

RESPONSE TO THE DRAFT JOINT CORE STRATEGY CONSULTATION DECEMBER 2013 EXECUTIVE SUMMARY

CPRE Gloucestershire has carefully considered the Draft Strategy and believes that key questions need to be answered:-

- Does the Strategy provide a balanced, practical and deliverable package of policies to guide the future development of this important central part of Gloucestershire?
- Will it result in the 'best environment in Europe' as GFirst wish or will it create a mass of suburban sprawl, with increased out commuting, a lack of services and supporting infrastructure, increasing congestion, and overall a poorer quality of life for its existing residents?

In answering these questions we have concluded that the Strategy fails to meet a number of tests set out in the NPPF and is therefore 'unsound'.

In summary, the process and resultant Draft Strategy:-

- has erred in its approach to seeking "to identify and to meet objectively assessed development and infrastructure requirements;"
- has failed to demonstrate that its proposals are "effectively deliverable," and as a result
- is not "consistent with national policy."

In particular, the process has failed to follow the NPPF's policies and Guidance in a number of key respects, for example:

Paragraph 14 of the NPPF which emphasises that:-

*"Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, **unless:***

- ***any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or***
- ***specific policies in this Framework indicate development should be restricted"***

Paragraph 50 which emphasises that:

"..... local planning authorities should:

- ***identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and***
- ***where they have identified that affordable housing is needed, set policies for meeting this need on site,....."***

Paragraph 173 which emphasises that:

"Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. "

As a result of its failure to take these points properly into account, the Strategy has ended up by proposing :-

- a development programme requiring a completion rate of up to 2,500 homes in 2017/18 – in contrast to the 944 and 1160 provided over the first two years of the Plan;

- a total level of development which would add well over 20% to the total stock of dwellings in the area in just the next 18 years;
- the greatest proportionate loss of Green Belt land of anywhere in the country;
- a rate of employment growth in each and every year of the Plan that has only been achieved in the county in the odd 'boom' year over the last decade;
- the provision of more than double the amount of land required to meet employment needs;
- no distinction between the types and tenures of the homes that make up its total requirement;
- no percentage or other targets set for the provision of 'affordable' homes on new development sites;
- a developers' free-for-all leading to widespread blight of sites, the development of greenfields before the re-use of brownfield sites, as the Draft JCS contains no phasing policies;
- development levels with no viable or deliverable programme to support the provision of essential infrastructure and services, and
- policies for monitoring that only imply the likelihood of higher levels of development.

Members of the three Local Authorities need to be advised that just stating a hypothetical and uncertain figure for new housing and jobs derived from a mass of conflicting consultancy reports does not provide a 'deliverable and viable' Plan. Many other factors must be taken into account not least the Government's own policies set out in the NPPF.

However, irrespective of the above findings and concerns, CPRE Gloucester considers that the thrust of the draft Strategy is broadly correct, as it seeks to:

- focus development on the principal settlements of Gloucester and Cheltenham close to existing areas of population and jobs
- look to urban edge locations as being the most sustainable for development, where the urban areas do not have the capacity to meet all development requirements,
- focus some development on Tewkesbury town, and then on the edge of the town, and
- recognise that the rural areas can accommodate smaller amounts of development proportional to their size and function

We support this approach because to do otherwise would inevitably lead to a more dispersed pattern of development which would perform poorly in terms of sustainability. In particular, traffic generation and trip length would greatly increase and the distribution of development would be far more damaging in terms of impact on landscapes and biodiversity with random incursions into non-designated countryside.

The decision is exceptionally important. It is one that must be taken at a local level rather than one imposed by central government because of a failure to demonstrate the special circumstances existing in the JCS area.

Every decision maker in the three local authorities now needs to stand back from the proposals of the Draft JCS and ask the key question – what would this central part of Gloucestershire look like in 2030 if the draft proposals were to be implemented – and - is it what we need, want and can deliver?

Now is the time to stand up for all that makes Gloucestershire a special place to live, work and play.

INTRODUCTION

CPRE Gloucestershire, after careful consideration of the Draft Joint Core Strategy (JCS) and its host of evidence-based documents, has concluded that the Draft Strategy fails to meet the test set out in Paragraph 182 of the National Planning Policy Framework (NPPF).

The Strategy is therefore ‘unsound’ and unless very significant amendments are made it will be formally challenged at the Examination planned for 2014.

Paragraph 182 of the NPPF says:

The Local Plan will be assessed.....

*“as to whether the plan has been prepared according to the duty to cooperate, legal and procedural requirements and **whether it is sound**. A local planning authority should submit a plan for examination which it considers sound – namely that it is:*

- *Positively prepared – the plan should be prepared based on a strategy which seeks **to meet objectively assessed development and infrastructure requirements**, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;*
- *Justified – the plan should be the most appropriate strategy when considered against reasonable alternatives based on proportionate evidence;*
- *Effective – **the plan should be deliverable** over its period and based on effective joint working on cross-boundary priorities; and*
- *Consistent with national policy – the plan should **enable the delivery of sustainable development in accordance with the policies of the Framework***

CPRE Gloucestershire considers that the Draft fails to meet the tests highlighted above in three key respects, namely that:

- it has erred in its approach “to identify and to meet objectively assessed development and infrastructure requirements;”
- it has failed to demonstrate that its proposals are “effectively deliverable,” and
- aspects of the strategy are not “consistent with national policy.”

This response considers each of these three failings in turn before commenting in some detail on other aspects of the proposed Strategy before responding to the four, very general, questions posed in the consultation.

Key points from the NPPF which set the context for the preparation of the JCS:-

Firstly, the attention of the three local authorities needs to be drawn to Paragraph 14 of the NPPF which makes it very clear that:

*“Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, **unless:***

*— **any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or***

— *specific policies in this Framework indicate development should be restricted.*

Footnote 9 related to this paragraph is also critically important with its specific reference to examples of the above specific policies, such as “... **land designated as Green Belt, Local Green Space and Area of Outstanding Natural Beauty...**”

Unfortunately this exceptionally important caveat and footnote are crudely summarised in the introduction to the Draft Strategy. The omission of the full text misleadingly gives the impression that merely allocating sufficient land to meet needs is the be all and end all of plan making. **Rather the NPPF stresses that decision making is far more complex and requires conclusions drawn from consideration of its full package of policies.**

Secondly, the NPPF at Paragraph 50 goes on to say that:

“..... local planning authorities should:

identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and

where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.”

Thirdly, the NPPF at Paragraph 173 says that:

“Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable.

Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.”

The above extracts highlight four crucial areas of the Draft Strategy where its ‘soundness’ is found wanting, namely:-

- its failure to properly assess Local Need;
- its failure to identify a viable programme for the delivery of sites;
- its failure to justify the relative weight given to its policies in order to deliver ‘sustainable development’, and
- its failure to properly plan for uncertainty.

These concerns are discussed in greater detail below in **Section 1** of this response.

Unfortunately for the residents and the environment of this central part of Gloucestershire, the above failures are only the most significant of a host other concerns. These are discussed in detail in **Section 2** of this formal response from Gloucestershire CPRE.

SECTION 1

a) UNDERSTANDING OBJECTIVELY ASSESSED NEED

Paragraph 47 of the NPPF states that “..... local planning authorities should:-

*- use their evidence base to ensure that their Local Plan meets the full, **objectively assessed needs for market and affordable housing** in the housing market area, **as far as is consistent with the policies set out in this Framework**, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;”*

More detailed Government Guidance on the definition of ‘need’ emphasises this point:-

“Need for housing in the context of the guidance refers to the scale and mix of housing and the range of tenures that is likely to be needed in the housing market area over the plan period – and should cater for the housing demand of the area and identify the scale of housing supply necessary to meet that demand.”

When taken together with the extract highlighted earlier from Paragraph 50 which emphasises the need to identify the ‘**size, type and tenure**’ of homes to be provided, it is demonstrably clear that the current consultation fails to do this.

The recent Inspector’s judgement on the Leeds Core Strategy highlights the importance of this point:-

He concluded ‘that the National Planning Policy Framework (NPPF) requires local planning authorities to set out their affordable housing requirements in their local plan, and these must include both the thresholds and the target sought.

*By failing to set the local standards for thresholds and targets, (Leeds JCS) Policy H5 **conflicts with national policy and is not sound.**’*

No policy in the Draft JCS or evidence provided in the reams of supporting documents provides this information. So in order to help, CPRE has analysed a number of associated documents, including the Fordham Research 2010 Housing Needs Assessment for Gloucestershire.

Applying its findings to the two household projections contained in the Evidence Base – the Flat Rate and the Return to Trend household projections provides a clear indication of the ‘needs’ of our local residents.

