

As local residents of a named strategic site in the proposed Joint Core Strategy we are submitting the following statements for consideration. We include evidence where appropriate.

The current Joint Core Strategy Document for Gloucester City, Cheltenham and Tewkesbury is unsound and is not consistent with National Planning Policy for the following reasons.

Soundness issues.

- The Joint Core Strategy for Cheltenham, Tewkesbury and Gloucester City, is presiding over the greatest proportional loss of Green Belt land in the country. 20% of Green Belt has been identified for development in the plan. Their plan to provide mass urban extensions will result in the loss of over 3,000 Acres of Green Belt, the equivalent of more than 2,000 football pitches.
- In NPPF terms Quote Nick Boles " (the) very special circumstances test which applies to approval of inappropriate development in the Green Belt has always been a high bar" All the proposed urban extension developments are inappropriate.

The Government and NPPF has reaffirmed Green belt protection noting "unmet housing need is unlikely to outweigh harm to the Green belt " ie housing need does not override Green Belt protection

- The Government has recently (Hansard report June 2014) stressed the importance of utilising brownfield sites, prioritising their development and giving government incentives to do so. The Aschurch strategic site is the only brownfield site put forward in this plan for development. The remaining sites being Green Belt and white field.
- With reference to a recent DCLG select Committee 7 July 2014 Q237 Councillor Dee for Gloucester City said" (We) have a lot of potentially good brownfield sites in the City centre and some on the peripheral of the City..... we could keep going for a while yet. (We) could keep going at the moment without causing any particular pain and without attacking any -I will not say Green Belt because it is not- land of similar origin." in this matter Councillor Dee can only have been referring to land South of Gloucester City which is Green field ,and not within the Green Belt, and which the City does not want to see developed, for reasons which are not clear. Councillor Dee went on to add "We have places in the City Centre" and referred also to the now abandoned HMS prison in the City centre which could be developed. In Q251 following a direct question about why so much Green Belt was under threat Councillor Dee admits to having stated 1000 brownfield sites were available. "Perhaps 1000 or so is stretching the point." this scenario alone would suggest a lack of co-operation from Gloucester City itself and a reaffirmation that brownfield is available. Green Belt is being prioritised over green field and brownfield. Brownfield should be prioritised. The importance of bringing brownfield land into use is a core principal in the NPPF. Therefore the plan is not in accordance with Government regulations.

- Planning Policy Guidelines March 2014 state "councils consider the delivery record of developers and land owners" In relation to Brockworth's Coopers Edge , a new build suburb of 1900 houses, this development remains incomplete. The rate of build has been slow and building completely halted during the recession. The rate of build has now picked up but hundreds of houses have yet to be built or sold. Similarly Gloucester Business Park, situated in Brockworth along Ermin Street, has a considerable amount of land waiting for business development. This land has lain waste for over ten years NPPF states " land set aside for business should be reallocated for housing if business is not taken up on these sites." The Business park lies adjacent to the Coopers Edge 'suburb' and therefore it would make considerable sense to utilise this empty land utilising the new and more than adequate infrastructure there. This land could provide hundreds of new homes and this needs to be addressed.
- Planning Policy Guidelines state that local plans can pass the test of soundness where authorities have not been able to identify (name) land for growth in years 10 to 15. The plan has managed to identify land for twenty years, contrary to the Government recommendations of 15 years max. The naming and identification of sites for such a long period has not afforded any great flexibility to the plan and has not allowed for credible changes to be made regarding future housing numbers and the uncertainty of the future.

### **Objectively assessed housing numbers?**

On 24.9.12 Cheltenham Borough Council met to agree recommendations to the JCS report. The council proposed a resolution on household size stating "there is evidence to indicate household size is broadly static" and required "officers to investigate ...that using ONS district data to assess household size across the JCS area would generate a housing need of 18,600" Gloucester City council felt this investigation would cause delay and classified the resolution as unacceptable.

Councils all over the country are facing forecasts of future housing, thousands of times larger than previous estimates. Ed Vaizey,MP for Didcot Wantage "urgent reviews are needed on planning and methodology. Massive numbers of houses are being planned. There needs to be a more realistic outcome. Numbers are over-estimated. Many local communities are now faced with levels of growth that will fundamentally change the nature of settlements." We concur wholeheartedly with this view.

