

**Pre-Submission Joint Core Strategy**

**April 2014**

# Foreword

Welcome to the Pre-submission Joint Core Strategy which covers the administrative areas of Gloucester City, Cheltenham Borough and Tewkesbury Borough councils.

The Joint Core Strategy (JCS) is a key part of the development plan for the area. It is an important document because it sets out the identified need and location for housing and employment, and supporting infrastructure, in our areas up to 2031 (see proposals diagram on page iii). The planning system is “plan-led” - this means that development proposals have to be in accordance with the policies and proposals of the development plan unless there are good planning reasons to set them aside. Without a Joint Core Strategy, therefore, we significantly increase the risk of being unable to prevent or control unplanned development.

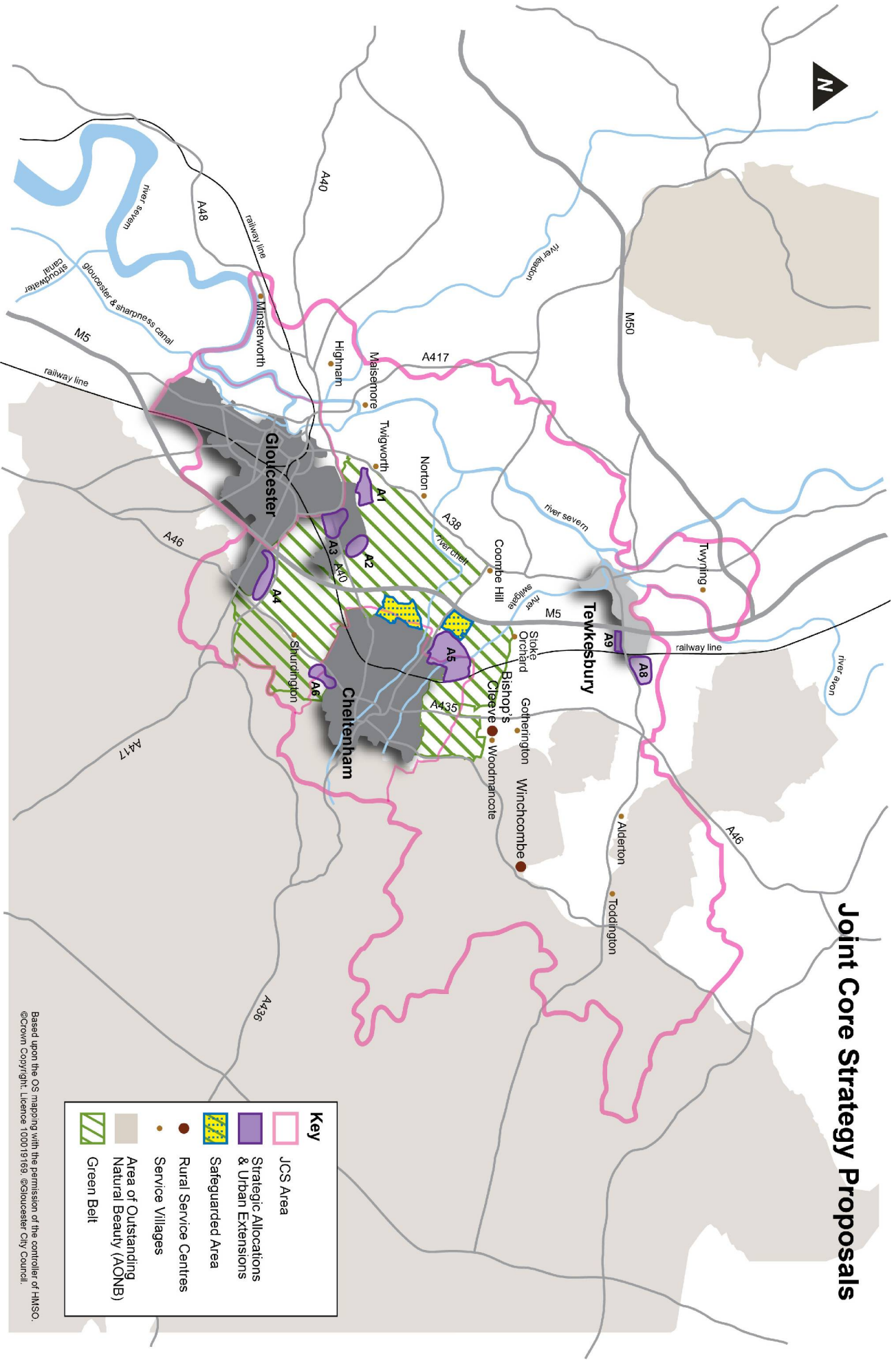
It makes sense for us to work together on a Joint Core Strategy, primarily because our communities share each other's town centres, leisure facilities and amenities - no matter what local authority area they live in. By working together we have been able to plan for the JCS area in a consistent way across the boundaries to benefit all. The government has recently introduced a “duty to co-operate” between public authorities - the JCS authorities pride themselves on being part of the advanced guard of this new requirement.

