

Keynote - Core Strategy Options

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1 Introduction

1.1 These "keynotes" have been prepared to provide summaries of key evidence or approaches used or evaluated in the compilation of the Core Strategy. Taken together they provide a broad justification for the Strategy and illustrate some of the main reasoning behind the strategy.

1.2 The purpose of this keynote is to provide some background about how the Core Strategy was involved in the assessment of options. It should be read in conjunction with the Sustainability Appraisal material that itself considers a variety of alternative courses of action and their consequences. The options considered fall into two categories, those generated as a result of the consultation process and those primarily used for testing of the SA. Both have had an influence on the option finally chosen for the Core Strategy. Further information about the process is contained in the Statement of Consultation, and more detail about the options themselves is contained in the SA and in this keynote..

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2.1 The Core Strategy is required to consider a range of alternatives and to show their potential implications for the District. They have been evaluated as part of the preparation of this final submission. The alternatives considered should be overall strategies and not simply proposals to develop individual parcels of land. Alternatives that would mean that the resulting Core Strategy would not be able to provide the general scale of development found to be required are not considered here. A wider range of alternatives have however been evaluated for the purpose of the sustainability appraisal. These illustrate the impact of much greater housing provision, much smaller housing provision, a strategy based on economic development and one where new development is kept to a minimum in favour of the conservation of the landscape. Options that do not relate to spatial planning are not considered, and all are evaluated against prevailing advice and good practice, as contained in for example Planning policy Statements (PPS). Examples of the options which do not meet the general requirements of the national policy could for example include proposals to disperse development rather than distribution favouring most change at the towns and larger settlements. The evaluation of the options below takes into account their compatibility with present national guidance.

2.2 The Core Strategy was prepared at a time when the Regional Spatial Strategy was being drafted. The representations made and the responses to them reflect this. It is now the government's intention to revoke all Regional Spatial Strategies and so the issue of whether or not a Core Strategy conforms to its RSS is not now relevant. While the RSS for the southwest is not now going to proceed, the evidence on which it was based remains as such and the principles behind it largely remain in national guidance. The Core Strategy Forest of Dean has been prepared using as a background the evidence prepared for the RSS, and these options have been judged against that rather than the now redundant policies in the draft RSS.

2.3 The main alternatives that were considered in formulating this strategy, in addition to that of continuing with an approach similar to the outgoing Local Plan, are those which propose a sufficiently different approach to show up at the strategic level. The range of alternatives is best illustrated by reference to the following which is a summary of the main themes emerging from the consultation exercises:

- Greater dispersal of new development to larger villages/other towns within the Forest of Dean, including some named village locations
- More even distribution of new development between the three or four towns
- Emphasise the importance of the countryside
- Strategy over emphasises the importance of reducing out commuting

- There is a lack of emphasis on need to increase educational attainment
- Over emphasis on affordable housing provision
- Levels of housing proposed are excessive
- Insufficient housing is proposed in a particular location
- Policy regarding new tourism related development is too restrictive
- Continue with the present strategy

2.4 Some of the options considered were derived from consultations which have taken place during the evolution of the Core Strategy. Others have been used for testing as part of the SA process. The first main consultation centred around the identification of the key issues and options and the second around a first version of a "preferred options" paper. Following the broad agreement of the Issues and options, this preferred options consultation set out a distribution of new development based on the towns and with the majority of change being proposed in Lydney and Cinderford. The responses generally endorsed the approach set out in this document but a number of variations were suggested and also a small number of more radical alternatives. A second preferred options consultation produced similar responses to the first in terms of possible options. The range of consultees was equally wide, and additional more detailed questions were posed.

2.5 The options which emerged are summarised below together with their assessment as informed by basic sustainability criteria. Most of the options proposed by persons responding to the previous consultations relate to parts of the overall strategy and are suggestions for varying certain aspects of it. Many are suggestions that the strategy should enable a particular parcel of land to be developed and some justify this by explaining how the it should be amended to enable this and why it would be made sound as a result.

