

### **Question 1**

***Do you consider that a comprehensive review of the plan is the correct approach for the JCS review?***

No.

***If not, what do you consider are the alternative approaches?***

For Cheltenham, simply update its distinctive/unique 'retained' Retail Policies "immediately", as promised by the JCS, and as is urgent for CBC's development control. These Cheltenham-specific Retail policies, handling this historic town's long-established Hierarchy of shopping districts, are arguably non-strategic (not in-common) and could be progressed immediately in the Cheltenham Local Plan. Once agreed, they would not need to conflict with the less elaborate Retail Policies for TBC and Gloucester City (focused mainly on their 'town centre' shopping district) if those authorities need to take longer to develop Retail policies from 'cold' (via JCS-2).

### **Question 2**

***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?***

To 2036 is long enough, and considering that the principal synchrony needs to be with Stroud DC (for burgeoning Gloucester's expansions, to South and East).

Looking beyond (as far as 2041) just facilitates the allocation of yet more site "options" for developers, whose claims will always be as over-aspirational as at the JCS (successfully) and equally out of touch with what is being delivered, and whether demand for so very much additional Employment land can materialise.

No further site supply (options) should be created to undermine the urgent delivery of Cheltenham NW and Cheltenham West. (Otherwise, the Cheltenham 'Safeguarded' land risks being phased ahead if more profitable for developers.)

### **Question 3**

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

All further incursions into the much diminished Gloucestershire Green Belt ought to be approved first via a full JCS Examination, not via a more time-limited Local Plan inquiry (as is currently scheduled for Cheltenham, with no multi-stage cross-questioning of "evidence").

All further Housing sites proposed for more than 50 units bordering Cheltenham or Gloucester City will inevitably be cross-boundary issues into TBC territory, and therefore need strategic JCS-2 approval and apportionment.

All DtC 'agreements' should be approved via full JCS-2 Examination, not as ad hoc (or single Local Plan) deals.

### **Question 4**

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

For Cheltenham's UEs, the JCS Transport strategy (DS7) needs total revision to become viable. GCC should take its cycling and walking blinkers off regarding the desperate need for planning some 'outer orbital' route to connect from M5-J11 to Bishops Cleeve passing through the West and NW UEs, thereby accelerating their perceived viability.

In view of very slow delivery (especially at Cheltenham), there should be no further allocations for aspirational "growth". Gloucestershire is a top-rank county with its sensitive rural-urban balance. The adopted JCS-1 has

suddenly precipitated more than enough damage to the Severn Vale and its smallest Green Belt (now split into two pieces), all of which massive development needs to seek delivery and bed in first.

### **Question 5**

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

(1)

For Housing sites, no DtC request can be issued from Gloucester City to CBC because those two Districts are not contiguous.

Land-deficient CBC could make a DtC request to Tewkesbury BC;

Gloucester City could make DtC requests to TBC and/or Stroud DC;

TBC could make DtC requests to Wychavon or Malvern Hills in Worcestershire.

Above all, remember the 'Apportionment' guidance established by the JCS Examination, that urban extensions for Cheltenham or Gloucester can be solely for their own individual Housing targets.

(2)

Schooling (at Secondary level) is a major Infrastructure issue, which the JCS failed to deal with because GCC kept quiet about its 'Strategic Review' (already written but deviously not published until after the JCS Examination sessions) which proposed an extra Secondary school for Cheltenham and its surrounding areas (additional to the planned Secondary school in the Cheltenham NW UE).

Secondary schools need considerable land and are inevitably cross-boundary service providers.

JCS-2 must address the whole issue of 'school planning districts' (Cheltenham, Tewkesbury and Gloucester areas), and GCC must be a full participant in JCS-2 (not wait until the JCS Examination sessions have closed and then immediately subvert the major JCS decision in favour of a substantial LGS (Local Green Space) for the 'valued Landscape' of Leckhampton; and indeed flout that verdict completely by intending soon to give giving full planning permission to itself).

GCC must publish comprehensive and convincing evidence and data covering all the interdependent 'school planning areas' within the JCS Districts, for timely scrutiny via the JCS-2 consultations.

(3)

GCC also needs to become a full JCS-2 participant for Transport planning, and publish scheme options early and be cross-examinable.

(4)

There is no proper DtC with a LEP.

Para. 5.4 states:

"The Gloucestershire Local Enterprise Partnership (LEP) is currently preparing the Industrial Strategy for economic growth in the county and the JCS will have an important role in delivering this."

