in the vicinity of the A48/A40 close to Churcham.

Many constituents have written to me about this subject. So in addition to those who I have replied to, I thought it would be useful to set out my position on it.

My starting position for the development of the next Local Plan, which sets out where future development should take place from 2026 onwards, is that any new housing should be in keeping with the surrounding area, both in style and scale.

However, any significant new settlements are best targeted at already developed brownfield sites. The FODDC's recent suggestion of building 2,000 houses in the vicinity of the A48/A40 close to Churcham doesn't seem to pass that entirely reasonable test. This is especially true given the very well-known significant traffic congestion which occurs at the A40/A48 junction quite frequently.

The Council's proposals are currently out for consultation. So, if you have a view on this matter, I would strongly suggest in the first instance that you respond to the consultation issued by the FODDC.

The consultation runs for three more days until this Friday, 29th January 2021, so time is running out.


This is the only way to ensure that your views are taken into account before a final decision is made by an independent Inspector. The feedback you give will help FODDC to examine just how this strategy can be delivered, as well as the case for or against development in specific areas of the district.

Representations must be in writing and may be made online at <https://www.fdean.gov.uk/LocalPlanPreferredOption>

Or via email at: [localplans@fdean.gov.uk](mailto:localplans@fdean.gov.uk)

Or by post to: Local Plans, Forest of Dean District Council, Council Offices, High Street, Coleford, Gloucestershire, GL16 8HG

It is extremely important that you contribute to the public consultation. This is the only way that you will ensure that your views are taken into account. Once a decision has been made it will be too late. A final decision will not be made until the plan is examined by an independent inspector.



FDEAN.GOV.UK  
**Local Plan Preferred Option - Forest of Dean District Council**  
Take part in Preferred Option consultation



Mark Harper ✓

@mark.harper.fod

Home

Posts

Videos

Photos

About

Community

Create a Page

Like Share Block Page ...



Mark Harper ✓

22 January at 10:00 · 🌐

### LOCAL PLANNING CONSULTATION

The Forest of Dean District Council (FODDC) is currently seeking the views from all of us who live in the Forest of Dean on its latest proposals for the District's new Local Plan. In particular, the Council's proposed suggestion of building 2,000 houses in the vicinity of the A48/A40 close to Churcham.

Many constituents have written to me about this subject. So in addition to those who I have replied to, I thought it would be useful to set out my position on it.

My starting position for the development of the next Local Plan, which sets out where future development should take place from 2026 onwards, is that any new housing should be in keeping with the surrounding area, both in style and scale.

However, any significant new settlements are best targeted at already developed brownfield sites. The FODDC's recent suggestion of building 2,000 houses in the vicinity of the A48/A40 close to Churcham doesn't seem to pass that entirely reasonable test. This is especially true given the very well-known significant traffic congestion which occurs at the A40/A48 junction quite frequently.

The Council's proposals are currently out for consultation. So, if you have a view on this matter, I would strongly suggest in the first instance that you respond to the consultation issued by the FODDC.

The consultation runs for one more week only, until next Friday 29th January 2021, so time is running out.

This is the only way to ensure that your views are taken into account before a final decision is made by an independent Inspector. The feedback you give will help FODDC to examine just how this strategy can be delivered, as well as the case for or against development in specific areas of the district.

Representations must be in writing and may be made online at <https://www.fdean.gov.uk/LocalPlanPreferredOption>

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Or by post to: Local Plans, Forest of Dean District Council, Council Offices, High Street, Coleford, Gloucestershire, GL16 8HG

It is extremely important that you contribute to the public consultation. This is the only way that you will ensure that your views are taken into account. Once a decision has been made it will be too late. A final decision will not be made until the plan is examined by an independent inspector.



FDEAN.GOV.UK

**Local Plan Preferred Option - Forest of Dean District Council**

Take part in Preferred Option consultation



## Annex 8: Letter sent to Green Party



Dear Green Party Member,

For the surprising number of you in the party who voted FOR the proposed housing development to be sited in the Churcham, Huntley villages and beyond. Please look at these points and carefully consider your decision. Does it hold up to your supposedly rigorous policies??

### **YOUR POLICY SAYS....**

- ➔ ***'The Green Party pledges to 'minimise the impact of housing on...the natural environment'.***
- ➔ ***'The Green Party aims to minimise the impact of human development on other species, and to nurture a network of resilient habitats to reverse declining biodiversity.'***
- ➔ ***'The Green Party strongly supports land designations which prevent inappropriate development on National Parks, the Broads and Areas of Outstanding Natural Beauty, natural habitats of local, regional, national or international importance, sites of special scientific or archaeological interest, and ancient woodlands.'***
- ➔ ***'Planning policy has failed to stem the alarming loss of biodiversity in England and Wales, and to arrest damage to ecology and landscapes, let alone to enhance them. The Green Party would require planning policy to protect and enhance ecology and biodiversity at a landscape scale, integrating this with policies on agriculture and industry.'***

(Items HO201, LP203 LP405 LP406)

### **BUT WAIT.....HAVE YOU CONSIDERED.....?!**

Highnam Woods, an RSPB Nature Reserve which is directly opposite to a large majority of the houses in the proposed development is part of the largest area of ancient woodland in the Severn Vale.

It is home to Britain's rarest Breeding Woodpecker species the Lesser Spotted Woodpecker. Its also home to at least one of the several UK birds on the Red List of Conservation Concern. This means they are in need of urgent action. One such species also present is the Nightingale which in addition protected by the Wildlife and Countryside Act 1981. This bird is a sensitive and secretive bird, a factor which affected the rejection of a previous development in this area due to its threat of further noise and light pollution which would undoubtedly affect the habitat of this rare and under threat species.

Highnam woods is home to a carefully cultivated population of 6 pairs of Nightingales. This doesn't even cover the other vast array of wildlife and rare plant species that could also be affected which include:

- There is a dedicated bat house on the proposed site (just past the end of Church Lane). This is home to a large number of bats.
- There are several large badger sets on the site.
- The Lake in the middle of the site is home to swans, moorhen and dozens of geese at certain times of the year. There were at least 40 there last week. I doubt that they would flock to the centre of a housing estate.
- We have had a herd of Roe Deer around the site for the past five years or so. They had two fawn last year. I have also seen Muntjac deer there.
- There is quite a large group of owls around the western end of the site.

**GREEN PARTY MEMBER..... HAVE YOU REALLY CONSIDERED THE PLIGHT OF THE NIGHTINGALES AND THE THREAT TO ALREADY HIGHLY CRITICAL OTHER SPECIES? HAVE YOU REALLY CONSIDERED THE IMPACT OF YOUR DECISION ON THIS VERY SPECIAL AREA?**

#### **YOUR POLICY SAYS:**

- *'unsustainable patterns of development have prevailed, though less than if there were no planning controls at all. Of particular concern has been the development of prime agricultural farmland and important natural habitats, low density suburban sprawl that makes sustainable lifestyles difficult, and energy-inefficient buildings'*
- *'Local authorities should make more use of small sites, which are often overlooked or undervalued in the current land availability assessments. Dense infill developments could significantly offset the need to build on larger brownfield and greenfield sites that provide natural habitats.'*

*(Items LP101, LP507)*

#### **BUT HAVE YOU THOUGHT ABOUT ITS IMPACT ON OUR ENVIRONMENT?**

The proposed development is exactly the opposite of this. The sites highlighted for this are predominantly farmland including hedgerows, trees.

The economic viability assessment proves there is enough brownfield and existing other sites to negate the need to push onto this Greenfield site.

