

Martin Horwood MP

working for a fairer, safer, greener Cheltenham

**South West
Regional Spatial Strategy**

Response to
the Secretary of State's
proposed changes

September 2008

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GOVERNMENT OFFICE
FOR THE SOUTH WEST

Draft South West RSS – Proposed Changes Comments Form

Office Use Only

Respondent No:

Comment No:

Date Received:

Acknowledged:

If you wish to comment on the Proposed Changes to the Draft South West Regional Spatial Strategy please:

- Complete all relevant details in Section A – this need only be done once irrespective of how many parts of the RSS you wish to comment on
- Complete a separate page 2 of the form for each part of the RSS you wish to comment on. Ensure you insert your organisation name (or surname if responding as an individual) on each page 2 and complete Sections B, C & D. You may make copies of this form.
- Type or print clearly in black ink
- Note that all comment forms will be made available for the public to read – they cannot be treated as confidential
- E-mail or post (please do not send duplicates) the completed forms to be received by the Government Office for the South West before **5.00pm on Friday 17th October 2008**.

Please send all responses to:

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Government Office for the South West
2 Rivergate, Temple Quay
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E-Mail: rssconsult@gosw.gsi.gov.uk

Telephone: 0117 900 1705

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Section A

Comments submitted by:		Agent (if applicable):	
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Surname	Horwood MP	Surname	
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Signature..... **Date**.....

Comments from (organisation, or surname).....Martin Horwood MP.....

Section B

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	1. and Policy SD1
For comments on the Sustainability Appraisal – Paragraph Number	
For comments on the Habitats Regulation Assessment Report – Paragraph Number	

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

Changes to section 1 appear to significantly weaken the environmental commitments of the draft RSS. Given the growing importance of carbon reduction targets – now 80% by 2050 at national level - and our growing understanding of the importance of the natural environment to human physical and mental health, happiness and quality of life, this is deeply regrettable.

In addition, the failure to include any form of ‘sequential test’ that would prioritise brownfield development over green field sites, including Green Belt and Areas of Outstanding Natural Beauty, is a major flaw in the RSS and a change to this effect should have been proposed. The reality on the ground around Cheltenham is that thousands of houses are already being planned by developers (David Wilson Homes, Martin Dawn plc, Bloor Homes and more) on the most valuable green field sites including large areas of Green Belt and even on the AONB.

Section D1

If you wish to expand your response please use the space below.

Paragraph 1.1.3 . The previous reference to the South West’s environmental qualities being seen ‘not just as a constraint of development’ has been changed to ‘rather than a constraint on development’ removing any sense that development can be legitimately opposed on environmental grounds. Yet for policy to be sustainable it **must** sometimes constrain development.

Para 1.2.2 praised the economic growth which has been sustained and ‘exceeded what was originally expected and planned for’ and reveals the link between optimistic growth data and the housing levels included in the RSS. Instead of being deleted, this section should now be changed to acknowledge that in the new economic situation previous growth estimates are now wild over-estimates.

Para 1.4.3 warned that ‘the environment is under pressure exemplified by the loss of and damage to natural and historic assets’ and declared the environment to be the ‘region’s prime asset.’ The replacement ‘new supporting text’ barely mentions the natural environment.

/...

Para 1.6.2 committed the RSS to sustainable construction 'as standard in new developments'. This has been removed. Policy SD1 and para 1.6.9 then replace 'requiring' by 'encouraging' in the same context.

Paras 1.6.10 and 11 warning that greater action to prevent climate change might be necessary have been removed.

Section D2

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

- 1.1.3 Suggest last sentence reads 'the high environmental qualities of the region will inevitably and rightly act as a constraint on unsustainable development but they are also a major contributor to quality of life and a direct source of employment for many and as such have value that must be measured alongside simplistic commitments to economic growth.'
- 1.2.2 Suggest new wording 'Since this strategy was first developed the volatility of the economy and unpredictability of long-term economic growth forecasts have been underlined by the effects of the global economic downturn. Housing market and economic growth projections must now be reduced in the face of new economic circumstances. As Treasury economist Kate Barker, the original author of the housebuilding strategy, predicted in 2004*, market conditions can change and this should lead to a reduction in housing targets, not least to ensure that valued greenfield sites are not simply developed first as 'quick wins' by developers.'

