



Submission to public consultation on the Joint Core Strategy (JCS)

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Submission contents

Answer to consultation Q1: strategy on urban extensions	3
Urban extensions are no more sustainable than dispersed development and will be less so in future	3
Urban extensions sacrifice the very green spaces that Matter most to people	6
A process of urban extension between Cheltenham and Gloucester cannot be sustained	8
There are alternatives to the urban extensions suggested	9
Answer to Q2: the choice of sites	10
The south Cheltenham urban extensions have been rejected in consultation	10
The justifications for inclusion of the broad location south of Cheltenham are very weak	12
Errors in the original Sustainability Analysis still uncorrected?	16
The positive case for protecting the land at Chargrove as Green Belt	17
The positive case for protecting the land at Leckhampton As Local Green Space	18
Answer to Q3: rural villages	21
Answers to Q4: other issues	21
1. The vision and contents of the JCS are too biased towards economic growth at the expense of environmental and social factors, and the Sustainability Appraisal methodology is unsound	21
2. The overall JCS numbers are too high	24
3. The JCS does not empower local people	28

Q1. 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?

“The idea of a workplace no longer needs to be constrained by anything as outdated as location. The office is everywhere you want it to be, with connectivity and smart devices allowing you to be everywhere from anywhere, never at the expense of productivity, collaborative potential or at the mercy of rush hour. The expectation now is that work comes to us instead of us going to work.”

**Sarah Moseley, Head of Customer Innovation for Global Logistics and GS UK, BT
July 2013**

“Without change we will simply repeat the mistakes of recent decades, creating unattractive developments of housing estates encircling our rural towns and larger villages, and we will fail to stem the trend of smaller villages becoming dormitory settlements of commuters and the retired, ever less affordable for those who work within them. This is not a sustainable future for rural England. We need to better balance social and economic sustainability with environmental sustainability.”

Matthew Taylor MP, Taylor Review July 2008

No. The constant emphasis on urban extensions is unpopular, unsustainable and contrary to the National Planning Policy Framework (NPPF).

Urban extensions are no more sustainable than dispersed development and will be less so in future

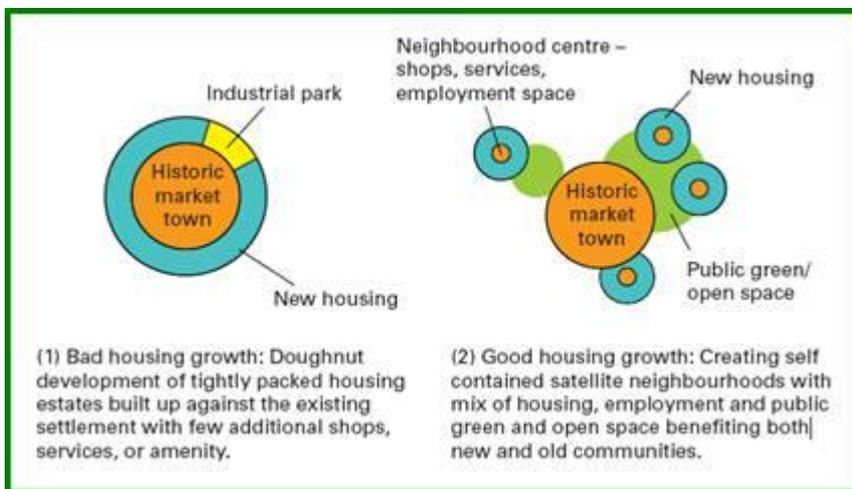
Planning minister Nick Boles MP confirmed to me in person in a meeting on 6 November that urban extensions should not be regarded as necessarily more sustainable than other forms of development yet this dated assumption constantly returns to render other scenarios less acceptable to JCS officers. This is only his opinion but it is widely supported.

The argument for the sustainability of urban extensions is lazily made in both the main JCS document and the Sustainability Analysis documents and appears to rest largely on drivetimes to service and jobs leading to higher carbon emissions. Quite apart from the fact that there is a lot more to sustainability than carbon emissions, the work patterns on which this assumption rests are changing fast and will do so even more during the JCS period:

- Superfast broadband roll-out will offer increased opportunities for homeworking, local office hubs and teleconferencing.
- Commuting to formal work spaces will become less and less the norm with rising commercial property prices only exaggerating this tendency
- The carbon emissions from commuting itself will also fall as electric vehicles take over from fossil-fuelled ones¹.
- More sustainable villages need more people living in them – and working in them - to keep schools, pubs, post offices and local shops open. Changing ways of working make this excitingly realistic. Concentrating all development on urban extensions undermines it.
- Transport policy is increasingly focussing again on expanding rail and public transport to rural areas with the possibility of re-opening the Honeybourne line north of Cheltenham being seriously discussed.

All of this means that if development needs to happen, it should be dispersed to avoid congestion and maximise access to green space and viable communities for everyone, including those in the villages and in the new developments themselves. This is more important than a 1970s focus on absolute commuting distances.

The government-commissioned Taylor review in 2008², quoted above, warned against doughnutting larger towns and gradually killing rural villages. Taylor argued for active but sensitive development in rural areas. His findings are widely quoted by planners and ministers but have been **ignored in the JCS which allocates just 8% of the proposed new housing to rural areas, allocates none at all to new settlements (unless we generously include the 6% at Ashchurch) and overloads the urban areas both in terms of ‘district capacity’ (47%) and urban extensions (38%).**



One graphic in the Taylor report (left) neatly summarises the way that councils could – with imagination – deliver similar levels of growth without enraging those neighbourhoods who want, quite reasonably, to protect the green spaces close to where they live and in the process deliver a better quality of life for those who move into the new settlements.

It is also important not to misinterpret paragraph 24 of the National Planning Policy Framework, which says: “when considering edge of centre and out of centre proposals,

¹ The European Commission has put electric vehicles at the heart of its commitment to the long-term goal of reducing carbon emissions by 60% within the transport sector by 2050.

² The Taylor Review of Rural Economy and Affordable Housing (DCLG, 2008)

preference should be given to accessible sites that are well connected to the town centre”³. This phrase is used in the context of town centre development and is not an argument **for** edge of centre and out of centre developments in and around towns, let alone urban extensions, but rather a guide as to how to choose **between** them.

³ National Planning Policy Framework, paragraph 24, p 8

Urban extensions sacrifice the very green spaces that matter most to people

“Over 95 per cent of people believe it is very or fairly important to have green spaces near to where they live and this value placed on green space is consistent across the social gradient”

“Health inequalities related to income deprivation in all-cause mortality and mortality from circulatory diseases were lower in populations living in the greenest areas.”

Sir Michael Marmot (Fair Society, Healthy Lives, The Marmot Review 2010)

“Children exposed to nature scored higher on concentration and self-discipline; improved their awareness, reasoning and observational skills; did better in reading, writing, maths, science and social studies; were better at working in teams; and showed improved behaviour overall”

Stephen Moss citing child psychologist Aric Sigman (Natural Childhood, National Trust, 2012)

It is no accident that Save the Countryside, the Leckhampton Green Land Action Group (Leglag) and now the Hatherley and Shurdington Triangle Action Group (Hashtag) between them attract thousands of members, command huge support in their respective communities and have the support of virtually all their elected representatives at parish, borough, county and parliamentary level. The former Countryside Agency highlighted the fact that the most visited parts of the countryside are those closest to where most people live, ie on the edge of urban areas⁴. The area of green space at Leckhampton, on which the JCS would build more than a thousand houses, is particularly valuable in this respect, nearly enclosed by housing on three sides but criss-crossed with public rights of way.