**GREEN PARTY MEMBER....DOES THIS DECISION REALLY AND TRULY FIT WITH YOUR POLICIES ON THIS??**

## **YOUR POLICY SAYS:**

- ➔ ***'The Green Party strongly supports the provision of green belts to contain urban sprawl, to maintain the separation of settlements, to protect prime agricultural land around settlements, to encourage urban regeneration and compact towns and cities, and to complement the ecological and cultural value of other designations, The Green Party would put a greater emphasis on the green belt's use for wider sustainable development considerations such as flooding, biodiversity, agriculture, energy production and sustainable transport. The local authority role in reviewing and protecting their green belt.'***
- ➔ ***'Local authorities should make more use of small sites, which are often overlooked or undervalued in the current land availability assessments. Dense infill developments could significantly offset the need to build on larger brownfield and greenfield sites that provide natural habitats.'***
- ➔ ***'To ensure no net loss in the quantity and quality of green belt land, and should aim to 'green the greenbelt'.***
- ➔ ***'Local plans should aim to reduce flood risks arising from all sources (rivers, tidal surges, sewers, groundwater, surface water and infrastructure failure).'***

(Items LP407, LP507, [LP510](#))

## **BUT DID YOU KNOW?**

In the last 2 years alone the A40 around where it meets the A48 was closed in November 2019, March 2020, and December 2020 for several days totalling hours of disruption but also highlighting the need to keep our farmland, woodland and wasteland to allow them to act as a sponge.

The impact of 2000-5000 houses will effectively reduce this 'sponge' dramatically further increasing flooding potential. We do not accept whatever flood measures put in place will totally eradicate this risk of further flooding and will instead push flooding areas to existing areas in the village.

## **YOUR POLICY SAYS:**

- ➔ ***'The Green Party sets out to achieve patterns of development that enable all people to realise their potential and improve the quality of life in ways which simultaneously protect and enhance the earth's life support systems'***

(Item LP200)

## **BUT DID YOU KNOW?**

Three years ago, the air quality in this area of Gloucestershire was already nearing the WHO limit fine particulate and other air pollutants (including Nitrous oxide) recommendation levels. This proposal will concentrate more houses and vehicles into this area will likely result in the air quality breaching WHO standards.

The loss of over 470 acres of green field space further exacerbates the air quality issue as it reduces carbon and nitrogen sequestration. Carbon sequestration in well-managed pastures has tremendous potential for fighting global warming. There is immense potential for the FOD to benefit financially from a well-managed grass farming and carbon-trading system. For each year of this proposed development, the local area will LOSE the ability to sequester 1,410 tonnes of CO<sub>2</sub>, annually. Over the term of the FOD's current Housing Strategy, that equates to 5,640 tonnes of CO<sub>2</sub>.

People will die as a result.

**GREEN PARTY MEMBER..... DOES THIS DECISION TO CONCENTRATE HOUSING AND TRAFFIC SIT WELL WITH YOU? THERE ARE ALREADY PROVEN DEATHS AS A RESULT OF THIS IN OTHER AREAS OF THE COUNTRY SUCH AS THE CASE OF ELLA KISSI- DEBRAH. DO YOU WANT TO BE RESPONSIBLE FOR CHANGES THAT ARE GOING TO LEAD TO THIS IN OUR COMMUNITIES?**

**Please consider your decision carefully in light of the above facts. We would welcome a discussion with you on this.**

Regards,

Communication and Action Group Supporting 6 Parishes of Churcham, Highnam, Huntley, Minsterworth, Westbury and Blaisdon.

## Annex 9: Communication Group Update Letter to all District Councillors



Dear Forest of Dean District Councillor,

I am leading the communications group supporting the Cross-Parish Action Group responding to the Forest of Dean District Council's housing strategy – the Local Plan 'Preferred Option 2021-2041'.

As a member of the Forest of Dean District Council you are currently reviewing the District's housing strategy; the biggest decision the Council will make since forming in 1973, and one that will affect the District's future.

During the October council meeting, the preferred strategy of a new settlement was pushed through. Unfortunately this meeting did not do justice to the seriousness and lasting implications of the matter being discussed. Councillors attempted to rush through the debate with comments such as: "We need to move on it's getting late".

I am sure you will recall that this was neither professional nor democratic. We have received a significant amount of feedback from the general public, representing voices from across the District, of many ages, regarding how disappointed this meeting was and representing constituents' overall lack of trust in the District Council.

This lack of faith in the District Council has only been compounded by the minimal effort made to inform and raise awareness of the consultation period among the District's population, and the implied lack of interest therefore in your constituents' opinions. This has been further exaggerated by the refusal to extend the consultation period in light of new lockdown measures, the final blow to a public consultation period during which open discussion, debate and awareness raising has been so severely curtailed.

We feel that there has been little transparency throughout the development of the 'Preferred Option'. Within the local Plan 'Preferred Option 2021-2041' document it states that the site for the new settlement is still being identified, however there are clear references to Churcham throughout Council documentation and no evidence of other settlement sites being considered. As you can imagine, this does not inspire confidence in the consultation and planning process.

A new settlement of 4,000 houses between the A40/A48 in Churcham, a new town the size of Coleford would be disastrous for many reasons as below:

### **Economic Impacts**

- Settlement on the boundary of Forest of Dean and Tewkesbury Districts will feed into Gloucester and Cheltenham, and starve the Forest of Dean District of investment and footfall.
- Any development or investment – whether housing, businesses or infrastructure – in Forest towns and on brownfield land deemed economically unviable by Council's Economic Viability Assessment – a death knell to our Forest communities.
- Will businesses be attracted to invest in towns and villages which the local council does not appear to deem worthy of investment.

### **Transportation**

- Existing road traffic will be exacerbated. The particular location of Churcham at the intersection of two main arteries of travel from the Forest of Dean into Gloucester and Cheltenham poses significant issues—a new town will intensify road use and congestion issues.
- National rail have stated that they will not be reopening the local train station.

### **Flooding**

- Land & roads surrounding the planned location of the new settlement are prone to flooding. In Dec 2020 the A40/A48 were both impassable due to flooding.
- The climate crisis requires foresight. Rising sea level rise and proneness to extreme weather events ought to exclude Churcham as the location for the new town. The land identified on the SHLAA is straddled by recognised floodzones. The science says floodzones will grow and need to be sensitively treated.

### **Environmental (inc wildlife)**

- Why build on greenfield land when we have enough brownfield sites?
- Residents are disappointed that it is Green Party Councillors who have adopting this preferred strategy, a plan that clearly challenges their own party values and manifesto commitments. The Green Party have the opportunity to demonstrate that these are not hollow promises by excluding Churcham for the particular environmental circumstances there.

- Highnam Woods, opposite the proposed site is home to protected species. An internationally recognised RAMSAR site is also located nearby. The entire Churcham greenfield landscape serves as important wildlife habitat. Defending their habitat should be at the forefront of a sustainable, green development plan.
- 10 years ago this plan was discussed however it was identified that for all the reasons we have outlined, Churcham could not survive with a new settlement. What has changed?

It was encouraging to see a shift in the Government's housing quota algorithm. However, we have not had any updates from the Forest of Dean Council on the impact on the District's quota. We are hoping this revision from the Government will be welcomed by the District Council and used to revise the preferred strategy to regenerate brownfield sites across the District in place of irreversibly damaging greenfield land. We have support from our local MP Mark Harper. Mark Harper has expressed that he does **not** support the plan to build a new settlement in Churcham as per the attached letter. We are planning to meet with Mark Harper to discuss this further.

