

**Section B**

Support / Oppose / Comment (please specify)	OPPOSE
RSS Reference – Policy or Paragraph Number	Sections 4.1.32 and 4.1.33 (including Key Diagram inset 3 C&G HMA)
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:

1. With regard to Picture 4.3 - Key Diagram inset 3 C&G HMA - there appears to be an important lack of understanding of the situation on the ground.

The HMA 3 transport outcome appears to rely mainly on the A40 (Golden Valley bypass) as the link between Cheltenham and Gloucester.

The situation is that, while traffic travelling North from Cheltenham can use the A4019 to access the M5 motorway at Junction 10, it is not accessible for southward travel. This traffic would have to access the motorway at Junction 11 using the barely suitable Cheltenham roads or, for Bishop’s Cleeve traffic, HGVs are more likely to access M5 Junction 9 at Tewkesbury by travelling through minor roads.

One search area for this HMA (sometime called Area of Search 3F) is significant in that it identifies the north west of Cheltenham as being suitable, whereas it is obvious that it was a supposition without the benefit of detailed analysis in conjunction with other areas or sites. We have shown elsewhere that a preferable site for development would be nearer to Junction 10 of the M5, with that junction being made a full one. This approach would also be in keeping with Paragraphs 3.7.1. and 3.7.2 as well as Development Policies E (High Quality Design) and F (Planning and delivery of major development)

2. Policy HMA 3 indicates that, spread across Gloucestershire there is a perceived need for a growth of 56,400 homes but the pre-wording calls for “growth of at least 56,400 homes”

Previous documentation variously calls for 48,600 (draft RSS), 56,986 (DCLG 2003) – cf DCLG 2004 the figure closely aligns with the draft RSS at 48,769. It was stated that “Precise reasons for disparity between these two sets of DCLG figures are unclear.”

We suggest that the reasons are due to the mathematical model used is overly sensitive to parameter changes which, in turn, is a sure sign of a bad model. There is nearly 20% difference in the draft RSS and the DCLG 2003 figures. One should expect that the DCLG 2004 figure is an improved figure to their 2003 figure and that one parameter in this bad model relates to the economic situation. If such is the case then, with the current declining economic situation and the widely forecast long lasting situation before recovery, the draft revised RSS should recognise this and reduce the forecast housing and job needs in the draft RSS. Given that the multi-use

development area is removed from a NW Cheltenham urban extension into the Tewkesbury Borough area then there will be a consequential and proportional increase in the Tewkesbury numbers and reduction for Cheltenham Borough.

## Section D1

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

## 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:

### Transport outcomes

Action should be taken to improve movement and accessibility for all on the following corridors:

- south Gloucester - Gloucester city centre
- **Gloucester city centre – Tewkesbury town centre**
- Gloucester city centre - Cheltenham town centre
- **Cheltenham town centre – Tewkesbury town centre**
- Cheltenham town centre - Bishop's Cleeve

This should comprise:

- demand management measures
- sustainable travel measures; and
- if necessary, targeted new infrastructure investment to unlock pinch points.

**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 24<sup>th</sup> October. Late responses will not be accepted.**