

FRIENDS OF THE FOREST

c/o Hartlands, Hartland Hill, Nr Minsterworth, Gloucestershire
GL2 8JY

Tel./Fax 01452 750594

E-mail Secretary@friendsoftheforest.co.uk

Mr P Brown
Director of Policy and Planning
South West Regional Assembly
Dennett House
11 Middle Street
Taunton
TA1 1SH

Our Ref: 19012006/1

Your Ref: -

19th January 2006

Dear Mr Brown,

The Regional Spatial Strategy for the South West 2006 – 2026 **Regional Spatial Strategy – Draft 2.2**

Having read the latest draft 2.2 version of the RSS and its accompanying appendices, we would like to make the following observations.

The document appears to be coming together quite well, and should form a firm foundation for the South West's future over the next 20 years. We are pleased that while allowing for sustainable growth to be achieved the need to retain, preserve, and where possible enhance its high quality landscape, biodiversity, cultural, and historical attributes are recognised and promoted. As Friends of the Forest we are particularly interested that this should be so within the Forest of Dean District, and we thank the SW Regional Assembly for recognising the importance of the Forest of Dean District in these respects. Although the majority of the Forest of Dean has yet to be designated, we also note that the document identifies that with care small-scale economic activity is not incompatible with the statutory purposes of National Parks or Areas of Outstanding Natural Beauty. That aligns with many recent studies by others, and our view, that high quality landscapes can be the key to their sustainable high quality economic evolution and by so doing make an important contribution to the general well being of their residents.

Bearing this in mind, and with many good things in the document, we are therefore concerned that in a few instances it appears to still promote mixed messages with respect to the Forest of Dean. The first of these is in Clause 2.2.2 on the matter of economic gradient and deprivation in the Forest of Dean. As we highlighted in our 24th December 2005 (Ref. 24122005/1) letter, despite what some parties may claim about the Forest of Dean District in relation to employment, deprivation concentration, deprivation extent, income, it is in no way a deprived District. Even at Super Output Area level (each SOA being a sub-ward geographic group of approximately 1500 residents) of the 354 English local authorities, unlike other Gloucestershire Districts, in Multiple Deprivation Indices terms, the District does not have a one SOA within the lowest 20th percentile (the most deprived). For completeness to illustrate how the Forest of Dean District compares with the rest of Gloucestershire over the whole range of domains, we repeat below Table 3 from the note (*Friends of the Forest, The Forest of Dean District, A 2004 Rational Approach to Planning its Future, November 2005 Update, Prof. Laurence Moseley & Colin Evers*) that accompanied the letter.

Table 3. Gloucestershire's More Deprived SOAs (i.e. The number of SOAs within England's 20 % lowest ranking SOAs – 2004 ODPM published data)								
County District	IMD	Income	Employment	Health Deprivation & Disability	Education Skills & Training	Barriers to Housing & Services	Crime & Disorder	Living Environ.
Cheltenham	7	8	6	2	12	0	15	11
Cotswold	0	0	0	0	0	20	0	1
Forest of Dean	0	0	0	0	6	17	1	4
Gloucester	17	18	12	9	15	3	18	28
Stroud	0	1	0	0	3	4	1	6
Tewkesbury	0	3	1	0	2	9	1	18

The myth that the FOD is a deprived area is again alluded to in Clauses 4.2.2 and 4.2.29 (SR6) where it states that there is a need for economic regeneration of the Forest of Dean towns; and the whole matter is reiterated via the statements made in Annexe 1 Clause 6.1 SR6 – Forest of Dean Towns. We accept that there are problems over access to services but that is typical of a rural area.

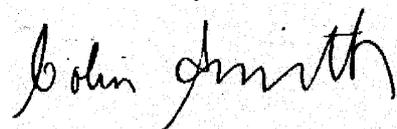
While we would be happy to see daily commuting out of and into the Forest of Dean District reduced, with further high intellectual property sustainable employment provided within the District, it is wrong to claim current levels to be either regionally or nationally excessive. To demonstrate this, WM Enterprise Consultants in their November 2003 report on the Forest of Dean District reported that of its 48000 employed residents, around 12000 people commute daily to work out of the District; i.e. 25%. By contrast, though, the University of Leeds in a report they produced following the 1991 Census studied the whole UK population. They showed that on average, even then, a total of 59% of workers in the mixed rural or predominantly rural parts of England were commuting to work outside of their districts each day; i.e. nearly twice the percentage value that in 2003 were commuting out the FOD District.

Nor is the Forest of Dean District suffering abnormal levels of unemployment. Latest released data (November 2005), show that in terms of claimant count by local authority district, the Forest of Dean District had a total of 709 persons out of work. This was 1.5% of the working population, and was the same in percentage terms as Gloucestershire as a whole, which was then the 33rd least affected by unemployment of a total of 203 counties/unitary authorities.

Finally, a word about income. Much play has been made in recent years that the Foresters earn less than in other parts of Gloucestershire. Looked at simplistically, that could be inferred, but it not a correct picture. An examination of incomes range reveals that compared with other parts of the County the salaries of persons in the Forest of Dean are in a narrower band, and in percentage terms, there are both fewer very low earners and very high earners. Consequently, the mean curve value is skewed towards a slightly lower value than that for Gloucestershire as a whole. Proof that the Forest of Dean District has a smaller percentage of very low earners can be seen in the income column of the Gloucestershire's Most Deprived SOAs table (see above). It shows that of 30 SOAs within the bottom 20 percentile (i.e. the most deprived), not one is in the Forest of Dean District.

None of these data are therefore indicative of the District or its "towns" suffering from demographic imbalance in comparison with other parts of England, the South West or Gloucestershire, and we seek that the RSS be altered to correct the misconceptions and inaccuracies.

Yours sincerely,



Colin Smith – Chairman, Friends of the Forest