Our working group and support base is continually growing thus I wanted to make you aware of the strength of feeling in the Forest of Dean and Gloucester against the Council's Preferred Option to build this new town and reject development and investment opportunities across the District. Through our actions we are reaching out and hearing the opinions of the Forest of Dean population, with the majority of people very concerned:

- We have more than 6,000 signatures on our petition: [Petition · Objections to the building of 5000 houses in Churcham Parish on greenfield land](#)
- We have had social media engagement with more than 30,000 users and direct feedback coming in from nearly 1,000 people! In between lockdowns we delivered 10,000 leaflets, erected billboards (minus the vandalism), held radio interviews and published some press articles (see below).
- We have reached out to local Forest businesses, mayors & key organisations and have got letters of support from many.
- We created a website & Facebook page to inform the population on the preferred option and how to have their say.  
<https://forestofdeanhousing.org.uk><https://www.facebook.com/NewTownInTheForestHaveYourSay/>

To be clear, the above demonstrates the lack of ability to effectively engage with residents. Traditional methods of community outreach have been prohibited throughout the consultation period and a full national lockdown effectively cut a month out of consideration.

The fact we have been able to receive these representations despite the hamstrung nature of the consultation period (including Covid regulations, national lockdowns, and the Council's decision not to extend the period) is tantamount to the strength of feeling against the selection of Churcham as the location of a new town.



We have compiled this ahead of the expiry of the consultation period to make you aware of the activities and engagement we have had with the public and interested organisations.

The overall sentiment is that the public, local business and key organisations do not support a new town in Churcham. They would, however, support regenerating brownfield sites and spreading the remainder of the housing quota across the district to support organic, sustainable growth across the area.

We value the support of our elected councillors and we want you to know that if you stand against the Preferred Option—or object to the selection of Churcham as the location of a new town—you have the backing of the majority of the population.

Many Thanks,

Hannah

On behalf of the communications group supporting the Six Parish Action Group (Churcham, Highnam, Huntley, Minsterworth, Westbury and Blaisdon.)

### **Press coverage**

Gloucestershire Live

- <https://www.gloucestershirelive.co.uk/news/gloucester-news/gallery/gloucestershire-village-between-a40-a48-4604022>
- <https://www.gloucestershirelive.co.uk/news/gloucester-news/anger-over-plans-dump-town-4600501>
- <https://www.gloucestershirelive.co.uk/news/gloucester-news/forest-dean-new-eco-village-4636924>
- <https://www.gloucestershirelive.co.uk/news/gloucester-news/christmas-flooding-shows-plans-new-4863100>

Forester

- <https://forestofdeanhousing.org.uk/wp-content/uploads/2021/01/Forester-Page-2-Jan-2021.pdf>

Punchline

- <https://forestofdeanhousing.org.uk/wp-content/uploads/2021/01/Punchline-December.pdf>

## Annex 10: Network Rail Representations

**From:** Stephen Wallbank <[Stephen.Wallbank@networkrail.co.uk](mailto:Stephen.Wallbank@networkrail.co.uk)>  
**Sent:** 11 January 2021 13:38  
**To:** Clerk <[clerk@minsterworthparishcouncil.org.uk](mailto:clerk@minsterworthparishcouncil.org.uk)>  
**Subject:** RE: additional points that need to be addressed re new station

OFFICIAL

The list of concerns raised by John Francis is a good summary of the complexity of creating a new station, even something which is on the face of it small and simple will inevitably run into many millions before the first train uses the station. Also, the list is by no means complete, one significant cost will be the compensation payable to existing freight and passenger operators if they are unable to run trains for any reason during the construction period .

Network Rail can answer almost all of the questions raised, at any given time they are dealing with many proposals for new stations indeed currently there are several ideas in South Gloucestershire. Because of the workload involved, Network Rail don't do anything before an up-front payment, I would estimate that for them to provide a detailed scope and quotation would cost perhaps £150k, and my personal guess of the total scheme costs would be perhaps in the range £20-£30m.

If you would like me to put some wheels in motion, just ask.

Steve

**JOHN FRANCIS:**

What assessments have been made on the capital cost of building a new station?

Land acquisition, extensive Civil engineering works for a Station & footbridge build, including approach roads, car & bus parking/pick up drop off - where do they plan to build it? Noting that any proposed station will need to provide 'step free' & be Disability Discrimination Acts 1995 and 2005 compliant – See Gloucester station as an example .....A large building / area.

Who have FODDC consulted regarding the required physical railway infrastructure works? possible track-laying/track geometry/gauging changes - signalling & power & control system provision?

The area is on a known flood plain close to the River Severn - any proposal site will require extensive Geotechnical investigations (GI), Fluvial modelling before any detailed Railway network capacity modelling could be undertaken - the location of the fixed station is pivotal in understanding cost.

(I'll see what I can dig out re SSSI etc for that stretch of line too).

furthermore;

Has the question been asked regarding is there enough capacity in the timetable to facilitate a (feasible) stopping service at any proposed new station?

What Engineering analysis and technical appraisal has been undertaken to verify a safety case for any new infrastructure? such assessment would include things like; axle loading, existing structure suitability (Over bridge). Any new passing loop requirements (is there pace). Station platform configurations, information systems, station lighting & waiting shelter requirements....

The cost of design and implementation of any new / reconfiguration infrastructure (toward Gloucester / Lydney) will be substantial, adding a new station may require a major re-signalling - it's on public record the cost of re-signalling - they run into multi millions!

(FYI the area to Lydney is signalled from Gloucester & from Lydney onwards by Cardiff so it is spanning two signalling control centres that will need to be updated),

What assessments have been undertaken re passenger demand at a new station...who'd use it? there would need to be a good payback & economic benefit.

A long way to go & a lot of lolly to be spent before FODDC start offering a new station in my view.... You can't just plop a couple of platforms either side of the track and hope Ivor the engine stops!

## Annex 11: Freedom of Information Request, Appeal Response

Subject: FOI Request - FODDC - FOI/000388

Date: 2021-01-27 11:34

From: "Freedom of Information (FODDC)" <[foi@fdean.gov.uk](mailto:foi@fdean.gov.uk)>

To: FODDC Churcham Parish Council Clerk <[Clerk@churchamparishcouncil.org.uk](mailto:Clerk@churchamparishcouncil.org.uk)>

Dear B Jelf

Further to your enquiry, and initial request in respect of the Issues and options consultation I hope the following will be helpful. At the time of the Issues and Options consultation, the concept of a possible new settlement was just that and it was not until early 2020 with the call for sites that significant development proposals were received in respect of the new LP. There was until the SHLAA of 2020 no third party proposal for major development in this area, though some were received for other areas such as near Huntley as part of the Issues and options exercise. All representations are either contained in the Issues and Options responses or are plotted with the SHLAA sites as previously referenced.

Informal discussion with members has taken place about the form the new LP might take and the possible scale of any development required since 2018, and members had received presentations and studied the possible vision (issues) that the new LP may need to embrace.

We have copies of the various SHLAA submissions and though these are mapped and summarised in the published reports can make copies of these available. I attach the representation received in relation to land at Highnam/ Churcham.

After the closing date for current representations in respect of the preferred option we will publish all the material received and some time later the FoDDC responses to each of them.