Threats to green space make people very angry. Why? Because access to green space and the natural world makes people happier. A recent National Trust survey revealed that 80% of the happiest people in the UK said that they have a strong connection with the natural world, compared with less than 40% of the unhappiest.⁵

Yet the JCS team want to focus 86% of its development on the urban areas where the majority of the JCS area population already live, nearly half of it on the green spaces closest to them. And they then think people are being unreasonable for objecting!

⁴ The Countryside In And Around Towns (Countryside Agency, 2005)

⁵ National Trust survey, quoted in Reynolds, F. (2011) People and Nature: A paper from Fiona Reynolds to the Ministerial Advisory Panel on NEWP

Green space on the urban fringe isn't just popular. There is mounting evidence that green space close to where many people live is enormously valuable in other respects too.

The many ecosystem services that urban populations in particular, derive from proximity to green space, including:

- Access to free recreation for exercise, relaxation, tranquillity and pleasure
- Improved health, including better mental health⁶, lower stress, improved blood pressure, lower cholesterol and reduced health inequalities⁷
- Reduced pollution. Vegetation intercepts airborne particulate matter (PM10), reducing concentrations in air, thereby improving air quality⁸
- Reduced CO₂. One hectare of trees and shrubs can absorb one tonne of CO₂ – equivalent to 100 current family cars. A single tree will produce enough oxygen for 10 people.⁹
- More balanced temperatures. Vegetation from green spaces reduces daytime temperatures by 2-3°C in an urban green space compared to the surrounding streets.¹⁰
- Agricultural land for local food production, including allotments, nurseries and higher grade agriculture
- Access to the natural world for children, increasingly believed to be important to their educational outcomes, social skills and behaviour¹¹
- The economic value of a more attractive and pleasant living environment with its potential to attract investment, relocating businesses and tourists. Both Cheltenham Borough Council's investment pages and visitcheltenham.com mention countryside in their opening paragraphs.

In their deliberate prioritisation of economic over environmental and social factors¹² and their insistence on urban extensions as a sustainable model, the JCS ignores all these environmental drawbacks to concentrating so much development on the urban fringe.

Later in this submission, I offer a more detailed critique of the highly lopsided sustainability analysis which has been produced for the JCS by Enfusion.

⁶ Ecotherapy – the green agenda for mental health (MIND 2007); Benefits of Green Space – Recent Research (Environmental Health Research Foundation, 2011)

⁷ Fair Society, Healthy Lives - Strategic Review of Health Inequalities in England post-2010, (Sir Michael Marmot, The Marmot Review, 2010)

⁸ Benefits of green infrastructure Evidence Note (Forest Research, undated, at www.forestry.gov.uk)

⁹ Blue Sky Green Space (GreenSpace, 2011)

¹⁰ *ibid*

¹¹ The Natural Childhood Report (Stephen Moss, National Trust, 2012)

¹² JCS draft for consultation, Vision, p10; Gloucester, Cheltenham & Tewkesbury Draft Joint Core Strategy Sustainability (Integrated) Appraisal Report (Enfusion, 2013), p vii

There are alternatives to the urban extensions suggested

The second part of consultation question 1 - **If not, where would you propose to locate the new development?** - is loaded and inappropriate, obviously suggesting that the only alternative to urban extensions is to place the same number of houses elsewhere. This is not the case. A number of factors, alone or in combination, could reduce or remove altogether the unpopular and unsustainable urban extensions between Cheltenham and Gloucester:

1. Refocus JCS on environmental and social factors not just economic ones, leading to reduced growth rate in housing for inward migration;
2. Reduced absolute numbers through more accurate and appropriate modelling, eg ONS spring 2014 figures
3. Reduced absolute numbers on the basis that the projected numbers cannot be met sustainably (see above but also CPRE Gloucestershire submission)
4. Rebalancing towards more dispersed development (see above)
5. Rebalancing of allocations between Cheltenham and other areas. Cheltenham's projected need in the JCS documents is actually 10,000 not the 10,849 actually allocated. This adjustment alone could remove all the allocation at Chargrove or most of the allocation at Leckhampton.
6. Addition, if necessary, of well-planned new settlements instead of urban extensions, for instance at
 - Sharpness, south of Gloucester. This has been allocated only 300 houses in the pre-submission draft of the Stroud Local Plan. Yet plans exist for an eco-town of 2,000 houses at Sharpness which could bring much-needed economic development to that area, would be immediately adjacent to the JCS area and which could provide sufficient housing to remove both the hugely contentious urban extensions from south of Cheltenham altogether. The NPPF explicitly asks authorities across boundaries who can, to include 'unmet requirements from neighbouring authorities where it is reasonable to do so'¹³
 - Highnam, identified in the Broad Locations report as non-Green Belt with only pockets of biodiversity interest and potential for 1,000 houses or more but which seems to have been omitted simply principally because of the 'significant impact on the existing settlement' – a sentiment that would surely be shared by the residents of Leckhampton or Swindon Village! This location should be reconsidered.
 - NW of Cheltenham but close to the M5 instead of the urban fringe at Swindon Village which should also be protected.

It is extraordinary that no attempt appears to have attempted at the collaborative working demanded by the NPPF (paragraphs 178 – 182) with neighbouring councils that have the potential to offset some of the demand for housing in areas easily commutable to the population centres of the JCS area. Sharpness, just south of Gloucester, is a potential development site which has been widely promoted.

¹³ NPPF (DCLG, 2012), para 182, p43

Q2. Do you think that we have identified the right sites based upon the strategy mentioned in question Q1? If not, which other sites within the JCS area would you suggest and why?

No. **The south Cheltenham urban extensions are not appropriate or sustainable locations.** As urban extensions, the arguments set out above in answer to Q1 apply to both sites. But the specific sites south of Cheltenham have been rejected again and again in consultation, the justifications for their inclusion in the draft JCS itself are weak and in the Sustainability Analysis documents they are weaker still, presumably building on uncorrected mistakes in the Sustainability Analysis process which I pointed out in my last submission.

The south Cheltenham urban extensions have been rejected in consultation

Urban extensions are fantastically unpopular and this should matter in a democracy. Every one of the now numerous consultations carried out during the development of the Joint Core Strategy has clearly and emphatically rejected urban extensions. From initial consultations in 2005 in the context of the then Draft Regional Spatial Strategy, finally abolished after receiving 35,000 objections, to the most recent consultation on the preferred option the message has been crystal clear:

- ‘Opposition to development on the urban fringes including South Cheltenham, Bishop’s Cleeve, Tewkesbury and Northway’¹⁴

When asked where growth should be accommodated, 27 out of 110 questionnaire respondents said there should be no growth at all, the rest prioritising:

- ‘Growth within existing urban areas
- Some growth within rural villages to support viability
- Higher density development
- Re-used land, empty properties
- Not in Green Belt’

In an earlier consultation in 2009, a red dot/green dot methodology was used. The result was emphatic, particularly south of Cheltenham:



Source: JCS roadshow 2009, Cheltenham

¹⁴ Joint Core Strategy response report, October 2011: summary of interactive map exercise

In my last submission in February 2012, I explained how officers had wilfully misunderstood consultation responses to earlier consultations by pretending to believe that when local people objected to urban sprawl, they were actually supporting urban extensions!