I would also suggest amending both SD1 and SD2 to add words such as 'Prioritising the conservation of Green Belt, AONB and other valuable green field sites over brownfield development, by setting a sequential test for new housing development that prioritises brownfield development.' The omission of any sequential test is a major flaw in the RSS.

* "...there are points in the review where I stress very clearly that you might start out with an intention To build X in an area and two years down the line what has happened in the market has suggested to you that X was too big and you should cut the target, and that would be absolutely reflected in this report." Kate Barker, Evidence to House of Commons Environmental Audit Committee 2004.

Please ensure that you have written your name at the top of the page. Completed forms should be received in the Government Office for the South West by 5.00pm on Friday 17th October [extended to 24 October]. Late responses will not be accepted.

Comments from (organisation, or surname).....Martin Horwood MP.....

Section B

Support / Oppose / Comment (please specify)	Oppose deletion of whole section
RSS Reference – Policy or Paragraph Number	2.
For comments on the Sustainability Appraisal – Paragraph Number	
For comments on the Habitats Regulation Assessment Report – Paragraph Number	

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

Section 2 set out important contexts for the RSS as whole, highlighting in detail the value of the region’s environmental assets, the alarming rate of loss of the countryside during the 1990s and the importance of other factors in determining housing affordability. It also admitted the fallibility of some of the projections behind the projected housing numbers.

Section D1

If you wish to expand your response please use the space below.

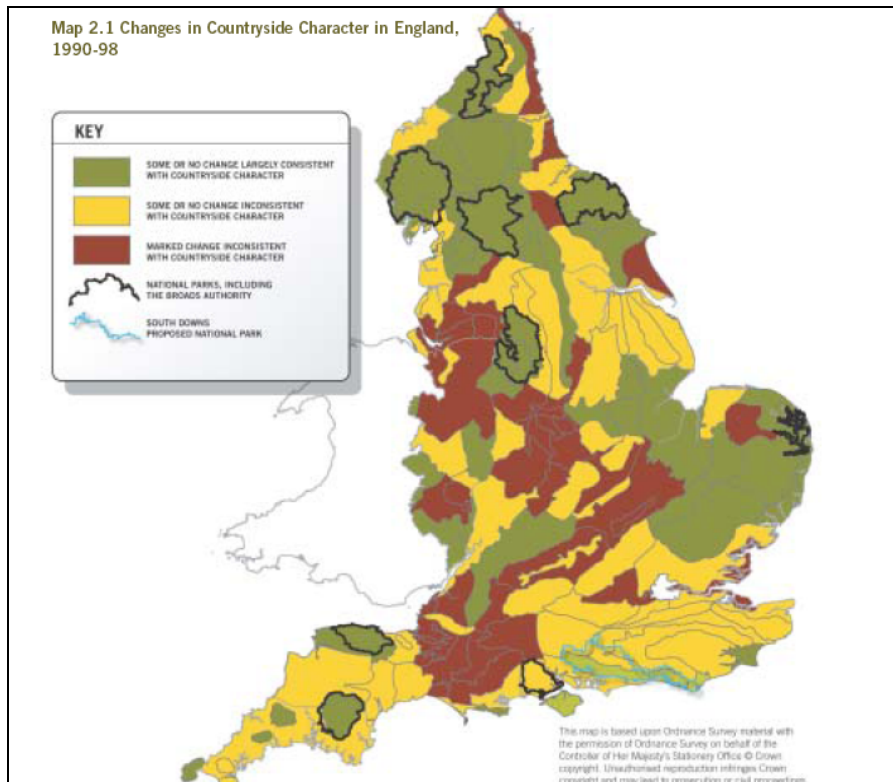
Some of the more valuable insights in Section 2 that should not be lost:

‘The quality and diversity of environmental and cultural assets is a key strength of the South West. One of the main roles of the RSS is to set out policies which ensure that the quality of these assets is not seriously undermined by future development. The environment has been identified by the RES [regional economic strategy] as a driver of the regional economy, underlining its importance to the overall prosperity of the region. It is a mainstay of the tourism industry and other business sectors and of fundamental importance to the quality of life enjoyed by the region’s residents.’

The section highlights the net inward migration of some 30,000 UK citizens from other regions in pursuit of an attractive work and physical environment:

‘The *‘Barker Review of Housing Supply’* has maintained that constraints on housing provision have been a major factor in creating high and rising house prices in the UK. The report argues that providing housing that most households can afford will only be achieved through increasing the supply of new housing nationally. In the South West however, the attraction of much of the region to inward migrants means that increasing housing supply alone will not solve the problem of affordability and other measure to provide affordable homes to rent or buy should be supported.’

