

Councillor L. G. Godwin, J.P.
10, Long Mynd Avenue, Up Hatherley,
Cheltenham, Glos. GL51 3QN
Telephone: (01242) 526649
Email: lgodwin@talktalk.net

Tracey Crews,
Head of Planning,
Cheltenham Borough Council,
Municipal Offices,
Cheltenham.

10th December 2013

Dear Tracey,

**Re: 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, is 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 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.

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).


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.

Finally, would the JCS Programme Board re-assess 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.



Councillor Les Godwin.
Joint Core Strategy/ Member Steering Group.