A representative written comment, singled out in the 2011 consultation - 'Protect environmental designations and restrict urban sprawl' - was met with the officer response:

*'Agree – The strategic development sites identified seek to safeguard other areas that are subject to statutory nature conservation or high levels of landscape sensitivity. Urban sprawl is restricted by providing development at several sites around the existing main centres in a plan led approach rather than in an unplanned manner. Plan led growth is not urban sprawl.'*¹⁵

This is frankly dishonest and must not be repeated in response to this consultation. When people in Leckhampton, Hatherley, Swindon Village and Hesters Way say they don't want urban sprawl, they are **not** supporting urban extensions. They clearly mean that they don't want Cheltenham spreading out unchecked into the countryside. When they say they want environmental designations protected, they mean they do not want Green Belt ripped up and the leftovers protected. They want the current Green Belt protected.

To hold so many extensive consultations involving thousands of people and then ignore them is unacceptable. The National Planning Policy Framework (2012) directs councils to 'allow people and communities back into planning'¹⁶.

The first core planning principle of the NPPF is that planning should be 'empowering local people to shape their surroundings.. promoting the vitality of our main urban areas, protecting the Green Belt around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it'¹⁷

In its detailed guidance on plan-making, the NPPF says that engagement and consultation with neighbourhoods, local organisations and businesses should be 'early and meaningful' and that a 'collective vision' has been achieved¹⁸. To demonstrate to an inspector that these criteria has been fulfilled I would expect the JCS team to be able to demonstrate that they have listened to at least a few of the thousands of representations made to them by local communities and changed their policies in that direction in at least some respects. The current JCS ignores most community representations that it has received, is hugely controversial and widely opposed by local people.

¹⁵ JCS: Response Report on Consultation (October 2011)

¹⁶ National Planning Policy Framework (DCLG, March 2012), p ii

¹⁷ NPPF, para 17, p 5

¹⁸ NPPF, para 155, p 37

The justifications for inclusion of the broad location south of Cheltenham are very weak

1. The main JCS document provides no rationale for the inclusion of the south Cheltenham urban extensions

In the main JCS document, this short statement is the sole justification for the urban extensions:

‘Our strategy is based upon meeting the identified need closest to where it is generated and, as this is within Cheltenham and Gloucester, we propose to concentrate this development in and around these urban areas.’¹⁹

Another version of the same statement is repeated later at para 3.22:

‘The three JCS Authorities want to concentrate new development around the existing urban areas of Cheltenham and Gloucester to balance employment and housing needs and provide new development close to where it is needed. .. The guiding principle of policy SP2 is that **need is met where it arises**, so that Gloucester and Cheltenham, together with their immediate wider areas, remain the primary focus for growth. This reflects the urban-focused economic vision and support for urban regeneration for the JCS area.’²⁰

Simply stating ‘the need is met where it arises’ is rather meaningless in the context of a Joint Core Strategy whose very existence is justified by the interaction and interdependence of the whole JCS area. It does not justify the harm proposed to enormously popular green spaces, the massive incursion into the Green Belt, the loss of biodiversity or the damage that will be done by allowing urban sprawl. The ‘urban-focused economic vision’ is nowhere set out in the JCS document, even in the core Vision statement on p 10.

2. The Broad Locations Report highlight significant value at these locations, especially at Leckhampton, but is then self-contradictory in its acceptance of development potential here and not elsewhere

In the **Broad Locations Report**²¹ there is no clearer explanation. At para 1.2, this makes the bizarre statement that ‘with the anticipated abolition of the Regional Spatial strategy, there exists no strategic direction for the JCS’. So much for localism! The South-west Regional Spatial Strategy (RSS) was never implemented and RSSs have been specifically abolished at national level as a basis for planning decisions so locations which had been identified in the RSS process should not have been automatically carried forward in to the new JCS process.

At para 1.6 – Methodology – the report then says that ‘large peripheral areas around the urban areas at Gloucester, Cheltenham and Tewkesbury were identified as part of the Broad Locations Study’ but again no rationale for this is provided.

The best clue is at para 1.10 – engagement with the development industry – where the report says that ‘the development industry has been engaged in this process and a series of meetings were held in summer 2011 with those representing land within the Broad

¹⁹ JCS Draft for Consultation, p v

²⁰ Ibid para 3.22, p29

²¹ JCS Broad Locations Report, October 2011

Locations.’ **This suggests that the broad locations were already in place and so perhaps were indeed simply carried forward from the RSS but that it was then left to developers, not councillors or the public, to identify and push forward the specific locations in the JCS document.** The subsequent Strategic Allocations report issued in October 2013 also reveals further consultation with developers in spring 2012²² which seems to have progressed regardless of the huge opposition to these plans expressed by members of the public in the consultation that finished only weeks earlier. **This is not an acceptable, democratic or truly plan-led process, according to the ambition for empowering local people set out in the NPPF.**²³

At para 3.43, broad location C6, south of Cheltenham is considered:

- **It is immediately stated that ‘this land forms part of the countryside which separates Cheltenham and Gloucester’.** Since the avoidance of the coalescence of Cheltenham and Gloucester should have been a key consideration, this should probably have led to this broad location being immediately ruled out
- **The land at Leckhampton is acknowledged as being flood zone**
- There is acknowledged to have been no landscape assessment of the area, astonishingly given that it adjoins the Cotswolds Area of Outstanding Natural Beauty and the countryside is widely regarded as being an important part of the setting of Cheltenham.
- The land to the centre and east – which includes both Chargrove and land towards Leckhampton – is then described: ‘the rural character has predominantly been retained and the **sloping topography prevents views of Cheltenham and strengthens associations with the AONB.**’ Moving further east towards Leckhampton, the report says that the ‘area has localised historic significance, high doorstep amenity value and is quite tranquil considering the proximity to the built form and the A46.’

The report goes on to detail an astonishingly positive view of the land at Leckhampton itself:

“Land to the south of Cheltenham and north of Ham Brook is intimate rolling landscape, predominantly pastoral with improved and some semi-improved pasture. A good ridge and furrow structure is displayed and hedgerows are in good condition. There exists a good proportion of orchard many of which display old over-mature Perry trees²⁴ and a good number of parkland trees and many veteran oaks along with other species. There are small pockets of woodland dotted around the Broad Location. The area around Leckhampton displays unusual land use patterns with many small holdings, orchards and allotment/market gardens with good brookline and associated tree cover. This area displays a useful mosaic of habitat types making mitigation difficult with good connections to like habitat to the east, south and west and green infrastructure potential along brook lines.”

This is one of the strongest endorsements of the landscape and environmental character of any area in the report – a particular contrast to areas like Highnam let alone potential near-

²² JCS Strategic Allocations report, October 2013, para 1.39

²³ NPPF p ii

²⁴ Much valued by the Gloucestershire Orchard Trust incidentally.

industrial sites like Sharpness near to the JCS area. Yet the report then bizarrely declares that the Leckhampton land has potential for a thousand houses, part of 1,300 in the Broad Location as a whole. A more suspicious reader might wonder if these paragraphs had been written by different people.

3. The Sustainability Analysis by Enfusion is particularly poor in its analysis of the areas south of Cheltenham and seems to have reached contradictory and unsupported conclusions in respect of them

The overall analysis of Broad Location C6 in the Sustainability Analysis by consultants Enfusion²⁵, which includes Chargrove and Leckhampton, states that ‘all parts of the location were considered to have a negative impact on biodiversity as the Location is considered important for biodiversity value and also for landscape given its proximity to the AONB.’ This important statement is then repeatedly contradicted and undermined by the consultant’s other statements and unexplained assumptions.