2.6 A number of representations were received that expressed an opinion about the suitability of the draft RSS, suggesting it should be modified. Options requiring major departures from the RSS are not covered in this document because the Core Strategy was written to generally conform to it and also because these also depart from national planning policy (for example in promoting highly dispersed patterns of growth). There is however a degree of latitude within this general conformity so more minor variations are considered. The view that the RSS did not provide adequately for the development of market towns or villages was expressed in a number of cases. With the revocation of the RSS, the test is whether the options proposed are consistent with national policy and the evidence base (including that prepared for the RSS).

2.7 In addition to suggestions that a different strategy should be followed, there were representations that related to single sites. Where these could have a potentially major impact on the overall strategy, they have been considered below. Where they

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relate however to individual small sites they have not been separately taken into account, though the general wish of the various respondents has been considered where stated (for example some promoting a single village site made clear their view that the balance proposed was too much in favour of the towns).

2.8 Generally there was much support for the concentration on the towns and the majority of the alternatives were variations on this theme. Some calls were made for greater dispersal including more development in the villages and this possible choice has therefore been evaluated alongside calls for a shift in the emphasis to one particular town or to a strategy that emphasised no single location.

2.9 The options proposed have been considered for inclusion as part of the Core Strategy or have been used to test the strategy. The implications of these options have to be considered in the Sustainability Appraisal. Several individual suggestions fall within the same overall theme and groups of individual suggestions that have the same potential effect on the strategy can therefore be evaluated together. Thus for example, options that support a greater dispersal of new housing in a particular area are evaluated as a general option for greater dispersal in the district as a whole. The generic options that are considered in the sustainability appraisal and those which are considered both to embrace the spatial consequences of those suggestions received during the consultation processes are:

Option A 'Development based on the 2005 Local Plan' An option identified at the earlier Issues and Options stage of the Core Strategy

To continue to identify all of the sites proposed in the 2005 Local Plan releasing the "phase three" housing sites when the strategic need for them can be established. This would be likely to meet the currently identified requirement and ensure that the release of land was controlled in relation to its need. The identified sites are still considered to meet the basic credentials necessary of new land identified for development and this strategy has been re assessed as part of the SA process. They are at the main towns and reflect the need to concentrate development in these locations. The scale of land allocated at Newent is more limited than at the others.

2.10 This option would meet the requirements of the Core Strategy in terms of the basic housing requirements and the overall pattern of development. It is compatible with the national guidance and respects the established settlement hierarchy. It is considered that a continuation of the Local Plan approach can meet the requirements of the Core Strategy both in terms of numbers and geographical distribution of change.

2.11 This was considered during the development of the CS on the assumption that the sites concerned would need to be appraised again as part of the SA process and that the adequacy of land supply would also need to be verified.

Option B 'Develop new portfolio of housing sites'. An option arising from the earlier issues and Options consultation.

To test and where appropriate identify a new portfolio of housing sites based on the overall needs of the area. This option could use existing sites and new ones identified in substitution for the present Local plan allocations which have yet to be taken up. All options would need to be tested by Sustainability Appraisal against other options. Given that the overall scale of the requirements for housing land is likely to be similar to that in the present Local Plan, and that the locations identified will need to focus on the towns the range of options may be limited. It could be further restricted by the way in which sites for particular uses eg housing need to be accessible to schools, shops etc. This option does however allow a re-appraisal of the existing portfolio of sites and could for example allow a degree of change between the towns. One reason why the balance between the towns is proposed as it is is the availability of land and another is the relative ease of access to some over others. These factors don't change in the short or medium term and therefore would still tend to suggest a distribution similar to the Local Plan.

2.12 As an option the introduction of new sites was considered- possibly as substitutes for the LP allocations. Alternatively the possibility of their introduction as additional sites was included. It is now considered that with two exceptions new sites will not need to be allocated, except as shown within the two proposed AAPs (Area Action Plans). The first possible exception is that relatively small sites in a few villages may need to be allocated. The second is that sites in existing built up areas that formerly could have been regarded as windfalls may be identified in advance to provide greater security of supply. These will in part have been identified in the SHLAA process.

