



## View Comment

### Comment Information

<b>Document Section</b>	<a href="#">▶ Consultation Draft Joint Core Strategy</a> ▶ <a href="#">Chapter 5 - Strategic Allocation Policies</a> ▶ <a href="#">Policy A 7 - South cheltenham - up hatherley urban extension, Cheltenham</a> ▶ <a href="#">Policy A7 - South Cheltenham - Up Hatherley Urban Extension, Cheltenham</a>
<b>Comment ID</b>	2858
<b>Respondent</b>	Cllr LG Godwin JP
<b>Response Date</b>	13 Dec 2013
<b>Uploaded By</b>	Sue Coxall
<b>Current Status</b>	Accepted
<b>Response Type</b>	OBJECT
<b>What is the nature of this representation?</b>	Object
<b>Comment</b>	

Objection to the proposal to include C6b (Up Hatherley Way) in the Joint Core Strategy

While most people recognise that there should be a strategy for growth and more houses to cope with a possible increase in employment opportunities in the three local authority areas, it is becoming clearer each day that the selection of possible sites and the calculation of the figures are flawed.

To support a strategy for growth, the population in the three areas must be supportive of the proposals. Of course, there will be some people in the three areas who are not directly affected by the JCS proposals. They will not be concerned until they realise that the countryside pursuits they used to enjoy are no longer there, or the alarming increase in traffic volumes start to affect them. But that should not mean that the

Cheltenham Local Plan Green Belt Policies that have stood the test of time, and now supported and reinforced by the words contained in Chapter 9 of the National Planning Policy Framework (NPPF), should be cast aside.

The JCS briefing note dated 7th July 2013, headed "Green Belt Review" informs members and those who visit the JCS website, "The purpose of the Green Belt Review is to provide an independent assessment of the Green Belt which falls within the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) area". The review followed a 'principles based approach' which meant that it assessed the entire Green Belt against the five key purposes of Green Belt Policy, which are contained within PPG2. The five purposes are well-known and have been used many times in previous years to defend the Green Belt from development.

The briefing note went on to say: "The review will help ascertain whether the Green Belt, as a whole, continues to contribute to these purposes, or whether there are parts which no longer contribute; and to what extent. It will also identify whether there is any justification to remove or add areas to the Green Belt".

At the bottom of the briefing note was an invitation to readers to download the JCS Green Belt Review Report dated September 2011. What the briefing note did not explain was that the independent assessment had been carried out by a company called Environment and Infrastructure UK Limited (AMEC). The review had been commissioned by Cheltenham Borough Council on behalf of the three councils in the JCS area.

The Assessment Methodology that AMEC used was a simple one. The key objective of the study brief was to review the existing Green

Belt in the JCS area in the context of PPG2 (subsequently replaced by the NPPF in March 2012) and the five purposes of including land in the Green Belt.

The study brief also stated: "There are certain areas which do not need to be considered in great detail as their role in meeting the purposes of the Green Belt and the key purpose of designation, separation is very clear".

AMEC's 'broad assessment criteria' re-stated the five purposes historically laid out in the PPG2 and later in the NPPF. The results of the assessment were recorded in a matrix using a simple 'traffic light' system where the red light indicated an area that made a significant contribution to Green Belt purposes.

The amber light indicated an area that made a contribution to Green Belt purposes: and the green light indicated an area that made a limited contribution to Green Belt purposes.

Using the traffic light system, AMEC placed the land between Cheltenham and Gloucester in the red area because it made a significant contribution to the Green Belt purposes. The land included the segment SE4 (Up Hatherley).

To justify its conclusion that SE4 made a significant contribution to Green Belt purposes, AMEC evaluated the significance of SE4 against the Green Belt purposes. It found that it "checked unrestricted sprawl; made a significant contribution to preventing the merger of Cheltenham with Gloucester; safeguarded the countryside from encroachment, and preserved the setting of the town". In its recommendation, AMEC endorsed that the area was critical to the separation of Cheltenham and Gloucester, which was the original purpose of the Green

Belt designation. It also confirmed "The land was critical to preventing the closing of the gap between Cheltenham and Churchdown, which has already been intruded in developments associated with Gloucestershire Airport".