Map 2.1 Changes in Countryside Character in England, 1990-98



And it graphically presented the threat of development inconsistent with a 'countryside character' (dark/red on the map above). The loss of graphics like this naturally lead to the suspicion that the RSS is now even less concerned with defending the countryside than it was before.

Section D2

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

Restore section 2.2 at least.

Please ensure that you have written your name at the top of the page. Completed forms should be received in the Government Office for the South West by 5.00pm on Friday 17th October [extended to 24 October]. Late responses will not be accepted.

Section B

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	New Policy CSS and deletion of 3.1.3
For comments on the Sustainability Appraisal – Paragraph Number	
For comments on the Habitats Regulation Assessment Report – Paragraph Number	

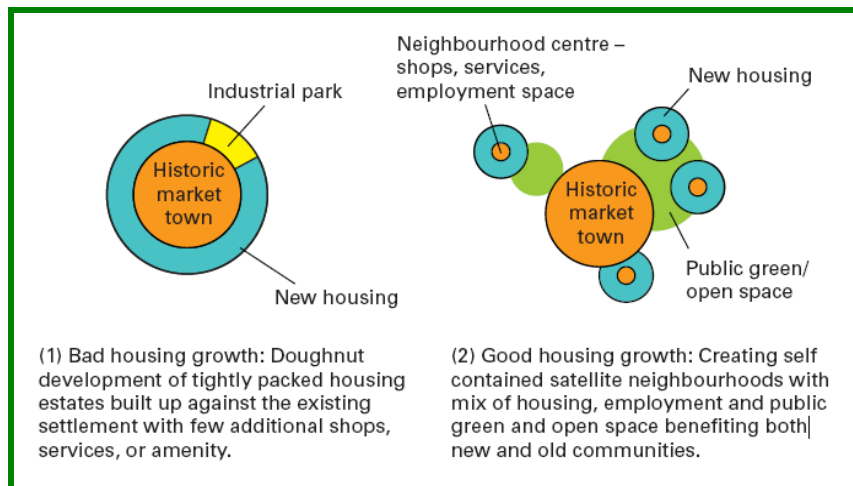
Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

The overwhelming focus on strategically significant towns and cities (SSTCs), including Cheltenham, is wrong and damaging. The impact of a relatively sudden 25-30% growth in a town of 110,000 people would be the equivalent of adding 1.7 million people to the population of London. Our roads already struggle, our outlying estates already encounter social problems and our drains and sewers have literally been at bursting point. Our arts and youth facilities are already overstretched and capacity at our railway station is at its limit. The Regency centre of the town was designed for a town much smaller than Cheltenham already is and the natural scale of the town should be respected.

In particular the policy of urban extensions – which is responsible for 6,300 of Cheltenham’s 13,800 total – threatens much-loved countryside including a significant proportion of the town’s Green Belt. It is a misreading of long-term sustainability simply to translate it into shorter car journeys – the only real rationale for the urban extensions policy – especially when policymakers and manufacturers are actively looking forward to a future of electrified travel powered from renewable sources.

The recent Taylor Report, commissioned by the Prime Minister, addressed the issue of more rural housing but made the general case against urban sprawl very graphically:



If you wish to expand your response please use the space below.

Cheltenham is an essentially prosperous town and an important driver of the regional economy although some areas such as Whaddon, St.Paul's and Hesters Way do score very highly on Multiple Indices of Deprivation. The impact of the proposed 13,800 new homes in and immediately around Cheltenham would be to add at least 30,000 people to the current population of 110,000 – the equivalent of adding 1.7 million people to the population of London. The EIP inspectors alleged without explanation that Cheltenham was 'underperforming relative to the regional economy'. It is difficult to see how, especially as the Draft RSS pointed out that it enjoys 'high skills and incomes, higher levels of GDP (on a par with Swindon and Bristol) and high rates of entrepreneurship'. But overdevelopment based on the SSTC model will put this regional success story at long-term risk:

- One of Cheltenham's principal assets, its nearby countryside, will be built on over a huge area. Circular walks that currently take thousands of walkers around fields and open spaces will be going through housing estates. A key selling point for the town may well be fatally compromised in the long-term. **Research by the former Countryside Agency emphasised the importance of protecting rural fringes:** "The character of the countryside in and around towns varies considerably. It may be a green corridor separating two major cities or following a river or canal into an otherwise built up area. In some places the countryside in and around towns may be designated as Green Belt to prevent urban sprawl. Whatever its form or character... this is a hugely significant resource and one we must use wisely." (*The Countryside In And Around Towns*, Countryside Agency 2005)
- Some social problems are already emerging strongly in outlying estates where young people feel disconnected from the town centre by the expense of travel and lack of facilities. These new extensions will be classic 'urban sprawl' of the kind most recently condemned by the government's own Taylor report.
- Last year's floods highlighted the limitations of a sewer and drainage system designed to cope with far smaller quantities of housing. One main drain in the middle of the A46 already bursts through the tarmac with every heavy rainfall and did so twice last year. It is immediately downhill of one of the proposed urban extensions at Leckhampton. It is inconceivable that the suggested 1,300 houses there will not add to the flooding problems suffered by hundreds in the estate of Warden Hill downhill from Leckhampton and quite possible that the northern urban extension will add to flooding in Gloucester directly downstream. Planning Policy Statement [PPS] 25 is likely to offer little protection because of its overwhelmingly site-specific focus.
- Many other local services will be stretched. Our two-platform railway station is already at the limits of its capacity, our police are constantly overstretched and our ambulance service is struggling to meet national targets. Admissions crises are a regular feature of our local schools system (primary schools in the southern area of Up Hatherley next to the Area of Search are currently full and closed to new residents, the two southernmost secondary schools Balcarras and Bournside are both oversubscribed and taking pupils from parts of Leckhampton in the south of Cheltenham only on appeal) . It is difficult to see how any of these problems could possibly be improved by such a huge increase in population.

And the cost will not only be to towns like Cheltenham. By allowing market-led short-term economic development to be focused on already affluent towns like ours – and yes, developers are falling over themselves to map out huge new estates around Cheltenham right now – there is a clear risk to those areas seeking regeneration. Witnesses to the Communities and Local Government select committee, ironically from the West Midlands Regional Assembly, pointed this out in 2006. They rejected 'adopting a Barker-style solution' for the West Midlands which would drive development towards affluent suburban zones: 'totally unacceptable environmentally and in

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terms of sustainability. It would accelerate out migration from the Conurbation requiring the duplication of huge infrastructure provision that already exists in the Conurbation.’ The Assembly, they said, ‘doubts the approach would reduce house prices and serve only to undermine our Regional Spatial Strategy’. (Written evidence to ODPM select committee inquiry 2006 on *Affordability and the Supply of Housing*, Volume II, p Ev241 <http://www.publications.parliament.uk/pa/cm200506/cmselect/cmodpm/703/703ii.pdf>)

Worst of all the idea of SSTCs is based on a mistaken view of sustainability. On the timescales of the RSS it is not sustainable to simply push everything into great conurbations where jobs and homes are closer together. That assumes technology will never change and that the only important environmental driver is the need to reduce journey times by car in particular and therefore carbon emissions.

First of all, local car journey times pale into relative insignificance even in the short to medium term beside threats such as the growth in aviation (where there is no green alternative at present) and opportunities such as large-scale improvements in energy efficiency and the explosive expansion in renewable energy. BT already employs 11,000 of its staff working from home (<http://www.btplc.com/Societyandenvironment/Ourapproach/Sustainabilityreport>) and more employers following their example will cut short-term car emissions faster than any planning policy.

But within the lifetime of these houses, cars won't be emitting carbon any more anyway. The direction of EU and UKL policy on car manufacture is clear and the first generation of electric and hydrogen-powered cars is already with us. If they could be made more affordable and were powered by renewable electricity, these could happily transport people to work already. **Perhaps**



The new Tesla Roadster – which can be powered entirely by renewable electricity. By the time the government's housing targets are achieved, all cars and buses could be made this way – turning the whole short-car-journeys 'sustainability' argument for urban extensions on its head.

on the timescale of the next few years, we do need to cut back drastically on car journeys but houses built in the 2020s should be there for decades at least and preferably hundreds of years, by which time the urgent need to constrain car journeys will be gone because we will have invested more and more in public transport and green car technology. Future generations will not forgive us for a short-sighted policy that will destroy countryside forever, probably kill off rural communities in the process and which was never really necessary.