According to the JCS plan the population across the three areas will increase by an incredulous 59,400 people between 2011 and 2031.

Many questions have been raised as to the feasibility and accuracy of future housing need estimates.

MP for the locality, Laurence Robertson presented his concern to Government in 2013, stating that housing numbers had been grossly over-estimated and declaring his very valid reasons for this conclusion. MP Martin Horwood also raised the issue and both MP's referred to the "appalling sustainability analysis and accuracy of models" which make up the evidence base for the JCS.

Locally, Councillor for Cheltenham and chairman of Cheltenham Alliance, Ian Bickerton has presented an alternative estimate, with evidence, challenging the figures presented by the JCS. Ref Cheltenham alliance Report on JCS housing numbers pdf file.

The 26 page document puts forward a strong case, stating that “ The JCS cast aside ONS population projections and the 2013 DCLG Household Formation Rates. ....The impact of inappropriate methods and out of date evidence leads to inflated housing requirement of 30,500 whereas use of referenced up to date data and DCLG modelling demonstrate a requirement of 23,500. ...Over provisioning of housing with early phasing into the Green Belt and open countryside is unsound....There is a 23% error in housing targets “

The questions which arise from the evidence on housing need, shows that there are serious anomalies and important issues which need to be clarified in order that the estimate for housing need is objectively and accurately assessed.  
The NPPF requires councils to “use up-to-date and objective data.”

In addition the JCS is unbalanced and is currently based around an economic growth model . Social and environmental aspects have been minimised

### **Traffic**

The strategic sites chosen and named in the plan have been not subjected to any relevant and current traffic assessment. The JCS admitted that transport modelling was not up to date during the first public consultation and evidence on the traffic assessment was on-going. A full traffic appraisal is currently being carried out.

The mass urban extensions proposed will create enormous amounts of traffic and clear and accurate assessments are crucial for such large developments.

NPPF transport 32 All developments that generate significant amounts of movement should be supported by a Transport Statement or Assessment

In relation to Brockworth and the nearby proposed development at Leckhampton the infrastructure for traffic is likely to be unsustainable given the amount of traffic the combined developments will generate. The cumulative impacts of development in Brockworth and Leckhampton will cause severe impacts on road the network.

An independent traffic assessment was initiated by Leckhampton and Warden Hill Parish Council in the light of this major concern. The modelling showed that an extra 3,000 houses will cause traffic gridlock around Brockworth, Shurdington and Leckhampton. It will also impact on the A417 and the traffic problems and pollution already experienced at Crickley Hill, Air Balloon roundabout.. The current roads are inadequate for this volume of traffic.

*Example of the above assessment included*

The Parish councils of Leckhampton and Warden Hill, Shurdington and Brockworth are currently raising these issues with the Highways Agency. (Aug 2014)

NPPF transport 29. Transport policies have a important role to play in facilitating sustainable

development.

Transport assessments are crucial to the evidence base of the plan.

The JCS Transport model report .Executive summary April 2014 concluded

“In all 2031 scenarios, vehicle delay is prevalent.....” .....in the absence of further scenario testing the report fails to quantify what the impact would be if (transport ) schemes were to be removed...etc. ” ....greater refinement of the transport schemes...is required before a preferred transport package is identified within the JCS and supported by the County Council and Highways Agency”

A further work package has been commissioned and is available later this year

The evidence base of this plan is therefore not complete.

*Example of above document included.*

A further and more detailed analysis of the traffic infrastructure can be found below

Windfall Sites Quote NPPF 48. Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.

