



## View Comment

### Comment Information

<b>Document Section</b>	<a href="#">▶ Consultation Draft Joint Core Strategy</a> ▶ <a href="#">Chapter 6 - Delivery Policies</a> ▶ <a href="#">Policy D 1 - Infrastructure</a> ▶ <a href="#">Policy D1 - Infrastructure</a>
<b>Comment ID</b>	2338
<b>Respondent</b>	cllr.bernard.fisher@cheltenham.gov.uk
<b>Response Date</b>	11 Dec 2013
<b>Uploaded By</b>	Alys
<b>Current Status</b>	Accepted
<b>Response Type</b>	OBJECT
<b>What is the nature of this representation?</b>	Object
<b>Comment</b>	<p><u>Infrastructure</u>. In Chapter 6.1 it states, "Successful and sustainable communities and new developments depend on suitable physical and social infrastructure being in place to meet the needs of their residents. Businesses also need infrastructure to operate effectively and meet the needs of their employees. These needs include transport, utilities and waste, social infrastructure, environmental and green infrastructure, cultural, education, leisure, faith and community facilities. The type of infrastructure can range from major investments such as new schools, to support for community transport schemes." However, as at the end of the consultation date, we have no highways statement or plan, no proposal to develop Junction 10 of the M5 into a four-way junction, no 24-hour A &amp; E facility, an ambulance service that cannot meet response targets, a backlog of highway repairs and maintenance totally £80M plus, and no real visible reduction of these repairs in the near</p>

future. There is an over-subscription in many schools in Cheltenham and no flood assessment available or maps to indicate areas at risk.

**Supporting Documents**

**Submission Method**      Email

**JCS Comments**

**Recommended Changes**



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### Comment Information

<b>Document Section</b>	<a href="#">▶ Consultation Draft Joint Core Strategy</a> ▶ <a href="#">Chapter 4 - Core Policies</a> ▶ <a href="#">Policy E 1 - Employment</a> ▶ <a href="#">Policy E1 - Employment</a>
<b>Comment ID</b>	2340
<b>Respondent</b>	cllr.bernard.fisher@cheltenham.gov.uk
<b>Response Date</b>	11 Dec 2013
<b>Uploaded By</b>	Alys
<b>Current Status</b>	Accepted
<b>Response Type</b>	OBJECT
<b>What is the nature of this representation?</b>	Object
<b>Comment</b>	<p><u>Employment</u>. Policy E1 states "This Joint Core Strategy supports the provision of 21,800 additional jobs to 2031. These jobs will primarily be outside the traditional B class uses and may not necessarily have land requirements." It does not show any evidence of what these jobs will be, will they be high or low paid jobs, part-time or full-time jobs and bearing in mind that four out of five jobs today in Britain pay £8 an hour or less, where on the scale will these jobs fall and will the people in work be able to afford the housing suggested. The JCS is allocating "63 hectares of employment land in urban extensions, together with a replacement provision of 20 hectares at the strategic allocation (MOD Ashchurch)." but there is no evidence that it will be used for new jobs for local people. We cannot prevent people commuting, we have officers who live in other counties within our Local Authority and many Cheltenham people do no work in Cheltenham. Recent planning evidence in</p>

Cheltenham shows us that more and more B class employment building/land is being converted to housing, like Thirlestain Hall, the Kraft building, junction of High Street, Gloucester Road, the GCHQ Oakley site and Grovefield Way (a greenfield site of over 6 hectares in size with B class outline permission, that has been available for 7 years, and the only application so far has been to build a BMW dealership which will close other premises within the applicant's group and probably reduce their wage bill and create less than 50 new jobs, some of which will be low paid and part-time. We have had a Planning Informative from a strategic planning officer of Cheltenham Borough that on the remaining 4 hectares plus on this site, despite trying to get an exemption from the Government, it will be virtually impossible to refuse a planning application to build housing on it).

Unemployment currently runs at between 7 and 8% average, the Governor of the Bank of England, Mr Carney, states that if unemployment drops below 7% (projected by the Government for 2015/16) the bank would then consider raising interest rates which would have a profound affect on the ability of people to afford mortgages and an increase in interest rates to employers generally drives down employment. The JCS has used the basis of the RSS in its assessment of housing want, but the RSS was based on a growth in the national economy of around of 3.5%, nowhere in the JCS document does it give any evidence of a figure of growth in the economy that would make this document sustainable.

**Supporting Documents**

**Submission Method**      Email

**JCS Comments**

**Recommended  
Changes**



## View Comment

### Comment Information

**Document Section** [▶ Consultation Draft Joint Core Strategy](#) [▶ Chapter 3 - Strategic Policies](#) [▶ Policy SP 1 - scale of new development](#) [▶ Policy SP1 - Scale of New Development](#)

**Comment ID** 2341

**Respondent** [cllr.bernard.fisher@cheltenham.gov.uk](mailto:cllr.bernard.fisher@cheltenham.gov.uk)

**Response Date** 11 Dec 2013

**Uploaded By** Alys

**Current Status** Accepted

**Response Type** OBJECT

**What is the nature of this representation?** Object

**Comment** **Housing Need.**

This JCS document uses figures provided by the ONS which they say should not be used on the calculation of housing need, so there is no evidence here of an accurate nature. New figures from the ONS will not be available until after consultation ends!