This consultation document has been prepared following several rounds of consultation with the public and other stakeholders, and extensive evidence gathering.

Our vision highlights just how important it is to us to ensure that Cheltenham, Gloucester and Tewkesbury Borough continue to develop as highly attractive and accessible places in which to live and work. Our pre-submission strategy also puts forward important supporting policies that cover issues such as flooding, affordable housing and green belt, and which will help shape our future development.



# Joint Core Strategy Proposals



| Key |   |
|-----|---|
|     | JCS Area                                  |
|     | Strategic Allocations & Urban Extensions  |
|     | Safeguarded Area                          |
|     | Rural Service Centres                     |
|     | Service Villages                          |
|     | Area of Outstanding Natural Beauty (AONB) |
|     | Green Belt                                |

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# Executive Summary

## What is the Joint Core Strategy?

The Joint Core Strategy (JCS) is an important document that will affect everyone that lives and works in Gloucester, Cheltenham and Tewkesbury and their surrounding areas. Amongst many other things, it sets out the identified need and makes provision for employment and housing and associated infrastructure (such as roads, schools and community facilities) up to 2031. The JCS must comply with national planning policy and planning practice guidance set by the government.

The plan has been developed using a range of studies (which we call our 'evidence base'). This is a key point, because it means that our approach to future development is not based on opinions or assumptions, but is founded on impartial and independent evidence. We have taken full account of representations received on drafts of the plan as it has evolved to its current stage.

## Why do we need a Joint Core Strategy?

All councils are legally required to have a development plan to guide future growth. Without a plan, there is a risk that *ad hoc* development will occur and we may struggle to prevent or control it. The need for a plan is now even more acute given that national planning policy - which represents "default" planning policy in the absence of a local plan or where a plan is out of date - has introduced a presumption in favour of sustainable development amongst other key changes.

The JCS will help us to ensure development takes place in a planned way and in a way that we want, protecting and enhancing our green infrastructure (such as parks and open spaces), areas of landscape and other cherished local features while meeting our long term development needs.

The planning system is "plan-led" - which means that development proposals must be considered against the policies and proposals of the plan unless there are good planning reasons not to. The policies are therefore vital because they will help to govern what can and cannot be developed in the JCS area

In addition, the Government has legislated under the 'duty to cooperate' that we must work closely with our adjoining councils when developing our plan. The three councils agreed to work together to generate a common strategic plan before this requirement became a legal duty. Under the Duty to Co-operate we are required to work with other relevant public-sector bodies in addition to local authorities, and the Infrastructure Delivery Plan is a good example of where that is taking place in a very effective way.