FLAT RATE PROJECTION

Table 2.1 Tenure of new accommodation required across JCS area 2013-2031				
Tenure	Tenure profile 2013	Tenure profile 2031	Change required	% of change required
Owner-occupation	91,972	95,523	3,551	17.9%
Private rent	27,980	35,945	7,965	40.1%
Affordable	19,508	27,846	8,338	42.0%
Total	139,460	159,314	19,854	100.0%

Source: Long Term Balancing Housing Markets) Analysis using updated 2009 survey database

CAMBRIDGE PARTIAL RETURN TO TREND PROJECTION

Table 2.2 Tenure of new accommodation required across JCS area 2013-2031				
Tenure	Tenure profile 2013	Tenure profile 2031	Change required	% of change required
Owner-occupation	91,972	99,942	7,970	30.4%
Private rent	27,980	36,459	8,479	32.4%
Affordable	19,508	29,259	9,751	37.2%
Total	139,460	165,660	26,200	100.0%

Source: LTBHM Analysis using updated 2009 survey database

Note :- the above Tables relate to the whole County study area

It can readily be seen that both sets of projections show an approximate **proportion of 'need' for Affordable and Private Rental homes taken together as between nearly 70% and 80%** of the total need for the remainder of the Plan period. Market housing needs therefore vary between just under 20% to 30% of 'needs'. As the JCS covers a cross section of the County it is not unreasonable to consider the above figures as likely to broadly represent its needs.

Lying behind these findings is the issue of **'affordability', one so far completely ignored by the JCS.** It has not been easy, as the evidence base fails to provide this essential information, to determine the historic delivery rates for just part of the 70-80% local need suggested in the above analysis, namely the completion of 'affordable' and 'private rented' homes in the JCS area.

However, 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 above 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.

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.

Meeting housing needs does not merely imply setting unrealistic targets for the provision of 'x' homes but essentially must also consider and demonstrate the feasibility of delivering the required tenure split.

If part or whole of the total needs identified cannot be delivered then the Plan must be deemed 'unsound'.

ANNEX A to this response sets out information on the relationship between house prices and incomes in the JCS area. Its conclusions dramatically show **how few local residents are in a position to afford to purchase market housing.**

Investigating further, CPRE has also considered a second element of the tenure split, the likelihood, practicality and deliverability of providing roughly a similar number of **'Private Rental'** homes to those discussed above for 'affordable' homes. The figure of the 'need' implied has again been taken from the above Tables.

We acknowledge that it not easy to assess deliverability for the number of 'private rental' properties over the Plan period. Forecasts, however, can be informed by historic trends and consideration of factors that might influence future provision. To do this we have reviewed the work undertaken by Nathaniel Lichfield Partners (NLP).

Unfortunately, that provides little assistance as:-

- it fails to distinguish between those who can afford housing to buy (market housing) and those who require private rental housing;
- it uses affordability ratios as a weak substitute for 'local market' data to analyse demand, and
- it merely adopts rather than challenges employment forecasts being provided by another source.

With respect to the latter point, we have also noted that the Cambridge Report explicitly states that any examination of the 'economic context' for the job forecasts was precluded from their brief – a point we return to later.

A key factor in considering likely future levels of '**Private Rental**' provision must be one of how well the Buy-to-Let Market will flourish once interest rates return to a commercial level of 4-5%. As a result, there must be a major question mark as to whether it is likely that some 40% of the currently forecast need will be provided from this source, particularly over the later parts of the 20 year Plan period. The Government's Autumn Statement with its closure of tax loopholes created by 'flipping second homes', lend considerable weight to our concerns.

It is therefore difficult to envisage a major increase in housebuilding being funded by 'Buy-to-Let' investors. Once money costs what it should, as a necessary condition for a sustainable national economic growth, its source as a means to purchase new homes will undoubtedly reduce considerably. Most certainly, it will not support around 40% of the proposed completions.

To merely substitute 'Market' housing for any shortfall in the provision of 'Affordable and Private Rental' homes would not only fail to meet local needs but also would increase in-migration, competition for jobs and/or unsustainable out commuting.

As experience and statistics show, income alone is not enough to buy housing in most of Gloucestershire. As the likelihood of delivering the level of homes of each type required to meet 'local needs' is clearly not practical then the total number of homes to be planned must be reduced from its current level of 33,400. This implies that local needs can only be met over a longer period than that for the current Plan. This point is further reinforced by the findings set out in the next section.

b) COSTS and DELIVERABILITY

To be 'sound' the plan must demonstrate that its proposals are 'viable and deliverable'.

So a key question is - how will the Infrastructure required to support the proposed level of additional dwellings and employment be provided and who will pay?

The failure to accompany the Draft JCS with any form of coherent and plausible 'Implementation Plan' has served to confirm our worst fears.

If the levels of development proposed cannot be delivered then their 'totals' must be reduced in order to provide a 'deliverable' and viable' plan.

We have considered the excellent work done by Arups' in its interim Infrastructure Delivery Plan (IDP). Its Foreword emphasises just how far the three local authorities are from identifying a viable delivery plan:-

"A wide range of proposed infrastructure projects and needs will be identified through plan preparation, with a high total cost. It will be necessary to explore options for infrastructure delivery that ensures essential services to support new development are put in place and that a contribution is made to the achievement of wider JCS objectives, while also making sure that the plan remains affordable and viable as a whole."

CPRE's reading of the interim Infrastructure Delivery Plan has highlighted the following key facts or headlines:-

Arups' appear to be suggesting that the estimated cost of capital funding required would equate to £15,800 per dwelling. If so, this would mean costs for developers of:-

£600,000 @ 40 dwellings per hectare or
£470,000 @ 30 dwellings per hectare

It will be interesting to see what the developers think of these figures as they would have to bear these costs and of course make substantial provision for a high percentage of 'affordable' homes on each site if the 'objectively assessed needs' are to be met.

If a site is not viable given these costs then **merely reducing the level of 'affordable' housing by substituting 'market housing' will fail to meet local needs and collectively will render the Plan 'unsound'.**

To compound problems related to the viability of sites, Section 106 payments will still be required to deal with any site specific one-off costs for local transport and/or flood alleviation measures. Further the above figures only make allowance for just 16% of costs, **therefore leaving an 84% funding gap for essential projects** such as the A417 missing link, M5 Junction 10 improvements and other major transport schemes.

Finally, as far as CPRE can ascertain –

- **no analysis has been provided on the recurring 'revenue' costs that will result from the Plan for each of the local authorities and therefore**
- **the implication for local council tax levels to be imposed upon existing residents therefore remains unknown. It would, however, be safe to surmise that the 'New Homes Bonus' receipts will fall very significantly below the sum required, particularly if in future this is fully or partly paid to the Local Enterprise Partnership rather than the local authorities.**

Any failure to identify how both the capital and the revenue costs of the infrastructure and services required to support the provision of new development indicates that the Plan is both 'unsound' and likely to fail to make provision for a 'sustainable' level of development.

c) THE BALANCE OF THE PLAN

The introduction to this response highlighted an extract from the NPPF Paragraph 14 in which the **Government pragmatically recognises that in certain circumstances the disadvantages of seeking fully to meet local needs can outweigh the benefits.**

In this respect, the footnote to the Paragraph quoted earlier is clearly important as it provides key examples of what the Government has in mind.

It is also clear that where the NPPF is considered in the round, just as the Government expects, then issues such as **the difficulty of delivery, the impact upon existing residents and/or upon the existing environment become key points that any 'sound' plan must take into account.**

The difference between crude projections (currently the basis for this Draft JCS) and forecasts that are based upon policies taking account of environmental and social constraints, exemplifies the essence of good planning. **The former implies that just because a town or area has historically grown at a certain rate it should continue to do so whilst the latter allows more careful consideration and judgements to be made so as to avoid adverse impacts.**

Members of the three local authorities need to be reminded that just stating a hypothetical and uncertain figure derived from a mass of conflicting consultancy reports does not provide a 'deliverable and viable' Plan. Many other factors must be taken into account not least the Government's own policies set out in the NPPF.

In this respect, issues such as:

- increasing congestion which can reduce the attractiveness of an area for employment growth,
- the impact of development upon the setting of historic towns and protected landscapes, with the potential to reduce their attraction for tourism and employment ,
- loss of agricultural land,
- the loss of Green Belt land, and
- the cost of infrastructure

must all be weighed in the balance in order to provide a coherent strategy.

Recently, the Secretary of State has confirmed that he recognises how difficult it is for all Local Plans to meet their local needs. In a similar vein, recent decisions by Inspectors considering Plans for Adoption have accepted that lower figures can be acceptable where the effects of developing such large numbers of new dwellings can outweigh the benefits of meeting all needs.

d) UNCERTAINTY and THE CONSEQUENCES OF GETTING IT WRONG

The ONS Statistical Bulletin of 28/9/2012 states:

"Projections become increasingly uncertain the further they are carried forward due to the inherent uncertainty of demographic behaviour. This is particularly so for smaller geographic areas"

It is, therefore, not surprising to see the NPPF in Paragraph 47 reflecting this point:-

" Local Planning Authorities should....