**Supporting Documents**

**Submission Method** Email

**JCS Comments**

**Recommended Changes**



## View Comment

### Comment Information

**Document Section**      ▶ [Consultation Draft Joint Core Strategy](#) ▶ [Chapter 4 - Core Policies](#) ▶ [Policy C 3 - Affordable Housing](#)  
▶ [Policy C3 - Affordable Housing](#)

**Comment ID**                      2342

**Respondent**                      [cllr.bernard.fisher@cheltenham.gov.uk](mailto:cllr.bernard.fisher@cheltenham.gov.uk)

**Response Date**                  11 Dec 2013

**Uploaded By**                      Alys

**Current Status**                  Accepted

**Response Type**                  OBJECT

**What is the nature of this representation?**      Object

**Comment**                          **Affordable Housing.**

There is no evidence within the JCS document of how we will achieve affordable housing. Currently, accurate evidence shows that in over 60% of all major greenfield planning consents granted, developers have circumnavigated the affordability policy of the local authority by using District Valuer assessments of cost. We have no guarantee that we will get the right affordable housing within this plan.

### Supporting Documents

**Submission Method**              Email

### JCS Comments

### Recommended Changes



## View Comment

### Comment Information

**Document Section** [▶ Consultation Draft Joint Core Strategy](#) [▶ Chapter 3 - Strategic Policies](#) [▶ Policy SP 1 - scale of new development](#) [▶ Policy SP1 - Scale of New Development](#)

**Comment ID** 2343

**Respondent** [cllr.bernard.fisher@cheltenham.gov.uk](mailto:cllr.bernard.fisher@cheltenham.gov.uk)

**Response Date** 11 Dec 2013

**Uploaded By** Alys

**Current Status** Accepted

**Response Type** OBJECT

**What is the nature of this representation?** Object

**Comment** Conclusion. As a councillor, I am aware that my first responsibility is to those who elected me to their wards, but I would also like to look at the larger picture for the whole town because without a massive reduction in the number of houses proposed, Cheltenham will become unmanageable with regards to the everyday living of its current residents. It will be a sprawling, over-congested, polluted town, lacking in services and where no-one will want to live. We know that there will be a reduction in services provided by the local government, mainly through the reduction in funding from the present national government. There are insufficient guarantees that this document as it currently stands, will deliver the right solution for the needs of Cheltenham as a whole. If this JCS is adopted in its current form, all it will do is provide large developers with land banks and the County Council with the promise of a fat cheque if and when the developers decide



to build. Bear in mind, the lack of building in the last five years has not been caused by the lack of land available to the developers but by the lack of money to borrow and the lack of profit for developers. Remember, there were developments left half-finished when the money to borrow dried up.

**Supporting Documents**

**Submission Method**      Email

**JCS Comments**

**Recommended Changes**



## View Comment

### Comment Information

**Document Section** [▶ Consultation Draft Joint Core Strategy](#) [▶ Chapter 3 - Strategic Policies](#) [▶ Policy SP 2 - Distribution of new development](#) [▶ Policy SP2 - Distribution of New Development](#)

**Comment ID** 2344

**Respondent** [cllr.bernard.fisher@cheltenham.gov.uk](mailto:cllr.bernard.fisher@cheltenham.gov.uk)

**Response Date** 11 Dec 2013

**Uploaded By** Alys

**Current Status** Accepted

**Response Type** OBJECT

**What is the nature of this representation?** Object

**Comment** I represent Swindon Village as a Borough Councillor and Swindon Village and St Paul's as a County Councillor and I am on the Planning Committee for both Borough and County which indicates I have a special interest and knowledge of the planning procedures. The submission to the JCS consultation by the "Save the Countryside" group, led by Mrs Helen Wells, I fully endorse, and would like to make the following observations:

1. The NPPF has the golden thread of sustainability running through it. The JCS document presented to us is, we are told, evidence led but there is little evidence within it. It has projections and speculations based on certain things happening but no hard evidence.

I have not referred specifically to option sites, this has been more than adequately covered by "Save the Countryside" and David Iliffe, former chair of Swindon Village Parish Council, and I fully endorse their views. There is no need, in my opinion, to have the largest incursion into the Green Belt of anywhere in England on Cheltenham's doorstep.

Any of the options in this document as it stands at present, I believe, are unsustainable as outlined in the NPPF.

**Supporting Documents**

**Submission Method**      Email

**JCS Comments**

**Recommended Changes**