Section D2

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

Totally revise section 3 to remove the focus on SSCTs for the detailed reasons given above.

Please ensure that you have written your name at the top of the page. Completed forms should be received in the Government Office for the South West by 5.00pm on Friday 17th October [extended to 24 October]. Late responses will not be accepted.

Comments from (organisation, or surname).....Martin Horwood MP.....

Section B

Support / Oppose / Comment (please specify)	Oppose
RSS Reference – Policy or Paragraph Number	4.1.28 and 4.1.33 *
For comments on the Sustainability Appraisal – Paragraph Number	
For comments on the Habitats Regulation Assessment Report – Paragraph Number	

* with consequent amendments to maps and housing totals throughout the document

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

On the basis of visits lasting less than an hour and without any adequate reasoned argument, the inspectors of the Examination in Public have dismissed massive local opposition to development of two much-loved and well-used areas of countryside. To the south, the green fields and Green Belt land next to Leckhampton have been repeatedly rejected for development by more considered inspections because of their rural character and local popularity yet the proposed changes earmark them for 1,300 homes with just twelve words of explanation. To the north-west the proposed changes suggest an increase in the urban extension to 5,000 new houses – in effect a new town – taking a huge proportion of Cheltenham’s relatively small and vulnerable Green Belt and planning housing right next to a hazardous waste and landfill site.

Both areas suffered ‘pluvial’ or surface water flooding last year and parts remained waterlogged for months. The Leckhampton site poses a direct flooding threat to neighbouring Warden Hill just downhill and the northern extension a broader one to the City of Gloucester. **It is important to note that the Regional Flood Risk Assessment did not include pluvial flood risk of this kind.**

Most obviously the housing market and economic growth projections on which the total housing numbers were based have changed. The economic growth assumption was 2.8 – 3.2% sustained over the 20 year period of the plan. As most now predict recession and September housing completions are 40% down on 2007, the housing totals need urgent downward revision.

The Secretary of State should reject the inspector’s recommendations in her proposed changes and stay true to the stated spirit of government policy: "It is important that everyone works together to make the best use of brownfield land. It is the best way to *protect the countryside* and improve the quality of urban land *without encroaching on the greenbelt.*" Minister of State Iain Wright, March 2008 (my italics).

(<http://www.englishpartnerships.co.uk/page.aspx?pointerid=A16574CFFEEA44A383B5252D8BFA9CC8>)

By replacing biodiverse countryside and agricultural land with housing estates, the Secretary of State would also go against the grain of government policy on biodiversity (section 40 of the Natural Environment and Rural Communities Act 2006 demands that ‘every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.’) The irreversible loss of these large areas of countryside will harm the environment and the quality of life in the town – for new as well as existing residents.

Section D1

If you wish to expand your response please use the space below.

For a full argument against the 'sustainability' of urban extensions asserted in **para 4.1.28** see my detailed comments above in opposition to New Policy CSS and the deletion of 3.1.3. **In addition I would like to reject the description of 'exceptional circumstances' in para 4.1.28. This is the justification for the destruction of a large proportion of Cheltenham's Green Belt and yet I can find nothing 'exceptional' about it – it discusses economic potential and the need for sustainability but neither of these are remotely exceptional concepts.** It is impossible to imagine a regional strategy that did not include them. The whole concept of the Green Belt is based on its permanence. If this permanence is compromised, it will always be negotiable, always under attack from developers like any other land and if normal planning strategies can be counted as 'exceptional' the countryside it was designed to protect for urban populations will be lost forever.

Para 4.1.33, third line: 'A further area of search is identified to the south of Cheltenham'

These twelve words represent the most serious proposed change in the Cheltenham section of the Regional Spatial Strategy and are based on a visit to the 'Leckampton' (sic) area by the Panel inspectors on 27 February lasting only minutes. Yet they threaten to destroy forever a much-loved and well-used rural area accessible to many local people where development has been repeatedly rejected by more considered inspections in the past.

The change is set out most clearly in the Cheltenham & Gloucester map, originally Inset Diagram 4.3, now Key Diagram Inset 3, which reflects the recommendations of the Examination in Public (EiP) inspectors and includes a large new area of search to the south of Cheltenham. This area has been furiously defended by thousands of local residents over the years, ranging from all the local elected representatives at every level from parish to Parliament and of every party, to the 400-strong Leckhampton Green Land Action Group, to more than 700 objectors to successive individual planning applications.