- **identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and where possible, for years 11-15;"**

Extracting information from the Evidence Base, CPRE - with assistance from our consultant - has identified the following summary information, expressed as annual rates of household growth. The multiplication by 20 produces an implied total for net new households related to each projection. This is shown in the bottom row of each table for the JCS area. The third column is simply taken from the Cambridge report.

Table 2.1: Annual household growth 2011-2031

	flat rate (1)	2021 rate (2)	JCS (3)
Cheltenham	341	369	500
Gloucester	456	557	655
Tewkesbury	316	417	505
Total	1,113	1,343	1,660

Sources: as discussed below

The following are notes on the three columns:

- (1) By applying the change set out in the 2010-based projections to the 2011 Census population figures to derive a population in 2031 (differentiated by age) and then applying a flat rate for household size to come up with a household total.
- (2) By using the headship rates (for different household types) per age band of the population set out for each authority in 2021 in the Interim household projections and applying this to the 2031 population figures (This scenario presumes that household formation rates remain at 2021 levels rather than 2011 as in the first scenario.
- (3) The Cambridge report figures for 'Partial Return to Trend'. This is assumed to be JCS's preferred option. These figures come from the three appendices at the back of their report. I have annualised the 20 year totals.

By adding a 5% vacancy rate onto these figures, a total projection of homes required over the 20 year plan period can be produced:-

Table 2.2: Total growth implications 2011-2031

	flat rate	2021 rate	JCS
20 year Plan period: total households	22,260	26,860	33,200
20 year Plan Period: total homes requirement including 5% vacancy rate	22,372	28,203	34,860

Sources: as discussed below

(ANNEX B provides further detail on the derivation of the above figures)

To achieve the addition of the nearly 35,000 new homes shown in column 3 above, drawn from a mix of new build and conversions, would require the completion of over 1,700 dwellings in each and every year of the Plan. Noting this fact the Housing Background Paper 2013 attempts to wrestle with this problem and to set out targets for each year's completions.

By 2017 it suggests that completions will need to have risen to nearly 2,500 per annum to make up for shortfalls resulting from the actual net increase of just 944 and 1160 dwellings in the first two years of the Plan period. This rate has never been achieved before in the JCS area!

However, to achieve these levels the Draft JCS argues that virtually every new allocation being promoted by this Plan will be producing large volumes of new homes by this date. This is even though the Plan will not even secure adoption before 2015 at the earliest.

To put it politely, it must be questionable as to whether such completion rates can be practically achieved and whether the average rates extended over the later years of the Plan are realistic and deliverable, particularly as they must include high levels of 'affordable and Private Rental' homes in order to meet local needs!

Irrespective of any reduction of the total due to a reconsideration of likely household rates – a point we return to below – another factor points to the need to reduce its excessive numbers, namely the failure of the forecasts to pay attention to wider economic issues.

The process adopted to derive housing numbers simply accepted information and growth targets for new jobs taken from GFirst to modify its dwelling requirements.

GFirst's suggestion that the JCS area should plan to provide some 22,000 extra new jobs derives from work undertaken as a precursor to its production of a Local Growth Plan for Gloucestershire. **It cites the Economic Vision for Gloucestershire 2022 as setting out 'an ambitious programme of activity for investment aimed at growing the Gloucestershire economy'.** While jobs and economic growth is almost always a good thing, the tone of this report is more of a cheerleading exercise than serious analysis. This is frankly admitted by headings which indicate that it is **basing its forecasts on the assumption that Gloucestershire is promoted and seen by employers as having an environment where "the quality of life is recognised as the best in Europe"**. This is a laudable aspiration but not a basis for robust and objective analysis.

Cambridge Econometrics additional study concludes that **an annual growth rate of over 0.75% was plausible. However, this rate has only been achieved in a few years during the debt fuelled boom of 2000 to 2007.** Clearly that boom will not recur, as there is no scope for further major debt fuelling. **It is therefore very surprising that Cambridge Econometrics assume that such a rate will be achieved for each of the next 20 years rather than an isolated one or two as history shows.**

The Cambridge Econometric forecasts imply a 15.3% rise in net employment between 2011 and 2031, compared with a total increase of just 2.5% in the previous 20 years. It implies there will be a total jobs rise from 176,950 to 203,960 over the 20 years. **This can best be summarised as an heroic assumption.**

NLP's own research, on the other hand, shows that because of the demographic makeup of the population in the JCS area, that even if 30,000 additional dwellings were to be provided, then the needs of working age residents would fall within a range from – **a decline of 7000 jobs to an increase of just 12,000 depending upon the assumptions used.**

Experian on the other hand suggest 15,580 new jobs over the 20 years as a more appropriate target: about half of the 27,010 forecast by Cambridge Econometrics. The Experian jobs forecast coincides with the average annual jobs growth 1991-2011 and in **CPRE's view represents a more practical and yet still aspirational base upon which the Plan might be prepared.**

Given this level of uncertainty, what are the possible consequences of the proposals currently being put forward in the Draft JCS turning out to be incorrect? It is not hard to envisage:-

- the allocation of an excessive number of strategic housing and employment sites
- the provision of unneeded and unaffordable infrastructure
- the blight and sterilisation of large areas of countryside, and/or
- the provision of homes taken up by in-migrants who will need to seek employment outside the county, leading to long distant commuting and therefore the provision of 'unsustainable development' in the JCS area.

So how does the Draft JCS currently seek to deal with this level of ‘uncertainty’?

Remarkably, the Draft JCS fails to address the issue in any practical manner as:

the currently drafted Monitoring and Review policies merely suggest that any updated information will lead to the need for greater rather than less provision being necessary (see Section 2 for further detail) and,

- unbelievably it fails to provide any phasing policies.

This is likely to have a mass of adverse consequences, including:-

- the development of greenfield sites taking precedence over the reuse of ‘brownfield’ land;
- the development of sites randomly started throughout the Plan area – pockmarking the countryside;
- the immediate commitment of sites for development that may or may not be needed in the latter years of the Plan, and
- a context in which the local authorities will not be able to resist giving planning permissions in the first 5 years of the Plan for development to begin to take place on every single strategic allocation.

CONCLUSION

This Section has demonstrated how the Draft JCS clearly fails a range of tests of its ‘soundness’ and fails to provide a coherent and well planned approach to development in the area.

It is now time to stand back from the proposals of the Draft JCS and ask what would this central part of Gloucestershire look like in 2031 if the proposals were to be implemented?

- **Does it provide a balanced, practical and deliverable package of policies to guide the future development of this important central part of Gloucestershire?**
- **Will it result in the ‘best environment in Europe’ as GFirst wish or will it represent the worst of suburban sprawl with increased out commuting, a lack of services and infrastructure, increasing congestion, and overall a poorer quality of life for its existing residents?**

CPRE Gloucestershire is firmly of the view that significant modifications to the Draft JCS are essential before its submission for Adoption. Nevertheless, we consider that once a more realistic level of development is set, then the potential exists to achieve a more balanced approach and a viable and sound Plan. Section 2 highlights a number of suggestions for change.

The decision to make these changes is one that must be taken at a local level, justified by the special circumstances existing in the JCS area. Only in this way will the local authorities avoid the imposition of unacceptable proposals by central government.

SECTION 2

RESPONSE TO THE FOUR SPECIFIC QUESTIONS

Q1. Do you think that 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 priority for the strategy must be to ensure that all development opportunities within the existing urban areas are delivered fully, particularly all opportunities for the reuse of previously developed land and for urban regeneration generally. We agree that where the urban areas do not have the capacity to meet all development requirements focussing on urban extensions is the correct approach. However, the pace of green field development must be carefully managed to encourage redevelopment within the urban boundaries. Accordingly, strategic allocations must be brought forward sequentially and development carefully phased within each development.

CPRE fundamentally disagrees with the statement in paragraph 3.30 of the draft Strategy that “it is anticipated that the majority of development on the urban extensions and strategic allocations will be started within the first part of the plan period in order to ensure an on-going supply of housing and employment development to 2031.”

We support the policy of focussed development because to do otherwise would inevitably lead to a more dispersed pattern of development. Such a pattern of development would perform poorly in terms of sustainability, particularly in relation to traffic generation and trip length, and would be far more damaging in terms of impact on landscapes and biodiversity with random incursions into non-designated countryside.

