

## **Draft Joint Core Strategy consultation**

This represents the general response from the Cheltenham Liberal Democrat Group although individual councillors will make their own response specific to their wards.

### **Joint Core Strategy**

Generally we support the current process of working with Gloucester and Tewkesbury Councils to agree a joint core strategy (JCS) between us. We believe it is right to plan for the future needs of our local population while maximising the protection for the built and natural environment that we all value. The main advantage to Cheltenham of the JCS is that Cheltenham and Gloucester are so close together that they operate as a single economic unit particularly in the housing market so separate strategies would need to address this in any case. In addition the Cheltenham Borough boundaries are generally close to the existing urban boundary so any decision about urban extensions would depend on discussion with Tewkesbury Borough Council where many of the houses would actually be built.

The current consultation is non statutory, and while it is a useful part of the JCS process, it is also true that a number of key parts of the required evidence base are not currently available. These are the Strategic Housing Market Assessment (SHMA), now available in draft but the final version still to be completed; the Traffic Modelling data, due to be ready early in 2014; and the Bramley housing market modelling which is due to be rerun to inform the final JCS. In addition final population and household size data based on the 2011 census are expected in 2014. Each of these is referred to in later sections of this response.

We welcome the proposal to regularly review the JCS and update it in the light of changing circumstances and that this should include population and household numbers. However, we have a number of concerns which should be addressed before the final JCS is produced and which are outlined below.

### **Overall housing numbers**

As required by the National Planning Policy Framework the JCS area has attempted to objectively assess the need for housing. However, as pointed out in the SHMA the methodology of assessing need in Stroud and Cotswold areas is different making countywide analysis difficult. Ideally we would use the same methodology across the county but at the very least the implications of the differences need to be understood. The current assessed need takes account of the interim figures from the ONS using the 2011 census. However, it will be important to consider the implications of the final sub-national population projections when ONS produce them in 2014 and the household projections that the Department for Communities and Local Government produce from these later in the year.

The work of the Cambridge Centre for Housing and Planning Research (CCHPR) projected a range of housing that might be needed by 2031. The baseline population projection gives a need for 28500 homes which also more than provides for the 21800 jobs expected to be created according to the Experian economic projection. However the Cambridge Econometrics projection would require 37400 homes. The final OAN proposed by officers is 33200 which assumes that household formation will 'partially return to trend' after the recession. There is a major question mark over whether this will actually happen, particularly given that government policies implemented to produce a more coherent welfare system and reduce the deficit will also restrain household formation. Given that every house required over the 28500 figure would be built in green belt this is not an academic issue and we believe the 28500 figure would be more appropriate.

The overall housing need currently takes no account of the mix of house sizes (ie number of bedrooms) which will clearly impact on how many people can be accommodated. This is part of what the SHMA addresses and should be dealt with in the final JCS.

### **Cheltenham housing numbers**

Within the overall housing allocation of 33200, Cheltenham has a target of 10000. However, based on the allocated sites the Cheltenham area would be supplying 10850 homes. Brownfield sites should be prioritised first for development. However it is estimated that only 4400 of the target figure can be met within the existing urban area.

The proposed urban extensions at North West Cheltenham, Leckhampton and Chargrove are all either in green belt or in green areas valued by local people. Given the sensitivity of all these sites the allocation in Cheltenham should be reduced to the target. The reason for the oversupply in Cheltenham is that there is an undersupply in the Gloucester area, which will need to be resolved in the final JCS. Possible developments at Highnam and South of Gloucester should be further reviewed. In particular we believe that the urban extension South of Gloucester, despite being in Stroud, should be treated in the same way as those in the JCS area when allocating housing numbers to the relevant district total.

### **Affordable housing mix**

The section of the draft JCS document dealing with affordable housing is largely missing pending the completion of the SHMA. The draft SHMA however, shows that there is a high level of need for affordable housing throughout the JCS area and it will be vital to tackle this in the final JCS. It will also be important to rerun the Bramley housing model. Previously this showed even 40000+ houses across the JCS area doesn't solve Cheltenham's affordability issues as it just tends to create vacancies in Gloucester with little impact on demand in Cheltenham. The assessed need of 33200 across the JCS area currently fails to acknowledge that there are different impacts in Cheltenham and Gloucester. This issue hasn't been addressed since the

previous consultation in 2012 and will be a fatal flaw if not resolved by the final JCS. Unless it can be demonstrated how the required level of affordable housing will be achieved it is difficult to justify the 33200 'need' figure.

### **Green spaces**

Where urban extensions are proposed it is important that there are adequate green spaces within and around them and particularly adjoining current developed areas. It is also important that these areas are protected in the future. The maps shown in the consultation document are inadequate to give any assurance on this.

### **Windfall figures**

The 10000 target for homes in Cheltenham assumes 4400 extra homes in the current urban area. Included in this are 53 homes per year as 'windfall' development. It is important that under the general heading of 'windfall' allowance is made not only for new individual homes, but also windfall brownfield sites and extensions to existing properties.

### **Traffic Modelling**

It is clear that the volumes of development being proposed would require considerable infrastructure improvement before they could happen. It would not be acceptable for required infrastructure to only be built decades after any housing as has sometimes been the case historically. The Infrastructure Development Plan starts the process of assessing these development needs. However, in relation to transport it is clear that the traffic modelling work yet to be completed will be crucial in deciding the viability of all the proposed developments. This work will be particularly important in assessing the impact of a series of sites such as along the A46.

### **Junction 10 improvement**

While there is general support locally for making M5 junction 10 a 4 way junction, the Highways Agency have previously resisted this to prevent 'junction hopping'.

The current JCS proposal is for 23 Ha of employment land at North West Cheltenham with housing around it in the Uckington area. In addition the area adjoining junction 10 is safeguarded for post 2031 housing development.

It has been suggested that the safeguarded land should be released now for employment which would create an extra 142 Ha. The JCS is already allocating well over the expected need as evidenced in the report by Nathaniel Lichfield and Partners. There is currently no evidence that the massive increase proposed is needed and the consequent housing it would inevitably generate make it unacceptable.

There could be a case for moving the current 23 Ha employment land allocation to junction 10. This could allow proper green buffers around the proposed housing development in North West Cheltenham, while giving capacity for current and post 2031 needs for employment land to be met. We believe upgrading junction 10 to 4 way is a prerequisite of making this work.