All the Issues and Options representations received were published in 2019 and have been accessible since November 2019, so I apologise for any misunderstanding. To access these please see below:

"1) Issues and Options consultation, 2019. This is available at <https://www.fdean.gov.uk/planning-and-building/planning-policy/emerging-local-plan/emerging-local-plan-issues-and-options/>

There is the document that was the subject of the consultation, a summary and a link to the consultation page. This link when opened will take you to the consultation document to which responses are added:

Opening the document, (read and view documents) then gives a view with "view comments" in the top right. Select this and a summary of the comments is available with the FoDDC response. To see scanned versions of the comments, click on the pdf symbol under attachments. If this is not visible then all the material received is contained on the page already open."

"2)SHLAA- responses to call for sites. These are third party responses to the call for sites and result in a register of sites that may have development potential, though they may not presently or ever be supported by planning policy. They are tendered sites considered technically to be able to be developed.

<https://www.fdean.gov.uk/media/0x1brwj4/strategic-housing-and-land-availability-assessment-2020.pdf>

is the 2020 sites and provides a link to mapped information from the table in the document. Earlier reports may be viewed from the previous page, <https://www.fdean.gov.uk/planning-and-building/planning-policy/strategic-housing-land-availability-assessment/>

These contain all the published information."

If you are unhappy with the service you have received in relation to your request and wish to make a complaint you should write to the Monitoring Officer, Forest of Dean District Council, Council Offices, High Street, Coleford, GL16 8HG.

If you are not content with the outcome of your complaint, you may apply directly to the Information Commissioner for a decision. Generally the ICO cannot make a decision unless you have exhausted the complaints procedure provided by the Council. The Information Commissioner can be contacted at: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Kind regards

Freedom of Information Team  
Forest of Dean District Council

-----Original Message-----

From: FODDC Churcham Parish Council Clerk

<[Clerk@churchamparishcouncil.org.uk](mailto:Clerk@churchamparishcouncil.org.uk)>

Sent: 14 January 2021 11:11

To: Freedom of Information (FODDC) <[foi@fdean.gov.uk](mailto:foi@fdean.gov.uk)>

Subject: Freedom of Information request

Dear Sir/Madam

Thank you for your response to our FOI request for information on the decision made by council on the 'preferred option' and

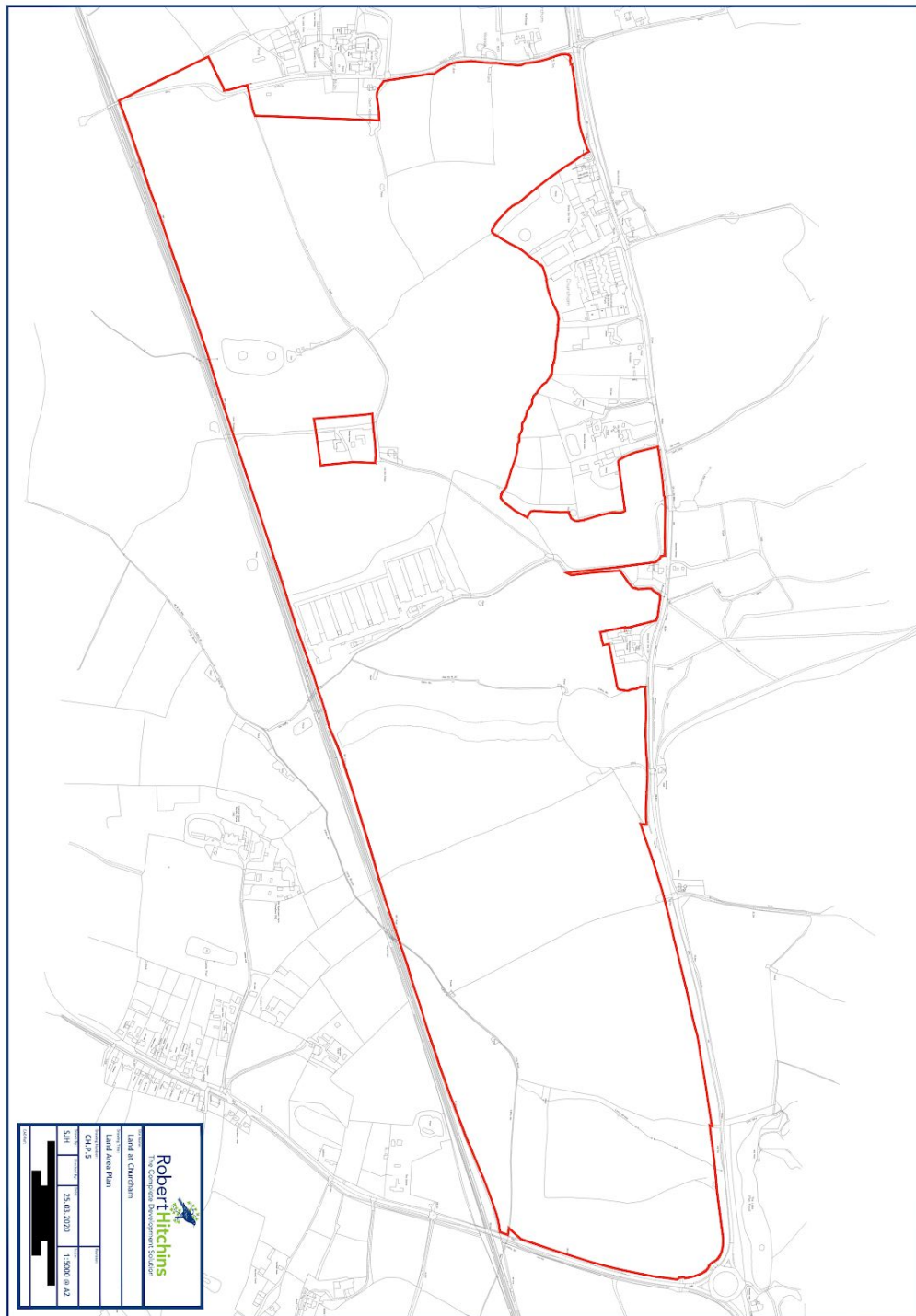
its location in the churcham area. furthermore, we asked for details of the breakdown of the information provided in the 'issues and options' consultation which ended in September 2019. That consultation has ended so we are at a loss to understand why we have to wait until the present consultation is over to receive any details from yourself. I would like to point out that your submission that all the information is already in the public domain (via the website) is incorrect, FOI requests cover ALL the correspondence and background interaction emails, meeting plans, minutes of meetings, meeting requests and responses. The information you have provided is no way comprehensive as a FOI request should be. So can we reiterate that we would like to be supplied with the correct information which is our legal right.