In our response to the Developing the Preferred Options Consultation (February 2012) we broadly support the proposed approach, namely:

- focussing development on the principal settlements of Gloucester and Cheltenham close to existing areas of population and jobs
- where the urban areas do not have the capacity to meet all development requirements, looking next at urban edge locations as being the most sustainable locations
- focussing some development on Tewkesbury town, and then on the edge of the town
- recognising that the rural areas can accommodate smaller amounts of development proportional to their size and function
- in relation to rural settlements great care will be needed to ensure that any development is compatible with the scale and character of the settlement.

This statement remains our position.

Previously we have indicated our objection to a new settlement because considerable and costly levels of land assembly and infrastructure would be required, thereby diverting much needed investment away from Cheltenham and Gloucester. Nowhere would be far enough away from Cheltenham and Gloucester to be self-contained, and a new town would have significant landscape and biodiversity implications.

It has been suggested that Highnam should be identified as a location for a strategic allocation. This is not a sustainable location for strategic development, because of traffic impacts on the already severely congested route through Over into Gloucester. We would however support smaller scale, organic growth of Highnam to serve local needs in line with its role as a Service Village.

Our view is supported by the JCS Broad Locations Report which concluded that at Highnam there would be “significant constraints to be overcome including flooding, loss of best and most versatile agricultural land and highways linkages between the City and this location” and that “developing at this Broad Location would have a significant impact on the existing settlement of Highnam and would substantially alter its existing role and character.” The Interim Infrastructure Delivery Plan also highlights issues over road capacity saying that “the potential for strategic development at Highnam raises major concerns with respect to the capacity of the A40 at the River Severn bridge, and at the Over and Longford roundabouts.”

CPRE would also be firmly opposed to development at Brookthorpe with Whaddon which was also considered in the JCS Broad Locations Report. Most of the new development around Gloucester in recent years has been to the south and at ever increasing distances from the city centre. Development at Brookthorpe with Whaddon would continue that pattern of development and would be poorly connected to the City. If Gloucester needs to grow it should be to the north. There are also significant landscape objections to development at Brookthorpe with Whaddon. The area is highly visible from Robinswood Hill and from the escarpment of the Cotswolds AONB, and the portion in Stroud District was previously designated as a Special Landscape Area in the former Gloucestershire Structure Plan to protect the setting of the AONB.

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

We have demonstrated in Section 1 of this submission that the total quantity of new housing proposed to 2031 is excessive. We do not believe all the strategic sites will be needed by 2031 or that the amount of development on each site is appropriate. It is essential that strong policies are set for a sequential release of sites and the phasing of development at each location, together with regular reviews.

The merits of each of the proposed strategic allocations are considered below.

Policy A1 – Innsworth and Twigworth urban extension, Gloucester

This broad location was previously identified as appropriate for significant development in the Joint Study Area exercise undertaken by the local authorities to inform their input to the now revoked South West Regional Spatial Strategy. It was supported by CPRE at the time.

The area is large. The Draft JCS includes a rare welcome intention to phase the allocation with development close to Innsworth being taken forward in advance of that at Twigworth. Rather we recommend that the **Twigworth allocation be deleted** but included as safeguarded land (see below). Over the period to 2031, further rationalisation of the MoD estate in the UK could result in land at Innsworth becoming available for redevelopment and this possibility must be taken into account.

The landscape and amenity of land towards Twigworth is of greater value than that closer to Innsworth and must be protected from development for as long as possible. This view is supported by the JCS Broad Locations Report which concluded that generally landscape intimacy, hedgerow condition, and historic importance increases north of the Hatherley Brook.

Policy A2 – North Churchdown urban extension, Gloucester

Notwithstanding its location between Gloucestershire Airport and existing development, the Green Belt in this area is important in terms of its primary purpose of preventing the coalescence of Gloucester and Cheltenham. Nevertheless, this would appear to be a promising site for

development. We note the intention to provide new green infrastructure links along Norman's Brook and for these to be actively managed for biodiversity purposes. Development here would be more acceptable if a generous landscape buffer was designed in a way that would soften the urban edge.

Policy A3 – South Churchdown urban extension, Gloucester

A serious issue arises with the proposal to develop at this location as it would significantly narrow the important gap between Churchdown and Gloucester and would therefore be in conflict with the primary purpose of the Gloucester and Cheltenham Green Belt.

We note that both housing and employment land is proposed for this urban extension but do not consider that this is an appropriate location for further employment land (see also our comments on Q4).

If development is to proceed at this location it is imperative that a generous, well-planned Landscape Buffer is provided to the west and south of the site. South of the A40 it is particularly important to retain open land in the long term and any redrawing of the Green Belt boundary must reflect this point. This land has visual continuity with the higher land of Churchdown Hill to the south east of the railway and is very important in the view from Churchdown Hill.

In line with our comments about phasing and a sequential approach to development, we advocate that this location should only be brought forward towards the end of the plan period, if it proves to be needed at all.

Policy A4 – North Brockworth urban extension, Gloucester

In considering this strategic allocation, a clear distinction can be made between the western end of the proposed development area towards Gloucester and the eastern end which forms part of the setting to the Cotswolds AONB and is important in views from the escarpment. The JCS Broad Locations Report identified the land to the west as of medium-low sensitivity and that to the east as of medium sensitivity. There is a strong case for retaining land as Green Belt at the eastern end, where the land begins to rise, beyond the existing playing field. This potential Green Belt boundary was considered in the Urban Extensions Boundary Definition Study and therefore clearly has some merit.

It is significant that, when viewed from the escarpment, the A417 in this location is largely concealed as a result of its alignment and landscaping, and the impression is of open countryside through to the edge of the existing built up area

The Brockworth Court area with its church (Grade I), court (Grade II*) and tithe barn (Grade II*) is of great local and national significance. A much larger buffer between this area and any future development is needed to safeguard the interests of these heritage assets.

Policy A5 – North West Cheltenham urban extension, Cheltenham

This location was previously identified as appropriate for significant development in the Joint Study Area exercise undertaken by the local authorities to inform their input to the now revoked South West Regional Spatial Strategy. It was supported by CPRE at the time.

In taking forward development at this location a comprehensive master plan will be essential together with special attention to transport provision and to transport issues more widely.

It is imperative that development of this strategic allocation is conditional upon infrastructure investment, making M5 junction 10 a 4 way junction thereby enabling movement to and from the south, and improvements to the A4019. The A4019 is an important route for visitors to Cheltenham but it gives a very poor impression of the town. Development of a North West urban extension

should be seen as a catalyst for transport improvements along the route and also for ambitious landscape improvements and general improvements to the public realm.

To the north of the proposed housing a significant area of land has been identified as Landscape Buffer/Green Infrastructure. We see no reason to remove this land from the Green Belt: the proposed modified Green Belt boundary should be redrawn to coincide with the land on which built development is envisaged. The final form of the Landscape Buffer/Green Infrastructure will need to be considered alongside the eventual closure and restoration of the landfill site to the north.

This is one of the locations where we consider the proposed provision for additional employment land is excessive. Detailed comments on employment are made under Q4.

Policy A6 – South Cheltenham – Leckhampton urban extension, Cheltenham

This strategic allocation is not within the Green Belt or within the Cotswolds AONB. Nevertheless, this is a highly sensitive location bordering the AONB and is clearly an important part of the setting of the AONB.

CPRE has two principle concerns about this location. The first concern is the effect that this scale of development would have in worsening traffic congestion along the A46. This concern has also been expressed by the Cheltenham Chamber of Commerce which sees congestion along this route as a deterrent to existing and future employers locating in the town centre. The second concern is the impact that the development would have on the setting of the Cotswolds AONB. The site is highly visible from the escarpment to the south which is within the AONB and from the Cotswold Way National Trail, and in turn the view of the escarpment is a significant feature of this part of Cheltenham.

Addressing the issue of traffic, our view is that the amount of development envisaged for the area is too high.

Addressing the issue of landscape impact, it is vital that the open land to the south of the proposed housing land is retained as open space in perpetuity. We advocate designating this land as Local Green Space as part of the process of preparing the JCS in line with the National Planning Policy Framework (Paragraphs 76 and 77). Policy S7 of the Draft JCS states that “Development proposals in and adjacent to the AONB will be required to conserve and enhance landscape, scenic beauty, wildlife, cultural heritage and other special qualities of the Cotswolds AONB and be consistent with the policies set out in the Cotswolds AONB Management Plan.” This policy intention would be met through a Local Green Space designation which would also help to meet the shortfall in the provision of informal open space in the Cheltenham area.

Policy A7 – South Cheltenham – Up Hatherley urban extension, Cheltenham

The Green Belt at this location is clearly important in terms of its primary purpose of preventing the coalescence of Gloucester and Cheltenham. Chargrove Lane could, however, provide a credible revised Green Belt boundary but only if coupled with a generous Landscape Buffer to the development, so softening the urban edge.