**Below is evidence of the historic windfall delivery rate of TBC 2006 to 2013**

Strategic Housing Land AA . Tewkesbury Borough Council 2013

*2.55 The situation of windfalls will be monitored through the annual monitoring and will be updated, as appropriate, within future assessments. Over recent years, the contribution that windfall development has made to the housing supply has been significant. A summary is included in Table 5 below for information.*

**Table 5: Windfall completions in Tewkesbury Borough 2006 - 2013**

| <b>Monitoring Year</b> | <b>Allocated site completions</b> | <b>Windfall site completions</b> | <b>Net completions</b> |
|------------------------|-----------------------------------|----------------------------------|------------------------|
| Apr 06 - Mar 07        | 223                               | 170                              | 393                    |
| Apr 07 - Mar 08        | 281                               | 403                              | 684                    |
| Apr 08 - Mar 09        | 232                               | 284                              | 516                    |
| Apr 09 - Mar 10        | 176                               | 122                              | 298                    |
| Apr 10 – Mar 11        | 163                               | 168                              | 331                    |
| Apr 11 – Mar 12        | 103                               | 206                              | 309                    |
| Apr 12 – Mar 13        | 183                               | 279                              | 462                    |

*2.54 For the purpose of the JCS housing trajectory an assumption about windfall development will be made in addition to the supply from planning consents and assessment sites. This will project past delivery trends forward for windfall sites of 0 to 4 dwellings, recognising that the majority of larger scale development will come forward through sites identified by local plans. The windfall allowance will be phased in following the first three years of the plan period to ensure that double counting of extant permissions does not occur. This work is currently being reviewed as part of the preparation of the pre-submission version of the JCS*

As shown above ,Windfall sites can significantly contribute to overall housing numbers. 1,632 houses in 7 years in Tewkesbury Borough alone. The JCs has failed to take into account windfall sites at the expense of Green Belt as evidenced by the above figures. The **JCS Pre-submission document** makes little mention of windfall sites. paragraph **4.11.4 JCS states....**

'Development' "will include sites allocated in neighbourhood plans and windfall sites." There is no other reference to windfall and no acknowledgement of, the 'significant contribution' made in the above document.

Windfall sites coming forward in the future afford some obvious flexibility in naming of sites and housing numbers. The JCS should ensure windfalls are properly taken into account

For example within the JCS area in recent weeks ie July 2014 , we have identified the following sites which can be classed as windfall. Yew Tree Close Quedgley 10 houses, The Larches Innsworth 6houses, Corrinium Court Brockworth 5, Brockworth Police Station site 4,Garden Build Ermin Street Brockworth 1, A grand total of 29 houses. If this number were to be replicated over the JCS 20 year period this would equate to a likely 580 houses. The above are sites we have recently noticed advertised in the local paper without any research on our part. No doubt across the combined areas of Tewkesbury Cheltenham and Glos, numbers of windfall will be far greater and would amount to 1000 possible future houses.

Examples of the above are included on the following page.

- Land availability

It should also be noted that under the current economic climate there is much market activity of willing land buyers and willing land sellers. This is leading to a heightened level of applications of all sizes. An application for 650 is shown below (Winnycroft Farm Matson Citizen newspaper). In JCS terms this application is greater than 450 and is therefore classed as a 'strategic site.' Why did the JCS not identify this area as a probable, suitable strategic site of its own. In JCS terms The JCS document has no policy as to how such applications will be dealt with. It is assumed that having identified housing numbers and where the strategic sites will be the answer to such applications will be "NO....housing requirement is addressed" If planning permission is given, then the JCS area is ultimately going to receive a far greater amount of housing and the strategy will have failed.

- Houses with planning permission

19,000 houses already have planning permission within the JCS area and the majority have yet to be built. The JCS area as a whole can show a 5-year supply of land plus 20%. Gloucester alone already has over 6 years of land supply.

However, Gloucester City were against a collective 5-year land supply between the three authorities and wanted to keep their own separate status on this matter. If this is indeed the case then the following statement would apply.

Gloucester City has shown a good rate of build so need only show 5 plus 5%. It has already 6 years of land supply. The City also has brownfield available (ref Councillor Dee remarks at DCLG select committee above.). As Gloucester City have named Brockworth Green Belt as an urban extension of the City, to take its housing need, why is the Green Belt under threat of development at this moment in time? Green Belt does not need to be used now and special circumstances can not be shown.

