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GLOUCESTER, CHELTENHAM AND TEWKESBURY JOINT CORE STRATEGY - DEVELOPING THE PREFERRED OPTION Response from Save The Countryside

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A. **Introduction**

Save The Countryside is an organisation, comprising many residents of the Cheltenham area. We all share the determination to protect the precious countryside around the town and nationwide, that has been under threat from massive development over recent years, following the previous Government's ill-fated Draft South West Regional Spatial Strategy.

Due to the residency of the majority of its members Save The Countryside have a particular interest in the North West area of Cheltenham, between Swindon Village Uckington and Elmstone Hardwicke under threat from an Urban Extension.

Save The Countryside has responded to the draft National Planning Policy Framework, the South West Regional Spatial Strategy and previous consultations as part of the joint core Strategy process. We have valued previous opportunities for direct consultation with Government Ministers and local Council members and would welcome such involvement in the process going forward.

Our group's stance remains as follows Greenbelt should not be removed or redefined as stated in the planning policy guidance – Greenbelts PPG2.



B. **Opening comments**

Save The Countryside will not be responding using the suggested Question and answer format as the questions are too restrictive. Instead we have listed our comments by key issue area and also provided commentary on the JCS document by relevant section. The consultation period has been far too short as 7 weeks considering its issue during the Christmas holiday season. Several requests for its extension were made by various parties and denied. This has made it impossible for Save The Countryside or local residents with limited time capacity to make a full detailed and accurate analysis of the document and the evidence base.

In addition some elements of the evidence base including those listed below were not available at the issue date on 13th and many have only been made available after the document was in consultation for one month. This is hardly a fair accurate consultation

• JCS Consultation reports
• JCS Retail Study
• Gloucestershire Affordability Model report
• Gloucestershire Affordability Model - testing of JCS scenarios
• Habitats Regulation Assessment
• Landscape Assessment
• Green Infrastructure
• Housing background paper
• Community infrastructure (<i>still not available on 27/1</i>)

Save The Countryside would like to voice our concern that the JCS housing calculations and locations can be seen as a virtually identical copy of the ill-fated Regional spatial Strategy with it's deeply flawed focus on increased development regardless of the consequences, as a main driver for the economy.

This document, including its' Urban Extensions around Cheltenham on greenbelt and green field land, was scrapped after 35000 objections including at least 4000 from the Cheltenham area which were hand delivered to Westminster by protestors from our organisation on 23/10/08.

Our Government including statements from the Prime Minister, has promised to save Green Belt land.

The JCS consultation document seems to ignore such opposition to development on Green Belt land, and could be seen to support a developer led initiative for maximum margin generation green field urban extension development as a priority over other areas including many smaller communities that require small scale development.

Our Government including statements from the Prime Minister, has promised to save green belt land. This document seems to ignore such opposition to development on greenbelt land, and could be seen to be taking a developer led initiative for maximum margin generation green field urban extension development at a priority over other areas including many smaller settlement areas requiring small scale development.

Sustainability:

The word sustainable is used in the vision and other areas of the JCS document without a clear definition. An acceptable definition could be: *"maintained at a steady level without exhausting natural resources or causing serious ecological damage."*

(source: on-line dictionary) – this definition alone sheds a new light on the JCS and its heavy suggestions for large scale “sustainable development”.

C. Summary of our recommendation:

Save The Countryside propose Option A with conditions and amendments as follows:

- The Greenbelt boundary must not be changed for the convenience and higher profit margins of developers.
- Development on Brownfield land first in all cases –with a clear focus on urban regeneration the sequential test must be used
- We must not lose our local food production land
- Absolutely no development on existing greenbelt land in phase 1.
- A further review to be under taken of housing demand no later than 2021 considering the current economic environment
- No development on green field sites to be done without proven flood protection methods in place for new homes and any existing homes adjoining the new developments
- Inclusion of windfall development in all housing calculations
- Councils should control the type of housing built by developers according to local need. Housing developments must include the size and type of housing that is most required to include low cost / affordable housing and social housing.
- A full infrastructure review is undertaken with particular focus to the opening of the M5 junction 10 as a two way junction.
- Fulfil the criteria set out in JCS Clause 4.13 Increase access to jobs/services (via sustainable transport modes) to benefit the existing communities prior to any new developments taking place. Any future developments should not take place until an expansion of these measures has been constructed in readiness to support all future developments on a phase by phase basis and NOT on a site by site basis.