The proposal to construct the South West Distributor Road (SWRD) in the early 1980's was fiercely opposed by local residents in Up Hatherley and The Reddings. The County Council could not persuade the parish councils or the local people that the road would be beneficial to them; neither could they justify the loss of many hectares of Green Belt land for a road they may or may not use.

In spite of PPG2, and local opposition, the road was constructed. The parish councils and Tewkesbury Borough councillors were assured that in spite of the loss of Green Belt land, which they regretted, the provision of the distributor road would be wide and robust and provide a permanent barrier against further encroachment into the Green Belt. The late inclusion of the C6B proposal (Up Hatherley Way) would extend the built form of the town into the well-defined Green Belt, and would compromise the fundamental aims of Local Plan Green Belt policies and the NPPF. To replace a robust and permanent road (SWRD) with a weak boundary line at Chargrove Lane is not in keeping with good Green Belt practice.

The 'gap' between Cheltenham and Gloucester is becoming smaller; the C6B proposal will reduce the gap still further, which is contrary to the second purpose of Green Belts – the merging of neighbouring towns and settlements. To fracture the significant Green Belt area at South Cheltenham, would inevitably lead to more planning applications being submitted. For some reason, with all the advice and recommendations from the experts,

the JCS team (Programme Board) appear to have been extremely selective with their choice of sites for development in the JCS area. The Highnam location (G8a) is non-Green Belt land and could take a large number of dwellings as part of the overall contribution to the joint core strategy. The AMEC (September 2011) review states: "Access is good via the A40 and the B4215).

Although AMEC admitted that access from the south would require road infrastructure work to be undertaken, that should not be taken to mean that no development should take place. AMEC also proposed large scale development being possible on all sides of Highnam, with the exception of the eastern side, which has significant flood risks considerations. Their recommendations included the phasing of development at Highnam over a twenty year period. As the land is not protected by the five purposes of the Green Belt (NPPF), it should have been looked at first before Green Belt land in other areas was even considered.

**Supporting Documents**

**Submission Method** Paper

**JCS Comments**

**Recommended Changes**



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**Document Section** [▶ Consultation Draft Joint Core Strategy](#) [▶ Chapter 5 - Strategic Allocation Policies](#) [▶ Policy A 7 - South cheltenham - up hatherley urban extension, Cheltenham](#) [▶ Policy A7 - South Cheltenham - Up Hatherley Urban Extension, Cheltenham](#)

**Comment ID** 2859

**Respondent** Cllr LG Godwin JP

**Response Date** 13 Dec 2013

**Uploaded By** Sue Coxall

**Current Status** Accepted

**Response Type** OBJECT

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

**Comment** Similarly, why is the land at Court Farm, Whaddon, south of Gloucester, which is not in the Green Belt not included as a sustainable growth option in the joint core strategy? The fact that part of the land falls in the Stroud District should not be a reason not to include it in the Cheltenham, Gloucester and Tewkesbury JCS. By not discussing with Stroud District Council the land at Whaddon may not be in accord with the cross-boundary co-operation principle laid down in the NPPF. The land at Court Farm, Whaddon, represents a genuine opportunity to provide a sustainable urban extension at Gloucester, without the need for incursion into the Green Belt at Up Hatherley Way (C6b).

### Supporting Documents

**Submission Method** Paper

**JCS Comments**

**Recommended  
Changes**



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**Document Section**      ▶ [Consultation Draft Joint Core Strategy](#) ▶ [Chapter 5 - Strategic Allocation Policies](#) ▶ [Policy A 7 - South cheltenham - up hatherley urban extension, Cheltenham](#) ▶ [Policy A7 - South Cheltenham - Up Hatherley Urban Extension, Cheltenham](#)

**Comment ID**                2860

**Respondent**                Cllr LG Godwin JP

**Response Date**            13 Dec 2013

**Uploaded By**              Sue Coxall

**Current Status**            Accepted

**Response Type**            OBJECT

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

**Comment**                    Furthermore, until the Regional Spatial Strategy (RSS) is removed from the Statute Book, its housing growth requirements remain part of its evidence base alongside local and national household projections. The evidence base that informed it still remains a relevant indicator of the sustainability of broad locations for growth within the JCS area.