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2.13 The option considered was really one which assumed that the existing LP major sites were not compatible with the Core Strategy. In practice, they have been subject to re assessment in the SA, and are considered the best option. Many now have permission and will deliver housing through the plan period. There is at present no proven need for adding to the available land supply.

2.14 To identify new major sites in addition to those already committed would risk an oversupply of land for housing. The option could however consider the substitution of sites for development. All of the Local Plan allocations are regularly reviewed to ensure that they are appropriate and deliverable. In addition, they have been assessed as part of the sustainability process and have been agreed as generally available under the SHLAA . The SA concludes that overall the pattern and location of the sites proposed for the Local Plan is appropriate for development. Although there may be some changes, for example in the case of the northern quarter of Cinderford. Here the strategy is to review the detailed location of some sites via the Area Action Plan. This may result in a new mix of sites within the overall scale of development envisaged for the town.

2.15 As part of the continuing review of the suitability of sites, alternatives are considered, and where appropriate, could be substituted as part of the DPD process. Similarly it is expected that new smaller (ie non strategic) sites will be identified as required, as part of the allocations DPD.. This will take place within the overall strategy and balance set by the Core Strategy.

2.16 The principles set out in this option, that sites need to be evaluated against the sustainability criteria have been applied, and while the main existing allocations are considered appropriate in scale and location, it is expected that the need for non strategic sites will be kept under review and will if required be proposed as part of the forthcoming Allocations DPD. There is presently no case for new large (additional) allocations.

2.17 The Core Strategy identifies various requirements for land for uses other than housing. These can be met under the proposed strategy which makes most allocations at the towns. This provision is in keeping with the overall provision for new development. Where specific sites have not been identified, such as in the case of certain retail provision, land is considered to be available mainly in the town centres of the settlements concerned. Retail allocations based on the needs described in the retail study ⁽¹⁾ will be made under the Allocations DPD and the AAP for Lydney.

1 GVA Grimley, 2008

Option C 'More even dispersal across towns' An option representing a number of submissions received during the consultation process.

This option broadly encompasses the desire expressed in some representations to consider development sites at a variety of locations around district but principally at the four towns. This option differs from B in that the strategic focus will not be based on the hierarchies as identified in the 2005 Local Plan but on a more even dispersal between the four towns. The scale of development overall need not change under this option, simply the distribution.

2.18 One option either implied by some representations or actually set out in others is that where a more even distribution of development is promoted between the towns. This is usually proposed as a tool to suggest that a particular site that is not presently allocated is brought forward. The Core Strategy proposes a distribution between the towns related to their capability to accommodate development in a manner that best achieves its overall objectives. These objectives emphasise the development of the south forest and identify Lydney as the most appropriate location for the greatest change. It identifies the regeneration needs of Cinderford and the relative constraints in Coleford. It also takes the view that Newent should be able to accommodate local needs but should not develop in any way that increases its role as a commuter settlement. This goal is also shared for the other towns but because of their greater self containment and potential to act together in a complementary manner, additional development is supported where there is identified capacity.

2.19 The 2005 Local Plan was based on the bulk of new development being directed to the four towns with the emphasis on the expansion of Lydney and Cinderford. There were smaller allocations in Coleford and Newent. The Core Strategy, having considered in greater detail the characteristics of the four towns and the movement patterns between them concludes that each has its strengths and opportunities and that a shift in emphasis is desirable in order to better focus the regeneration objectives on these. It is also concluded that there should be a strategy which concentrates on reducing the commuter role of Newent. As a consequence it places a greater development emphasis on Lydney, where there are greater opportunities for expansion and on Cinderford where the Area Action Plan and wider Business Plan is promoting a local regeneration strategy.

