



Consultation Draft Joint Core Strategy

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Answers to **4 key questions**

COMPLETE RESPONSE

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Public Profile

Name Cllr Roger Whyborn
Email whyborns@blueyonder.co.uk
Date 21 Nov 2013 12:09

Private Profile

Organisation	Councillor
Address 1	42 Fernleigh Crescent
Address 2	Up Hatherley
Address 3	
Town/City	Cheltenham
Postcode	GL51 3QL
Contact No.	01242231458

In addition to being involved in Gloucester, Cheltenham, Tewkesbury Joint Core Strategy, what other area(s) of planning policy would you like to be kept informed? Please tick the appropriate box (you can select more than one box)

Gender

Age

Ethnic Group

Ethnic - other

Do you consider yourself to have a disability?

Religion or Belief

Religion or Belief - other

Sexual Orientation

Sexual Orientation - Other

Question 1

Do you think our strategy of focusing on urban extensions (i.e. development sites located around Gloucester and Cheltenham) is the correct one? If not, where would you propose to locate the new development?

No. The main focus should be on new developments, though there is scope for small scale urban extensions, not only to Cheltenham and Gloucester, but co-terminous to smaller settlements, some of whom would like 50/100/200 houses depending on the village size. (e.g. Shurdington). Highnam has been suggested, but it is for officers to find the sites not me. The one dimensional focus on Cheltenham and Gloucester can only produce:-

- Lack of green space and lack of amenity for new and existing residents
- Strain on green belt
- Strain on infrastructure to intolerable levels, resulting in poor quality of life.

Question 2

Do you think that we have identified the right sites based upon the strategy mentioned in question Q1? If not, which other areas/sites would you suggest and why?

No, see above regarding alternative sites. Clearly the identification of Chargrove is highly inappropriate as this site has high status on the 2011 green belt review, done by Amec for the JCT team. It is coloured red on the maps and ticks most GBelt boxes. There is over-provision proposed in the draft around Cheltenham. (The JCS plan calculates that Cheltenham will need 10,000 new homes by 2031 out of a so called 'Objectively assessed need' of 33,200 in the JCS area. But when added up, all the proposed housing total at sites in and around Cheltenham comes to 10,849). I think this is unacceptable and unfair, the retention of Chargrove (795 houses) in the plan must be considered untenable at every level; given that the Chargrove site was a very late addition to the plan and represents a serious breach into green belt- there is a very good case for it being the first to go.

Equally there shortage of sites around the Gloucester Area of about 1000 homes, and this is where JCS officers need to focus their efforts to find sites.

I am not in a position to comment on the suitability of individual sites around Gloucester and Tewkesbury. Around Cheltenham, the Swindon Village/Uckington site needs moving further out to give significant green buffering from Swindon Village. The Leckhampton sites are problematic in terms of infrastructure, and the parish council's report on this by Dr Adrian Mears should be considered seriously. The areas within TBC to SW of Farm Lane should be returned to Green belt as suggested in the 2011 green belt review, done by Amec.

Local Green Spaces as in paras 76-78 of NPPF may be an appropriate way to designate green buffering and other 'green lung' local areas, particularly within the Swindon village/Uckington and Leckhampton areas, and no doubt some others. Whilst these may be arguably more appropriate to a local plan and/or master planning, it is important to depict these indicatively at the JCS stage. This is because it may be difficult to add them later, and doing so may affect the achievable housing numbers – so planners must be clear that the scope to incorporate LGSs and additional buffering is incorporated at the outset.

Question 3

Have we identified the right list of Rural Service Centres and Service Villages and is this the appropriate amount of new development for them?

I am not in a position to comment on the details of the rural service centres and service villages, but the import of my answers to Q1 and Q2 is that a higher quantum of housing and related employment land should be found in these locations, (unless it can be demonstrated the overall OAN figure is too high).

Question 4

Is there any aspect of the strategy that you wish to question or comment on as a result of additional or alternative evidence? For example, do you have alternative information or evidence for how much housing and employment should be provided, or what infrastructure is required to support the proposed growth?

There are problems within the strategy itself in terms of overall housing numbers:-

- a) over provision around Cheltenham see my answer to Q2
- b) Using the methodology and ONS datasets which were used in the JCS report, the objectively assessed need would be 28,500 houses over the 2011-2031 period across the whole JCS area, if the most recent population and household formation rates are used. However I believe the JCS authors' assumption of a partial recovery in household formations to a point half-way between the rates suggested by the 2008-based projection and those in the latest projections, the so called "partial return to trend", is much too optimistic given the slow return to growth in the economy, the environmental constraints on economic growth (e.g. the price of energy etc), and importantly the government's direction of travel on housing benefits (bedroom tax/spare room subsidy etc). It seems most unlikely that would be such a large "return to trend" in household formation etc. as to reach the half way point over the average of 20 years.
- c) The JCS calculations are based on interim population projections issued by the Office of National Statistics (ONS), dated 28th September 2012. www.ons.gov.uk/ons/rel/snpp/sub-national-population-projections/Interim-2011-based/index.html

However the ONS preface their report with the warning that their projections are known to over project the number of births at a national level, (and in some specific areas), and that caution should be used in the application of these projections for Planning purposes. My understanding is that newer figures will be available soon which are likely result in a lower projection, and that the difference is significant. At the time of writing it is not possible to fully quantify this nor say how soon new data would be available, but I believe this must be taken into account before completion of the final draft of the JCS.

It is clearly true that locally many young people, in particular, are struggling to find suitable housing and secondly I am keen to ensure brown field sites are developed first. It is far from clear how either of these issues are addressed by the draft JCS. A major concern in assessing the 'need' for housing is the danger that given Cheltenham is a popular location, increased supply may just attract more people to the area without meeting local need. The affordable housing policy will be key to addressing this but it is incomplete. There is also a woeful silence on the question of the infrastructure needed for the proposed developments. I am concerned that traffic implications, schools provisions and doctors'/dentists' provision must be properly considered – not to mention provision of open space and safeguard against urban sprawl.

Question 5

Do you have any further comments? If yes, please reference the section/ paragraph of the draft JCS you are referring to.

Question 6

If you're responding following attendance at one of the JCS events, please state which one:

Please select zero or more options.

Ashchurch Village Hall	[]
Leckhampton Village Hall	[Selected]
Bishop's Cleeve Primary School	[]
Innsworth Community Hall	[]
Shurdington Social Centre	[]
Cheltenham Regent Arcade	[]
Winchcombe Abbey Fields Community Centre	[]
Cheltenham Civil Service Club Uckington	[]
Brockworth Community Centre	[]
Gloucester Eastgate Shopping Centre	[]
Churchdown GL3 Community Hub	[]
Tewkesbury Town Hall	[]
Apperley Village Hall	[]
Alderton Parish Hall	[]