### Supporting Documents

**Submission Method**      Paper

### JCS Comments

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**Comment ID** 2861

**Respondent** Cllr LG Godwin JP

**Response Date** 13 Dec 2013

**Uploaded By** Sue Coxall

**Current Status** Accepted

**Response Type** OBJECT

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

**Comment** Finally, would the JCS Programme Board reassess the brownfield MOD site at Ashchurch for housing rather than a mix of housing and employment? If the Joint Core Strategy is to progress smoothly to the next stage, then non-Green Belt land should be developed before significant Green Belt such as the land along Up Hatherley Way (C6b) is even considered.

I strongly oppose the inclusion of C6b (Up Hatherley Way) in the JCS proposals.

### Supporting Documents

**Submission Method** Paper

### JCS Comments

### Recommended Changes

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<b>Document Section</b>	<a href="#">▶ Consultation Draft Joint Core Strategy</a> ▶ <a href="#">Chapter 4 - Core Policies</a> ▶ <a href="#">Policy S 5 - Green belt</a> ▶ <a href="#">Policy S5 - Green Belt</a>
<b>Comment ID</b>	2862
<b>Respondent</b>	Cllr LG Godwin JP
<b>Response Date</b>	13 Dec 2013
<b>Uploaded By</b>	Sue Coxall
<b>Current Status</b>	Accepted
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<b>What is the nature of this representation?</b>	Object
<b>Comment</b>	Cllr Godwin Racecourse

#### **S5**

Objection to the remove the Green Belt status from the land on the south side of Cheltenham Racecourse was an after-thought. It was never mentioned during any of the three years of discussion at the Joint Core Strategy/ Member Steering Group meetings, which means it never formed part of the core strategy for Cheltenham, Gloucester and Tewkesbury. Why should it? The land has always played a prominent part in securing the openness of the Racecourse, a point recognised by the consultants AERC and AMEC, who were engaged to study the significance of the Green Belt around Cheltenham in March 2007 and again in September 2011.

The Leader of Cheltenham Borough Council claimed at the 5th September 2013 council meeting that the proposal was "only a tidying-

up exercise" of the Green Belt, and the Chief Executive claimed at a subsequent meeting with the PAB group councillors, that "he didn't even know it was being proposed". The Leader of the Council went further, and added to his earlier comment: "By putting the JCS out to public consultation, it would be possible to take out that area depending on the feedback". On that advice, I strongly object to the proposal to remove the Green Belt status from the land on the south side of the Racecourse and the north side of New Barn Lane for the following reasons.

In June 1984, an appeal to develop the land was dismissed by the Planning Inspector. This is what he said: *"In my opinion, the possible impact of the proposed development on the character and environmental setting of the Racecourse is a prime consideration, irrespective of any arguments regarding the Green Belt boundary. It is distinguishable from the adjoining Pye site, largely on account of its contours and its visual domination of the Racecourse. The site in conjunction with the other open land to the west, provide an attractive, grassland buffer between the New Barn Lane housing and the Racecourse. From the southern part of the appeal site, fine views are obtained across the Racecourse to Bishop's Cleeve and Southam. In my opinion, the existing natural grassland setting of some 150 to 200 metres in depth would not be adequately replaced by a landscaped strip of some 35 metres. Not only would the visual character of the area be entirely altered, but the location of residential uses and their associated activities in such close proximity to the Racecourse, would contribute to the urbanisation of the surroundings"*.