D. Detailed Analysis of the joint Core Strategy document

1. Population growth

Within Paragraph 5.4 the JCS states that there is an expected Increase in population within the JCS area from 322600 to 367800 i.e. 45200. However the JCS document states 45000 – this causes confusion.

The document says that these 45000 will require 36850 dwellings. This calculates as 1.225 person household size which is factually inaccurate

Studies commissioned by the Department of Communities and local government the Office of National Statistics and Gloucestershire County council and reports from the Cambridge Centre for Housing and Planning Research which all give figures for the number of persons per dwelling between 2.17 and 2.4

In fact the JCS document itself demonstrates an average of 2.28 persons per dwelling in 2011 as it states the number of people in the JCS area as 322600 and the number of dwellings as 141500.

On top of this the JCS does not seem to take into account into the overall figures any increases in available dwellings arising from death or movement of the occupants, only increases. This seems short sighted as we can continue to expect some people to die and leave the JCS area in the next 20 years.

Using the most pessimistic 2.25 average household size a 45200 population increase would require only 20,000 new Dwellings not 36850.i.e 1000 new dwellings per year.

In essence for the first 16 .2 years of the plan the land already identified in the JCS without Urban extensions would be sufficient without any need to build on greenbelt or green field land

The JCS calculations can be seen to be based on an out of date economic growth rate. As they are so similar to those used in the Regional spatial Strategy we assume they use the same economic growth rate of 3.2% whereas the treasury estimates national economic growth for 2012 as 0.7%.

So we would not expect the volume of housing demand to be distributed evenly throughout the time period and demand to be lower in at least the next few years.

In addition to our questioning of the volumes of new housing estimated by the JC S team as required, we believe that the JCS document heavily overestimates the actual demand for new housing.

The JCS takes as its base figure for housing need the requirement derived in The Housing Market Assessments 2009 - The Fordham Reports. However these were directed primarily at assessing the future need for affordable housing. It is our view that this provides only a partial view on reality; as they assume that any new household a will have the ideal dwelling built for them whether or not they wish to have such a property or can actually afford to purchase it or live in it. The JCS must take into account the current economic climate including mortgage availability as increased house building itself is not the only driver to consumer demand for new housing.

In Summary:

An amended version of Scenario A (16200) should suffice for the housing needs for at least the next 16 years and considering the current economic climate, most probably the full 20 years of the plan.

There should be sufficient sites available identified in the SHLAA to meet the housing need for phase 1 and 2.

2. Critique of the Urban Extensions Identified within Options B, C and D

The way that the RSS proposes the increase to be accommodated in the Cheltenham Area produces 'planned' urban sprawl into Greenfield and greenbelt sites – one to the south around Leckhampton; one to the North around Bishops Cleeve and one to the North West around Swindon Village. This incursion into the green-belt effectively sabotages the intention of the green belt – of containing urban sprawl – and so we entirely oppose it. It undermines the identity of the settlements and villages that such development will surround.

The proposals will compromise the development of brownfield sites within the town unless the use of land is properly phased because developers will find it easier and more profitable to develop Greenfield sites first. It will threaten the development of some of the more difficult brownfield sites in the town, and could undermine the Council's Civic Pride initiative.

These new extensions to Cheltenham will change the character of the town, erode its Regency identity and encourage the development of 'out of town' shopping centres that will compete with the existing town centre.

The attractiveness of Cheltenham as the 'Centre for the Cotswolds' is a marriage of its Regency past and its proximity to the countryside. All the areas being proposed as sites for development have their own character and are used for recreational and amenity purposes by people who live in the town and those who visit.

The growth of Cheltenham should to be controlled and limited to protect its environmental quality and character.

Planning Policy PPG2 provides guidance regarding existing villages in the Green Belt, stating that the local plan should ensure that any policies do not have an adverse effect on the character of the villages concerned.

We cannot understand that this guidance seems to be ignored in options B C and D with the proposed North West Urban extension, to the future detriment of Swindon Village, Uckington and Elmstone Hardwicke.