Also in the overall Broad Location analysis, ‘positive effects were identified for Leckhampton and other northern and eastern parts in terms of their close proximity to Cheltenham and services and facilities. The transport infrastructure in these areas is also considered to be good.’ The positive effects are not explained and it is not explained who considers the transport infrastructure to be good – this is highly questionable.

The only transport infrastructure in the Leckhampton area are roads and these are primarily two heavily congested routes into Cheltenham, one the heavily congested A46 and the other a winding lane, Church Road, which follows a medieval route through the village, passing a primary school and including two regular crossing points for many of its pupils. The photograph of the A46 on the left below was taken at 08:25 in the morning (by Martin Williams), the one of Church Road on the right at 08:52. The land supposedly available for development in the JCS begins to the immediate left of the first picture.

Leckhampton Primary is just out of picture on the right in the second.



The Enfusion report then states baldly that **'flooding is not a constraint'** in this location. This is surprising since the Broad Locations report accepted that this is flood plain, and since the area did flood in 2007 and has done since (see below – pictures are of land next to Brizen Lane and Kidnapper's Lane near Hatherley Brook.)



Looking deeper into the Enfusion report, this omission becomes less surprising. On pp 26-27 they state that 'fluvial flood risk is a particular issue at Tewkesbury, where the Rivers Severn and Avon meet as the topography is flat and the underlying bedrock largely impermeable. During high flows there is substantial risk of these rivers flooding local areas, such as the major flood event that occurred in July 2007.

While it is obviously true that Tewkesbury has the greatest risk, the consultants seem unaware that 600 homes flooded in 2007 in Cheltenham, mostly due to intense *pluvial* (surface water) flooding. Water descended in huge volumes from the Cotswold Hills that cradle the town on three sides.

As the subsequent Pitt report highlighted in 2007, pluvial flooding is a particular issue for urban areas:

"Surface water flooding happens quickly and is hard to predict. It occurs when natural and man-made drainage systems have insufficient capacity to deal with the volume of rainfall. The critical factors for surface water flooding are the volume of rainfall, where it falls and its intensity. In urban areas sudden and intense rainfall cannot drain away as quickly as it can in rural areas where the soil is exposed. Around two-thirds of the flooding in summer 2007 was due to surface water and this was a particular problem during June."²⁶

²⁶ Learning the Lessons from the 2007 Floods (Michael Pitt, DCLG, 2007), para 1.17

Errors in the original Sustainability Analysis still uncorrected in relation to Leckhampton?

In my last submission in February 2012, I highlighted a serious set of serious errors of omission in the original Sustainability Analysis in relation to Leckhampton. Enfusion’s report records only four responses commenting on the Sustainability Analysis not including mine. This raises a doubt as to whether all responses were properly analysed and whether or not the errors in the original Sustainability Analysis were ever corrected. For the record they were²⁷:

- At p112 the SA gave no rating for climate change mitigation despite the obvious fact that loss of an overwhelmingly greenfield site would clearly have a major carbon impact. The SA said that ‘this objective is not assessed as part of the broad locations SA’.
- It gave a GREEN rating on flooding despite the area’s 3a rating from consultants Halcrow and the wide local knowledge that this land floods regularly
- It gave no rating for landscape sensitivity despite concluding that ‘the overall landscape sensitivity considered to be high’ with ‘an impression of a well wooded landscape’ and ‘a large network of hedgerows most of which are well maintained’
- It concluded that 95% of the site contains high grade agricultural land but gave it a GREEN/AMBER rating
- It gave no rating to archaeological significance despite reporting a ‘scheduled ancient monument at Leckhampton’
- It reported health impact only in terms of proximity to the nearest surgery. The natural benefits of green space to mental and physical wellbeing and the potential reduction in health inequalities from free access to green space and recreation were not mentioned. An AMBER rating is given for other reasons.
- **Most seriously, complete omissions were made when critical questions were asked about the value of the green space south of Cheltenham:**

16.Green Space	Notes and commentary		Performance rating
16a Does the location provide the opportunity for access to the countryside and natural environment?	Yes/No		
16b Does the site contain strategic open green space?	Yes/No	Good green infrastructure along the brook lines.	
16c Will it ensure existing open spaces are protected and enhanced?	Yes/No	There is existing greenspace at Leckhampton which will need to be protected, development could offer opportunities to enhance greenspace	

No answer Yes or No. No ‘Red’ warning. The answers of course should all have been Yes and the warnings should have been red. If this informed the subsequent broad locations and strategic allocations policies, it is a serious error.

²⁷ JCS Sustainability Analysis, p118 of 171 in Appendix 1

The positive case for protecting the land at Chargrove as Green Belt

The triangle of land beyond Up Hatherley Way at Chargrove is Green Belt and should remain so. Although the JCS disingenuously claims to commit to protecting the Green Belt, having amended its boundaries, it is actually the very permanence of Green belt that gives it value, particularly in a location where it directly separates the major conurbations of Cheltenham and Gloucester, and the smaller ones of Brockworth, Churchdown and Shurdington in between. The distance between the southernmost point of Cheltenham at this point and the first houses of Shurdington are less than a mile away. If ever there was a stretch of land that would prevent the coalescence of two conurbations, this is it.

The JCS's own AMEC report into the Green Belt²⁸ makes the case very clearly for retaining the triangle as Green Belt, scoring the land RED on three key criteria for Green Belt:

1. Check the unrestricted sprawl of large built-up areas

Significant contribution – forms clear southern boundary to Hatherley preventing further ribbon development along up Up Hatherley Way and Shurdington Road

2. Prevent nearby towns from merging into one another

Significant contribution – limits the joining of Leckhampton and Shurdington, thus separating Cheltenham and Gloucester,

3. Assist in safeguarding the countryside from encroachment

Significant contribution – forms clear southerly boundary to recent development at Hatherley, well defined by boundary of Up Hatherley Way preventing encroachment.

Overall Evaluation is RED for a significant contribution to the Green Belt. **The Chargrove land should remain Green Belt.**

Astonishingly, the Enfusion consultants' Sustainability Analysis report²⁹ on shows a positive GREEN for Green Space against this site, and another strongly GREEN for Biodiversity and more for climate change. It is very difficult to see how building on Green Belt land can be good for green space,

biodiversity and even for climate change and this challenges the credibility of the Sustainability Analysis by Enfusion.

	Sustainability Objectives																	
	Biodiversity	Climate – Mitigation	Climate – Adaptation	Flooding	Resources, Landscape	Resources, Soil, water	Historic	Transport	Waste, Pollution	Economy	City, Town Centres	Communities – Equalities	Communities – safety	Health	Housing	Green Space	Education & Skills	Culture & Tourism
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
CHELTENHAM – P HATHERLEY																		
POLICY A8 – MOD SITE AT ASHCURCH	+	++	+	++	+	+	○	++	+	++	++	++	+	+	++	+	+	○
POLICY A9 – ASHCURCH	++	+	+	++	-	+	○	+	+	++	++	+	+	+	○	+	++	○