In March 2007, Cheltenham Borough Council commissioned Applied Environmental Research

Centre Limited (AERC) to provide independent advice on the Green Belt for input into the Core Strategy. The AERC Green Belt Review included "Extensive consultation with Tewkesbury Borough Council, Gloucester City Council, Gloucestershire County Council, and officers of the South West Regional Assembly". AERC found that three of the four Cheltenham Borough Council Green Belt policies contributed positively to the purposes of the Green Belt, and should be included in a future Local Development Framework without change. The fourth Green Belt policy allowing "limited infilling at Bowbridge Lane and Shaw Green Lane", would not, in the opinion of AERC, "contribute positively, and would conflict with Green Belt purposes and could be considered unsound". It did not suggest that the Green Belt status of land at Bowbridge Lane and Shaw Green Lane should be removed, it recommended that "infilling should not be included in a Green Belt policy".

On 5th March 2007, AERC held a seminar at the Municipal Offices for councillors from Cheltenham and Bishop's Cleeve. Officers were also in attendance. Seminar attendees were given maps of Cheltenham and surrounding district, and they were asked to score against those areas of Green Belt that they considered made significant contributions to the purposes of the Green Belt (prevent merging of settlements). The area that received the highest score was the land between Prestbury and Bishop's Cleeve, including the Racecourse. The AERC Review when commenting on the 'ranking exercise' said: *"The assessment reflects the view (shared by the stakeholders) that the most important Green Belt purposes in Cheltenham are preventing towns merging, particularly Cheltenham and Gloucester, and Cheltenham*

*with Bishop's Cleeve, and checking urban sprawl*". Figure F (Map of Cheltenham and surrounding area) of the AERC Review, confirmed the strong, I repeat strong Green Belt boundary that existed along New Barn Lane.

Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council commissioned AMEC Environment and Infrastructure UK Limited to carry out an assessment of the Green Belt in readiness for the Joint Core Strategy. AMEC published their final report in September 2011. Their findings on the Green Belt in the Cheltenham and Bishop's Cleeve segment, was similar to the findings of AERC. AMEC reported: "*The separation between Cheltenham and Bishop's Cleeve is critical to fulfilling the purpose of Green Belt designation (as extended in 1981)*". Segments NE18 and NE22, which abuts Prestbury, is included in the total segments that make up the land between Cheltenham and Bishops Cleeve. The Green Belt area also abuts New Barn Lane, similar to that shown in the 2006 Cheltenham Borough Council Proposals Map. AMEC, in its evaluation and recommendations concerning the land between Cheltenham and Bishop's Cleeve, made the following observations.

1. The segments NE18 and NE22, along with others, make a significant contribution towards preventing sprawl in various locations where there is already some evidence of ribbon development.
2. The segments make a significant contribution towards the separation of Cheltenham and Bishop's Cleeve.
3. Safeguards the countryside from encroachment: although there are significant

urbanised areas associated with Cheltenham Racecourse and associated development, much of the land is open. There are no strong boundaries to contain development. In its recommendation, AMEC reported:  
*"Maintenance of the separation between Cheltenham and Bishops Cleeve is critical to fulfilling the purpose of the Green Belt designation. These segments play an important role in this. Therefore, this area does not merit further consideration for release from the Green Belt at this stage unless other elements of the evidence base strongly suggest otherwise".*

Your comment at our one-to-one meeting in your office on Wednesday, 6th November 2013, that the reason for the 'tidying up' exercise is due to the recent problem of a planning application in the area, and the Local Government Ombudsman (LGO) case that followed. I suggest is not consistent with the AMEC recommendation above. The fact that a resident objected to a planning permission given for a development in the Green Belt and was successful with his application to the LGO, should not be condemned, or used as an excuse, but hailed as a success in the defence of the Green Belt around the Racecourse.

For the reasons I have set out above, the proposal to remove the Green Belt status from the land on the south side of the Racecourse, would be a retrograde step, and contrary to the purpose of the Green Belt.

I strongly object to the removal of the Green Belt status of the land on the south side of the Racecourse.

**Supporting Documents**

**Submission Method** Paper

**JCS Comments**

**Recommended  
Changes**