3. Infrastructure

The suburban development included in options B,C and D will depend on motorized transport – mainly private cars. The kind of investment necessary to develop effective systems of public transport along the main arterial routes is not available on the back of planning gain alone. The amount demanded through planning gain for other infrastructure and social housing provision is so substantial that it is unlikely to be achieved without compromising the quality of any development – particularly in terms of the sustainability of any new houses as outlined in the Governments Code for Sustainable Homes.

The JCS documentation and presentations (until amended after notification by Save The Countryside members) showed a major road linking the A4019 Tewkesbury Road from north West Cheltenham to Bishops Cleeve. This road does not exist in this form today.

4. Affordable housing

There is insufficient evidence throughout the JCS document to demonstrate that the JCS team is leading the decisions regarding affordable housing provision. Local councils should ensure that there is a supply of affordable housing resulting from each new development regardless of location and size.

5. **Student Accommodation**

The loss of affordable housing to provide student accommodation has had a negative impact on the ability of Cheltenham to meet its affordable housing quota. This will need to be more controlled in the future with sites allocated for student accommodation to enable existing housing stock within existing communities to be freed up to provide affordable housing for Cheltenham residents. This has not been addressed at all within the proposals of the document.

6. **Evidence Base** **Green Belt Review**

The JCS area is predominantly rural. This is one of the most attractive features of the area and one of the reasons why its urban areas are attractive places to live and work and entice tourism. It is a key side that any Green belt land should be protected.

It can be said that there are some glaring inaccuracies within the greenbelt reviews. Land along Tewkesbury Road (A4019) is incorrectly described as Ribbon development, when in fact it is land used for agriculture and horticulture managed by Nurseries run on land owned by Gloucestershire County Council

The greenbelt review seems to dismiss the importance of much of the greenbelt land, with JCS team members emphasizing its benefit in avoiding coalescence of urban areas alone. Save The Countryside would like to remind the JCS team that the Greenbelt surrounding Cheltenham delivers so much more than that duty, and should be protected at any cost. It's benefits in terms of food production, recreation, flood alleviation and ecological benefits should be more highly recognized in the JCS document.

The last Gloucestershire Quinquennial Review indicated the following objectives for the Green belt:

(a) to avoid the erosion of the landscape by preventing urban sprawl, sporadic, undesirable and inappropriate development and uses;

(b) to protect and improve the open character of the countryside between Cheltenham and Gloucester, and to secure a high standard of visual amenity in the landscape of this area;

(c) to preserve the special character of the individual towns by preventing their coalescence; and

d) to confirm a long term agricultural future by reducing uncertainty, thus providing security for agricultural investment.

These objectives must remain paramount in the interests of the community with improved accessibility and amenity for people living in the JCS area and in its economic development.

In Summary

The JCS should stand by the long held development sequence of:

1st Brownland,

2nd Greenfield and only after that should changes be made to the statutory Green

Belt

3rd AONB.

But considering the above, any decision to place new housing on agricultural land must take into account the long term replacement provision for feeding that population.

Without this control – Development Planning will be non-existent and development could be at the direction of the developers not the council for the benefit of the JCS population.

Wingmoor farm toxic waste and landfill site

There is a glaring omission of the Toxic waste site which occupies site next to land identified for development as part of the North West urban extension. Save the Countryside would have expected a significant bespoke study of this element as part of the Evidence base and we find it irresponsible that this has not been undertaken.

the existing site has been completely disregarded in the Greenbelt review which states that the Land area marked NE11 on which it states is green fields. This site has recent been granted another 20 years licence to operate. As such is should be highlighted as a significant factor in considering appropriate sites for development.

Cheltenham SHLAA identifies north West Cheltenham for 1928 homes with potential for contamination from Wingmoor farm but this concern seems to be omitted from the main body of the JCS.

The Joint Core Strategy includes proposed sites on land north west of Cheltenham for significant development; a settlement of 4450 homes would be the size of Tewkesbury. This area known as the North West Urban Extensions would abut Wingmoor Farm West, and only be 750 metres from the hazardous Wingmoor Farm East.

This place will not be conducive to residential development, and could breach Planning and Environment Directives that indicate that no residential development should take place within 0.5km of a landfill site and 2km of a hazardous waste site.