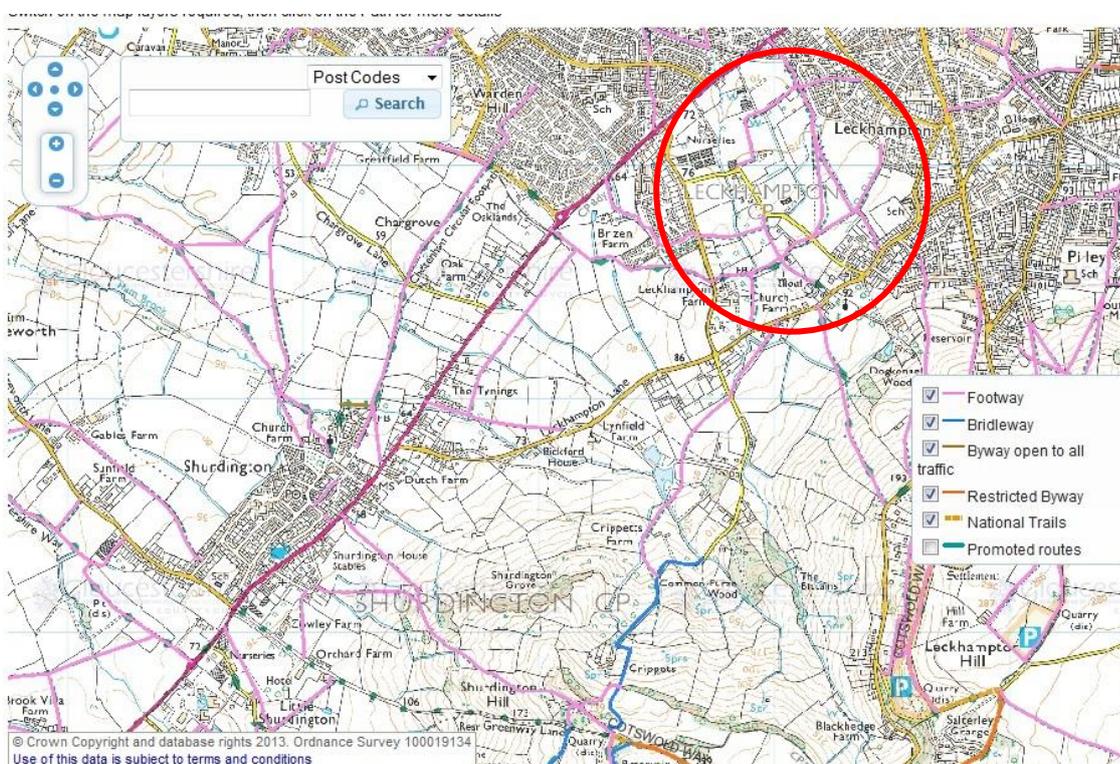
The positive case for protecting the land at Leckhampton as Local Green Space in the JCS

²⁸ JCS Green Belt Assessment, September 2011

²⁹ Gloucester, Cheltenham & Tewkesbury Draft JCS Sustainability (Integrated) Appraisal Report: Non Technical Summary (Enfusion, September 2013)

An enormous amount has been written about the value of the green land at Leckhampton and I would refer the JCS team not only to Leglag’s latest submission , but also to the Neighbourhood Planning document produced by Leckhampton with Warden Hill Parish Council, which describes an area of green space which is:

- Rich in history, including medieval field patterns
- Naturally alleviating flood risk to neighbouring Warden Hill and Hatherley
- Producing local food and local jobs, including the farming of rare local pigs
- Flourishing in its ecology, and rich in biodiversity including five species of bat as well as deer, slow-worms, grass snakes and common toads, and seven bird species on the RSPB red list. Buzzards nested in Lott Meadow this year.
- Popular and well used for free, informal recreation, with 94% of residents responding to a recent survey opposing development and many using the network of rights of way which are much more significant than neighbouring closed fields and more universally accessible than nearby steep hills:



The original JCS Sustainability Analysis p112 concluded that the broad location south of Cheltenham, including Leckhampton, enjoyed:

- ‘Sites of biodiversity value’ (RED)
- ‘Development of the site would be likely to lead to the fragmentation of important habitats’ (RED)
- ‘The area displays a good mosaic of habitat types which could make mitigation difficult’ (RED)
- For overall biodiversity impact, the site shows ‘intimate rolling landscape, predominantly pastoral with improved and semi-improved pasture. Good hedgerow condition and

good proportion of orchard ... good number of parkland trees and many veteran oaks along with other species. Small pockets of woodland dotted around the site. Area around Leckhampton displays unusual land use pattern with many smallholdings, orchards and allotment/market gardens. Good brookline and associated tree cover.’
(RED)

Inspectors have repeatedly rejected appeals by developers, citing the rural character of the land:

- **In 1993** Inspector Brian Dodds ruled that **‘the land at Leckhampton should be protected for its special historical, landscape and amenity value. It represents the last example of the gradual transition between the urban area and the countryside which characterised the Regency town.** It should be considered anew for green belt or AONB status, for ‘landscape conservation area’ status, and as part of a Leckhampton Conservation Area (35A, 129W).
- **In 2003** Inspector Mary Travers, conducting an enquiry on Leckhampton development reported that:
“2.25.11 The site consists of four fields subdivided by substantial hedgerows that are interspersed with hedgerow trees. It has a gently rolling, topography and an attractive pastoral character that in my view links strongly into the landscape of the AONB immediately to the south of Leckhampton Lane. Generally the contours fall from south to north and from east to west and there is a distinct ridge running roughly northwest-southeast through the site- -so that the south-eastern corner is the most elevated part. A public footpath that traverses the northern part of the site forms a link in a network of rural paths to the east and west of the site.

“2.25.12 As can be observed from public vantage points, the site is highly visible from within the AONB, for example from the lower slopes of Leckhampton Hill and from higher up at the Devil’s Chimney. It is also visible partly from the west and in long distance views from the north. There is a substantial hedgerow on the western boundary with the Green Belt but this area drops away towards the Vale of Gloucester As a result, development on the more elevated south-eastern part of the site would be very conspicuous from the western approach along Leckhampton Lane where it would be seen within the context of the AONB. And looking southwards from the public footpath across the site **it is apparent that development would entail a significant intrusion into views of the open countryside and the AONB from the existing edge of the built-up area. It would also sever the link between the rural footpaths to the east and west of the site and replace it with one of an entirely different character. For these reasons and taking into account the scale of the proposed development, I consider that its visual impact on the surrounding countryside would be very significant and that it could not be easily mitigated.”**
- **In 2005**, Inspector David Asher was looking into the Cheltenham Local Plan, and concluded **“that the development of the objection site would materially harm the rural character and appearance of the area, and the important contribution that this makes to the landscape within the site and when seen from the AONB.”**

This land has now at least twice been requested for **Local Green Space status**, by me in my February 2012 submission and most recently again by the Parish Council with their substantial Neighbourhood Planning document to support the application. So far these applications seem to have been ignored.

It is a disgrace that three councils working together to form a Joint Core Strategy have not so far identified a single area anywhere in the JCS area for this important new protection.