- Planning Practise Guidelines outlined and confirmed by Nick Boles in March 2014. state "unmet housing need is unlikely to outweigh harm to the Green Belt and other harm to constitute very special circumstances justifying inappropriate development. Stating also... "encourage(ing) joint working between local authorities, but clarifying that the duty to co-operate is not a duty to accept; we have considered and rejected the proposals of HM opposition to allow councils to undermine Green Belt protection and dump development on their neighbours' doorstep.

This is exactly the scenario of this JCS plan, with Tewkesbury having to relinquish acres of Green Belt to accommodate the needs of Gloucester City and Cheltenham.

**Heritage and History** Brockworth as a Strategic Site. The JCS commissioned an independent report into the Heritage and History of its strategic sites **ECUS March 2014**. the report found that there are "major heritage concerns to development in this area" (Brockworth). The land scored highly in terms of concern together with another major strategic site identified by the JCS. The historical rural setting ( St Georges Church and Grade 11 listed Tithe barn and Brockworth Court) described in the report, is an important element of Brockworth, valued by residents and crucial to the settlement's identity. The hedgerows too are classed as important. The scale of housing proposed for this site will impose upon the rural outlook of the historic buildings and will be harmful. In this regard Hunter Page, developers of the site have not sufficiently addressed this issue. Adequate Mitigation measures have not been put forward. A concession to include an orchard close to Brockworth Court and Tithe barn and retaining of the some of the hedgerows is not appropriate given the historical importance of the area as recognised in the above report. **NPPF Core planning principles 17 states** ---conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations; (Further detail on the Heritage and History constraints of Brockworth are included)

**Environmental constraints.** In considering the Broad locations for development Tewkesbury Borough Council stated that an environmental impact assessment was required before any development was considered for Brockworth Green Belt as the development exceeded thresholds within schedule 2 and would be likely to have significant impact on the following

*visual quality of the countryside and natural environment*

*sig impact on strategic road network*

*sig impact on the hydraulic regime of Horsebere Brook at the location*

*sig impact on residual flood and surface water*

*sig impact problems upon 3rd party properties*

*and the nature conservation, value of the water environment, land ,fauna and flora*

The above statements clearly identify an area which can only be justified for building in exceptional circumstances

The scale of additional housing (1500) planned for the area will harm the character of the settlement and have adverse effects for example in regard to traffic, and over-development.

Example of above included

### **Important open space.**

The named strategic site in Brockworth is identified as 'an important open space' in the Tewkesbury Borough Local Plan 2007- 2011. Evidence POLICY LND3 and Appendix 4 Important Open Spaces--- "Land adjacent to Horsebere Brook . A linear open space forming a landscaped edge to the built up area" "The Borough Council considers that the loss of the defined open space (s) would adversely affect the character and setting of these settlements. These areas should be of amenity value to the public, clearly visible and important to the character of the settlement. " Brockworth Green Belt was judged to be so.

Policy LND3 states “ The Borough Council considers that the loss of the defined important open spaces...adjoining settlements would adversely affect the character and setting of these settlements”

Nothing at all has altered in the landscape since the publishing of this Local plan in 2007. That such an area can be so easily dismissed as now being suitable for the siting of 1500 houses is controversial and alarming. Important open space to building site in 7 years!?! The large urban extension planned, will deprive Brockworth of a highly valued open space, used for informal recreation. It allows residents the experience of walking through the countryside along public footpaths, which also provide wildlife corridors. Although the developers are duty bound to keep the public footpaths open, the experience of countryside walking will be terminated and public rights of way spoiled. NPPF75. Planning policies should protect and enhance public rights of way and access. NPPF 73. Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.

Brockworth has undergone a massive amount of development over the last 10 years and this is the very last space left for local residents to enjoy. The landscape assessment within the TBC local plan highlights also the significant beneficial impact of important open spaces to the following criteria; rate of CO2 fixing, wildlife habitats, landscape and open land, public access open space, urban environmental viability. That significance still stands and whilst it is appreciated that this local plan is now under review it indicates the importance and value of the site to Tewkesbury Borough and local residents.

The mass urban development proposed will afford a harmful visual interruption to open countryside particularly in the East ie the Cotswolds and Coopers Hill (site of the world famous Cheese Roll). The settlement of Brockworth lies low in the landscape and does not impact at all on this landscape. The area abuts the AONB.

