

CPRE GLOUCESTERSHIRE BRANCH

Response to JCS Main Modifications Consultation March 2017

PMM003

This sentence should be amended to read “*Where development cannot be accommodated within the existing Gloucester and Cheltenham urban areas, areas of Tewkesbury Borough which lie at the edges of Gloucester and Cheltenham will play an important role in accommodating development through urban extensions.*”

PMM005

CPRE strongly supports the specific inclusion of measures to increase rural access to high speed broadband.

PMM007

CPRE strongly supports the changes to emphasise increased public transport, education, recreation and leisure. But the change to Strategic Objective 8 should be removed: encouragement to provide “at least” the number of houses required – ie overprovision – is an invitation to developers to continue to make speculative planning applications outside the provisions of the JCS.

PMM010

The number of jobs to be created in the JCS area during the Plan period has risen from between 21,000 to 28,000 and is now projected to be approximately 39,500. This figure has been based on the highly aspirational 4.8% GVA growth per annum rate envisaged by GFirst LEP, a figure we have repeatedly argued is totally unrealistic when compared to UK economic growth forecasts. Both the emerging Local Plans for Cheltenham and Gloucester do not include a jobs to be created figure and only Cheltenham refers to a much lower growth rate. The Local Plan employment aspirations fail to match those of the JCS with much lower and more realistic growth anticipated in both Gloucester City and Cheltenham Borough. It seems unlikely that the growth in Tewkesbury Borough will be able to fully address the major shortfall. Against this background, setting a minimum figure for employment land is extremely unhelpful. See also comments on PMM017

PMM013

For reasons set out under other comments. CPRE does not accept the rationale for the increases in the requirement for both housing and employment land.

PMM016

CPRE takes issue with the need for assessments to provide for “aspirational” business growth which is not grounded in reality.

PMM017

CPRE notes that the JCS authorities accept that employment forecasts are subject to considerable uncertainty. We do not accept that providing an economic uplift to the demographic OAN has been justified. In our comments on the Inspector’s Interim Findings we noted that the 2016 budget had reduced UK GDP forecasts to 2.0% in 2016 with broadly similar figures through to 2020; and that uncertainty caused by the decision to leave the EU

was likely to lead to a further slowdown in economic growth at least in the short to medium term. The LEP aspiration is for growth of 4.8% GVA per annum, a growth rate we consider to be totally unrealistic.

PMM019

CPRE supports the strengthening and extension on cross-authority cooperation.

PMM020

During the hiatus created by the lengthy preparation of the JCS a number of planning permissions have been granted, some on appeal, which we note will make a substantial contribution to the delivery of the housing envisaged for the Service Villages over the Plan period. However, the scale of development in certain villages, such as Alderton, has already exceeded their acceptable capacity. The total housing figure for the Rural Service Centres and Rural Villages must be seen as an absolute maximum for provision over the plan period, noting that the overall housing figures for the three JCS authorities are expressed as minimum figures which will inevitably lead to further speculative planning applications outside the provisions of the JCS and Local Plans. Full account must also be taken of democratically supported Neighbourhood Development Plans, where available.

PMM022

While comprehensive assessments have been carried out for urban extensions and strategic allocations in the pre-submission JCS, including site specific issues and sustainability assessments, we are not aware that similar assessments have been carried out for those locations added as part of the Major Modification process, in particular at Winnycroft and West Cheltenham. Such assessments are essential if the JCS is to be accepted as sound.

PMM023

CPRE maintains that housing provision of 31,100 is closer to the reality of what is likely to be delivered over the plan period. We note the proposal for an immediate review of the JCS to address the alleged shortfall in sites in Gloucester City and Tewkesbury Borough. Any review of the housing figures should closely monitor actual employment growth against the figures implied by the JCS projections.

PMM025

As noted elsewhere, CPRE considers that the provision of employment land is excessive on account of the highly speculative employment projections.

PMM045

CPRE supports the emphasis now placed here on waste minimisation and reuse.