Yours faithfully

B Jelf

Clerk Churcham Parish Council

Attached Files sent from FODDC in email to  
[Clerk@churchamparishcouncil.org.uk](mailto:Clerk@churchamparishcouncil.org.uk) at 2021-01-27, 11:34:



*“Location Plan CH\_P\_5 25 march 2020.pdf”*



### Background

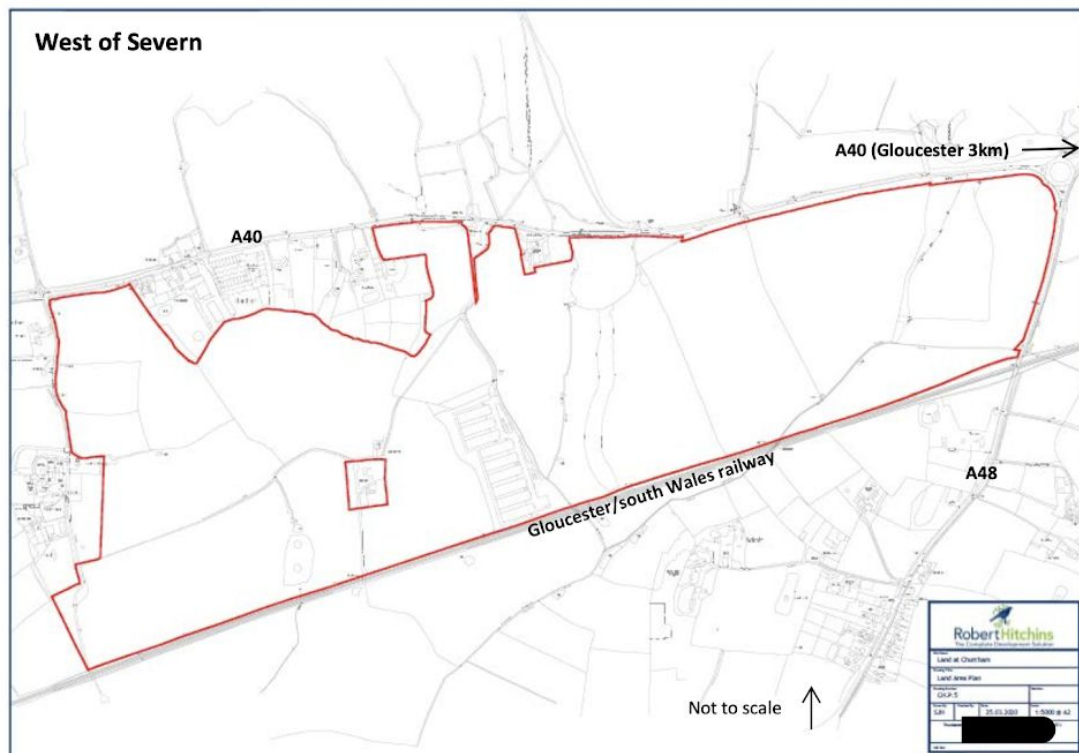
The Joint Core Strategy (for Gloucester Cheltenham and Tewkesbury) and the Forest of Dean Local Plan are both under review. These will set out planning policy for the next 20 years across the two plan areas and identify additional development land required to meet needs arising over this period.

The residual housing requirement for the Forest of Dean to 2041 is likely to be in the region of 4,000 homes whilst within the JCS area the residual housing requirement, taking into account the current JCS shortfall of around 3,500 homes is likely to be in the order of 22,000 new homes.

In addition both plans have to ensure that sufficient land is identified for meeting economic objectives over this period.

This presents quite a challenge in terms of identifying where development can be located that will achieve the economic, social and environmental objectives of sustainable development.

Land to the west of the River Sever at the confluence of the A40 and A48 as shown below presents just such an opportunity.



### The Proposal

West of the Severn comprises 176 ha of land (75ha within Tewkesbury Borough and 101ha within Forest of Dean District) to the west of the A40/A48 junction, immediately to the north of the Gloucester/Cardiff rail route. This is a key nodal point on the main transport corridor linking the Forest of Dean with Gloucester and Cheltenham and is capable of benefitting from and enabling improvements to existing public transport services including the provision of a park and ride site. The potential for a new train station will also be investigated.

Proximity and accessibility to Gloucester by means other than the private car is provided by an existing dedicated bus lane along the A40 and cycle link, which with the proposed P&R site point to the potential for achieving a significant modal shift.

The opportunity has capacity for around 4,000 new homes, a business park, together with all the services, facilities and infrastructure necessary for a successful new community. It is mostly in the control of a highly experienced commercial and residential developer/promoter with a proven track record of delivering strategic mix-use sites within the County.

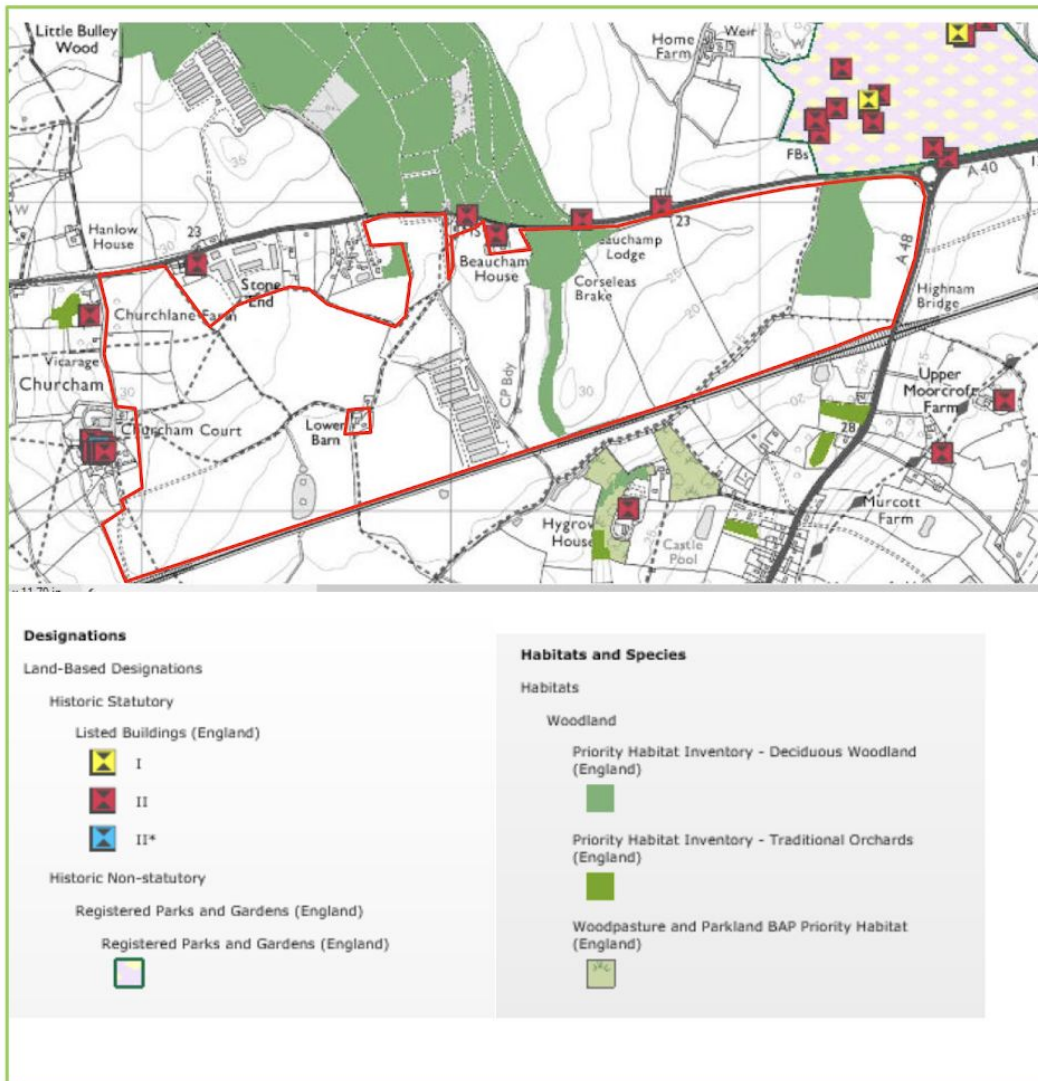
It is expected, given the potential outlets that this site could deliver around 200 new homes per annum. Assuming planning permission is granted in 2023 then the site would be substantially completed by 2041.