#### NPPF reference 8. "Promoting Healthy Communities"

NPPF Promoting healthy communities73. Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless an assessment has been undertaken which has clearly shown the open

space, buildings or land to be surplus to requirements; or

● the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or

● the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

## Brockworth's Green Belt reviews.

The JCS plans to re-draw the Green Belt in several places. Brockworth Green Belt is to be re-defined for the reason that the A417 provides a new and permanent boundary.

Brockworth Green Belt has been the subject of three Green Belt reviews since 2006.  
 Buchanan review on behalf of The South West Regional Assembly 2006  
 AERC review on behalf of The Cheltenham and Gloucester Green Belt review 2007  
 The AMEC Green Belt review on behalf of the JCS 2011

The outcomes are as shown below

South West Regional Assembly  
February 2006 Buchanan  
REF D

| Cheltenham and Gloucester Green Belt Review |                                           |                      |                           |                             |                     |                        |                           |                                                           |
|---------------------------------------------|-------------------------------------------|----------------------|---------------------------|-----------------------------|---------------------|------------------------|---------------------------|-----------------------------------------------------------|
| Ref                                         | Description                               | Purpose              |                           |                             |                     |                        | No. of purposes fulfilled | Double weighting of purpose (1 and 2 ahead of 3, 4 and 5) |
|                                             |                                           | 1. Preventing sprawl | 2. Preventing coalescence | 3. Safeguarding countryside | 4. Historic Setting | 5. Encourage recycling |                           |                                                           |
| B                                           | North of Gloucester city centre           |                      |                           |                             |                     | 1                      | 1                         | 1                                                         |
| C                                           | North east of Gloucester                  |                      | 1                         | 1                           |                     | 1                      | 3                         | 4                                                         |
| D                                           | North of Brockworth                       | 1                    | 1                         | 1                           |                     | 1                      | 4                         | 6                                                         |
| G                                           | South-west of Cheltenham                  |                      | 1                         | 1                           |                     | 1                      | 3                         | 4                                                         |
| H                                           | West of Cheltenham (Golden Valley area)   |                      | 1                         | 1                           |                     | 1                      | 3                         | 4                                                         |
| I                                           | North-west of Cheltenham                  |                      |                           |                             |                     | 1                      | 1                         | 1                                                         |
| J                                           | North of Cheltenham (Bishop's Cleeve Gap) |                      | 1                         | 1                           |                     | 1                      | 3                         | 4                                                         |

It will be noticed in this review that Brockworth Green Belt, judged on the 5 recognised Green Belt criteria, comes top in the ranking. It also scored more highly than others, within the criteria of "area sensitivity to change"

Cheltenham Borough Council Cheltenham Green Belt Review  
AERC March 2007

*Session 2 – Summary of Findings*

*7.3.21 In this session, many Councillors were of the view that the whole of the Green Belt was of equally high value and should be protected. Others referred to the complementary and mutually-supporting roles of both the Green Belt and the Cotswolds AONB.*

*Nevertheless, a number of areas were highlighted as being of high value, to be protected at all costs, some of which were not within the Borough boundaries. Within the Borough, the most important sector was to the north, between Cheltenham and Bishop's Cleeve – the area around Hunting Butts was especially mentioned. (cont)*

*The other area of high value was around Swindon Village, on the western side of the Borough. Outside of the Borough, areas with the most mention were to the west of Uckington (towards the M5 motorway) and around Brockworth.*

#### AMEC for the Joint Core Strategy Sept 2011

The Green Belt at Brockworth "makes a limited contribution to the Green Belt" despite the same 5 recognised criteria which have been used in previous reviews

example included

It must be noted here that nothing whatsoever has changed in regard to the landscape between the three separate reviews. The A417 was not recognised as a suitable boundary in two out of the three Green Belt reviews. The criteria on the Green Belt purpose and definition remain consistent. The outcome inconsistent in the case of AMEC for the JCS.