2.20 Representations received have suggested that there should be less differentiation between the towns and that Newent and Coleford should receive correspondingly greater allocations than proposed in the preferred option. These are

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in some cases supplemented by material that suggests additional sites that should be allocated, usually for housing. Others refer to the needs of a particular town not being met in the strategy as proposed and suggest alternative (usually additional housing) allocations.

2.21 In general terms, this option amounts to one of additional housing in Newent and Coleford and possibly less in Cinderford and Lydney. It could lead to a larger number of affordable houses in the first two towns. It is likely however that further housing in Newent would tend to increase commuting to Gloucester. Land suitable for housing is also in relatively short supply. In the case of Coleford, land for employment and housing is in relative short supply. It is also not as readily accessible as Lydney.

2.22 Because this option is derived from a number of representations, it is not possible to provide detailed information about the scale of development proposed. The representations themselves are in the main related to single sites that are not seen as being compatible with the preferred option.

2.23 This option does not take account of the different needs and characteristics of the towns. Generally, it does not give priority to the regeneration of parts of the district most in need and could lead to some forms of less sustainable development. In most cases the relevant representations are that an additional housing site should be allocated. It is considered that the objectives of the Core Strategy are more likely to be achieved with a spatial vision that recognises the differences and constraints of each of the four towns and also the opportunities. It is therefore discounted as being unlikely to deliver the necessary outcomes.

Option D 'Focus development in one town' - An option representing a number of consultation responses

The proposal in this option would be to focus most development in one of the four market towns with limited provision for development in the other 3 towns. This option considers the strategic implications on the district as whole and is not intended to identify a 'most appropriate' town at this point. It is an option that would enable economies of scale and could assist with the retention of services in one location.

2.24 The preferred strategy does to a degree already do this for reasons stated above. It is however designed to develop the towns in a complementary manner with the emphasis on Cinderford and Lydney. The representations received suggest

that a different focus should have been chosen. As with option C, it is often used to make a case for additional development at one particular location, and impinges on the other options by potentially changing the emphasis in the preferred option.

2.25 This option is considered to contrary to the overall strategy of the plan which is to develop the towns together for their mutual benefit. The service base they provide would be undermined if one town was to develop in such a way as to become dominant. The three towns together provide a much greater critical mass than any one does individually and in the case of Newent, the dominance of Gloucester would mean that it would always remain in its shadow.

2.26 The settlement pattern and the way in which the settlements function means that this option would be very unlikely to deliver the strategy or vision. It is the case that there will be the greatest scale of change at Lydney, but this will be complimented by a strong regeneration strategy in Cinderford, together with changes in Coleford and Newent. The present focus on two towns is considered a better way of achieving the objectives.

Option E 'Tourism focus to employment development' A theme suggested in a number of consultation responses

One theme emerging from the preferred options consultation is the case to develop tourism as a means to diversify the economy. Some responses suggested that the Core Strategy should place greater emphasis on this growing sector of the economy.

2.27 Representations received tend to suggest that the importance of tourism was under played in the Core Strategy. In response, the Core Strategy's policies have been strengthened to make clear the way in which tourism will be promoted. The main issue is the need to ensure that the area retains the benefits to be accrued from its visitors, whether in tourism orientated accommodation and attractions or in more general spending including that in the towns and villages.

Option F "Greater dispersal to towns and villages" A theme common to a number of consultation responses

Just as options for a greater dispersal amongst the four towns will need to be considered (C, above) so should the greater dispersal to towns and villages. It was suggested by a number of respondents to the previous issues and options exercise and was raised at earlier stages in the Core Strategy. It is presumed that the option is one where the scale of new development would remain the same.

2.28 The settlement pattern in the Forest of Dean is such that there are a number of large villages which are often quite closely linked and several offer substantial employment. The previous Local Plan and the Core Strategy place an emphasis on the development of the towns, while allowing for some further development in villages, according to their size and the services and facilities that are present. This in turn reflects national guidance.

