

Response of the Conservative Group on Cheltenham Borough Council to the JCS consultation December 2013

The Conservative Group on Cheltenham Borough Council welcomes the JCS document as important to protecting our county from unrestricted and unregulated development.

We recognise the strength that it will provide all 3 councils in leading sustainable development in their areas while ensuring that our communities thrive and grow.

However we believe that the JCS, as currently drafted, is in great danger of killing the 'goose that lays the golden egg'

The desirability of Gloucestershire as a place to work, to live and to visit, is in its unspoilt character, the green environment, the cultural variety and the ease of access to other areas of the country.

The JCS as currently drafted does not provide sufficient safeguards to allow for sustainable growth while protecting the key features that are unique to this area. The strategic objectives are laudable but there is a significant disconnect between those objectives and the strategic delivery plans identified in the remaining document.

Furthermore, we believe that the concentration on urban extensions is the wrong approach, and that a better balance could be achieved. Providing employment and housing land to support the assumptions about inward migration levels is a self fulfilling prophecy. If you don't build they will not come.

Our approach would be to provide for the existing population resident within the JCS area but with a much lower and more sustainable 'inward migration' figure. We believe that the JCS assumptions exaggerate the predicted level of internal population growth and over state the extent to which the present trend for fracturing domestic units will continue.

These assumptions need to be looked at again before the final draft is published.

We would argue that a better balance should be achieved by reducing the concentration on the urban centres and providing greater numbers of homes and jobs in the smaller communities in the area.

Many villages and towns are becoming dormitory towns with jobs to be found only in the large urban areas. The failure to provide affordable accommodation and employment leads to decay of the community, closure of key services, transport, schools, shops etc. Furthermore the issue of an ageing population becomes more exaggerated as young people find it difficult to remain in their community.

The identification of existing traffic congestion in Gloucester and Cheltenham will not and cannot be resolved simply by providing more buses or cycle lanes. This throw away comment is not a solution to the congestion and pollution problems that would follow

the development as recommended in the JCS. The road network in Cheltenham was not designed for bus or cycle lanes in addition to existing lanes of traffic. There are serious issues with existing air quality levels and these will not be resolved by the proposals as drafted. The failure to address traffic issues undermines the credibility of the strategy.

Furthermore a more detailed approach to the provision of social, cultural, economic and transport infrastructure must be provided.

We do not believe that provision of housing/employment has to be provided exclusively within the JCS area. The 'travel to work area' for Cheltenham and Gloucester extends far into the rest of the county and beyond. There must therefore be a requirement for adjacent district councils in Stroud, Cotswolds and Forest of Dean to consider how they will respond to the required housing numbers.

Given the recent decision in Nottingham where a local district was required to revise its numbers to contribute to the numbers required by the city, we believe that further work is required to create a consensus with adjacent councils as to what element of the JCS requirement will be satisfied from outside the JCS area itself. This must be concluded prior to the final document being published.

We welcome the focus on affordable housing and need to improve the skill base of the workforce in Cheltenham. We would welcome stronger environmental and renewable energy requirements for new and existing properties. We believe that the JCS should set out a new 'Gloucestershire' standard leads the way in what is expected of developers and that requires more than the minimum Sustainable Homes and BREEAM requirements identified in Policy S3.

More thought should be given to the impact of an older working population. Given that fifty will shortly become a mid career point, the JCS team should re-consider how the requirements of the workforce will change, how it will be re-skilled and what additional requirements are needed to a workforce with different aspirations, mobility and experience that the average 25 year old.

We are constantly told by the JCS team that it is simply not enough to object to the inclusion of sites in the plan, but that we need to identify how extra capacity could be developed to support changes after the consultation. A target reduction of over 10,000 dwellings would be desirable, sustainable and in accordance with the views of the general public as expressed in the consultation exercises to date.

The impact of a better balance in the allocation of sites, a revision to the inward migration assumptions, and agreement with the adjacent authorities should allow for, at the very least, a reduction in the allocation to be built within the JCS area of between 3,000-5,000 dwellings.

We believe that, even at this very modest level, the JCS team would be able to re-consider the considerable public opposition to the Up Hatherley and Leckhampton sites

in the south as well as the objections to areas around the racecourse and Uckington. It would similarly allow reconsideration of sites in other communities within the JCS area.

This solution means that it would be possible to amend current sites or even to remove contentious green belt areas from the plan altogether.

The emerging strategic economic plan to be published by the LEP may have a significant impact on the JCS as drafted. The JCS is undermined by the proposals for employment land which are almost 3 times over and above those currently identified in the JCS, and by implication a similar increase in housing requirements. This must be resolved as soon as possible.

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