In reference to this The Navigus report (NOV 2013 page 4) commissioned by Brockworth parish Council states. "The process (by the JCS) adopted has been to sieve out alternative options before arriving at the view that Green Belt deletions are the only option. This has driven the Green belt review and ensures justification is made..."

#### **Green Belt**

The purpose of the Green Belt, Quote Planning Policy Guidelines, is to " provide opportunities for outdoor recreation near urban areas. Retain attractive landscapes and enhance landscapes near to where people live" The landscape in this area will seriously be compromised by the the proposed mass urban extension.

The Navigus report commissioned by Brockworth parish Council concludes that "The Green belt around Gloucester and Cheltenham has been dismissed without sufficient justification that this is the only reasonable alternative"

The NPPF states the Government attaches great importance to Green Belt. Boundaries can only be changed in exceptional circumstances. The JCS has not proven that long term development needs of the area necessitates the use of Green Belt. NPPF states 87. inappropriate development is harmful to the green belt and should not be approved except in very special circumstances.

The JCS is allocating 20% of Green Belt for development on named GB strategic sites. This equates to 73% of the overall housing need. This shows an imbalance in suitable sites put forward with only a single site on brownfield land and one on white field.

#### **Legal Compliance**

1. The identified strategic sites of Chargrove and Twigworth were removed from the strategy within one week following a visit from the DCLG in March 2014. This sudden removal of two major sites is questionable. Was this matter democratic, fully discussed and ratified by all concerned? At a previous meeting a TBC request to remove Ashchurch strategic site was

discounted as being impossible in terms altering the JCS at this stage. Why then were these two sites so easily deleted. Councillors were questioned on the matter at the Cheltenham JCS meeting in April and admitted the deletion had been a political one. This matter highlights the issue that the outcome of the final plan is political and not what is best for communities.

There is now a rumour that Leckhampton Green field site could be removed in much the same way. This would result in the deletion of a Greenfield site before Green Belt sites which should have priority.

## 2. Process of Community involvement

It can be said that Tewkesbury did not fully admit to the public that they were taking all the housing need of Cheltenham and Gloucester City.

Any revision of the DPD was minimal in response to the public consultation. The was to Quote JCS Public consultation report , strong support for “preserving Green Belt and AONB, wildlife corridors, open spaces. Re-using brownfield” The public also questioned the evidence and accuracy of growth figures. ie housing need.

The public consultation became a ‘list making ‘ process, where comments were dutifully listed and consequently dismissed.

## 3. Duty to Co-operate.

7 separate authorities constitute the area of Gloucestershire.

South Glos, Stroud, Cheltenham, Tewkes, Glos City, Cotswold district and the Forest of Dean with Gloucester County Council over all. Non of the authorities across the boundaries of the 3 JCS areas have been involved and included within the duty to co-operate.

There has also been an imbalance of co-operation in the JCS with some authorities being more open to co-operation than others and some authorities even exploiting the 'duty to co-operate' to fulfill their own needs. For example.....Councillor Dee quoted at DCLG select committee "I think Gloucester would be unhappy if we only concentrated on (development in) the south. In fact, I have got a very firm directive from my management that Gloucester is happier about northern development—that is, the Cheltenham side—than it is on the Stroud side. We are impinging on a lot of very attractive countryside." An unjustified and curious statement considering the countryside referred to is not in the Green Belt (Brookthorpe and Whaddon) and not abutting the AONB contrary to other named strategic sites eg Brockworth!

Tewkesbury's “need to cooperate” has become “obligation to obey”. They have no choice but to give up land to satisfy needs of Cheltenham and Gloucester

Further issues regarding co-operation are; on 24.9.12 Cheltenham Borough Council met to agree recommendation to the JCS. A resolution proposed at this meeting requested officers to consider the inclusion of a single 5 year housing land supply for the whole JCS area. This was not supported by Glos City Council as it would "not have control of its own land supply through its own decision making process" the recommendation was deemed unacceptable. Glos City remained in control. The JCS can show a five year housing supply collectively across all three authorities.

Also Gloucester City has not brought forward suitable land for development within the plan ie Development of South of the City and the plentiful brownfield sites, which it now states it has.