Leckhampton meets all the criteria set out in the National Planning Policy Framework:

- The Leckhampton green land is in very close proximity to the community it serves;
 - It does not overlap with Green Belt or AONB;
 - It is demonstrably special to the local community, having led to the creation of its own pressure group and generated many thousands of petition signatures, letters, emails and individual attendances at meetings over several decades
 - It holds significance, for its unkempt rural charm, its animals so close to where children can go to ‘see the pigs’, its history, recreational value, tranquillity and the richness of its wildlife.
 - It is very local in character (as inspectors have noted) and not an extensive tract of land. The NPPF beta guidance now online at <http://planningguidance.planningportal.gov.uk> makes clear “there are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgement will inevitably be needed”. The original Liberal Democrat policy³⁰ compared the new designation for community value to SSSIs for scientific value. At 56 hectares in total, the Leckhampton land is comparable in size to our nearest SSSI at Lineover Wood (40ha), much smaller than London’s Hyde Park (142ha), Clapham Common (89ha) and Kensington Gardens (111ha) and much smaller than the smallest Green Belt, which is (for now) some 700ha.
- The planning minister Nick Boles MP also confirmed to me in person at our meeting on 6 November that of course it was in order for LGS designations to be chosen at the JCS stage not the technically subsequent Local Plan stage. LGS can only be designated during the plan-making process and it would be an obvious nonsense for land to be allocated for development in the JCS and then for ‘protection’ only to be available for particularly valued green spaces from amongst the leftovers after the JCS is decided.
 - This is actually made clear in an important footnote in the NPPF itself which states at Paragraph 14 that Local Plans should meet objectively assessed needs for housing **unless** specific policies in the Framework indicate that development should be restricted. The footnote on p4 then specifies a list of protections that could be used in this way and they include the Local Green Space designation.
 - **The land at Leckhampton between Church Road, Farm Lane and Shurdington Road should be protected as a Local Green Space in the JCS.**
 - **The Sustainability Appraisal of this land too is flawed.** The analysis by consultants Enfusion gives the building of 1,000 houses on valued, diverse land rich in biodiversity a GREEN light for biodiversity, a strong GREEN for flooding, GREENS for climate change and only an AMBER for green space. It begs the question: what on earth would you have to propose to get a red rating?

³⁰ Our Natural Heritage (Liberal Democrats, 2009), para 4.2.1

Q3. Is this the right list of rural service centres and service villages and is this the appropriate amount of new development for them?

I won't comment on individual villages and locations but I have made clear above that it is unsustainable and damaging to impose urban extensions on Cheltenham, destroying the green fields of most value to the most people, and that more dispersed development is a much more sustainable option. I listed many other options for reducing the numbers in urban extensions in answer to Q1 above but if, theoretically, none of those were available and the overall numbers had to be maintained or increased, a few thousand extra houses dispersed amongst smaller villages would make a very positive impact and quite possibly save a village shop or school or pub from non-viability. This option should be actively explored.

Q4. 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?

1. The vision and contents of the JCS are too biased towards economic growth at the expense of environmental and social factors, and the Sustainability Appraisal methodology is unsound

The National Planning Policy Framework makes clear³¹ that councils should balance the three aspects of truly sustainable development in planning:

- Economic
- Social
- Environmental



The JCS draft itself refers to this triumvirate when introducing its own Sustainability Appraisal³² and clearly labels one as the Natural Environment.

Yet the collective JCS vision completely neglects the enormous value of Gloucestershire's natural environment to local people, to communities and to our local economy. The **Cheltenham Sustainable Community Strategy Vision 2008 -2028**, quoted in the consultation document, highlights the need to

'to deliver a sustainable quality of life, where people, families, their communities and businesses thrive; and in a way which cherishes our cultural and natural heritage, reduces our impact on climate change and does not compromise the quality of life of present and future generations'.

The JCS vision, by contrast, seeks a

'vibrant, competitive economy with increased job opportunities and a strong reputation for being an attractive place in which to invest.'

³¹ NPPF, paragraphs 6 and 7, p2

³² JCS Draft for consultation, p7

Not a bad thing, of course, but hardly one likely to deliver development that is truly sustainable. There is, in fact, no mention of Gloucestershire's unique, rich and precious natural heritage anywhere in the vision statement.

Then at paragraph 1.20 the JCS draft then sets out a subtly altered three 'sustainable community strategies' which qualifies the environmental pillar:

- **'A thriving economy:** Building a strong and competitive urban economy; Ensuring the vitality of Town centres; Supporting a prosperous rural economy.
- **A sustainable natural and built environment:** Conserving and enhancing the environment; Delivering excellent design in new developments; Meeting the challenge of climate change.
- **A healthy, safe and inclusive community:** Promoting sustainable transport; Delivering a wide choice of quality homes; Promoting healthy communities. '

The watering down of environmental priorities continues even in the **Sustainability Appraisal**. Consultants Enfusion's report³³ paragraph 1.1 says that **'the purpose of Sustainability Appraisal (SA) is to promote sustainable development through the integration of environmental, social and economic considerations in the preparation of Local Development Plans. This requirement for SA is in accordance with planning legislation, and as set out in paragraph 165 of the National Planning Policy Framework'**.

No it isn't. Actually NPPF paragraph 165 is almost entirely concerned with the **natural** environment. It *actually* says :

*'Planning policies and decisions should be based on up-to-date information about the natural environment and other characteristics of the area including drawing, for example, from River Basin Management Plans. Working with Local Nature Partnerships where appropriate, this should include an assessment of existing and potential components of ecological networks. A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.'*³⁴

Paragraph 167 goes on to say 'the process should be started early in the plan-making process and key stakeholders should be consulted in identifying the issues that the assessment must cover.' As far as I can tell this has been a largely officer-led process, perhaps in consultation with the development industry.

This may explain why Enfusion accepted the rejection of JCS strategies involving lower housing numbers and accepted one that exceeded local need by so much. Their report says that the

'A spatial strategy option based on addressing climate change was not taken forward as there were likely to be major negative effects on landscape and biodiversity from fewer larger development sites. A spatial strategy based on achieving economic resilience (together with elements from the other 2 options) was progressed as this provides the greatest

³³ Gloucester, Cheltenham & Tewkesbury Draft JCS Sustainability (Integrated) Appraisal Report: Non Technical Summary (Enfusion, September 2013)

³⁴ NPPF, para 165, p35

*opportunities for all in the JCS area; concentrating development in the urban centres reduces negative effects on the wider environment and maximises economic performance.*³⁵

As this submission has sought to show, there is nothing necessarily more environmentally friendly about urban extensions and they have many negative consequences. And it is very unlikely that a strategy allegedly based on addressing climate change (as if these were really either/or options) would really damage biodiversity.

The report is more honest at Paragraph 6.5 when it says that Option 2 has been progressed

*‘since it provides the greatest opportunity to improve the wealth & prosperity of residents.’*³⁶

In practice we have a drive for economic growth at the expense of social and environmental factors which has led us into a crazy situation of trying to persuade our own citizens and their elected representatives to swallow a plan that they clearly don’t want and which now needs a drastic rethink before it is defeated at one council or another, or declared unsound in front of the inspector on examination.

This may go badly as much of the Sustainability Appraisal is actually a justification for having a plan rather than doing nothing, eg

- Climate change: ‘The frequency of extreme weather events is also likely to increase. Without the JCS, adaptation and mitigation of the effects of climate change will be less’.
- Waste: Development is likely to increase waste generated as well as minerals and land required; this is likely to be more significant if not coordinated through the planning and design of development in the JCS.³⁷

But this does not amount to a genuine sustainability appraisal of the option actually pursued in the draft JCS which has a very high environmental cost. Enfusion’s report often fails completely to recognise this, for instance describing the preferred option as having ‘positive/neutral effects for biodiversity and green space as the level of development could be accommodated without adverse effects’³⁸ despite the fact that it would involve losing 2,000 football pitches worth of Green Belt.

