



Joint Core Strategy: Issues and Options Consultation Response Form

This form should be used to respond to the JCS Issues and Options Consultation. You may use as many additional sheets as necessary, but please ensure you clearly identify the question to which you are responding.

Completed forms can be emailed to info@jointcorestrategy.org or posted to: JCS Team, Municipal Offices, Cheltenham, GL50 9SA. Responses should be received no later than 5pm on Friday 11th January 2019.

You can also respond direct via the consultation portal at www.jointcorestrategy.org.

Question 1

Do you consider that a comprehensive review of the plan is the correct approach for the JCS review? If not, what do you consider are the alternative approaches?

It all depends what is meant by a comprehensive review. We would not consider that merely modifying the recently adopted JCS by adding the extension of development northwards at Ashchurch could be seen as a comprehensive review. As will be clear from our later response to Question 12 we would certainly oppose such an approach.

However we would favour a much more radical reconsideration of the strategy which would place much less emphasis on development at Ashchurch. We understand that the proposed Ashchurch Master Plan has continued to assume that Ashchurch is a natural focus for growth because of the MOD site. It has then responded to the fact that the MOD will not release this land, at least in the short term, by providing the housing that was planned to go there in the green fields to the north, despite the environmental and traffic problems that this will cause.

We consider that the strategy should now be thoroughly overhauled. The comprehensive review should take account of the site specific arguments put forward below.



Question 2

On the basis that the plan period needs to be extended, what do you think is a reasonable timeframe for the JCS to plan for and why?

The proposed extension to 2031 seems reasonable.

Question 3

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

The difficulty is that the key strategic issue of major transport infrastructure is not under the control of the JCS. However the location of housing and employment land should depend on the the major road infrastructure that is likely to come forward in the plan period.

The plan should certainly consider the effects on existing settlements, both within the plan area and adjacent to it.

It should certainly consider the protection of biodiversity and landscapes, of both national and local importance.

Question 4

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

We would like to see some strengthening of existing policies to meet response to Question 3.

Question 5

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

We can only speak about cooperation across the northern boundary with Worcestershire. In particular we are concerned about the impact on views from Bredon Hill and the increased traffic through the centres of the villages on the southern and western slopes of this hill.

We consider that the JCS and the South Worcestershire Development Plan Review (SWDPR) should have equivalent policies in respect of protecting the setting of the AONB.

Question 6

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

Yes

Question 7

Having regard to the spatial strategy and the options presented above, how do you think the JCS authorities can most sustainably deliver for our future development needs?

So far as the northern part of the JCS area is concerned, by concentrating development to the south of the A46 and providing better links to it.

Question 8

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

No

Question 9

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

Affordable housing for local people.

Question 10

There is going to be a need for sites to be identified for employment land. What types of employment land do you think are required in the JCS area to provide for the needs of different business sectors and where would it best be located?

We do not feel qualified to answer this question.

Question 11

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

We do not feel qualified to answer this question.

.Question 12

Having regard to development needs in the JCS area and the spatial strategy discussed, do you feel that the known development opportunities can play a role in helping to meet needs?

From the introduction to this question it is clear from paragraphs 12.3 to 12.7 that sites identified in the Ashchurch Concept Masterplan constitute some of 'the known development opportunities'

Kemerton was one of the neighbouring parishes whose parish council was invited to send representatives to a workshop held at Tewkesbury Borough Council offices on 13 November 2018. At the time the attendees had not had time to study the masterplan in detail and were only able to comment on the material presented on the workshop. Nonetheless we believe that the concerns which we presented to that workshop are also those issues which, after further consideration, we consider to be the most important.

These were

- 1. Transport infrastructure.** Congestion on the A46 will lead to the isolation of Ashchurch from Tewkesbury and lead to rat-running through all neighbouring villages as motorists try to avoid the grid-lock which will ensue from further development around Ashchurch. We stressed that if a bridge was built over the railway linking Hardwick Bank Road and Aston Fields Lane this should only be done if there was a route due south linking the junction with Aston Fields Lane direct to the A46. We were particularly concerned about the diversion of traffic eastwards on to the B4077 and thence rat-running through the Bredon Hill villages to join the A46 at Beckford.
- 2. The impact on the ecologically important Lower Carrant valley.** We referred to the evidence produced by the Kemerton Conservation Trust on this issue. Its importance is not merely ecological but of archaeological and landscape interest. For example it still retains its field boundaries visible in the photograph taken by the Luftwaffe during the second World War and has a substantial area of medieval ridge and furrow.
- 3. The impact on the Worcestershire portion of the Cotswolds AONB (Bredon Hill).** Kemerton has always stressed the need for adequate screening of any new development from the many public viewpoints in the AONB whose boundary is less than 2 km from the proposed development.

We now wish to expand on these points with reference to the document “Ashchurch Concept Masterplan”.

1. **Transport** . We would oppose a new access road running to the north of and parallel to Aston Fields Lane and joining the B4077. The point about rat-running through the Bredon Hill villages has already been made, but we are also concerned that such a road would necessarily bring development to the north of Aston Fields Lane, which we oppose. Even without such development but with the construction of a bridge over the main railway line there would be increase congestion at Aston Cross which is on the road to work for many of our residents.
2. **The ecological importance of the Lower Carrant Valley**. Recent work has been carried out on the Worcestershire side of this valley to make it more attractive for breeding curlew which would not tolerate development nearby, both because of disturbance by dog walkers and the attraction of predators such as crows and foxes.
3. **Landscape**. The fields on both sides of the Carrant between Kinsham and Northway provide part of the setting of the Bredon Hill part of the Cotswolds AONB, as well as comprising an important historic landscape of their own (see above). The South Worcestershire Development Plan Review which is presently under consultation is proposing strengthening the protection given to the setting of the AONB. Large scale development so close to the AONB boundary would probably conflict with this policy and hence clash with the need to cooperate.

Question 13

Do you have a site you would like considered for inclusion in the Local Plans? You will need to provide a completed form with information about the site including a site plan.

No

Question 14

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

We did agree that A8 was an appropriate strategic site in the previous version of the JCS, and supported it under stringent landscaping conditions so long as it did not extend north of Aston Fields Lane. Because of the MOD response it had to be withdrawn but nonetheless it provides a good example of what would constitute a strategic site.

Question 15

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

The A46 and Junction 9 of the M5.

Do you have any other comments to make?

No

Would you like to be added to the consultation database and receive future correspondence as the JCS review progresses?

Please note: your personal information will be held by the Joint Core Strategy authorities (Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council) for the purposes of notifying you about progression of the plan review. Further information about how the Council uses your information is contained in the privacy notice [\[link\]](#)

If you would like to be removed from the consultation database, you may do so at any time by emailing info@jointcorestrategy.org.

Yes, please include Kemerton PC on the database.