2.29 Some representations call for a greater degree of dispersal. In some cases this is sought instead of any variation on the town based strategies discussed above and in others it is a more even dispersal to towns and villages that is sought. Often this case is made to support the development of a particular site in one village and may not have a major impact on the strategy as a whole. These representations may therefore be better considered at the stage when there is an allocations DPD and where particular small sites can be individually evaluated. Such an evaluation would need to be within the context of the overall strategy. This option considered here implies the need for a strategy which would allow a greater degree of dispersal than the preferred option. This seeks to provide for most growth in the towns, and to then have a proportional allocation over the larger villages for modest additional housing, while supporting employment. The preferred option is driven by the settlement hierarchy which takes account of the distribution of services and the way in which the settlements can interact.

2.30 Generally the dispersal of development is less sustainable than concentration and it can lead to an uneconomic use of resources. It is contrary to government policy. In its favour some of the local needs can be met (for example housing) and development can help to support services that are declining.

2.31 For the Forest of Dean and its distinctive settlement pattern the preferred option is based on looking at groups of settlements rather than individual towns and villages in order to recognise the way in which they can benefit each other. In the

larger villages a degree of change is expected and in some this may be quite significant as, for example, redevelopment takes place. The Preferred Option is based on an analysis of capabilities and interactions and seeks to achieve the best added value by ensuring settlements are considered together. It is not a strategy that supports the dispersal of development but does allow and indeed require development in the villages.

2.32 In addition to the representations advocating additional development or a re distribution of amount of development proposed in the draft RSS (mainly housing), there were several which did not support change of the scale proposed. Generally the level of new housing provision is supported by the prevailing evidence including that prepared for the draft RSS, the level of change in retailing by the Council's study and changes in employment by the capacity study and other research ⁽²⁾. The need for changes in educational provision are supported by the actions of the authorities themselves, underpinned by primary evidence of underachievement in particular in Cinderford.

2.33 The case for a different level of change is not established, and unless or until the current evidence changes, the scale of housing to be provided will not change. There is no evidence presented for the alteration of the retail nor a deviation from the employment strategy. Representations seeking a different scale of development in a way that implies the strategy would need to be changed cannot be entertained where it would make the Core Strategy incompatible with the prevailing evidence. Major alterations to the scale of housing provision or to the principles of the settlement hierarchy would do just this. Options that imply such a major change should not therefore be considered further.

Option G Employment focus

This option would promote a strong employment lead prioritising development for employment purposes above housing availability, housing affordability and rural character. The option would promote substantial infrastructure to support major employment development. Distribution would be based on access to major transport corridors.

2.34 In order to test the Strategy and to illustrate one possible alternative approach, an option whereby employment uses are promoted above others has been tested for the sustainability appraisal. The preferred option is one where a balance of

2 eg Marketing and Workspace Study, 2008 in Evidence Base

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development is sought and the overall focus is on employment, housing and other services. The district is one that it is not able to compete with more accessible locations as a location for certain types of employment and does not have the infrastructure required for major development. Environmental constraints also would limit certain possible courses of action under this option.

Option H Increased housing numbers

This option would increase the housing provision within the Core Strategy by at least 50%. The option would focus on bringing the most suitable and deliverable locations based on access to transport corridors.

2.35 Evidence of the likely future requirements for housing suggest provision at the level proposed in the strategy. Beyond this the likelihood would be that a large amount of in migration would be implied and that the balance between housing and employment would be further tipped to a situation where a high level of commuting was sustained. It was been suggested during consultation that the proposed level of new housing is too low. The scale of increase sought varies, often in step with the opportunities thought to be able to be offered by a particular site. An increase of the housing provision by 50% would require major new land allocations, and would lead to a less sustainable pattern of development. It may lever in some additional infrastructure to mitigate the impacts of development but overall could also bring considerable environmental cost.

Option I Reduced housing numbers

This option would decrease the housing provision within the Core Strategy by at least 50%. The option would focus on bringing the most suitable and deliverable locations around the four market towns.