The indicative strategic allocation envisages that a significant area of land to the west and north of Brickhouse Farm would be maintained as a Landscape Buffer or Green Infrastructure. There is no reason why this land should not remain within the Green Belt. As with the proposed Leckhampton urban extension, this location is prominent in views from the AONB. If development were to go ahead then particular attention will need to be paid to the landscape treatment of the whole area to minimise impact on the setting of the AONB and to protect existing properties.

If development is to take place then access to this site should be from Up Hatherley Way. It must not be on to the A46 as it would create a second junction too close to the existing roundabout.

Policy A8 – MOD site at Ashchurch strategic allocation

CPRE endorses this location as a strategic allocation. It has good access to the strategic transport network by road (A46 and M5) and rail through the railhead station at Ashchurch which has potential for more frequent services. The location could also be linked to Tewkesbury's network of both on and off road cycle routes. However, there would need to be improvements to the A46 which already carries between 15,000 and 20,000 vehicles a day and to the quality and frequency of strategic bus routes. These conclusions are supported by the Interim Infrastructure Delivery Plan, section 4.11.3. It is noted that already £1.65million of Government money has been secured for improvements to the M5/A46 junction under the Pinch Point Programme with implementation scheduled for 2014.

In line with our views on the requirements for additional employment land (see Q 4), we consider that the provision for new employment land could be reduced at this location as it is relatively far from the main population centres in the JCS area. This change would allow space for additional provision for housing land in substitution for less satisfactory locations identified in this response.

The location is directly connected to the rail network with the freight line link for the MoD. This rail connection must be safeguarded.

The indicative plan for this strategic allocation shows only a very narrow landscape buffer to the north and east of the area. Landscape treatment needs further thought. The location is close to the Cotswolds AONB and is prominent in views from Bredon Hill. A more substantial landscape buffer must be provided to soften the urban edge and reduce the visual impact of development when viewed from higher land in the AONB and from the landscape of the lower Carrant Vale.

Recognising the need for the early delivery of housing we suggest that the greenfield part of this allocation be uniquely considered for early release in advance of the brownfield part of the site.

Policy A9 – Ashchurch Strategic Allocation

Allocation for employment uses is acceptable at this location. However, it is unlikely to be a sustainable location for the further provision of retail units. It could have an adverse effect on the vitality and viability of shops, particularly within Tewkesbury town centre but also across the wider area including Gloucester. Major retail development should not be permitted in this area until its impact has been fully tested in line with the recommendations made in Draft JCS Policy E2 C3.

Safeguarded land

It is essential that the extent and location of proposed safeguarded land is reviewed before the JCS is finalised:-

Land west of Strategic Allocation A5 – North West Cheltenham Urban Extension

The area of safeguarded land to the west of this strategic allocation is excessive. Any safeguarded land must be confined to land east of the bridleway from Withy Bridge on the A 4019 to Church Lane Farm, Elmstone Hardwick in order to secure a better long term urban form should the land ever be needed for development.

Hayden Area

Major development at this location is entirely inappropriate. The nature of the land form means that the location would be highly visible from the west.

In our comments on Policy A1 we have suggested that the Twigworth area, already proposed for bringing forward towards the end of the plan period, might be better considered as safeguarded land.

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

CPRE agrees that the list of Rural Service Centres and Service Villages set out in Table SP.2c is correct.

The JCS, however, must set out a clear policy approach for Service Villages. The organic growth of Service Villages can appropriately meet local needs, if development is delivered through small incremental schemes, well integrated with the settlement and fully reflecting its character and local distinctiveness. It must be made clear to developers that there is a presumption against major development in these settlements.

We endorse the guiding principle of Policy SP2 that need is met where it arises and therefore that Gloucester and Cheltenham, together with their immediate wider areas, must remain the primary focus for development.

Accordingly, the policy of meeting development requirements through a number of urban extensions and a strategic allocation at Ashchurch where needs cannot be met within the built up areas of Gloucester and Cheltenham is supported. As noted elsewhere, this support is conditional. We consider that the overall scale of development proposed during the plan period is too high and that there must be an emphasis on careful phasing and a sequential development of sites, not least to encourage the maximum reuse of previously developed land.

Policy SP2: Distribution of New Development allocates 2,740 homes to Rural Service Centres (1870 new homes) and Service Villages (880 new homes). However, it is noted (para 3.35) that approximately two thirds of this is already committed leaving around 900 houses to provide. We assume that the figure for Rural Service Centres includes the 1000 homes with planning permission at Bishops Cleeve and the recent permissions for 212 homes at Winchcombe.

Against this background, the Draft JCS provides insufficient guidance on the nature of development that would be appropriate, particularly in the Service Villages.

The JCS therefore must include a detailed policy setting out the approach to development in Service Villages. We propose the following wording:

Policy SP2a: Development in Service Villages

Limited development in service villages will be supported to enable their organic growth and to sustain rural services

Proposals for development must respect the form and character of the settlement. Individual housing schemes must be of less than 10 units, unless supported by an approved Neighbourhood Plan.

Any development must be carefully phased to meet needs arising over the full 20 years of the Strategy.

[Major development is defined as 10 houses or more, on 0.5ha of land or more in Statutory Instrument 2010 No.2184, The Town and Country Planning (Development Management Procedure) (England) Order 2010. It came into force on 1st October 2010.]

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?

Scale of New Development

We note and concur with the statement at paragraph 3.12 of the Draft JCS that there are inevitably significant uncertainties when planning for a 20 year period. Within the life time of the JCS it is expected that the economy will at least partially recover, the mortgage lending situation will improve, and that the housing market will also improve from its current position. You have taken the view that this would result in a return towards previous trends in household formation rates. We disagree.

Your consultants, Nathaniel Lichfield and Partners and Cambridge Centre for Housing and Planning Research have advised that if household formation rates were to make a partial recovery that would imply a requirement for 33,200 additional homes and that if the economy were to make a full recovery the requirement would be 37,400 new homes.

Independent research for LEGLAG and CPRE by Richard Fordham indicates that a key constraint to housing delivery will not be the state of the economy or the availability of mortgage finance but the affordability of market housing and private rental levels and that this situation is unlikely to improve and may well deteriorate. Furthermore, is it unlikely to be fully compensated by public investment in affordable and social housing.

The evidence from the censuses of 1991, 2001 and 2011 is that that household sizes have remained remarkably steady since at least 1990. In light of the housing affordability situation it is unlikely that household sizes will begin to fall in the near future. We conclude that even the proposed requirement for 33,200 additional homes is too high and that the target for annual JCS housing delivery must be reduced to a more practical and viable delivery rate.

Windfall sites and conversions

Windfall sites make a significant contribution to housing delivery. The Gloucester City Council Housing Monitoring Report 2011 reported gross completion of 597 new dwellings and windfall permissions in 2010/11 of no less than 324. Similarly, Table 1 in the Cheltenham Borough Council Strategic Housing Land Availability Assessment shows that “since 2006 Cheltenham has had high levels of windfall development with the exception of last year”.

Draft JCS paragraph 3.24 says that the number of windfall sites could be lower than the assumption made in the draft Strategy. In contrast, CPRE believes that the number may in fact be higher and could be considerably higher as recent government policy changes take effect. Importantly, government policy now encourages change of use from office to residential and the government is currently consulting on a similar approach for retail uses. Already evidence from elsewhere is showing that significant additional housing is likely to be generated by these changes.

Some 15% of all housing completions in England last year came from changes of use and conversions (ONS Net Supply of Housing 2012/13). This key element of housing supply now needs much more careful consideration before the JCS is finalised, together with a more aggressive policy to bring vacant properties into use.

Employment

A core principle of the Draft JCS is to align more closely the provision of housing and jobs. If the scale of job creation envisaged cannot be delivered then following this principal the requirement for new homes must be reduced, as extra new homes would merely create additional out-migration for work. It is therefore very important that job forecasts are realistic and deliverable and not simply aspirational.

It is noted that the Draft JCS supports the provision of 21,800 additional jobs to 2031 and that these jobs are likely to be outside the traditional B class uses and may not necessarily have land requirements. In assessing how realistic this figure is it would have been helpful to have information on previous rates of net job creation in the JCS area, ideally over the past twenty years which would include periods of economic growth as well as periods of recession. We have not been able to find this information in the Evidence Base and it is therefore difficult to assess how robust the projections are.

Table 3.1 of the Nathaniel Lichfield report assessing employment land reviews, *Summary of Employment Growth in ELRs, 2006 – 2026*, however, set out the following projections:

<u>Total Employment Change</u>	<u>Minimum</u>	<u>Maximum</u>
Cheltenham BC	6670	8860
Gloucester City	-1260	3130
Tewkesbury BC	4380	11,170
Total	9790	23,160

Against this background it is surprising that the Draft JCS chosen figure of 21,800 jobs is at the top end of this range.