When asking itself ‘**What are the likely significant effects of the JCS?**’, the report³⁹ fails to recognise the impact of the preferred option on green space and what the NPPF describes as the intrinsic value of the countryside, focussing instead on the *built* environment. *How* the JCS encourages the multi-functional benefits of green infrastructure is not explained:

<p>‘Climate Change Natural Environment Sustainable Communities Biodiversity Green Space</p>	<p>The JCS sets out a strong focus on sustainable design requirements ensuring that compliance with the Code for Sustainable Homes will be met in the longer term. Policies S3 and S4 on design and construction require sustainable standards that should have positive effects overall on climate change, energy efficiencies, and includes</p>
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³⁵ G, C & T Draft JCS Sustainability (Integrated) Appraisal Report: Non Technical Summary (Enfusion, Sept 2013)

³⁶ Ibid para 6.5, p 43

³⁷ Ibid p v

³⁸ Ibid p 55

³⁹ Ibid p viii

	encouragement for multi-functional benefits of green infrastructure for people and wildlife.
Biodiversity Natural Environment Historic Environment Waste and Pollution Health Green Space	Green Belt, landscape and historic assets are particular issues for the JCS and Policies S5-8 will limit negative effects and provide for enhancement possibilities. The JCS has a strong commitment to Green Infrastructure which is cross-linked in different policy areas and specified for the Strategic Allocations – all will have major positive cumulative effects in the long term on many sustainability factors including biodiversity and human health. ‘

The Enfusion report is more of a cheerleading exercise for the preferred option already chosen, not a rigorously evidence-based sustainability appraisal as required by the European directive.

This is not what the National Planning Policy Framework demands. At Paragraph 152, it says: ‘**Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.**’⁴⁰

The draft JCS as it stands does have a significant negative environmental impact because the numbers are simply too high.

2. The overall JCS numbers are too high

The overall numbers planned for the JCS area are simply too high.

10,000 extra homes in and around Cheltenham – the apparent result of Cambridge Econometrics model - would represent another 22,000 people and a colossal 19% increase in the town’s population. This would be enough to house everyone in real need on Cheltenham’s waiting list three times over.

Except that it won’t even house them once. As the CPRE Gloucestershire submission to this consultation makes clear, they do even appear to deliver on the basis of local need:

‘Our understanding is that the total ‘net’ number of ‘affordable’ homes provided in the JCS area between 2007/8 and 2011/12 equates to less than 300 homes per annum. The longer term historic trends give **an even lower average figure than for this 5 year period.**

This historic rate for the provision of ‘affordable’ homes contrasts starkly with the number now apparently proposed by the Draft JCS. Applying the proportion of ‘affordable’ homes identified in the.. Tables to the proposed 33,200 homes in the Draft JCS implies a need to complete **around 670 homes in each and every year of the plan:** a figure therefore more than double the historic high average rate.

⁴⁰ NPPF, paragraph 152, p 37

Compounding the problem of ‘deliverability’ for such high figures and therefore the test of ‘soundness’, it is already clear that the average target rate will not be achieved in any of the first five years of the Plan, thereby implying an even greater need per annum for completions in later years.’⁴¹

So we face the prospect of allocating large swathes of countryside for housing that, if it is built on this scale at all, will largely be market housing for those we know exercise the greatest pressure on housing in Gloucestershire: those moving from other parts of the UK, attracted by higher than average incomes, good schools and.. countryside. **By failing to distinguish between and properly analyse ‘need’ and ‘demand’ , the model and so the JCS risks handing profitable greenfield sites over to developers and then finding that many of the planned homes aren’t built, some of the land just adds to developers’ landbanks, the land is blighted for more positive development in the meantime (such as the proposed country park at Leckhampton) and those on the housing waiting list actually have more prospect of being housed by Cheltenham Borough Council itself in new social housing for rent at North Place, the Brewery or in St Paul’s than in any of the new greenfield developments.**

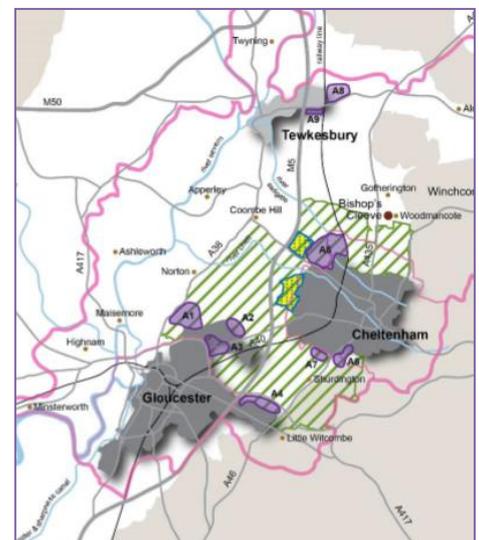
In its core planning principles⁴², the National Planning Policy Framework makes a number of demands on councils bringing forward sound plans. The presumption in favour of sustainable development is well known but it is not the only planning principle in the NPPF and in effect it only updates a presumption in favour of development that already existed in law to put new emphasis on sustainability.

Other core planning principles of the NPPF insist that plans should:

- Be genuinely plan-led, empowering local people to shape their surroundings
- Take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belt around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it
- Contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework
- Encourage the use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value
- Recognise that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage or food production)

The level of development in the current JCS draft appears to fail on many of these fronts:

- It is not clear that the JCS has been a genuinely plan-led process (see my answers to Q2 at pp 10, 11 earlier in this submission) but rather one increasingly foisted on reluctant councillors and pleasing largely the development industry.
- Far from protecting the existing Green Belt, the draft JCS plans more than 38% of all development for greenfield sites and almost all of that for Green Belt sites as is clear from this



⁴¹ CPRE Gloucestershire submission, p 6

⁴² NPPF, paragraph 17, p 5

wider Gloucestershire map (previous page). The fact that Green Belt status as such cannot be sacrosanct under the plan-making process does not excuse a process which seems almost designed to undermine it.

- It is not clear either from the main JCS document or the Sustainability Appraisal that a rigorous process has been attempted of bringing forward brownfield and low quality land in advance of land of higher environmental value
- Green land has largely been allocated on the basis of its proximity to urban areas. No assessment has been carried out of the multi-functional value of areas like Leckhampton which contribute wildlife, recreation, flood risk mitigation, carbon storage and food production.

Hidden deep on pages 102 and 103, the Sustainability Appraisal does concede the obvious environmental impact even if this isn't represented in any of its main conclusions:

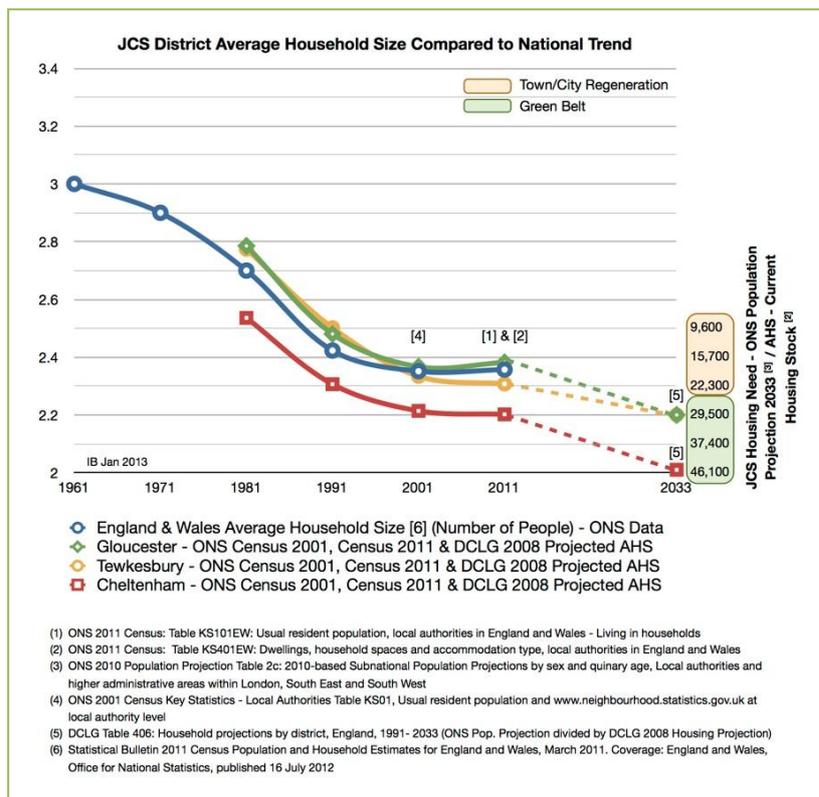
- **'Biodiversity**

7.142 **Significant negative effects are likely to arise from the physical changes (loss of local habitats and linkages and disturbance to species) associated with the quantum of development in the plan.**⁴³