Wingmoor Farm West processes over 35,000 tonnes of waste including compost, whilst Wingmoor Farm East processes over 200,000 tonnes of waste per year, including 120,000 tonnes of hazardous waste including APC residues from incinerator fly ash.

Already 15,000 people live within 3 km of Wingmoor Farm. Disamenity and nuisances including traffic, flies dust and odours, caused by the existing waste sites has been acknowledged by some properties close to the sites having their council tax reduced by up to two bands. The Environment Agency Incident Reports catalogue month after month, year on year complaints about adverse odours around the Wingmoor sites.

One of our members who lives within ½ km of the site, has had a recommendation from Tewkesbury Environmental Health Department, that they should fix screens to their doors and windows to protect from flies. Will that apply to new homes in this area?

Concerns regarding the impact of the Wingmoor sites are such that the Health Overview and Scrutiny Committee undertook a review and the Community Health Impact Assessment being facilitated by NHS Gloucestershire was set up specifically because of the level of concern. This piece of work is still not yet complete.

The latest research which has been done as part of the Community Health Impact Assessment of the Landfill sites 2011 is still in draft, this has covered various health profiles as well as cancer incidence.

However, what is of most concern that all this work, whose remit was to cover the population within 3km of the sites, has to date only focused on the postal codes around Bishops Cleeve. Therefore no data has been done for the communities to the south of the site, including, Stoke Orchard, Elmstone Hardwicke, Uckington, Swindon Village, Brockhampton, Wymans Brook, Prestbury and other districts within Cheltenham Borough, and would cover the proposed North West extension to Cheltenham.

Since Wingmoor Farm East has now received Planning Permission to continue importing toxic incinerator ash to Bishops Cleeve for the next 20 years, then surely this work needs to be done, not only for existing residents peace of mind, but also this should be taken into account when accessing the potential sites for possible new housing, of numbers up to 10,000 residents.

We have also noticed through the Waste Core Strategy Inquiry that Cory Environmental and Grundons on both their sites, are still hoping to include a waste incinerator process, and this may be built there in the future to deal with the proposed increase in Gloucestershire's population

In Summary, the North West Urban extension development of 4450 homes proposed in options B C and D considering the proximity to a hazardous waste disposal site and potential incinerators would be wholly unacceptable.

Ecology

The Preferred Options document of the JCS provided almost no information on how the environment and bio-diversity within it could be enhanced. It is notable that the evidence base documents, "green infrastructure" and "habitats assessment" are not yet available so it impossible to comment on these.

The only mentions found are imprecise goals including "improvements to green infrastructure via tree planting" and "possibility of a regional park between the main centres" and a strategy to "conserve and improve natural environment". There is no policy for how to achieve these goals.

Most seriously the sustainability report states that neither Cheltenham nor Tewkesbury's Boroughs are meeting their obligation for 95% of SSSI's to be favourable or recovering. Tewkesbury manages 71% while Cheltenham a shockingly low 50%.

The region to the NW of Cheltenham is known to contain some protected species. It contains some ancient trees, some protected by tree protection orders including some beautiful old pollarded Willows. Of particular wildlife interest is Dog Bark Lane. Walk along here in Spring and Summer and the air is filled with delightful bird song.

The region, while assessed as low/moderate biodiversity currently was also stated to have the potential for moderate/high biodiversity. I suspect the low/moderate biodiversity is due to the industrial non-organic farming techniques used in the area and no specific protection of biodiversity. However, Organic methods of agriculture combined with countryside stewardship schemes would significantly enhance biodiversity.

The Sustainability Appraisal document makes it clear that there is a serious conflict between protecting the environment and house building. Scenario A, with the lowest house building targets, will obviously have the least impact on the natural environment and also provides the additional benefit of leading to decontamination of brown field sites.

Save The Countryside would like to see the following:

Some policies that can enhance biodiversity. Allocation of new SSSIs, enhancement of existing SSSIs Provision of the allotments, community orchards and gardens, a plan for a regional park Protection of hedgerows and ancient trees Allocation of green corridors Supporting and encouragement of more environmentally sustainable farming methods in the JCS region

Recreation

The Preferred Options document is sorely lacking in any positive visions for improvements in the recreational infrastructure be in indoor or outdoor. It is clear that any building in green land, green belt or otherwise will damage opportunities for activities such as walking in the outdoors in the affected areas.