The 83ha of employment land proposed in the Draft JCS would appear to be a considerable overprovision. The allocation has assumed the need to provide 28,400 jobs. This would be the number of jobs required if the upper range of homes to be provided was 37,400 (Nathaniel Litchfield Employment Land Review for JCS, March 2011). However the Draft JCS is allocating the lower figure of 33,200 homes.

According to the Nathaniel Litchfield report (Experian for NLP) if 21,800 jobs are to be created this would only require 20 to 26ha of employment land. Remarkably there is no justification in the Draft JCS for allocating an additional 57ha of employment land.

Importantly, we note that the NLP report actually warns against over allocating employment land. The level of predicted growth in the provision of jobs in the Draft JCS would be at a higher rate than that observed in the JCS area overall since 1991. This seems extremely unlikely given the continuing economic climate. Even a partial return to trend (as is expected) is unlikely to bring about the level of improvement in jobs created that is being used as a basis for land allocation. The uncertainty over the amount of employment land to be allocated is further compounded by the imperative to improve productivity without additional land take.

The GFirst LEP SIF Strategy draft submission in October states that there needs to be a "balance between maintaining an infrastructure to serve new housing and employment land expansion...against the protection of the Green Belt". The JCS clearly needs to get this balance right. Based on the amount of proposed employment land (and anticipated jobs to be created) this does not appear to be the case.

The rural and land based sectors are important components of the economy in the JCS area. There is a substantial proportion of business activity in rural areas. Despite this the Draft JCS lacks

awareness of the needs and challenges of these sectors. Closely linked with the land based economy are food production, tourism, leisure services and "green" businesses, for example alternative energy and environmental technology. This sector has important potential to make a more substantial contribution to future employment and sustainable economic growth and as such should be assisted by the policies in the JCS.

Retail

Policy E2: Ensuring the Vitality and Viability of Centres states, in paragraph C, that new retail development should "not compromise the health of other centres". How this would be assessed and achieved is unclear. There are a number of major retail proposals in Gloucester, Cheltenham and near Tewkesbury town centre. These potential retail developments include the expansion of Gloucester Quays, north of Beechwood and Royal Well, Cheltenham and a large scale retail proposal to the east of junction 9 of the M5 at Tewkesbury. What effect these schemes may have on the health of the adjacent city and town centres, or on more peripheral centres like Bishops Cleeve and Winchcombe, is unclear. Paragraph 23 of the NPPF states that policies should "recognise town centres as the heart of their communities and pursue policies to support their viability and vitality".

The DPDS Retail Study (December 2011 and July 2012) identified limited need for additional convenience goods retail development in all three main centres. It also identified the requirement for additional comparison goods retail development to meet the needs generated by the residents of the new housing. If the housing figure is reduced the need for this additional retail development must be adjusted down accordingly.

The report also highlights certain retail areas that are in need of improvement and investment: Coronation Square in Cheltenham and Northway near Tewkesbury where there are a limited number of shops for a large number of houses. The Draft JCS has failed to address the issues in both locations.

Additionally, it has failed to address the issue of empty retail units, particularly in the town and city centres. In other areas of the country local authorities have been tackling this issue in innovative ways. Empty shop units, where they account for a high percentage of the whole, discourage shopping in central locations. The centres of Gloucester and Cheltenham need to remain vibrant, attractive places for people to shop and visit. Retail and tourism are important elements of the local economy by providing a range of job opportunities and drawing in income from visitors.

Tourism

In the Draft JCS area tourism importantly helps to maintain a diverse economic structure. Remarkably there is very limited reference in the Draft JCS to tourism or to the key part it plays in the economy, particularly the rural economy. Policy support for this part of the economy is essential.

The GFirst LEP Strategy Draft Submission report states that the retail, construction and tourism aspect of accommodation and catering needs to be addressed in innovative ways in order to support their degree of specialism and maintain a strong and resilient economy. It recognises that these sectors are potential growth areas for the economy and as such should be a point of focus.

Large numbers of visitors to events such as the Cheltenham Gold Cup Festival, the Science and Literature Festivals, Tall Ships in Gloucester Docks and the Tewkesbury Food and Drink Festival boost the economy by staying in local accommodation and eating and drinking in the local area. Similarly, visitors who come to walk in the countryside and visit attractions and heritage sites such as Gloucester Cathedral, Tewkesbury Abbey and Sudeley Castle all contribute in this way. Their importance to the local economy needs proper recognition and encouragement in a positive policy framework.

Delivering development

The Strategic Allocations have been identified and specified on the basis that there is insufficient land within the existing urban boundaries of Gloucester, Cheltenham and Tewkesbury town to accommodate all their housing and employment needs.

However, it is very important that development opportunities within the existing urban areas are delivered fully, particularly all opportunities for the reuse of previously developed land and for urban regeneration generally. The fifth purpose of the Green Belt is “to assist in urban regeneration, by encouraging the recycling of derelict and other urban land” is especially important in this regard.

We are particularly concerned by the statement in paragraph 3.30 of the Draft JCS that “it is anticipated that the majority of development on the urban extensions and strategic allocations will be started within the first part of the plan period in order to ensure an on-going supply of housing and employment development to 2031.”

Brownfield redevelopment targets must be specified in the Strategy and the pace of greenfield development carefully managed to encourage redevelopment within the urban boundaries as the first priority. Accordingly, development at the strategic allocations must be carefully phased within each development and locations must be brought forward sequentially. Our comments on the Strategic Allocations (in answer to Q1) have already addressed this issue. In relation to housing, we accept to a degree that the type of housing which will be provided on brownfield sites is likely to meet the needs of a different market to that provided on greenfield sites. Nevertheless, the two housing streams will still be in competition.

The JCS must include a specific policy on brownfield development. The following wording is proposed:

Policy: Redevelopment of previously developed land:

The three councils will give priority to securing the redevelopment of previously developed land by the phased release of greenfield sites

Individual targets for the use of previously developed land will be determined and included in the respective Local Plans for Gloucester, Cheltenham and Tewkesbury Borough.

Monitoring and Review

Policy SP1 includes a commitment to monitoring and review. The monitoring process and review process is the place to consider the pace of delivery and when strategic allocations need to come forward. The process needs to be thorough. While reviews could indicate that provision for new homes and land for new jobs needs to increase, reviews could equally show that provision is excessive and needs scaling back. Policy SP1 must make that clear.

The following additional paragraph at the end of Policy SP1 is proposed:

In the light of monitoring and reviews it may be necessary to revise the Joint Core Strategy to accommodate a higher or lower rate of development than that assessed to be needed in the current Strategy.

Green Belt

We have already noted the importance of the fifth purpose of Green Belt in assisting urban regeneration by encouraging the recycling of previously used land.

Losses of Green Belt land must be kept to the absolute minimum. Paragraph 4.5 states that where Green Belt boundaries are proposed for alteration the emphasis has been on identifying a firm boundary. We concur with this approach but nevertheless consider that at a number of the proposed Strategic Allocations more Green Belt has been identified for removal than is necessary. Our detailed comments on this are made in response to the Strategic Allocations discussed under Q2.

The Draft JCS makes no reference to additions to the Green Belt.

The third purpose for Green Belts is to assist in safeguarding the countryside from encroachment. Bishop's Cleeve has seen much recent development, notably the controversial decision on appeal to allow development of 1000 houses at Homelands Farm. This has significantly reduced the important gap between Bishop's Cleeve and Gotherington. CPRE believes that there is a strong case for extending the Green Belt north of Bishop's Cleeve to prevent the risk of further major development in this area, which would be contrary to JCS policy.

Other policy areas:

Policy S 1 – Presumption in Favour of Sustainable Development

This core policy in effect repeats what is said in Paragraph 14 of the National Planning Policy Framework. We emphasise the importance of the caveats, namely

Permission will be granted “unless material considerations indicate otherwise, and unless:

- i. Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole, or
- ii. Specific policies in that Framework indicate that development must be restricted.”

In our view, the Draft JCS has conspicuously failed to properly take account of the implications of these caveats for the total amount of development. (See Section 1).

Policy S 3 - Sustainable Design and Construction

This set of policies is welcome, if challenging. The JCS must resist pressures to water them down.

Policy S 4 – Design Requirements

Policy S 4 D: Public Realm and Landscape, is particularly important in delivering high quality development. Many a good intent has been spoiled because robust long term maintenance arrangements for landscaping and the public realm were not in place. Planning permissions where appropriate must be conditional on such arrangements and this must be stated in the policy.