- **Natural Environment and Resources: Use and Quality**

7.145 The rural landscape of the JCS area includes the Cotswold Area of Outstanding Natural Beauty, which is present in both Cheltenham and Tewkesbury Borough Councils. **The level of development proposed by the plan could lead to major negative effects on the environment.**⁴⁴

The basis on which the projections have been calculated has been widely challenged and convincingly. The Leckhampton Green Land Action Group present this chart illustrating both the sensitivity of the JCS numbers to assumptions of household size and the degree to which the higher JCS projections are now wildly off-trend⁴⁵:



⁴³ G, C & T Draft JCS Sustainability (Integrated) Appraisal Report: Non Technical Summary (Enfusion, Sept 2013), p 102

⁴⁴ Ibid, p 103

⁴⁵ www.leglag.org.uk Evidence Base

There is extensive and highly detailed speculation in the Cambridge Centre peer review of household formation rates⁴⁶ about the possible explanations for these deviations from trend but importantly the Cambridge Centre issue a clear disclaimer: the source of the very high housing numbers are the economic growth scenarios generated by Nathaniel Lichfield and Partners (NLP) in their 'Assessment of Housing Needs' (September 2012). The Cambridge Centre team tactfully say that NLP

'use a rather different method from a classic demographic approach to projecting household growth'.

They quote NLP's report:

'the economic scenario adopts a different starting point to the demographic scenarios. The demographic scenarios apply input data relating to (inter alia) natural change and migration and then identify the resultant population change, dwelling requirements and number of jobs that would be supported by the economically active population. By contrast the economic scenario uses the employment forecast prepared by Cambridge Econometrics as its starting point and then identifies the number of migrants that would be expected, taking account of assumptions regarding commuting, unemployment and economic activity levels and the likely future levels of non-economic migration from this. It then tests the likely levels of natural change and population growth and identifies resultant household growth and dwelling requirements.'⁴⁷

There can be no clearer statement of how the JCS how ended up with such very high numbers and how, at its heart, is not about meeting an objectively assessed need for growth or jobs or housing for Gloucestershire's residents. It is about a reckless pursuit of economic growth above the natural trend, generating artificial demand for housing by trying to pull in people from other parts of the country.

The expensively commissioned Cambridge team make clear that is 'beyond the scope of their report 'to review the methodology adopted by NLP in forecasting the housing implications of the two economic growth scenarios and no attempt has been made to do this.'⁴⁸

But surely the JCS team are free to pursue an economic growth scenario at the expense of the environment if they so wish? Not if they are to follow one of the cardinal principle of the National Planning Policy Framework they're not...

⁴⁶ Independent Peer review of Household Formation Rates (Cambridge Centre for Housing & Planning Research, January 2013)

⁴⁷ Independent Peer review of Household Formation Rates (Cambridge Centre for Housing & Planning Research, January 2013) p 24

⁴⁸ Ibid p24

3. The JCS does not empower local people

“The evidence is made up of two elements:
• **The views of local communities** and those with a stake in the future of the area;
• **Research and fact finding evidence”**
Stroud Local Plan, pre-submission draft (Stroud District Council, 2013)

Stroud District Council’s interpretation of the evidence base (quoted above) is strikingly different from anything in the draft JCS. By regarding the views of local communities as a key part of the evidence base, they are absolutely true to the spirit of the National Planning Policy Framework:

“Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives.

This should be a collective enterprise. Yet, **in recent years, planning has tended to exclude, rather than to include, people and communities.** In part, this has been a result of targets being imposed, and decisions taken, by bodies remote from them. Dismantling the unaccountable regional apparatus and introducing neighbourhood planning addresses this.

In part, people have been put off from getting involved because planning policy itself has become so elaborate and forbidding – the preserve of specialists, rather than people in communities.

This National Planning Policy Framework changes that. By replacing over a thousand pages of national policy with around fifty, written simply and clearly, **we are allowing people and communities back into planning.”**

Rt Hon Greg Clark MP, Minister for Planning
Foreword to NPPF, March 2012

In detail, the NPPF is equally clear:

- Paragraph 1, p1: “The National Planning Policy Framework... provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities”

- Para 17, p5: “Planning should be genuinely plan-led, **empowering local people** to shape their surroundings”
- Para 155, p 37: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. **A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area**, including those contained in any neighbourhood plans that have been made.”

To date the JCS is falling far short of these ideals. The draft JCS claims that it ‘takes account of the outcomes of three previous sets of consultations undertaken between November 2009 and February 2012.’⁴⁹ It doesn’t.

The JCS draft is quite clear that ‘of the four scenarios set out in the *Developing the Preferred Option* consultation document, Scenario A, based on capacity [the low growth option], was the one that found most favour with respondents, if often qualified. References made to Scenario A considered that this should be the maximum level of development that should be accommodated within the JCS area and that this is the only sustainable option to take forward’⁵⁰ Yet this scenario was rejected.

In the Joint Core Strategy response report (October 2011), the public’s views are very clear from the various consultation methods:

- Interactive maps
 - Support for development within the major urban areas plus Highnam and Stoke Orchard
 - **Opposition to development on the urban fringes including South Cheltenham, Bishop’s Cleeve, Tewkesbury and Northway**
- Post-it notes
 - **Concern over the scale, nature and need for growth proposed**
 - **Concern over possible Green Belt changes** [sic – this means the loss of Green belt]
 - **Conservation and use of open spaces**
- Short questionnaires
 - High priority to flood prevention, **affordable** housing and **informal outdoor recreation and general open space’**

When asked where growth should be accommodated, 27 out of 110 said there should be no growth at all, the rest prioritising:

- **Growth within existing urban areas**
- **Some growth within rural villages to support viability**
- **Higher density development**
- **Re-used land, empty properties**
- **Not in Green Belt**

⁴⁹ JCS draft for consultation, paragraph 1.13, p6

⁵⁰ Ibid para 6.17, p54

In an earlier consultation in 2009, already quoted in relation to the earlier question on urban extensions, a red dot/green dot methodology was used. The result was emphatic, particularly south of Cheltenham:



Source: JCS roadshow 2009, Cheltenham

In my view the public got it right, again, and expressed their views very clearly during this consultation exercise as during all the others. It is no surprise that their elected representatives at parish, district, county and parliamentary level have gone out of their way to support them.

As far as I can see they – and we – were then completely ignored.

If local people are not included and empowered in this process, as directed by the National Planning Policy Framework, but excluded and disempowered then we will be in breach of the national Planning Policy Framework and the inspector at examination next year will be right to reject this plan as unsound.

I urge the JCS team to respect national and local policy and opinion, to respect democracy, and make changes to the economic model on which this draft plan is based, listen to those communities who want to protect the land of most value to most people, and make fundamental changes to this Joint Core Strategy.

Martin Horwood MP

December 2013