No vision is presented regarding better cycling routes. There is a one line mention of the “possibility of a regional park between the main centres”. Sustainable transport options such as walking and cycling in new urban extensions should be considered with the services and recreation areas positioned centrally. Such routes need to be off-road to provide safe cycling routes for families where children are not yet able to ride on the road.

Another important aspect in any new development is the provision of community buildings such as village halls which provide for essential recreational activities some as club and community meetings, and provide the necessary 'glue' for the community.

It is extremely important that in any urban extensions community infrastructure such as parks, allotments, etc... is planned and build early in development and not left to end of the 20 year plan in which case it is either forgotten about and ends of inaccessible to most residents.

Save The Countryside would like to see the following:

Allocation of new green, recreational areas. Parks which provide outdoor play for all ages of children, both in small playground and large equipment spread across an area (such as in Pittville Park). Provision should be made for sporting activities.

New off-road cycling and walking routes combined with green corridors in existing urban areas and within any new developments New allotments, community orchards and gardens which can provide exercise opportunities and social benefits. Provision of community buildings

Urban Extensions Boundary Study.

Five Purposes of the Green Belt (copied below) are listed within this Evidence base document, yet these seem to be disregarded within the strong recommendations for Urban extensions on greenbelt land within the JCS document and even later on at the recommendations (E.g. section 8.8.5) where the purposes of green belt are then conveniently restricted to maintaining the separation of Gloucester, Cheltenham and Bishop's Cleeve.

- To check the unrestricted sprawl of large built-up area.
- To prevent neighbouring towns from merging into one another.
- To assist in safeguarding the countryside from encroachment.

- To preserve the setting and special character of historic towns.
- To assist in urban regeneration, by encouraging the recycling of derelict land and other urban land.

The value of natural attributes across the Area of Search has been judged in this study to be 'moderate' to 'high' which seems accurate, but low in terms of sensitivity of cultural factors. This is surprising as the public footpaths on this green belt land are used daily by hundreds of local residents and other people for recreation activities.

Strategic Objectives

7. Regeneration

Within the Strategic Objectives on page 17 to 26 there is a lack of focus on the regeneration of empty, disused or industrial property in favour of new development. The sequential test mentioned in previous planning documents has been disregarded.

In the JCS exhibitions it has been explained that the Greenbelt development would be planned in phase 1 – this is unnecessary and unacceptable, it should be a last resort.

JCS paragraph 4.5 promotes *Conserve and improve the natural environment*

But by excluding any references to the greenbelt and by not recognizing their relevance in this statement it fails to encompass all those areas that need to be protected and reinforced in order to ensure that this can be achieved and thus this statement is meaningless.

The JCS area has a total of 4820 homes empty (Empty Homes website – source Halifax BS and Mori). This is 3.54% of current stock. The JCS itself says that 3% is acceptable. The other 0.54% represents 753 houses that could be brought into use

Our request is that the local councils should have a plan to bring back long term empty properties into effective use.

Regeneration must be done in phase 1 and no urban extensions should be planned in phase 1

8. Flood Risk - SUDS

The statement to manage and reduce flood risk on page 17 through appropriate sustainable drainage systems is far too basic. This should be accompanied by a statement directing how they should be maintained post the housing development.

There are many cases in Gloucestershire and nationwide where SUDS are proven to be ineffective in flood management and have no agreement regarding their maintenance which is discussed further in this submission.

9. Forecasted Job increases

Page 24 states through the latest economic forecasts, an expected increase of 20,000 to 35000 new jobs. There is insufficient explanation to this without the reader undertaking a detailed study of the employment land review within the evidence base.

On the contrary table 3.1 in the Evidence base employment land review, states a minimum of 9790 jobs and a maximum of 23670 additional jobs from 2006 to 2026, so the JCS statement needs explanation.

Considering our current economic climate of job losses and recent departures of large employers or significant reductions in workforces (for example Kraft Foods, Zurich, Chelsea Building Society, GE.) alongside no imminent public awareness of job creation in the JCS area, we advise that the increase in jobs would be more towards the minimum calculation.

In summary

We do not believe the expectation of a significant increase in jobs; hence a lower demand for housing that would most likely be met by option A.