### Delivery Timeline

When	Event	Comment
late 2021	Planning application submitted	
Summer 2023	Planning permission granted	
Summer 2027	First home completed	
2028 - 2041	2600 homes completed	@200 dwellings pa
2048	Development completed	@200 dwellings pa

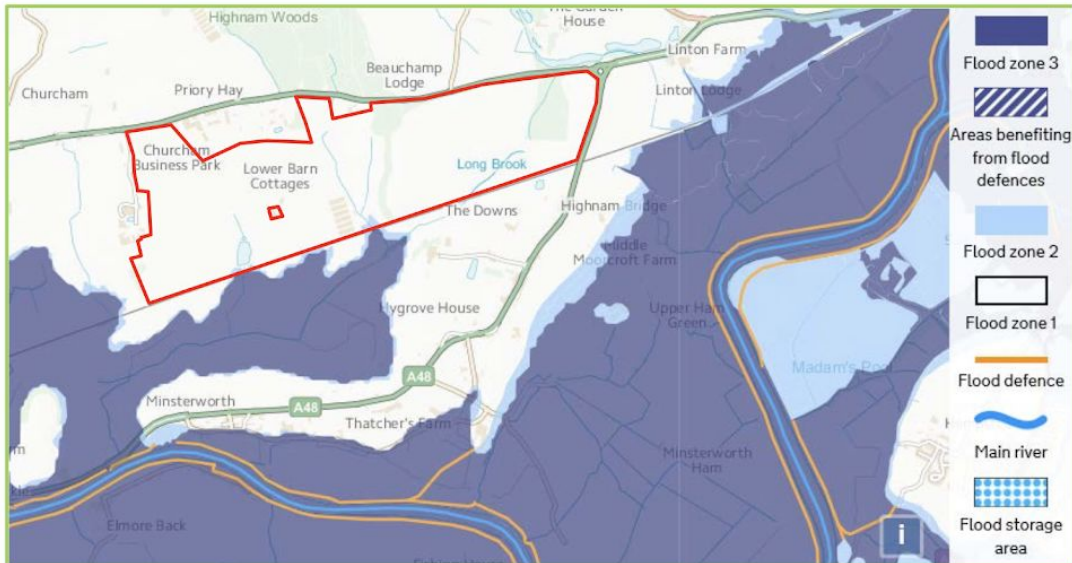
The above is a realistic estimate of timescales based on RHL's recent experience in delivering strategic sites

## Environmental Context

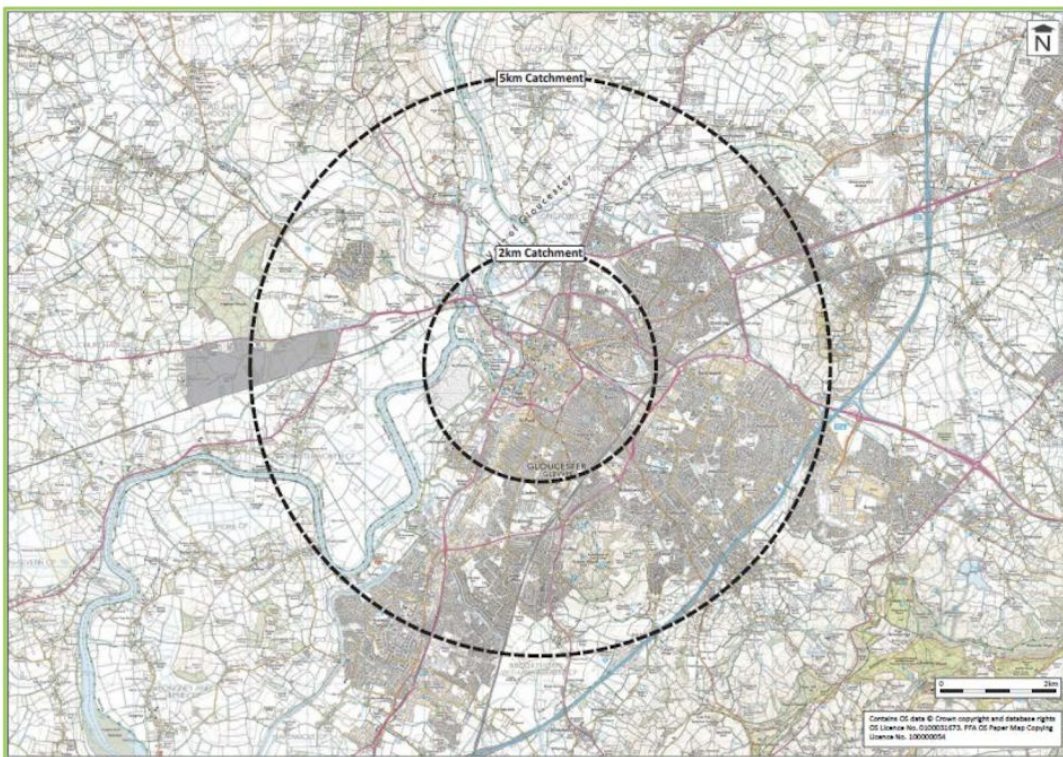




## West of Severn



## Transport and Access

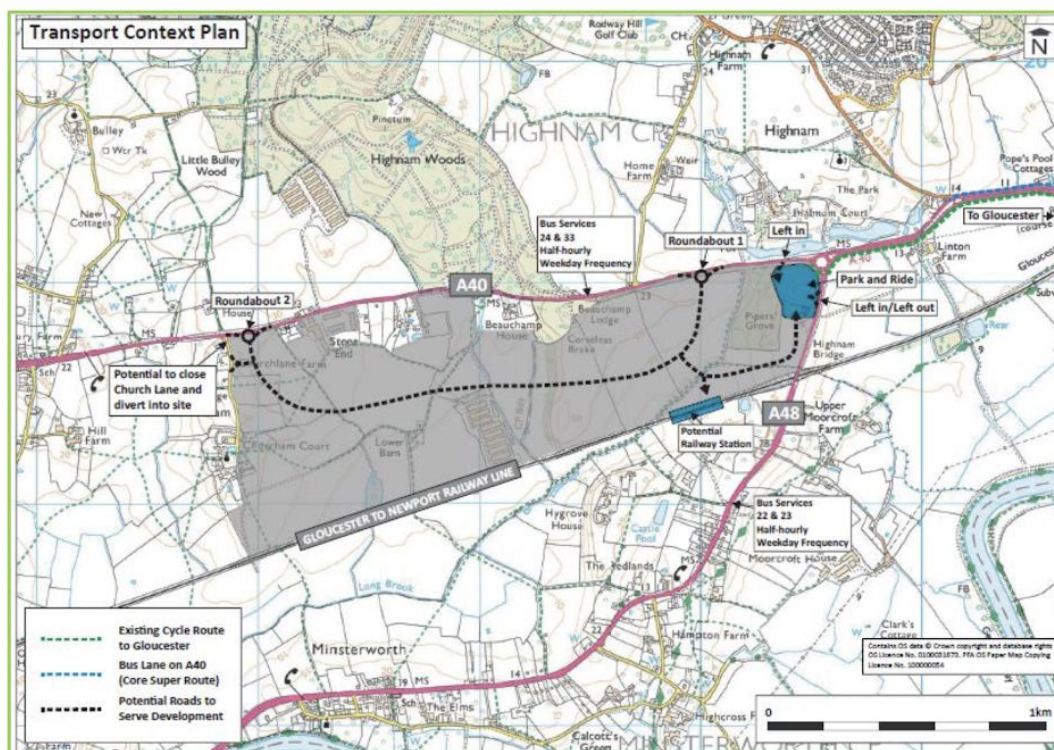


As illustrated above West of Severn is closer to the centre of Gloucester than options to the south and east of the City and therefore is a sustainable choice for future development.