2.36 It has been suggested during consultation that the proposed level of housing provision is too high. This view is in contrast to one that there should be increased allocations in the district. The level of provision proposed in the Strategy is based on projections of changes in the composition of households already in the district and on the need to make some provision for some in migration. Although there are alternative forecasts which suggest a higher level may be needed, there are none that suggest the actual requirement will be much lower. While it is to be expected that the strategy will be reviewed during its life, there is at present no justification for

a major reduction in housing provision. Any review will take account of future requirements but will also need to allow for the current number of unimplemented consents. These include the entire east of Lydney development.

Option J Landscape character (small scale development)

In this option all development would be focused on maintaining the existing character of the district above other considerations. Preservation of the natural and built environment would be the strategic drivers. In this option development is expected to be small scale with a varied dispersal with small-scale development widespread with some larger scale development clustered in the least sensitive locations. Overall development rates and areas would be significantly lower than those proposed in any of the other options.

2.37 The option is one of restricting change in order to maintain the character of the district. The proposal would not deliver new housing in significant numbers nor new employment opportunities. It is likely that it would not address the imbalance in commuting, and it could become worse as more of the existing housing is taken by in migrants and is not replaced.

3 Conclusion

The preferred option

3.1 The strategy chosen is derived from that originally published as the preferred option, but has been modified on account of representations made and because of the findings of the SA at various stages. It is based on the fact that currently foreseeable needs of the area can be met on sites already identified, and that the appraisal of those sites indicates their continued suitability. Additionally the Core Strategy places great emphasis on revitalisation, with strong action plans for Cinderford and Lydney as a means to re focus these towns as locations for more diverse employment and as service centres. The outgoing Local Plan anticipated the need to re assess its larger housing allocations in the light of new information and this (principally the emerging RSS housing figures) confirmed that the available land could be used to meet the needs of the district over a longer period than originally anticipated in the Local Plan (which was written to provide the 1998 Structure Plan requirement). Although the RSS is now to be revoked, the forecasts that it used for the Forest of Dean are still considered an appropriate base for the future needs of the area. The later estimates of household formation prepared by Gloucestershire County Council in June 2010 bear this out. The changes originally planned for in the Local Plan will therefore take place but over a longer period and will be complemented by new town centre allocations, and better and more comprehensive delivery mechanisms in the form of the two AAPs.

3.2 The Core Strategy is much more explicit about the way in which development should proceed and its full implementation depends on the implementation of programmed and planned public investment as well as private investment following the spatial pattern in the Key diagram.

3.3 Within the overall strategy the part to be played by each of the towns is as follows:

3.4 In Lydney, there is the greatest focus on change with the completion of the new neighbourhood in the east, the delivery of related infrastructure and the new AAP addressing the town centre, and connections to the older employment areas. New more varied employment sites will be delivered as part of the new neighbourhood and the AAP area.

3.5 In Cinderford the focus is on delivery of a new mixed development and on the centre. A greater range of employment will be provided. The strategy will enable the delivery of secondary and further education in a manner that better reflects the needs of the area and uses as a key site the northern quarter.

3.6 In Coleford the focus is on enabling a more modest level of growth including changes in the town centre and additional housing and employment. There is potential for a greater service focus and for the town to benefit from tourism.

3.7 In Newent the emphasis is on locally based change within the town to provide a range of housing and employment and to maintain or improve the town centre.

3.8 In villages and in the remainder of the area, there will continue to be some change. This will be based on the principle that the best locations for new development are the towns and then larger villages according to the settlement hierarchy. The Core strategy upholds this hierarchy generally and detailed allocations will follow under a subsequent Development Plan Document.

3.9 The basis for the level of housing that is being planned for remains that contained in the latest figures used in the last version of the draft RSS, the 2008 Secretary of State's proposed changes. The evidence on which this has been based has been the subject of a public examination and is more up to date than, for example, the 2006 so called "option 1" which is the original figure proposed at the start of the RSS exercise.

4 Glossary