10. Employment Land

JCS Clause 13.1 contains a long term proposal to direct development for employment, retail and leisure to the central areas of Gloucester and Cheltenham to make the best use of land, existing infrastructure and to deliver regeneration. Yet this does not seem to align with the proposals for employment land around Cheltenham. There is mention of reinforcing trade and commerce in the town centres and then there is a clear indication that most of the proposed development will be promoted in rural and green field sites

if there are any additional large scale developments to the north-west of Cheltenham that create a traffic flow to the M5 that can only go or come from the south after first driving through Princess Elizabeth Way the road network will struggle to cope, the pollution will increase and the residents along this route will suffer considerably.

Any large scale development to the North of Cheltenham should not be entertained without junction 10 first being reconfigured to provide access and egress from the south as well as the north.

Any large scale commercial developments should be focused around the motorway junctions to reduce the impact of traffic, pollution, nuisance and danger on the existing communities and infrastructure.

11. Rural Settlements

On Page 25 There is a fast dismissal of the option of smaller scale expansion of rural settlements due to infrastructure and sustainability factors. This is woefully inadequate and requires explanation. Some of these villages listed on page 57 and 58 are requesting small numbers of additional housing to enable sustainable full time communities and for future generations to be able to live in their family area.

In far too many cases we see the demise of smaller villages and settlements with the loss of their supporting amenities. There should be a focus on the long term viability and sustainability of these settlements.

Such a sweeping statement that this is not a viable option cannot be treated as a serious exceptional circumstance for alternative housing in massive urban extensions requiring a change to the greenbelt.

The JCS does however plan for 2400 new homes in rural areas but these are not identified on the maps provided so it is not clear in which areas and volumes these could be expected.

12. Scenario A Page 33

This option for public consultation is dismissed many times and on page 34 in particular.

This gives the reader a miss representation of the scenario as an alternative option to B,C or D. For example using language as:

The impacts of this option are particularly acute in that the housing market in the JCS area might fail and the councils could experience people leaving the JCS area due to the lack of new homes, and the ability to find jobs and better economic conditions elsewhere. The housing market could suffer in that i. overcrowding might increase,

We feel that this is a mis representation of a viable option and the working should be adjusted to allow fair consideration of this option

13. Scenario B Page 40

The traffic light system for Scenario B JCS objectives – Conserve and improve the natural environment is selected as Amber when Urban extensions on agricultural land should be highlighted as red on this point

14. Scenario B Page 44

The traffic light system for Scenario C JCS objectives – Conserve and improve the natural environment is selected as Amber when Urban extensions on agricultural land should be highlighted as red on this point

15. Phase 2 page 51 Maximising Economic opportunities

A new business park is suggested at Junction 10 – while this could deliver employment land, within the JCS area and in particular Cheltenham there are already many vacant office and industrial sites across the town these should be planned for regeneration first before any consideration is given to the provision of a new business park.

There is no comment on the infrastructure required for this business park particularly considering the motorway is only a 1 way junction. Already today the A4019 is at maximum capacity at peak times. All traffic wishing to travel south on the M5, from North Cheltenham, Bishops Cleeve and surrounding areas, must travel through an already congested Princess Elizabeth Way to join the M4 at junction 9.

To add thousands of additional cars to this congestion, through car owners living in the proposed North West Urban Extension of 4450 homes (when many homes today own 2 cars) would be catastrophic.

Representatives of the JCS team have stated to our members that the issue of the 1 way junction 10 of the M5 as non-critical. We are astounded at this fact.

16. Flood Risk and water management Page 70

Land to the north west of Cheltenham where the NW Urban Extension is planned is composed of heavy clay and there is regular surface flooding.

Wingmoor Farm Toxic waste landfill site is in this location precisely because the clay it sits on seals the tip. The land is regularly waterlogged. The fall to the river Severn (about 4 miles away) is slow. No amount of flood prevention works, ponds or sustainable drainage structures will prevent future flooding in this area because it is becoming evident that climatic conditions are changing and because the land is heavy clay. We have recent evidence of this in the floods of 2007.

