



JCS team
Cheltenham Borough Council
Municipal Offices
The Promenade
Cheltenham GL50 9SA

12 December 2013

Joint Core Strategy – consultation

1. I welcome the opportunity – for at least the third time – to respond to a consultation on the Joint Core Strategy. I made my previous submissions in February 2010 and February 2012 and other submissions to the old Regional Spatial Strategy consultations before that. I made the point in 2012 that a great deal had changed since the earliest consultations - a new government, the Localism Act 2011 and the abolition of Regional Spatial Strategies. But yet more has changed since February 2012. We now have a National Policy Planning Framework which – very significantly – committed planners to a presumption in favour not just of development, as had previously been the case, but in favour of **sustainable** development.
2. The final NPPF in March 2012 made it quite clear that sustainability was to be seen in environmental and social terms not just economic ones. The NPPF also included important tools like the Local Green Space (LGS) designation which councils were to use to protect those green spaces particularly valuable to local communities, especially urban communities. This was an expression of the government’s stated commitments to localism and to the protection of local environments. The Cheltenham, Gloucester and Tewkesbury Joint Core Strategy as presented for consultation ignores many significant policies set out in the NPPF, largely ignores environmental sustainability and does not propose a single LGS designation anywhere in the JCS area. I think this places the draft JCS in serious breach of the spirit and letter of the NPPF and, if it is to avoid challenge and rejection by the planning inspectorate as unsound at examination next year, then it needs major amendment.

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3. In February 2012, I also pointed out that many of the arguments made in my earlier submission – which were widely shared by elected representatives at all levels, community groups and members of the public – had not been reflected in the subsequent Joint Core Strategy documents. They still aren't. **In fact, it is pretty clear that public opinion has been completely ignored. It is also clear that the strongly expressed objections of local councillors of all parties have been ignored**, including those made with reference to the unsustainability of particular sites and of the overall numbers of houses planned and the inaccuracy of the modelling used. This again brings the draft JCS into conflict with the NPPF.
4. Once again, therefore, as well as answering the specific consultation questions, my submission addresses areas such as the appalling sustainability analysis, the accuracy of the models, the undermining of the Green Belt, the dismissal of consultations and conflict with national policy separately. Errors in the earlier sustainability analysis and pointed out in my February 2012 submission have been ignored.
5. Typical of the misdirection and doublespeak throughout the JCS documents is the claim on p12 that the plan will deliver “some peripheral development” for Cheltenham, consisting of “new developments set within attractive new green spaces”. On p14, the JCS document promises “the character of the rural area will be protected and enhanced” in neighbouring Tewkesbury borough which surrounds Cheltenham. In fact it plans a roughly 20% increase in the size of the town and since nearly 60% of the development around Cheltenham is intended for urban extensions on the green fields next to where thousands of people live and may well be undeliverable in practice, those new developments will either destroy hundreds of hectares of some of the most treasured and used green space in the county (a large proportion of it Green Belt) or blight them by turning them into little more than land banks for developers waiting for a housing market boom and desperately trying to minimise the amount of affordable housing they are forced to provide in the meantime.
6. As Member of Parliament for Cheltenham, my primary concern obviously has to be for my own constituency which does not include the northern parishes of Prestbury or Swindon Village but does include the southern parishes of Leckhampton and Up

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Hatherley. Since Leckhampton and Hatherley are both faced with large proposed urban extensions and include some of the best-loved and most fiercely-defended areas of green space, my evidence inevitably focuses on these more than other areas. But I would not want this to be interpreted as a lack of concern or support for other communities facing similar issues.

Yours sincerely

A handwritten signature in black ink that reads "Martin Horwood".

Martin Horwood MP
Member of Parliament for Cheltenham

Submission attached