This is an abdication by JCS officers, who ought instead to commission (and fund) their own independent Employment consultants, not over-influenced by the unelected non-transparent LEP lobby group.

A sustainable growth level should be determined by the JCS itself, which should not be a mere "delivery" mechanism.

The G-First-LEP is a group of employers driven on by pushy planning consultants making over-aspirational claims of drawing "growth" (and population) into this environmentally most sensitive county.

The LEP should only be involved if as a full participant, publishing its material with (not after) each JCS-2 stage, and being open to cross-examination.

### **Question 6**

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

(1)

At NorthWest and West Cheltenham, JCS-1 completely failed on Transport to plan the vaunted "improved infrastructure" "for new and existing residents".

DS7 was never truthfully viable, and currently remains stalled at both Cheltenham UEs.

This needs to be addressed before any further work on JCS-2.

(2)

The 'Objectives' need to be numbered in rough order of importance.

'Climate Change' has to be Objective-1.

Thereafter, 'Environment' needs to be Objective-2 because it can only be meaningful as a possible pre-veto (after which the other Objectives can all be aimed for, as they do no overlap or conflict among themselves).

The principles of doing no avoidable harm to valued environment, and minimising environmental impact, needs to be built in clearly to Policy, (with no trading-off of Environment for cheapness or expediency).

### **Question 7**

***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?***

JCS-2 identifies four options:

Brownfield/Urban, Urban Extension, New Town, Rural Dispersal.

Other options are:

'Restraint' (not being able to accommodate the full calculated 'requirement' into an environmentally sensitive county), and

'Diverting' housing demand to other less exceptional Districts (beginning with those South and North along the M5).

(2) Urban Extensions

No more greenfield incursions are environmentally tolerable at the edge of Cheltenham (other than some of small sites which the JCS Inspector made available from Green Belt along the Northern edge of the PUA), but certainly no further destruction of the town's 'valued landscapes' and Green Belt setting at Leckhampton or Chargrove.

However, Gloucester may consider a further UE into non-GreenBelt land across the river around Highnam, which would fund an improved river crossing.

Tewkesbury is already planning its major UE, at Ashchurch and M5-J9.

TBC did not demur from JCS-1's readiness to accommodate the high 30,000+ Housing target (into this environmentally sensitive county), thinking that TBC's share could be deposited largely on Cheltenham's boundary. However the JCS Examination ruled that the correct 'Apportionment' between these Districts assigns all of Cheltenham NorthWest and West UEs entirely to Cheltenham's (most constrained) need.

(Also in JCS-1, approval for Gloucester's final Northward UE, called 'South Churchdown', means that TBC's Churchdown is now merged into Gloucester City.)

(3) New Town (NT)

There are no acceptable NT locations inside the development-oppressed Severn Vale of the JCS territory: not Coombe Hill or Apperley or Boddington or Bentham or Toddington.

See my recent TBC Local Plan submission (attached) concerning incipient 'ribbon development' unwisely joining Cheltenham to Tewkesbury along the A4019 and A38.

Stop trying the grow the population of this environmentally top-rank county with its sensitive rural-urban balance up.

Let JCS-1's huge expansions bed in, and see if they can materialise, before fixing any JCS-2 decisions for further sprawl.

### **Question 8**

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

Yes.

Twenty additional houses per annum is minor, not worth altering (uplifting) JCS-1 for.

JCS housing (and Transport infrastructure) needs to commence being delivered first.

### **Question 9**

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

No specific house types should be identified as additional numbers.

At Cheltenham, the likely dominance of retirement housing buyers should be acknowledged.

No specific provision should be made to facilitate investment-buying of housing either for second homes (or even for some renting out).

Housing in desirable Cheltenham will always inevitably be scarce and therefore less affordable.

Accept and acknowledge the reality that 'numbers-chasing' can never change that relative unaffordability.

### **Question 10**

***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?***

Disagree that there is "going to be a need" for yet more Employment land on top of the over-aspirational 192 hectares approved by JCS-1.

Existing employment land is capable of much densification.

Changing employment patterns (including hot/desk-sharing and remote/home-working) will relieve demand on land.

Above all, no further provision need be made for land-wasteful 'retail parks' or car storage "showroom" lots, in the context of increasing online purchasing and store closures (producing site re-availability).

### **Question 11**

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

This retail issue concerns town centres. It does not need to subsume or include the detailed Policies concerning Cheltenham's specific (uncommon) Hierarchy of townwide retail clusters, which do urgently need the promised "immediate" (not drawn-out) updating of these Retained CBC policies.