While only partly Green Belt, development of sites within this southern area was clearly rejected by the Inspector of the Tewkesbury Local Plan in 2003 (Tewkesbury Local Plan to 2011: Inspector's Report, 2.25.1-17, pp369-373) and the Inspector of the Cheltenham Local Plan in 2005 (Cheltenham Local Plan: Inspector's Report, 10.159-160). Their remarks still hold true:

A car-based extension to Cheltenham with poor travel connections which will increase congestion

The Tewkesbury Inspector Mary Travers wrote of the Farm Lane site which is again under threat from developers David Wilson Homes because it is now in the 'Area of Search':

'Even with the improvements to pedestrian facilities that are proposed by the site's developers, the nearest primary schools would be about 1.1km and shops at Up Hatherley about 1.4kms away. These distances are well in excess of the maximum desirable walking distances set out as interim criteria in Annex A of RPG10.... in my view the distances entailed in this case would be a significant disincentive to journeys on foot from the site to local facilities when taken together with the need to cross Shurdington Road (A46). Potential improvements to cycle links could bring cycle routes to within about 750m of the site, but it would still be necessary to use narrow country lanes or to cross the A46 to gain access to many facilities. Overall, I do not consider that the site would be easily accessible by cyclists....

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Traffic management measures that might be required to discourage increased rat-running on unsuitable routes in the locality are an indication of the significant increase in competition for road space that would be likely to be generated by the proposed allocation...

Future occupiers would be likely to be reliant on car transport for most day-to-day travel needs'. This, she said, brought the development into conflict with the national planning guidance document PPG3, now PPS3, paragraph 37 of which says very clearly that locations for new housing should take into account 'the contribution to be made to cutting carbon emissions from focusing new development in locations with good public transport accessibility and/or by means other than the private car'.

Considering car access to the site Mary Travers said that 'from a technical perspective' satisfactory arrangements could be made but that 'these would be achieved at some considerable cost to the rural environment of Farm Lane by its

widening and the removal of a significant length of hedgerow... I consider that this amounts to a physical and environmental constraint on the development of the site that adds to my concern about its overall visual impact.'

A thousand new homes would add intolerable pressure to the rush-hour gridlock on the A46 Shurdington Road and to the village-scale Church Road in Leckhampton which is often impassable at busy times with commuters competing with parents dropping children at the two local primary schools, Leckhampton primary and Richard Pate. In transport and traffic terms, this extension would simply be a disaster.

A popular and much-loved rural landscape ruined

Walkers on the designated Cheltenham Circular Route (enjoyed by more than a thousand people on a single day on the Cheltenham Circular Challenge and Britain's most beautiful marathon distance route) are not the only people to enjoy the spectacular views to and from this site. Many local people enjoy its quiet beauty.

The Cheltenham Local Plan inspector David Asher described the area as bringing 'a rural character up to the edge of the town which would be lost if development were to take place' and went on '**I have no doubt that the value of this land lies in the quality of its landscape**'. (Report, March 2005, 10.145, 10.149)

Tewkesbury Local Plan inspector Mary Travers was equally clear and even more specific in her admiration for the landscape. She described '**gently rolling topography and an attractive pastoral character that in my view links strongly into the landscape of the AONB** immediately to the south of Leckhampton Lane. Generally the contours fall from south to north and from east to west and there is a distinct ridge running roughly northwest-southeast through the site so that the south-eastern corner is the most elevated part. A public footpath that traverses the northern part of the site forms a link in a network of rural paths to the east and west of the site.'

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She went on: **'the site is highly visible from within the AONB, for example from the lower slopes of Leckhampton Hill and from higher up at the Devil's Chimney.** It is also visible partly from the west and in long distance views from the north. There is a substantial hedgerow on the western boundary with the Green Belt but this area drops away towards the Vale of Gloucester. As a result, development on the more elevated south-eastern part of the site would be very conspicuous from the western approach along Leckhampton Lane where it would be seen within the context of the AONB. And looking southwards from the public footpath across the site **it is apparent that development would entail a significant intrusion into views of the open countryside and the AONB from the existing edge of the built-up area. It would also sever the link between the rural footpaths to the east and west of the site and replace it with one of an entirely different character.'**

Her conclusion was inevitable: 'I consider that its visual impact on the surrounding countryside would be very significant and that it could not be easily mitigated.'