## West of Severn

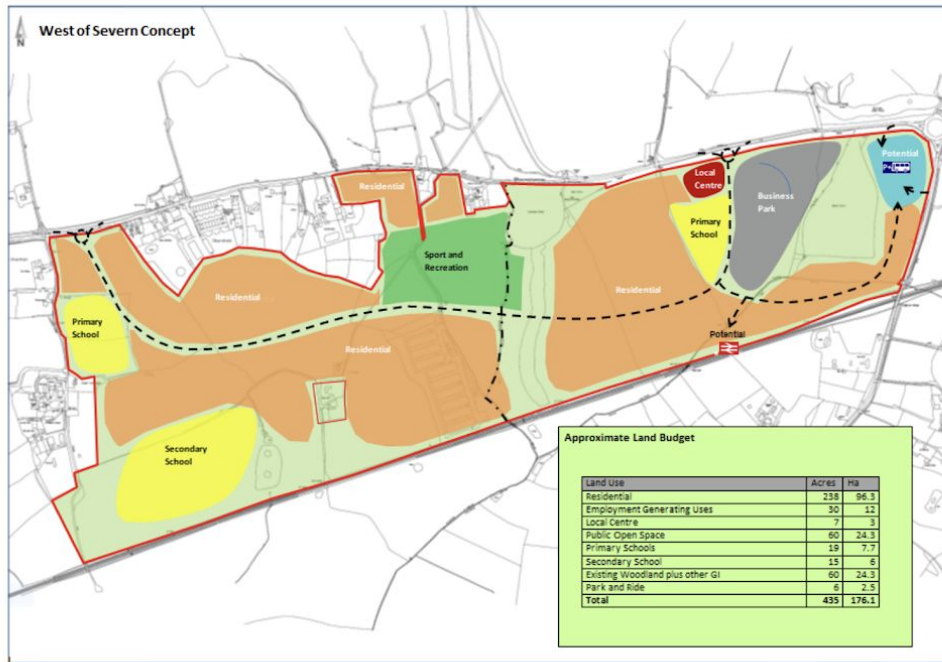
The West of Severn proposal can be integrated with existing transport infrastructure which can be further improved to provide for modal shift; both by new residents and for those already using the A40/A48 and travelling from further afield and thus help address the climate change emergency.



## Emerging Concept Plan

Having regard to constraints and opportunities a concept plan has been prepared showing how around 4,000 dwellings, a business park, local centre, schools, a park and ride facility, sport and recreation facilities and other green infrastructure could be accommodated. A broad land budget is set out below.

Land Use	Acres	Ha
Residential	238	96.3
Employment Generating Uses	30	12
Local Centre	7	3
Public Open Space	60	24.3
Primary Schools	19	7.7
Secondary School	15	6
Existing Woodland plus other GI	60	24.3
Park and Ride	6	2.5
<b>Total</b>	<b>435</b>	<b>176.1</b>



### Vision

To achieve a sustainable development that addresses the climate change emergency where access to higher order facilities and services can be readily achieved by means other than the private car and provides all the services, facilities and infrastructure necessary for a successful new community.

### Summary and Conclusions

West of Severn has capacity for around 4,000 new homes, new jobs and all the services, facilities and infrastructure for a successful new community.

It is mostly in the control of a highly experienced developer/promoter and can help meet needs arising within the Forest of Dean and the JCS area in the period to 2041 and beyond.

The concept plan demonstrates how environmental resources can be taken into account and where appropriate integrated into the development enhancing both the resource and the development.

West of Severn is located around three miles from the centre of Gloucester with considerable potential for existing access to be improved to provide access to higher order facilities and services by means other than the private car.



## 2020CALL FOR SITES

### Strategic Housing and Economic Land Availability Assessment(SHELAA)

#### For the Forest of Dean district

Please use this form to provide information on sites within the Forest of Dean district that you would like to suggest for future development. For a form to be accepted it is not necessary to complete all details, but the more information you provide the easier it will be for us to understand and assess a site.

All submissions must be accompanied by a map showing the site boundaries at a scale of **1: 1250**. This map should be clearly legible and have an Ordnance Survey base. If you are submitting multiple sites, you will need to submit a separate form and map for each.

Please note that not all sites we receive will be considered appropriate to be included within future planning policy documents / plan. This is particularly the case where a site is less than 0.2ha or heavily constrained.

Personal details	Agent details (if applicable)
First Name:Phil	First Name:
Last Name:Hardwick	Last Name:
Job title:Head of Planning	Job title: (where relevant)
Organisation:Robert Hitchins Limited	Organisation: (where relevant)
██████████	Address Line 1:
██████████	Line 2:
██████████	Line 3:
██████	Line 4:
██████████	Post Code:
██████████	Telephone:
██████████████████	Email:

Please send completed form to: [localplans@fdean.gov.uk](mailto:localplans@fdean.gov.uk) Or post to: **Local Plans** Forest of Dean District Council, High St, Coleford, GLOS, GL16 8HG

All information supplied to the council will be available publicly through their website.



I am... (please select which ones are relevant)	
Owner of the site	Planning Consultant
Parish Council	Land agent
Local Resident	Developer
Amenity/ community group	Registered social landlord
Other (please specify): Promoter/Developer	

Site information	
Site location (Name, address and postcode)	Land south of the A40, Churcham
Total site area (in hectares)	176 hectares (of which 101 ha are within Forest of Dean District, the remainder is in Tewkesbury Borough and details are also being submitted pursuant to its 'call for sites'.
Developable area (in hectares)	See attached additional information
Has the site been considered in a previous year? (provide reference if known)	No
Current use of the site (E.g. Vacant, agriculture etc.)	Agriculture
Has the site been previously developed?	No
Access to site (vehicle and pedestrian)	See attached additional information
Local facilities	Will be provided as part of the proposed development - See attached additional information
Designations? (AONB, SSSI, Special landscape area etc.)	None
Current planning status: (include reference numbers if known)	-

Proposed future uses and capacity		
Circle one of the below:		
Housing Land	Employment land	Combination- housing & employment
Use:	Basic information: (Area/ number of units/ floor space etc.)  In summary around 4000 dwellings, 12 ha business park, local centre, schools, associated social and community infrastructure, park and ride site and possible site for railway station.  See attached additional information.	

Please send completed form to: [localplans@fdean.gov.uk](mailto:localplans@fdean.gov.uk) Or post to: **Local Plans** Forest of Dean District Council, High St, Coleford, GLOS, GL16 8HG

All information supplied to the council will be available publicly through their website.

"2020 SHELAA form.pdf"

## Annex 12: Email requesting clarification on Settlement Options

1/28/2021

Gmail - Fwd: Note from Hannah Freeman to your Facebook Page Chris McFarling



Your Say UK <infoyoursayuk@gmail.com>

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### Fwd: Note from Hannah Freeman to your Facebook Page Chris McFarling

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**hannahfreeman1994@gmail.com** <hannahfreeman1994@gmail.com>  
To: Your UK <infoyoursayuk@gmail.com>

Thu, Jan 28, 2021 at 7:55 PM

Sent from my iPhone

Begin forwarded message:

**From:** Chris McFarling <chrismcfarling@phonecoop.coop>  
**Date:** 21 October 2020 at 11:30:11 BST  
**To:** [hannahfreeman1994@gmail.com](mailto:hannahfreeman1994@gmail.com)  
**Subject:** Re: Note from Hannah Freeman to your Facebook Page Chris McFarling

Thank you Hannah.

please can I make it absolutely clear before chinese whispers take hold. These 3 suggestions for the location of a new settlement are not exclusive. Other sites and locations may well be offered during the consultation period.

