

RESPONSE FROM CPRE GLOUCESTERSHIRE

16 DECEMBER 2018

JCS REVIEW: ISSUES AND OPTIONS CONSULTATION

Q1: Do you consider that a comprehensive review of the plan is the correct approach for the JCS review. If not, what do you think are the alternative approaches?

Yes, particularly in the light of the revised NPPF.

Q2: On the basis that the plan period needs to be extended, what do you think is a reasonable timeframe for the JCS to Plan for and why?

An aim should be common timeframes for all the local plans in Gloucestershire. It is noted that Stroud District Council is working to roll forward its Local Plan to cover the period 2020 to 2040.

Q3: What are the strategic policy areas that you consider the JCS should cover?

The policy areas should include:

- Addressing housing needs, and particularly delivering more genuinely affordable housing
- Providing for realistic levels of economic growth
- Ensuring that development is in sustainable locations
- Ensuring that the special character of the JCS area is conserved and enhanced – its historic environment, archaeology, geological features, diverse landscape character and its natural environment
- Providing necessary infrastructure, particularly transport infrastructure
- Revitalising our town centres and addressing the issue of retail restructuring
- Mitigating climate change and adapting to it
- Safeguarding best and most versatile agricultural land
- Maintaining the integrity of the Gloucester and Cheltenham Green Belt and enhancing its beneficial use
- Ensuring the highest standards of design, landscaping and provision of green infrastructure in new development

Q4: Do you consider any alterations to the existing policies in the adopted JCS are required, particularly in the light of the revised NPPF?

Policy SD4 (Design Requirements) should make more specific reference to green infrastructure, noting that all Gloucestershire's local authorities have signed up to the "pledge" to deliver green infrastructure across the county. [We have noted the welcome

inclusion of a separate policy on green infrastructure (INF3) but consider that a more specific reference is required in Policy SD4].

The policy for Green Belt (SD5) needs amending to reflect the revised wording in the NPPF which says that once established Green Belt boundaries should only be altered where exceptional circumstances have been fully evidenced and justified (NPPF para 136). The policy should also include a commitment to “plan positively to enhance their beneficial use” (para 141)

Policy SD7 (The Cotswolds AONB). See the response to Q5 (duty to cooperate).

Policy SD12 (Affordable Housing) will need revision in the light of the expanded definition of affordable housing in the revised NPPF (Annex 2) and the inclusion of starter homes in the definition.

Q5: What are the duty to cooperate issues that the JCS review will need to consider?

We suggest that the main issues are:

- Addressing housing needs if needs cannot realistically be met within the JCS area. We note existing engagement with Stroud District Council and Wychavon District Council
- Ensuring that JCS policies and the Local Transport Plan are fully aligned (Gloucestershire County Council and Highways England)
- Providing for a realistic level of economic growth) (GFirst LEP/Gloucestershire County Council)
- Ensuring that the latest information on flood risk is fully taken into account (Environment Agency)
- Adapting to and mitigating other climate change impacts where a Gloucestershire scale approach would be desirable
- Ensuring that impacts on areas/sites of nature conservation importance are avoided or adequately mitigated (Natural England/Local Nature Partnership)
- Achieving a single Local Plan policy for the Cotswolds AONB applying to all the local authorities with land in the designated area (Cotswolds Conservation Board)

Q6: Are the vision, key challenges and objectives identified in the JCS still relevant? Are there new key challenges the JCS review needs to consider?

The challenges and objectives identified in the JCS still look relevant. What has changed is their relative importance.

We suggest three areas need greater attention:

Increasing recognition of the imperative to seriously address climate change points to a greater emphasis on achieving sustainable patterns of development and reducing the need for car travel;

Demographic changes and the increasing proportion of older residents points to a greater focus on addressing their specific needs;

Provision of affordable housing where there is an urgent need to deliver a significant increase in genuinely affordable housing to meet local needs.

Q7: Having regard to the spatial strategy and the options presented above, how do you think the JCS authorities can most sustainably deliver for our future development needs?

We consider that the most sustainable approach to delivering for future development needs is to continue with the present overall strategy of focussing development at Gloucester and Cheltenham and in the Ashchurch/Tewkesbury area; providing for additional growth requirements which cannot be met in the urban areas through well designed and located urban extensions served by good transport links; and providing for limited growth in the two service centres of Bishops Cleeve and Winchcombe. In our view there remains considerable scope for further urban regeneration initiatives particularly in Gloucester, with opportunities for well designed, higher density development on previously developed land, including housing - which would also benefit towns centres generally (See Q11). The urban capacity of Gloucester needs to be fully investigated.