Policy S 6 – Landscape Policy and Policy S 10 Green Infrastructure

The recognition in Policy S 6 of the wide variety of landscapes within the JCS area and the requirement that development must to have regard to local distinctiveness and historic character is very welcome, as is the reference to landscape and townscape sensitivity. There are two issues: safeguarding important locally distinctive landscape features from development and conserving and enhancing features within new development. A good example would be orchards which are a characteristic feature of the vale landscape but in serious decline.

This important landscape dimension to policy is not reflected, however, in Policy S 10. Within the policy on Green Infrastructure an additional bullet point must be added.

The following wording is proposed:

Policy: New development, where appropriate, must:

- *contribute to maintaining and enhancing local character and distinctiveness.*

The point should also be repeated in paragraphs 4.94 and 4.98.

Policy S 7 - Cotswolds Area of Outstanding Natural Beauty

This policy is supported and welcomed. We are particularly pleased to see reference to the Cotswolds AONB Management Plan 2013 – 2018 and more detailed guidance, and that the plan and guidance should be considered as material considerations in assessing any planning applications in the AONB.

Policy S 9 – Conservation and Improvement of Biodiversity and Geodiversity

This policy is supported and welcomed. It would be helpful, however, to see a more specific reference to Nature Improvement Areas. A number of Nature Improvement Areas are being progressed in Gloucestershire and it is clearly the Government's intention that these should be specifically recognised in Local Plans (NPPF Paragraph 117). If possible their boundaries should be delineated in the subsequent Local Plans of the JCS constituent authorities.

Policy S 11 – Renewable Energy Development

The landscape in the Draft JCS area is fine-grained. Its ability to absorb any sort of development including renewable energy can only be judged on a very localised basis. We would therefore be opposed to the idea of local authorities designating suitable areas for renewable energy as is hinted at in paragraph 4.109. Policy S11 in our view provides an adequate basis for decision-making and for the development of any more detailed policies in subsequent local plans.

Policy C 1 – Residential Development, Policy C 2 Housing Mix and Standards, and C 3 Affordable Housing

Policy C 1 is supported. Clarification is needed, however, in relation to rural exception sites, either here or in Policy C 3. Our understanding of Paragraph 54 of the NPPF is that local authorities may now allow small numbers of market homes on such sites where this is essential to enable the delivery of affordable units without grant. In order to reflect National Policy, the JCS needs to include appropriate guidance on this matter.

In relation to Policy C 2 C: Homes for Older People, it is assumed that housing units provided under this policy are included within the 33,200 homes to be provided across the JCS area by 2031. Retirement Villages and Continuing Care Retirement Schemes are likely to be compact developments at high density, making good use of land. Requirements need to be set out in the Strategic Housing Market Assessment. CPRE supports the need for special provision for this type of tenure. However, it is essential that the JCS stresses the need for the location of this type of development to have ready access to local services.

Policy D 4 – Master Plans and Design Briefs

We are pleased to see the importance attached to Master Plans and Design Briefs. We agree that it is essential to include a policy requirement for their production in locations where major development is proposed. Government guidance stresses that in preparing such master plans and design briefs developers must seek the views of communities most affected by the proposals, and undertake wider consultation as appropriate. This should also be specified in Policy D4.

Extracts from a study commissioned by CPRE Gloucestershire and LEGLAG from Richard Fordham**Introduction**

This Annex examines the relationship between household projections and a Long Term Balancing Housing Markets model (LTBHM) to consider what types and tenures of housing the projected households could afford.

The following analysis is based on the Fordham Research 2010 Housing Needs Assessment for Gloucestershire. The original survey's overall sample size in 2008, when the fieldwork was done, was 11,125 and the sample for the JCS area was 6,289. Since Guidance says that 1,500 is an adequate sample upon which to base a Strategic Housing Market Analysis (SHMA), this total sample is clearly big enough to permit quite a lot of analysis.

Revised housing needs assessment

In 2012 Stroud District Council commissioned, on behalf of all the county's districts, an update of the Fordham Research SHMA by HDH consultants. At this stage only a presentation of findings is available. Nevertheless it provides essential information, as it covers an updated housing needs analysis and provides some market indicators such as dwelling construction figures. **It is therefore surprising that the JCS Evidence Base does not refer to this study!**

A comparison of its figures with those of the 2009 HNA shown below:

2009 HNA CLG Guide housing need estimate for Gloucestershire: 3,804 pa

2013 Updated estimate of CLG Model Housing Need for Gloucestershire: 5,894 pa

This is a surprising level of increase: over 150% in four years. However, the figures have been used for the following analysis:-

Table A.1: HDH Housing needs estimate: CLG Model; Geographical distribution of housing need

Local authority	Gross Annual Need	Gross Annual Supply	Net annual need	As a % of net annual need	Supply as a % of gross annual need
Cheltenham	2,232	777	1,456	24.7%	34.8%
Cotswold	980	406	574	9.7%	41.4%
Forest of Dean	1,311	420	891	15.1%	32.0%
Gloucester	2,767	991	1,776	30.1%	35.8%
Stroud	1,165	587	578	9.8%	50.4%
Tewkesbury	970	350	620	10.5%	36.1%
Total	9,425	3,531	5,894	100%	37.5%

Source: Table 7.15 of HDH SHMA 2013

The needs estimate quoted above, however, do not provide all the figures required to analyse the possible direction of the JCS housing market. This process requires analysis of each tenure group (not just those requiring affordable housing) and identification of those who can afford to buy as compared with those who can only rent in the market.

The HDH report presents some household projection figures using the 2008 based and 2011 based household projections. No source is given and so these figures are not discussed further, beyond noting that the 2011 based projections are much lower than the 2008 based ones: a total of 1,400 new households compared with 1,933 per annum for the 2008 based forecasts. The 1,400 most closely resembles the Interim 2011 based projection.

An estimate of the tenure of future households in the JCS area

The following tables apply the LTBHM to the two main relevant demographic projections discussed during preparation of the Draft JCS: the Flat Rate and the Cambridge Partial Return to Trend. The purpose of this analysis is to show what, given the demographic trends, is the likely tenure breakdown that would result if they were in fact realised.

The analysis produces the following results, all updated to 2013 terms. The Flat Rate results are set out first, followed by the Partial Return to Trend.

Flat Rate: For the three councils and JCS Total

The following 4 tables contain the Flat Rate results for each JCS council and then the JCS total:-

Table A.2 Tenure of new accommodation required in Cheltenham 2013-2031				
<i>Tenure</i>	<i>Tenure profile 2013</i>	<i>Tenure profile 2031</i>	<i>Change required</i>	<i>% of change required</i>
Owner-occupation	32,574	34,081	1,506	24.5%
Private rent	12,478	14,696	2,218	36.1%
Affordable	6,928	9,342	2,414	39.3%
Total	51,980	58,118	6,138	100.0%

Table A.3 Tenure of new accommodation required in Gloucester 2013-2031				
<i>Tenure</i>	<i>Tenure profile 2013</i>	<i>Tenure profile 2031</i>	<i>Change required</i>	<i>% of change required</i>
Owner-occupation	33,345	34,253	908	11.3%
Private rent	10,266	13,376	3,109	38.7%
Affordable	7,999	12,010	4,011	50.0%
Total	51,610	59,638	8,028	100.0%

Source: LTBHM Analysis using updated 2009 survey database

Table A.4 Tenure of new accommodation required in Tewkesbury 2013-2031				
<i>Tenure</i>	<i>Tenure profile 2013</i>	<i>Tenure profile 2031</i>	<i>Change required</i>	<i>% of change required</i>
Owner-occupation	26,053	27,190	1,137	20.0%
Private rent	5,236	7,873	2,637	46.4%
Affordable	4,581	6,495	1,914	33.6%
Total	35,870	41,558	5,688	100.0%

Source: LTBHM Analysis using updated 2009 survey database

Table A.5 Tenure of new accommodation required across study area 2013-2031				
<i>Tenure</i>	<i>Tenure profile 2013</i>	<i>Tenure profile 2031</i>	<i>Change required</i>	<i>% of change required</i>
Owner-occupation	91,972	95,523	3,551	17.9%
Private rent	27,980	35,945	7,965	40.1%
Affordable	19,508	27,846	8,338	42.0%
Total	139,460	159,314	19,854	100.0%

Source: LTBHM Analysis using updated 2009 survey database

Cambridge Partial Return to Trend Report

The following 4 tables contain the Cambridge Partial Return to Trend results for each JCS council and then the JCS total:-

Table A.6 Tenure of new accommodation required in Cheltenham 2013-2031

<i>Tenure</i>	<i>Tenure profile 2013</i>	<i>Tenure profile 2031</i>	<i>Change required</i>	<i>% of change required</i>
Owner-occupation	32,574	35,966	3,391	38.5%
Private rent	12,478	15,081	2,603	29.6%
Affordable	6,928	9,733	2,805	31.9%
Total	51,980	60,780	8,800	100.0%