PMM052:

The original proposals for safeguarded land at Twigworth have been reinstated. In our previous response in December 2013 (to the Draft JCS) we expressed the view that 'the landscape and amenity value of land towards Twigworth is of greater value than that closer to Innsworth and must be protected from development for as long as possible', a view reinforced by the Broad Locations Report which concluded that the landscape, hedgerows and historic importance increases north of the Hatherley Brook. Against this background CPRE is pleased to note that this area is not being proposed for immediate development.

PMM053

CPRE welcomes the inclusion of the additional text regarding waste management activities in the Green Belt. But the test could go further to indicate that the long-term objective should as far as practicable be to relocate these facilities to one or more sites outside the Green Belt and restore the land to agricultural use or green infrastructure.

PMM056

We welcome and support the inclusion of 'within the setting of' the Cotswolds AONB, which is a broader concept than 'adjacent to'. But this part of the sentence needs to read "... in **and** within the setting of ..."

PMM060

CPRE supports the additional text proposed by Natural England.

PMM070

CPRE strongly supports the proposed level of provision of much needed affordable housing but remains concerned that it can actually be delivered. We note recent cases where developers have succeeded in demonstrating that sites are unviable with the level of affordable housing required, and that they have successfully secured reductions in the affordable component of the development and in some instances the removal of any requirement. It is therefore essential that the proposed viability assessments are truly independently and rigorously carried out and that penalties are imposed on developers who make unrealistic initial proposals but then seek to reduce the proportion of affordable housing at a later stage without valid extenuating circumstances. Without some certainty around delivery, is this a viable and 'sound' policy? We were surprised that there is not a policy encouraging development by Housing Associations and small developers in line with emerging national policy. And is there a role for the JCS authorities in providing housing for rent?

PMM071

This section covers affordable housing provision in relation to small developments and in 'designated rural areas'. District level plans should (not may) give more detail on where a lower threshold will apply. See also CPRE comments on viability made at PMM070.

PMM072

CPRE is pleased to note, and fully supports, the changes made to reflect new government policy with respect to gypsies and travellers. This also applies to the remainder of this section (PMM 72 to 77)

PMM081

CPRE fully supports the thrust of this policy. However the use of the phrase "where appropriate" is both gratuitous and unnecessary and could give rise to undesirable dispute. It should be deleted from 1b, 1c and 4.

PMM088

We were pleased to note the inclusion in the JCS of the potential River Severn area regional park. This concept is of strategic significance and accordingly we recommended its specific inclusion in the JCS. In addition, there should be reference to investment to improve green

infrastructure within the Gloucester and Cheltenham Green Belt in line with the policy in paragraph 81 of the NPPF.

PMM089

CPRE strongly supports the proposed area of Local Green Space at Swindon Village.

PMM100

CPRE fully supports the publication of assessments for the reasons given.

PMM102

CPRE welcomes the requirement that comprehensive master plans should cover the entire area of the strategic allocations.

PMM104

In addition to including reference to site specific policies A1 to A11, this section should also refer to the indicative site layouts referred to in PMM105.

PMM105

It is essential that developers are held to the contents of the indicative site layouts for each of the strategic allocations in site master planning and at the development management stage. Accordingly, the word 'should' should be replaced by 'must', i.e. must take into account the indicative site layouts. This is necessary to ensure that the development is delivered on site as envisaged by the local authorities and the affected local communities.

PMM106

A1: Innsworth & Twigworth

In February 2017, GFirst LEP secured money through its Growth Deal funding package for a new road junction on the A40 Gloucester Northern Bypass to provide a link into the proposed strategic allocations at Innsworth and Twigworth. This is before these strategic allocations in the JCS have been proved 'sound' and the Inspector has concluded the JCS Examination and issued her final report. This fundamentally undermines the credibility of the planning process and is both undemocratic and unacceptable.