The NPPF requires that exceptional circumstances have to be evidenced and rigorously tested before the release of green belt land. In the JCS area, we note the thinking around more significant development in the Ashchurch/Tewkesbury area in association with improvements to the A46 and J9 of the M5. This option should be fully explored (see also the response to Q12). We see no case for considering a new settlement at this point in time. It would be too small and too close to the existing major urban areas to ensure that it would be a truly sustainable option. We do not advocate rural dispersal as it is not a sustainable approach.

Q8: Are there any justifications for departing from the Government's standard housing calculation methodology?

No, but see the answer to Question 10.

Q9: Do you think that there are any other specific forms of housing the JCS Review should seek to address?

In relation to older people, there is a need to cater for "downsizing", enabling residents to move to smaller properties in the area they currently live, at the same time freeing up larger properties suitable for families. Policies should also be included to encourage the building of 'lifetime homes', homes which can be readily adapted internally to make them suitable for different stages of life.

Q10: There is going to be a need for sites to be identified for employment land. What types of employment land do you think are required in the JCS area to provide for the needs of different business sectors and where would it best be located?

The JCS employment strategy is largely based on the Strategic Economic Plan prepared by GFirstLEP. This anticipated growth in GVA over the JCS period of 4.8% per annum, a highly aspirational rate of growth that many argued was wholly unrealistic. It generated the figure of 39,500 new jobs being created by 2031 and led the Inspector at the JCS Examination to add an “economic uplift” to the housing numbers to cater for in-migration to fill the new jobs. The review of the JCS must begin with a full analysis of the number and types of additional jobs actually created since 2011.

Economic growth since 2011 has clearly been much lower than the projected figure of +4.8% GVA per annum and looks likely to stay that way for some considerable period ahead. Is provision for further employment land needed at all? How many jobs have been created since 2011 in each business sector and how much additional employment space has been taken up over the period? And are the assumed current numbers of new homes needed still valid? These questions must be answered thoroughly to provide a proper basis for the JCS review.

Q11: How can the JCS best plan for the changing nature of city and town centres to ensure that they remain vital and viable in the future?

A revised JCS should rigorously apply the sequential test to retail developments, to focus investment in town centre locations. More “leisure-focused” activity should be encouraged together with office and business uses of an appropriate scale and nature. More town centre and edge of centre housing would also be very welcome and would add to footfall. City and town centres must be readily accessible which implies improvements to public transport provision and possibly more investment in park and ride, and addressing issues around parking. Most of all, city and town centres must be attractive and welcoming places to visit if they are to thrive. The highest standards of design of new and refurbished buildings will be essential, alongside continuing improvements to the public realm.

Q12: Having regard to development needs in the JCS area and the spatial strategy discussed, do you feel that the known development opportunities can play a role in helping to meet needs?

At a strategic level, we see no justification for further significant green belt releases. Exceptional circumstances are unlikely to be met. Reference to further development at West Cheltenham beyond the current allocation is of particular concern. This would impact on the essential purpose of the Gloucester and Cheltenham Green Belt of maintaining a clear separation between the two urban areas.

We agree with the assessment that the Ashchurch area looks to be a potential sustainable location for growth and could accommodate much of any additional development needs over the Plan period which cannot be provided within the Gloucester and Cheltenham urban areas, the existing strategic allocations and on the “safeguarded land.” We welcome

the work underway, through the Ashchurch Concept Masterplan, to explore options. We note the need to resolve issues relating to existing congestion on the A46 in the Ashchurch area and discussions over improvements to junction 9 of the M5; and we are aware of wider discussions about upgrading the A46 as part of an improved strategic link to the East Midlands under the banner of the A46 Partnership.

Further development south of Gloucester would exacerbate an already unsatisfactory development pattern adding to congestion. The first priority must be to fully explore the capacity of Gloucester to meet its housing needs within its boundaries (see also the answer to Q7). We note the Stroud Local Plan Review has identified a number of potential development opportunities south of the City. Limited further development at Hardwicke might be acceptable and could be supported by enhanced bus provision on the A38 corridor and the Waterwells Park and Ride. Development at Whaddon would be particularly damaging being difficult to service with adequate transport links and having damaging landscape impacts on the setting of the Cotswolds AONB.

Q13: Do you have a site you would like considered for inclusion in the Local Plans? You will need to provide a completed form with information about the site including a site plan.

No. Question not applicable to CPRE.

Q14: What do you think is an appropriate definition for a 'strategic site' in terms of for example size, location and proposed use?

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Q15: Are there any infrastructure needs the JCS Review needs to consider?

The needs look well defined. Major development should not proceed unless the necessary infrastructure can be guaranteed. The issue is more about funding and delivery.