### **Question 12**

***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?***

Yes, the huge known JCS-1 schemes must be progressed urgently.

The only additional sites should be those recommended by the JCS-1 Examination (but needing further detailing before formal adoption), principally:

Brookthorpe-Whaddon and  
'Greater Tewkesbury' (encompassing M5-J9 and Ashchurch).

Greater Tewkesbury or 'Great Ashbury' was the inevitable consequence of TBC (and CBC and Gloucester City) officers failing to consider any tempering-back (on environmental sustainability grounds) from the full growth calculation of 30,000+ houses, in this most delicately balanced county.

### Cheltenham

At NorthWest and West Cheltenham, the 'safeguarded land' areas should definitely not be for growth "particularly from an employment perspective", following the massive 65+ hectares allocated there by JCS-1. Cheltenham is far too short of land for its long-term Housing growth to squander its last possible UE sites merely to provide JCS-wide commercial "opportunities", never mind that those sites happen to lie close to an M5 junction.

Moreover, any such "employment" use (so called) would most likely become sprawling land-wasteful retail parks or logistics warehousing, with limited jobs provision.

Cheltenham's 'safeguarded land', the town's final contiguous option, must be predominantly for Housing.

### Other

After the seismic UE expansions of JCS-1 (none of which is reliably progressing to implementation) there should not (as in para. 12.15) "be a requirement to allocate further strategic sites" for a mere 5 or 10 year period extension beyond 2031. What JCS-1 schemes will have materialised by 2031 is most uncertain.

### **Question 13**

***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.***

Relatively less sensitive landscape designations around Highnam are the next direction for the aspiring metropolis of Gloucester to swallow.

### **Question 14**

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

**Size :** if the proposed or implied follow-on development of the wider site exceeds 20 hectares OR  
if the maximum conceivable capacity exceeds 250 dwellings within 2 km of an adjoining District;

OR

**Location :** if leading to further erosion of Green Belt OR AONB OR  
if located close within 2 km of an adjoining District OR  
if acknowledged as 'valued landscape';

OR

**Use** (proposed or likely) : if substantially for commercial ("Employment" or Retail), because they provide JCS-wide services across District boundaries

### **Question 15**

***Are there any new infrastructure needs that the JCS Review needs to consider?***

(1) The IDP accompanying JCS-1 is high cost, unfunded, and is not proceeding (especially at vital Cheltenham).

- (2) Chargrove Lane is one of the top "desirable routes for walking and cycling" (para. 13.4) close to a large urban population, thereby attaining high Amenity value, which merits its designation as a 'Quiet Lane'.
- (3) JCS-2 (and/or TBC) should create a "keep off" Index of important Amenity landscapes, which feature footpaths and historic landscape features, (amounting to 'valued landscape'), and record them in the Gloucestershire HER (Historic Environment Record).
- (4) Provision of Secondary schools, whose 'school planning areas' (as defined by GCC) range across District boundaries (and even across the county boundary for Gloucestershire's high provision of Grammar schools).

### ***Do you have any other comments to make?***

#### Summary

This is not a JCS "Review", because officers have chosen to formulate it as a leisurely "long grass" JCS-2, (which is what I call it).

Retail, however, does need to be an "immediate" review, as promised by the JCS.

Secondly, the vital Cheltenham UEs are floundering and need an immediate Transport infrastructure review.

Only 'Greater Tewkesbury' and Brookthorpe-Whaddon may need a timescale that is slower (or is dependent on an outside District, Stroud DC).

As regards any "review" of the overall JCS-1 housing target, Cheltenham can and should be left entirely out of it, having met its difficult JCS housing target in full.

All that CBC (and sub-competent) GCC need to address is specifying some viable Transport road network to serve, link and progress Cheltenham's two stalled NW and W Urban Extensions.

Expansion-eager Gloucester may need to use the JCS-2 process to initiate its westward expansion towards and around Highnam.

TBC is already facing up to the planning of 'Greater Tewkesbury'.

#### **In conclusion,**

- (1) pause any further work on a "comprehensive" JCS-2 For four years, and then do it 'to 2041';
- (2) instead, do a genuinely "immediate" review of the **urgent** outstanding issues:
  - (1) the 'retained' Retail policies, essentially the updating of Cheltenham's intricate set;
  - (2) revise the Transport 'solution' (DS7) for Cheltenham West and NW;
  - (3) add the (omitted) infrastructure plan for Secondary school provision across the interdependent JCS Districts.

For the eventual "comprehensive" JCS-2, for the M5-bordering spine of Gloucestershire, Stroud DC should join, plus GCC.