Further rationalisation of MOD sites in the UK could result in land at Imjin Barracks, Innsworth becoming available during the plan period: this possibility should be taken into account. As has been seen at Ashchurch, MOD estates and their future are subject to periodic review.

PMM109

A3: South Churchdown:

Proposals for 50ha of green infrastructure to protect important views and ancient woodland are welcomed. The proposed landscape buffer for the A40 will have to take account of any future improvements to this route. The green infrastructure areas will also be critical in maintaining an element of separation between Churchdown and Gloucester City's boundary south of the A40, currently ensured through Green Belt designation.

PMM111

A5: North West Cheltenham

As noted in our comments on PMM089, CPRE supports the provision of Local Green Space adjacent to Swindon Village. The indicative site layout needs to indicate the approximate line of the proposed new link road between the A4019 and Hyde Lane as listed in the 'Emerging JCS Transport Strategy' October 2016.

PMM112

A6: South Cheltenham Leckhampton

CPRE welcomes the deletion of this strategic allocation on both traffic and landscape impact grounds. The location is an important setting to the AONB in a sensitive area and highly visible from the Cotswolds escarpment to the south. Traffic from the development would use the already heavily congested A46.

PMM115

A9: Ashchurch

The objective to provide high quality public transport facilities and connections and safe, easy and convenient pedestrian and cycle links to this location is particularly welcome.

PMM117

A10: Winnycroft

We support the need to respect the landscape character of this edge of Gloucester City's setting and the heritage asset at Winnycroft Farm but the reason for protection should be extended to include the setting of the Cotswolds AONB. The AONB boundary in this location follows the line of the M5 to the southeast where the strategic allocation borders the M5.

PMM118

A11: West Cheltenham

Due to the proximity of the Hayden Sewage Treatment Works the JCS should stipulate that development, and especially the residential component, shall not be undertaken until satisfactory measures to reduce odours have been clearly demonstrated.

Consideration must also be given to the power lines that cross the north of the area identified and the exposed nature of the most western part of the site due to the slope of the land which falls from the edge of the existing development at Springbank. Viewed from the west, development on this part of the site will be visible from a far distance. Careful design of development must reflect this and the height of employment and other buildings must be limited to minimise landscape Impact.

The adjacent road network is a complex system of residential streets. Access back into the existing urban area must be prevented at both construction and post completion stages. The indicative site layout needs to indicate the approximate line of the proposed new dual carriageway linking the A40 to the A4019 – new access to west of Cheltenham development in the 'Emerging JCS Transport Strategy' - October 2016.

PMM120

It is essential that all strategic allocations should have indicative site layouts. See also comments under PMM105.

PMM122:

CPRE is strongly opposed to any policy which advocates the early release of safeguarded land and the proposal to identify alternative sites if there are delivery problems. Such policies are an open invitation to developers to artificially delay the delivery of less profitable sites. They should only be considered as a last resort.

PMM123

CPRE completely fails to understand how the failure to provide 110% of the housing trajectory figures would trigger a review. This would mean the overprovision of what are ambitious housing completion targets. Any review should not automatically increase the housing figures and if the job creation figures are less than anticipated could justify a reduction in the overall housing numbers.

PMM 123a

See comments under PMM023 about monitoring projected employment growth figures against the actual job creation figures.

PMM123b

See comments under PMM023 about monitoring projected employment growth figures against the actual job creation figures.

PMM124

The use of the Liverpool approach is supported for the reasons stated.

PMM 131

The intention to maintain average journey times at their 2015/16 level is questionable and there is no supporting evidence. It is not possible to judge the soundness of the JCS without the up to date traffic modelling information. Approval of the JCS before this is complete and published would lay the plan open to legal challenge. Your own Emerging JCS Transport Strategy - October 2016 states that 'Only once this work has been completed will the strategic and local highway authorities be able to fully consider the transport impacts of the JCS' and therefore to determine if their policy requirements will be satisfied. In addition, the same document gives no confident indication that a number of the required infrastructure schemes are in fact going to be funded within the plan period, if at all.

6 April 2017

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