I have received numerous emails confirming that people have read the report and understand the decisions made and are not confused. The locations being explored will take advantage of their proximity to Gloucester and Cheltenham. As the report indicates, creating sustainable transport infrastructure is key to making the settlements themselves low carbon and sustainable.

I hope this helps. Please use the consultation to make further comments.

kind regards,

chris

On 21 October 2020 at 11:13 [hannahfreeman1994@gmail.com](mailto:hannahfreeman1994@gmail.com) wrote:

Hi Chris,

Thank you for making it clear that the three settlement options are; Elton corner, Minsterworth & churcham!

I think this needs to be clearly communicated as there is much confusion across the district, especially as churcham is the only location referenced on reports!

We are all in agreement that new houses need to be built. I believe that we should spread the new builds across the Forest of Dean district to support all of our towns and villages. Building a new settlement on the edge of the district will result in people going straight into Gloucester and Cheltenham; supporting their economies! This will have a detrimental effect on the Forest towns and will see their footfall drop dramatically and they will just continue to die out!!

Thanks, Hannah

<https://mail.google.com/mail/u/0?ik=9ddcf424bd&view=pt&search=all&permmsgid=msg-f%3A1690161603316699893&simpl=msg-f%3A16901616033...> 1/3

1/28/2021

Gmail - Fwd: Note from Hannah Freeman to your Facebook Page Chris McFarling

Sent from my iPhone

On 20 Oct 2020, at 21:40, Chris McFarling <[chrismcfarling@phonecoop.coop](mailto:chrismcfarling@phonecoop.coop)> wrote:

Thank you Hannah.

Apols for not making it clear. The broad area in Churcham Parish, Elton Corner and Minsterworth were considered for their potential. In the reports Churcham is suggested as having potential but no decision has been made to confirm this. More work needs to be done on each of these potential locations and those received through the consultation.

I accept that most readers would have assumed that the new settlement would go to Churcham. I was at pains to clarify that during the meeting and to remind councillors that no decision had been taken on any location, only that Churcham had come out well when tested against the strategic criteria. It's all in the report.

Whatever decision is made will elicit objections and that is understandable. However, we do need to make a local plan and fit in the required housing numbers given us, otherwise the plan will not go through and then developers will develop where they like.

I hope this helps.

I have received many many calls on this and it is difficult answering everyone comprehensively. I know this is important so urge you and others to contribute through the Local Plan consultation please.

kind regards,

chris

On 20 October 2020 at 15:58 [hannahfreeman1994@gmail.com](mailto:hannahfreeman1994@gmail.com) wrote:

Hi Chris,

Thanks for the quick response.

I am getting slightly confused;

1. It is stated that there is three potential areas for the new development
2. In your email below you only mention two areas; Elton corner & Minsterworth
3. In the council reports it only mentions churcham as a potential settlement

<https://mail.google.com/mail/u/0?ik=9ddcf424bd&view=pt&search=all&permmsgid=msg-f%3A1690161603316699893&simpl=msg-f%3A16901616033...> 2/3

1/28/2021

Gmail - Fwd: Note from Hannah Freeman to your Facebook Page Chris McFarling

Please can you clarify the three areas being assessed for the new settlement?

Many thanks, Hannah

Sent from my iPhone

On 20 Oct 2020, at 14:59, Chris McFarling  
<[chrismcfarling@phonecoop.coop](mailto:chrismcfarling@phonecoop.coop)> wrote:

Thanks Hanna,  
a number of sites in the north and east of the district have been looked at with a high level assessment of the main criteria. These are broadly the areas between the A48 and A40, the Elton corner and Minsterworth areas. These were the ones chosen by councillors way back in early 2019 as possibilities. More work needs to be done to carry out a deeper assessment of their potential and we also need to wait for other locations that may be suggested through the consultation process before we get anywhere near a point of focusing on any particular location. These new suggestions will need assessing for their merits and disadvantages in their own right of course so that we can get a fair spread of potential sites and choose the one that best fits the criteria and does the least harm to our district and our residents.  
I hope that helps.  
Kind regards,  
chris

On 20 October 2020 at 14:03  
[hannahfreeman1994@gmail.com](mailto:hannahfreeman1994@gmail.com)  
wrote:

Hi Chris,

I am following the districts housing development strategy. I would like to understand which three areas are currently been assessed as a potential new settlement?

Many thanks, Hannah.

Sent from my iPhone

## Annex 13: Official Petition Submission - Agenda Item Request

We are getting in touch on behalf of Churcham Parish Council in response to the Forest of Dean District Council's Local Plan 'Preferred Option' 2021-2041.

A petition was launched by the Parish Council during the Public Consultation period. The petition has raised just over 6,000 signatures (as of 23/01).

As part of the Parish Council's response to the Public Consultation, we are submitting this petition to the District Council. Given the number of signatures amassed, we feel it legitimate to request the following:

- a) An Agenda Item at the next Full Council meeting in February 2021, to recognise public strength of feeling on the matter, and to debate the core issues associated with the petition (please see below).

Link to the petition:

[https://www.change.org/p/forest-of-dean-district-council-objections-to-the-development-of-greenfield-land-for-the-building-5000-houses-in-churcham?use\\_react=false](https://www.change.org/p/forest-of-dean-district-council-objections-to-the-development-of-greenfield-land-for-the-building-5000-houses-in-churcham?use_react=false)

### **Summary of the subject of the petition:**

A petition in response to the Forest of Dean District Council's Local Plan 'preferred option' 2021-2041.

The petition refers principally to the Council's 'preferred option' proposed settlement of 4,000+ houses at Churcham, and the implications of this for the Forest of Dean District as a whole.

The petition's aim is to raise awareness among people who live, work and study in the Forest of Dean and vicinity, to ensure people engage in the Council's public consultation on the matter, and where relevant, ultimately to gain their support in an objection to the 'preferred option' settlement plan.

The petition demonstrates significant strength of feeling on many counts.

A representation of ~6,000 signatures represents approximately 5% of the District population – and goes far beyond the 800 signature threshold required for Council consideration.

The petition demonstrates a breadth of perspectives for objection to the 'preferred option'.

Signatories cite:

- The economic implications of this development plan for the District at large, with a development on the Tewkesbury/Forest of Dean border irrefutably positioned to boost Gloucester's economy, while leaving Forest businesses further marginalised and cut-off



- The lack of transparency in the development of the 'Preferred Option'
- The environmental implications of building such a large settlement and disregard of brownfield sites across the District
- The insufficient infrastructure and amenities needed to facilitate a settlement of such scale
- The traffic and congestion – and therefore additional environmental – impact of a settlement at the identified location

This petition should also be considered a reflection of the weight that internet engagement has played in this consultation period – there have been few other avenues available to us.

In February 2020, a public meeting was held to discuss the Grange Court Eco Village plan for 6000 homes. This platform has been denied to residents regarding the Churcham settlement due to Covid 19. The digital equivalent should be held.

As I am sure you are aware, the Local Plan constitutes the most significant decision the District Council will take since its inception in 1973.

Thus, I hope due attention will be accorded to this petition.

Please advise us as to when and how the issues addressed by this petition will be discussed by the Council.