But she added more: 'In addition, the site forms part of a swathe of open land that sweeps down from the Cotswolds to pass between Cheltenham and Gloucester and it provides a link between the AONB and the Vale of Gloucester. **Development of the site would form an incongruous promontory in this open area, eroding the link and cutting off the rural land to the east of Farm Lane from the tract of countryside to the west.** I do not consider that there are any differences in character or appearance between the Cheltenham Borough safeguarded land and the SH1 site that are so significant as to render this incursion less harmful.'

The most obvious conclusion from the Inspectors' comments and the enormous support for this area from local people would be to include it in the Green Belt and protect it, not build on it.

The EiP inspectors paid only the briefest of visits to the area during a day tour on 27 February starting and finishing in Bristol and taking in Thornbury, Quedgeley, Brookthorpe, Twigworth, Innsworth, Down Hatherley, Brockworth, Gloucester, 'Leckhampton' (sic), Shurdington, Cheltenham, Uckington, Swindon, Prestbury, 'Bishop's Cleave' (sic), Ashchurch, Tewkesbury, Avonmouth and the Avon Gorge. But even they acknowledged the strength of feeling about the area locally. They call it a **'local beauty spot of some historical interest. There are panoramic views both to and from the hill which include views across part of the Leckhampton/Shurdington land of Cheltenham itself. A large number of draft RSS representations relate to this land and the Panel is left in no doubt that the Hill and the views from it are an amenity much appreciated by local people'**. [EiP Panel Report, December 2007; 4.3.31, p 97]

Astonishingly their response to this huge expression of public concern is to conclude – without any reasoned justification - that 'there is scope for sustainable development here without harm to the AONB, the outlook from Leckhampton Hill or to the local environment'. They then identify the land as a 'broad area of search' and make the incredible assertion – again without any supporting evidence – that the area can accommodate 'about 1,300 dwellings in total'.

This dramatic proposal, based on the briefest of visits, is given no adequate justification and goes against not just near universal local opinion and representation but also a series of judgements by government inspectors who have taken a great deal more care to inspect and establish the value of the area concerned. It has the potential to wreck a much-loved landscape almost on the whim of a few government officials and a policy change summed up in just twelve words. To allow this change to go through would have serious implications for the democratic credibility of the entire process.

The area is also immediately uphill of the Hatherley and Leckhampton areas of Cheltenham which flooded dramatically in June and July last year. Sewers burst through the tarmac on the A46 Shurdington Road immediately to the south of the area. The government's own Foresight report identified urbanisation as a key factor in increased flood risk from surface water and it is inconceivable that such a large development would not increase the flood risk to the Warden Hill and Hatherley areas. Sites in the area being mapped out now by developers have been largely

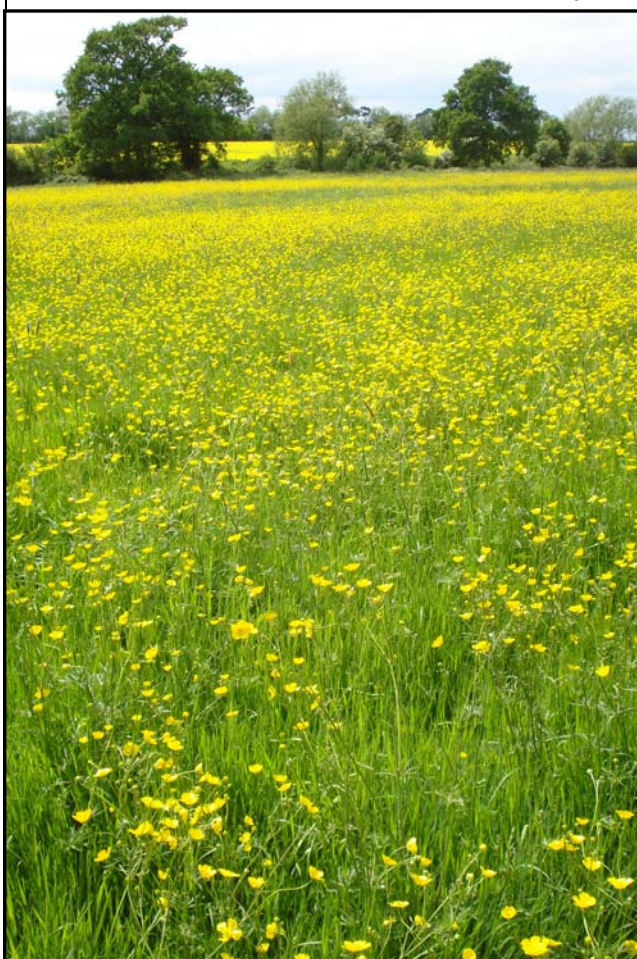
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water-logged since last summer so it is difficult to see where else the water could go, even with the best run-off management in the world.