Also with reference to the co-operation of Councils many Councillors admitted during debates that they had been unable to read the document thoroughly, were uncomfortable with some aspects, but felt pressured to vote through the document with the threat of 'ad-hoc' planning applications.

4 The DPD has not had regard to National Policy as stated above with references to the NPPF.

5 Green Belt reviews were inconsistent .

### **The DPD should be changed**

The DPD should focus on regeneration of rural areas in accordance with emerging local plans and not solely on mass urban extensions. The Government vetoed mass urban extensions. People do not want to live on mass housing estates and residents " do not want massive housing estates plonked next to their village ", to quote David Cameron in 2012. A focus on Regeneration of areas with smaller units of housing. a fairer a more imaginative vision with an emphasis on the value of landscape Green Belt and how people want to live, should be the focus of any DPD. The DPD should be a mixed strategy of urban and rural development. There are many rural areas across the whole of the JCS area which would benefit from regeneration, with limited numbers of small units of additional housing.

"Local authorities need to take a critical look at their future housing needs and be creative and inventive in seeking solutions instead of considering an easy way out by nibbling away bits of protected countryside." David Harris chairman of the Chiltern society. 2014

The DPD should be more flexible in terms of future windfall sites. There needs to be a policy in the DPD to deal with the very likely possibility of future appropriate sites coming forward and an acknowledgement of past availability of these sites in terms of the amount of housing provided.

The DPD should be a Plan for 11 years, not 20, which would afford some flexibility in housing requirements and chosen sites .. That is keeping sites in reserve ie Green Belt . "establishing future need is not an exact science" Quote. PPGuidance. Also the naming of sites for a 20 year period has allowed developers a green light for immediate planning applications across the area. (NPPF 24 Local planning authorities should demonstrate flexibility on issues such as format and Scale )

Building on the Green Belt should be a last resort for councils when all other possibilities have been exhausted. The JCS has been eager to utilise as much Green Belt as possible for development and in our view this is unreasonable according to the above evidence. Building on Green Belt may be needed in the future, but we argue strongly that an alternative plan is possible as statements above suggest, and Green belt does not have to be sacrificed unnecessarily at this moment in time. In line with this, there also needs to be pressure to use sites with existing planning permissions first.

The DPD should utilise 3,000 homes which lay empty in Gloucestershire. This could and should be addressed. The Government has admitted that the number of long-term empty houses is a scandal which if addressed, could provide homes for over 300,000 families countrywide.

The DPD should utilise available land at Glos Business Park which has lain waste for more than 10 years.

The DPD should re evaluate the brownfield sites available and prioritise their development ahead of white field, greenfield and Green Belt. Green Belt being the obvious last resort, not the first. Although this is not at this moment in time , a specific requirement from the NPPF, the strategy can show ( as evidenced above)some committment to protecting as much Green Belt as possible for as long as possible and show some regard for the opinions and concerns of local people as it is duty bound to do.

Areas such as Highnam should be considered as viable urban extension of Gloucester City. Recent infrastructure improvements, costing several million, along the A40 have improved the road network and access to the City at this location.

The DPD should interpret the NPPF correctly.

Conclusion There is a need to provide housing and particularly affordable and social housing over the next twenty years. Whilst we certainly appreciate this is the case and that planning for future need is a complicated and rigourous process, we also have a genuine concern that the JCS plan has unnecessarily put at risk enormous areas of valued Green Belt land and countryside.

Methodology is not an exact science, and this has been stated by government ministers and JCS officers. This being so, we ask that serious consideration is given to the decision to release so much Green Belt land at this stage.

This is a group response.

Our views are supported by residents of Brockworth whose signatures are included in this representation. The public consultation process is onerous, complicated and impossibly difficult for the majority of local residents . The very leading questions in the pre-submission consultation and previous consultation have only resulted in the vast majority of people feeling unable to contribute and make their feelings known to the JCS team and the Government. The signatures are indicative of these residents who felt unable to respond individually, but were anxious to show that in their opinion, the JCS is unsound in its present form and that they are in total agreement with the statements presented in this representation.

Yours faithfully

Janet Thomas

John Eccles

representing Brockworth Residents and Save Brockworth's Green Belt