Comment Information

Document Section	 Consultation Draft Joint Core Strategy Chapter Strategic Policies Policy SP 1 - scale of new development Policy SP1 - Scale of New Development
Comment ID	2451
Respondent	Paul Massey
Response Date	13 Dec 2013
Uploaded By	Jordan Langdon-Bates
Current Status	Accepted
Response Type	OBJECT
What is the nature of this representation?	Object
Comment	The Objectively Assessed Need (OAN) for 33200 homes is, in my view, unsound. The baseline population projection gives a need for 28500 homes (which also more than accommodates the 21800 jobs expected by the Experian economic projection).
	The 33200 figure assumes that household formation will 'partially return to trend' after the recession. This <u>cannot</u> be assumed with any confidence, particularly given that a range of current government policies (such as changes to housing benefit) are likely to restrain future household formation rates regardless of the position in the economic cycle.
	It is clear that projecting housing need over the long timescales of the JCS is an inexact science, and that even slightly different values of the input variables (such as the rates of household formation) lead to very different



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	final numbers. It is also clear that, once a	
	green field site is developed for housing, it is	
	impossible to return it to its undeveloped state	
	if the actual housing requirement turns out to	
	be lower than predicted. However, if we build	
	too few houses, it is always possible to build	
	more. As such, I suggest that the most	
	prudent course of action is to err on the side of	
	caution and set the JCS OAN at the figure of	
	28500 homes as suggested by the baseline	
	population projections.	
	The final JCS will also need to consider affordable housing need in far more detail than the current draft (which awaits the completion of the SHMA). Even if 33200 houses are built, they will not solve the JCS area's affordable housing problems unless radical action is taken to increase the percentage of affordable homes in the developments which are actually built.	
Supporting Documents		
Submission Method	Email	
JCS Comments		
Recommended Changes		

Comment Information

Document Section	Consultation Draft Joint Core Strategy Chapter 3 - Strategic Policies Policy SP 1 - scale of new
	development Policy SP1 - Scale of New Development
Comment ID	2452
Respondent	Paul Massey
Response Date	13 Dec 2013
Uploaded By	Jordan Langdon-Bates
Current Status	Accepted
Response Type	OBJECT
What is the nature of this representation?	Object
Comment	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. Given the sensitivity of all the sites in question the figure in Cheltenham should be reduced to the target. The reason for the oversupply in Cheltenham is the 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. The 10000 target for homes in Cheltenham includes an allowance of approximately 50 homes per year as 'windfall' development. This is unreasonably low. It is important that allowance is made for not only new individual homes, but also windfall brownfield sites and extensions to existing properties.

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 Supporting

 Documents

 Submission Method
 Email

 JCS Comments

 Recommended

 Changes

Comment Information

Document Section	 Consultation Draft Joint Core Strategy Chapter Strategic Allocation Policies Policy A5 - North West Cheltenham Urban Extension, Cheltenham Policy A5, North West Cheltenham Urban Extension, Cheltenham
Comment ID	2453
Respondent	Paul Massey
Response Date	13 Dec 2013
Uploaded By	Jordan Langdon-Bates
Current Status	Accepted
Response Type	OBJECT
What is the nature of this representation?	Object
Comment	There is strong local opposition to the scale of the North West Cheltenham Urban Extension (NWC UE). Arguments against a large NWC UE include the proximity of the Wingmoor Farm waste disposal sites, the inability of local road infrastructure (especially Tewkesbury Road) to cope with the increased traffic volumes, and the fact that a large development will "swallow up" and dilute the distinct character of Swindon Village.
	Although extra primary school provision is proposed in current plans, it is not clear how the extra secondary school demand will be met. Although none of the proposed strategic

developments are large enough to warrant a new secondary school, taken together they will

create considerable extra demand that Cheltenham's current schools will struggle to

meet.

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 Supporting

 Documents

 Submission Method
 Email

 JCS Comments

 Recommended

 Changes

Comment Information

Document Section	 Consultation Draft Joint Core Strategy Chapter Strategic Allocation Policies Policy A5 - North West Cheltenham Urban Extension, Cheltenham Policy A5, North West Cheltenham Urban Extension, Cheltenham
Comment ID	2454
Respondent	Paul Massey
Response Date	13 Dec 2013
Uploaded By	Jordan Langdon-Bates
Current Status	Accepted
Response Type	OBJECT
What is the nature of this representation?	Object
Comment	Should a large NW Cheltenham urban extension go ahead, it is important that there are adequate green spaces within and around it. It is also important that these areas are protected in the future. The maps shown in the consultation document are inadequate to give assurance on this.
Supporting Documents	
Submission Method	Email
JCS Comments	
Recommended Changes	

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Comment Information

Document Section	 Consultation Draft Joint Core Strategy Chapter Strategic Allocation Policies Policy A5 - North West Cheltenham Urban Extension, Cheltenham Policy A5, North West Cheltenham Urban Extension, Cheltenham
Comment ID	2455
Respondent	Paul Massey
Response Date	12 Dec 2013
Uploaded By	Jordan Langdon-Bates
Current Status	Accepted
Response Type	OBJECT
What is the nature of this representation?	Object
Comment	I note that the Local Enterprise Partnership have proposed developing an additional 140Ha of land near M5 Junction 10, currently safeguarded for post 2031 housing development, as employment land within the JCS plan period.
	I do not believe that there is enough evidence of demand to justify such a large increase in employment land provision. However, I would provisionally support moving some or all of the current employment land allocation closer to Junction 10. This would allow better green buffers around any eventual urban extension in the Swindon Village area. However, upgrading M5 Junction 10 to a four-way junction would be a prerequisite for this. There is general support locally for making M5 junction 10 a four-way junction. Although the Highways Agency have previously resisted this to prevent 'junction

Powered by	INOVEM Inclusionware [™] - Online Consultation Software hopping', I understand that improvements could be looked on more favourably if they could be shown to support/trigger significant economic growth (which a 23Ha business park in the J10 area would do).
Supporting Documents	
Submission Method	Email
JCS Comments	
Recommended Changes	