4.1.33 The northern extension and the principle of the Green Belt

The northern extension to Cheltenham west of Swindon Village is an even more massive incursion into well-used countryside now totalling 5,000 houses instead of the draft 4,000. It is already in the draft RSS but its size is increased on the basis of the EiP. Even this huge extension to Cheltenham's urban area is justified in only a few lines of the proposed RSS. Again it is opposed by local representatives of every party and at every level from parish to Parliament. And once again the inspectors can have made only the very briefest of visits to the area on their packed itinerary on 27 February. It is impossible to see how they could possibly have appreciated the importance of this area to local walkers and families and beyond belief that they have concluded that this beautiful countryside is ripe for development without 'environmental constraints'.

The Green Belt around Cheltenham – really a 'C' shape complemented to the east by the



Costwolds Area of Outstanding Natural Beauty – is one of the smallest and most vulnerable in England. The major incursions already being actively planned by developers to the north and south of the town will rip it to shreds and take what I estimate will be a third of its total land area. After such an incursion it seems difficult to imagine how future local authorities will ever be able to defend the principle of the Green Belt. Only if the Green Belt boundary is regarded as permanent can local people expect to be free from constant assault by developers.

The proposed para 4.1.28 contains text originally in draft 4.2.34 but the latter's wording was much stronger in relation to the Green Belt, explicitly referring to the threat of 'urban sprawl' and the need for the Green Belt's primary purpose to be 'reinforced'. Both these phrases are missing from the new 4.1.28, which only commits to maintaining the two towns' separate identities and keeping 'land open between them' – a formulation that clearly does allow for the Green belt to be weakened.

Proportionately, the northern urban extension must be one of the largest thefts of Green Belt land being considered anywhere in England. The long, attractive rural walks it

affords are enjoyed by hundreds of people and it connects not just to more affluent areas but to rural villages and hamlets and also to urban neighbourhoods with high scores on Multiple Indices of Deprivation. It has a gentle beauty that sums up the tranquillity and peace that is now being appreciated by more and more organisations and academics, most recently by the mental health charity Mind in their recent report *Ecotherapy*. Its loss would be irreversible and irreplaceable.

And this area too may have played a part in last year's flooding. It is uphill of watercourses that flow directly towards the City of Gloucester that was badly hit both by surface water and fluvial (river) flooding last year.

As with the Leckhampton site, this area is distant from town centre facilities and any existing

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schools or community facilities and it is inconceivable that most travel to and from it will not be by private car, adding to congestion, pollution and CO2 emissions.

Last but not least, the area being considered for development is within half a mile of the Wingmoor Farm hazardous waste disposal facility and landfill sites. Quite apart from the occasional unpleasant smells which could make this a pretty unattractive location in which to place large numbers of houses, there are obvious public health concerns. These are already the subject of well-supported campaigns by local groups like SWARD, representing concerned residents in nearby areas like Bishop's Cleeve.

The northern extension's expansion in the Secretary of State's proposed changes will exacerbate the loss of much-loved countryside, increase risks to new and existing residents and compromise the whole principle of Green Belt protection on an unprecedented scale.

Section D2

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

I would revise section 4.1.28 to remove the reference to urban extensions, change the references to the Green Belt to make clear that it will be maintained and where possible – for instance at the Leckhampton 'white land' – extended to reflect the obvious value of these much-loved green spaces to the community.

I would delete section 4.1.33 altogether to remove both northern and southern urban extensions from the Regional Spatial Strategy (with consequent amendments to maps and housing totals throughout the document) . This will also have the result of reducing the overall totals which is realistic in the light of the housing market and economic downturns.

Please ensure that you have written your name at the top of the page. Completed forms should be received in the Government Office for the South West by 5.00pm on Friday 17th October [extended to 24 October]. Late responses will not be accepted.