Source: LTBHM Analysis using updated 2009 survey database

Table A.7 Tenure of new accommodation required in Gloucester 2013-2031

<i>Tenure</i>	<i>Tenure profile 2013</i>	<i>Tenure profile 2031</i>	<i>Change required</i>	<i>% of change required</i>
Owner-occupation	33,345	35,596	2,251	22.1%
Private rent	10,266	13,562	3,296	32.3%
Affordable	7,999	12,652	4,653	45.6%
Total	51,610	61,810	10,200	100.0%

Source: LTBHM Analysis using updated 2009 survey database

Table A.8 Tenure of new accommodation required in Tewkesbury 2013-2031

<i>Tenure</i>	<i>Tenure profile 2013</i>	<i>Tenure profile 2031</i>	<i>Change required</i>	<i>% of change required</i>
Owner-occupation	26,053	28,381	2,328	32.3%
Private rent	5,236	7,816	2,580	35.8%
Affordable	4,581	6,873	2,292	31.8%
Total	35,870	43,070	7,200	100.0%

Source: LTBHM Analysis using updated 2009 survey database

Table A.9 Tenure of new accommodation required across study area 2013-2031

<i>Tenure</i>	<i>Tenure profile 2013</i>	<i>Tenure profile 2031</i>	<i>Change required</i>	<i>% of change required</i>
Owner-occupation	91,972	99,942	7,970	30.4%
Private rent	27,980	36,459	8,479	32.4%
Affordable	19,508	29,259	9,751	37.2%
Total	139,460	165,660	26,200	100.0%

Source: LTBHM Analysis using updated 2009 survey database

Importantly, it can readily be appreciated that if the level of ‘affordable’ and ‘private rental’ homes cannot practically be provided during the Plan period then a reduction of household size is less likely

Comments on the results

The same sort of comments can be applied to both sets of tables, but since the Flat Rate ones are the most relevant to the JCS by virtue of being rooted in local data, the following comments are mainly focussed upon them. For reference, though, the equivalent ‘Partial Return to Trend’ figures are shown in [square brackets] after them.

The point of importance is the amount of extra newbuild for sale housing that could be justified by these projections. At the JCS scale the answer to that question is:

3,551 new dwellings for sale [7,970 for Partial Return to Trend (PRT)]

There is also the issue that the LTBHM aims to reduce or remove the amount of unsuitable housing. To that extent the increase in Affordable Housing shown in Table A.5, which is slightly larger than the

increase in private renting, would be reduced if no attempt were made to address the current stock of unsuitably housed households. However the numbers in unsuitable housing who could buy must be close to or zero. Hence the difference made by the LTBHM really only affects the boundary between private renting and social renting. It can therefore be largely ignored for the purpose of examining the level of owner occupation.

Private tenants who might buy, or support buying newbuild housing

There are in principle two categories involved:

- (i) Private tenants who might buy
- (ii) Dwellings for sale that are bought for Buy to Let

The Buy to Let Market is unlikely to flourish once interest rates return to a commercial level of 4-5%. The likelihood of this sector providing a sustained demand for significant amounts of newbuild over the 20 year plan period is clearly likely to reduce.

There is then the issue of how many private tenants are likely to be able to trade up to buying. The household datasets permits analysis of this issue, as the following tables show:

Table A10 Profile of market demand in Cheltenham		
	<i>2008</i>	<i>2013</i>
Proportion of households that moved to market accommodation in last two years that moved to the private rented sector	57.4%	71.3%
Proportion of newly forming households that formed in last two years that moved to the private rented sector*	67.9	75.4%
Median income of recent new owner-occupiers (last two years)**	£35,464	£40,035
Approximate median savings/equity of recent new owner-occupiers when purchasing home (last two years)**	£25,015	£32,842
Median income of private rented households not in receipt of LHA (potential future owners)	£28,650	£35,353
Proportion of private rented households not in receipt of LHA (potential future owners) with savings in excess of £20,000 (the minimum likely to be required to afford a deposit)	14.0%	14.2%

Table A.11 Profile of market demand in Gloucester

	2008	2013
Proportion of households that moved to market accommodation in last two years that moved to the private rented sector	52.0%	68.7%
Proportion of newly forming households that formed in last two years that moved to the private rented sector*	61.5%	70.2%
Median income of recent new owner-occupiers (last two years)**	£23,256	£28,941
Approximate median savings/equity of recent new owner-occupiers when purchasing home (last two years)**	£31,512	£38,424
Median income of private rented households not in receipt of LHA (potential future owners)	£21,699	£25,341
Proportion of private rented households not in receipt of LHA (potential future owners) with savings in excess of £20,000 (the minimum likely to be required to afford a deposit)	5.2%	5.0%

Table A.12 Profile of market demand in Tewkesbury

	2008	2013
Proportion of households that moved to market accommodation in last two years that moved to the private rented sector	30.9%	49.9%
Proportion of newly forming households that formed in last two years that moved to the private rented sector*	47.4%	58.0%
Median income of recent new owner-occupiers (last two years)**	£29,241	£35,264
Approximate median savings/equity of recent new owner-occupiers when purchasing home (last two years)**	£33,464	£39,686
Median income of private rented households not in receipt of LHA (potential future owners)	£24,761	£28,611
Proportion of private rented households not in receipt of LHA (potential future owners) with savings in excess of £20,000 (the minimum likely to be required to afford a deposit)	8.1%	7.2%

*May include households that previously owned but have moved back to shared accommodation or back with parents/ relatives. It includes households that moved into affordable accommodation.

**May include households that previously owned but have moved back to shared accommodation or back with parents/ relatives or into rented accommodation (including affordable) Source: Gloucestershire County Housing Needs Assessment, household dataset 2009 and updated to 2013

(For comparison, the levels of equity of households in-migrating to the JCS area to buy is far larger at: £97,321

And that of in-migrants who were not owners before, and therefore bought their first home in the JCS area, the equity level was: £58,084

Clearly this latter group is likely to be in work, and much younger than the former group.)

As can be seen, from the above Table, the updating process does not alter the proportion that might be able to buy something at the bottom end of the housing market by very much. The average figure is about 10%. However, it should be noted that this is only buying something at the bottom of the second hand market, and would not necessarily extend to buying new.

If a vacancy rate of 5% is added to the newbuild for sale figures identified earlier then the range of true demand appears to be between 3,729 to 8,369.

If the 10% of the new private rent totals are added, then we get:

$$7,965 \times 10\% = 797 \quad \text{or} \quad 8,369 \times 10\% = 837$$

When added to the 'true demand' this gives a Market Housing totals ranging from just:

$$3,729 + 797 = 4,526 \quad \text{or} \quad 8,360 + 837 = 9,206$$

Based on the Flat Rate projection above, and ignoring the economic prospects nationally and for the JCS area, the largest amount of newbuild housing that could be supported by purchase is therefore 4,500 in round figures and just over 9,000 based upon the Partial Return to Trend projection.

ANNEX B

A Brief Review of Forecasts used in the JCS

The figures in the Table below are expressed as annual rates of household growth. The addition of a 5% vacancy rate and multiplication by 20 produces the implied total net new households implied by each projection. This is shown in the bottom row of each table, for the JCS area. The third column is simply taken from the Cambridge report.

Annual household growth 2011-2031			
	flat rate (1)	2021 rate (2)	JCS (3)
Cheltenham	341	369	500
Gloucester	456	557	655
Tewkesbury	316	417	505
Total	1,113	1,343	1,660

Sources: as discussed below

The following are notes on the three columns:

- (1) By applying the change set out in the 2010-based projections to the 2011 Census population figures to derive a population in 2031 (differentiated by age) and then applying the flat rate for household size to come up with a household total. These households and a vacancy rate should be added to produce a dwellings estimate.
- (2) By using the headship rates (for different household types) per age band of the population set out for each authority in 2021 in the Interim household projections and applying this to the 2031 population figures (This scenario presumes that household formation rates remain at 2021 levels rather than 2011 as in the first scenario.
- (3) The Cambridge report figures for '*Partial Return to Trend*'. This is assumed to be JCS's preferred option. These figures come from the three appendices at the back of their report.

By adding a 5% vacancy rate onto these figures total projections of homes required over the 20 year plan period can be produced:

Total growth implications 2011-2031			
	flat rate	2021 rate	JCS
20 year Plan period: total households	22,260	26,860	33,200
20 year Plan Period: total homes requirement including 5% vacancy rate	22,372	28,203	34,860

Thus the highest realistic homes forecast based on locally relevant demographic data would range from approximately:

22,400 to 28,200 new homes

This forecast, however, pays no attention to the wider economic issues nor does it pay any attention to the tenures that households can afford, dealt with Annex A above.

Further details of the research upon which the above figures are based can be obtained from CPRE