## What happened to my feedback from the last consultation?

Following our last public consultation - the JCS Draft for Consultation which ended in December 2013 - we have reviewed all the consultation comments and commissioned further studies to help us prepare this plan. We reviewed many matters including:

- How many houses and jobs will be needed and where they should be built.
- Where and when schools, health and community facilities, transport infrastructure and services need to be provided to support the proposed development;
- How the policies in the plan can be improved to address issues raised by respondents

You can view all comments and our responses on our website [www.gct-jcs.org](http://www.gct-jcs.org)

### What has changed since the consultation on the draft JCS and why?

In presentation terms the plan has been substantially reorganised to improve its clarity and ease of use. The heart of the plan now comprises:

- Strategic policies - SP1 and SP2;
- Sustainable Development Policies - SD1 - SD15;
- Infrastructure Policies - INF1 to INF8
- Strategic Allocations SA1 and A1 - A8

To assist respondents in tracking changes to policies they made representations on in the previous consultation, a cross-referencing table is provided at Appendix 1

In policy terms, in response to representations and new evidence there have been amendments made to virtually all the policies. Some of the changes are minor, some are more substantive. Whilst it would be inappropriate to list all the changes in this summary, they are detailed in the Consultation Summary Report available on the JCS website.

In evidence base terms, the key changes from the draft JCS are:

|  |   |
|--|---|
| <p>OAN (Objectively Assessed Need) revised to 30,500</p> | <p>The proposal to revisit the OAN was put forward by Members of the JCS authorities.</p> <p>The JCS Pre Submission includes a revised OAN. The starting point for the assessment is 2011ONS projections. Throughout the plan making process the key concern around the statistical baseline has been both the fall and deterioration in household formation rates for younger adults (those falling within the 25 -34 age group).</p> <p>The revised approach to OAN allows for a partial return to trend for this age group, recognising that it is likely that there will be some return to historic trend as the economy recovers, access to mortgages improve, and the JCS delivers improvement in housing supply.</p> <p>The OAN will need to be reviewed when the ONS local projections are published in May 2014, this forms part of the recommendations of this report. A breakdown of the OAN by district is provided at Table 2.</p> <p>The revised OAN and strategic allocations are set out in</p> |
|--|---|

|  |  |
|--|--|
|  | policies SP1 and SP2.  |
| Removal of strategic sites:<br>South Cheltenham - Up Hatherley - removal of whole<br><br>Innsworth and Twigworth - removal of Twigworth parcel (northern area) from strategic allocation | Removal of strategic allocations in whole or part in response to changes to the OAN. The proposal to remove strategic allocations has been put forward by Members of the JCS authorities.  |
| Incorporation of Green Belt at north Cheltenham (south of Racecourse) back into the Green Belt   | The decision to add land at north Cheltenham back into the Green Belt has been made by Members   |
| Amendments to capacity figures of strategic allocations  | All strategic allocations have been reviewed to ensure that the number of homes and amount of employment land that could be delivered reflects detailed work as part of masterplanning of sites, viability evidence, transport modelling and other relevant evidence.<br><br>The capacity numbers have been amended to reflect the views of the Environment Agency in respect of strategic flood risk assessment.  |
| Amendments to the list of service villages   | Following a review of the consultation representations received and evidence regarding the level of services/facilities at rural settlements, a number of changes have been made to the list of service villages and a simplified approach has been adopted to the inclusion of villages within this category. Service villages offer 2 or more primary services, 2 or more secondary services and a bus and car/road access score of 2 or more.<br><br>This information and the amended approach would result in the inclusion of two settlements not previously identified; Stoke Orchard and Twigworth. It also results in the deletion of Apperley, Ashleworth, Dumbleton and Little Witcombe. |

### What are we consulting on now?

This version of the Joint Core Strategy is technically known as the pre-Submission plan. Pre Submission is a key stage of the plan making process; it means that this is the version of the JCS that the three councils would like to submit to the Secretary of State for examination - with the councils confident that a sound plan can be presented to an Inspector for examination. At this advanced stage in the plan-making process, consultation is required to focus largely on whether or not the pre-submission Plan is sound and in accordance with national planning policy and other legislative requirements.

Whilst representations are allowed in respect of other matters, comments that do not relate to soundness or the other matters referred to may not be forwarded to the Planning Inspectorate for consideration at the Examination. Generally a representation that merely expresses disagreement with a policy or proposal is unlikely to carry much weight at this stage. To carry weight the representation will need to explain why the respondent considers the policy or proposal to be unsound or in conflict with national policy or legislation.