The soil has the same nature of that in the Tewkesbury area, where analysis has proven that flood Sustainable Urban Defense systems (SUDs) are ineffective in areas of this soil type as demonstrated within a report by the Severn and Avon Flood group entitled building on the flood plain is misguided (a definitive proof of evidence) of

September 2008. www.nacra-tewkesbury.org.uk/Report%202008%20restricted%201.pdf

The JCS document states on page 70 that the sequential test can be overridden if unsuitable sites and then the exception test used. This means that sites can be developed on even if it is deemed a flood risk.

It is totally irresponsible to consider the importance of the delivery of new sites over the risk of flooding.

The photographic evidence shows some of the devastation caused within Swindon Parish alone where 4450 additional homes are suggested.

It would be irresponsible to take further flood risk through large scale green field development on existing properties and land in this area



Church road



Brockhampton Lane

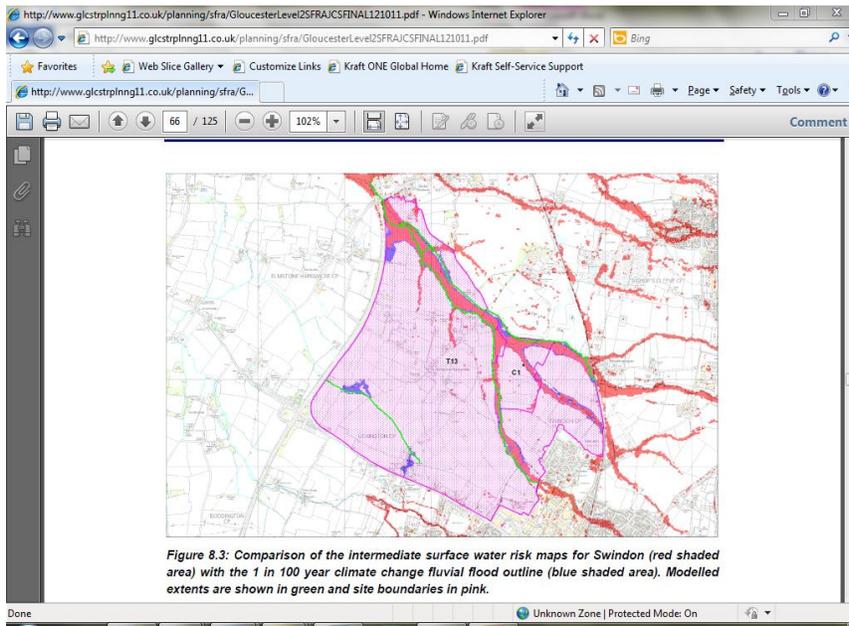


Swindon village Primary School



Hyde Bridge

The Strategic flood Risk Assessment level 2 shows significant areas within the planned North West Urban extension area as high surface flooding risk, due to the watercourses in the area predominantly the River Swilgate, Hyde Brook & Leigh Brook. The map extracted from this document demonstrates the watercourses and highest flood risk.



Large scale development on land such as identified for the North West urban extension will cause enhanced risk of flooding for existing housing and land, through water displacement as the soak away opportunity provided by the existing green fields is permanently removed through additional properties and roads built on the same land. This cannot be alleviated by temporary measures achieved by SUDS let alone a 5% improvement in runoff as stated in the JCS document.

Nowhere within the JCS document or evidence base can details be easily found regarding long term management proposals for SUDS. There are cases on new developments where these systems are left un maintained once the developer has completed the estate. In any case there must be clear regulations regarding the permanent maintenance of any urban drainage or flood alleviation scheme. We see too many examples where ineffective management between varying parties of interest fails, to the detriment of the buildings and residents living in that area.

In summary:

Suds need far more definition, proof and post development management. There should be no Greenfield development on any area within the JCS boundary that may be liable to flooding in the future fluvial or pluvial. No risk can be taken by building on land that will remove a soak away factor for the existing properties.

E. Final note

Save The Countryside urge the JCS team to consider our responses and take the responsible approach to flexible planning, using more accurate up to date economic and environmental data.

The only route forward can be a revision of Option A. for the reasons discussed above. Increased house building for the long term success of the JCS area should be done in a responsible manner. There should be no compromise to the wellbeing of existing and future residents in the area.

Options B, C and D should be disregarded as not necessary and irresponsible for the long term benefit of our area.

We should be delighted to continue to work with the JCS in a productive manner to ensure that the long term needs of the JCS area in terms of planning and the wellbeing of all residents are met.