Following the consultation, the councils are required to gather together representations, summarise them and pass everything on to the Planning Inspectorate ahead of the formal Examination in Public. It will be a matter for the appointed Planning Inspector to determine which matters s/he wishes to examine and who to invite to take part in the formal Examination discussions.

The consultation, examination and subsequent stages timetable currently is as follows:

|             |   |
|-------------|---|
| Summer 2014 | Formal Consultation on Soundness of Pre - Submission Document           |
|             | Consideration of Representations and preparation on Submission Document |
| Winter 2014 | Submission to the Secretary of State                                    |
| Spring 2015 | Examination Period  |
| Summer 2015 | Receipt of Inspector's Report   |
|             | Adoption of Joint Core Strategy   |
|             | Publication of Final Document   |

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# PART 1 - Introduction

*“The purpose of planning is to help achieve sustainable development”*

1.1 In addition to the quote above, the ministerial foreword to the National Planning Policy Framework says:

“Sustainable means ensuring that better lives for ourselves don’t mean worse lives for future generations.

Development means growth. We must accommodate the new ways by which we will earn our living in a competitive world. We must house a rising population, which is living longer and wants to make new choices. We must respond to the changes that new technologies offer us. Our lives, and the places in which we live, can be better, but they will certainly be worse if things stagnate.

Sustainable development is about change for the better, and not only in our built environment.

Our natural environment is essential to our wellbeing, and it can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature - and opened to people to experience it, to the benefit of body and soul.

Our historic environment - buildings, landscapes, towns and villages - can better be cherished if their spirit of place thrives, rather than withers. Our standards of design can be so much higher. We are a nation renowned worldwide for creative excellence, yet, at home, confidence in development itself has been eroded by the too frequent experience of mediocrity.

So sustainable development is about positive growth - making economic, environmental and social progress for this and future generations.

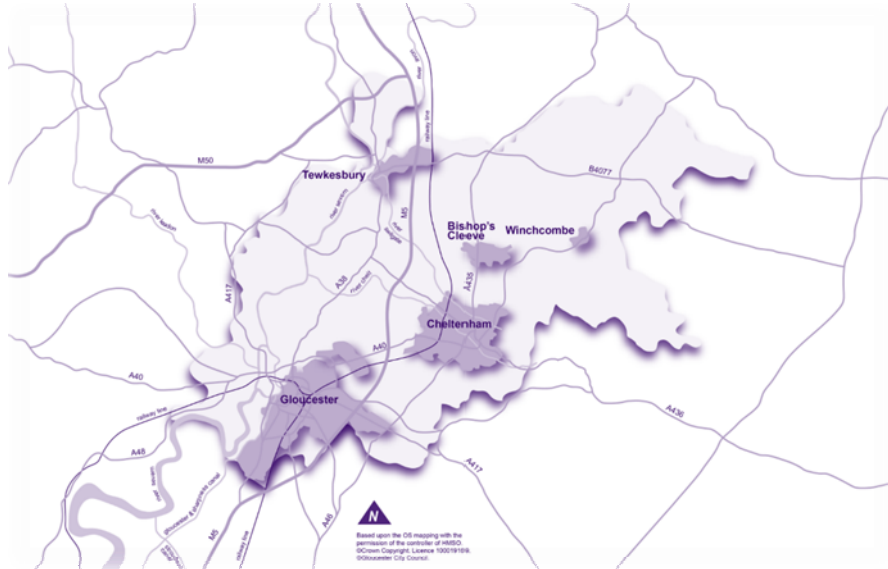
The planning system is about helping to make this happen.”

1.2 A key component in “helping to make this happen” is the development plan prepared by the local planning authority. In a plan-led system, planning applications are required to be determined in accordance with the development plan unless material planning considerations indicate otherwise. In fulfilling this critical role, it is clearly important that the development plan is up-to-date and backed by sound evidence so that its policies and proposals can be relied upon by stakeholders and decision-takers.

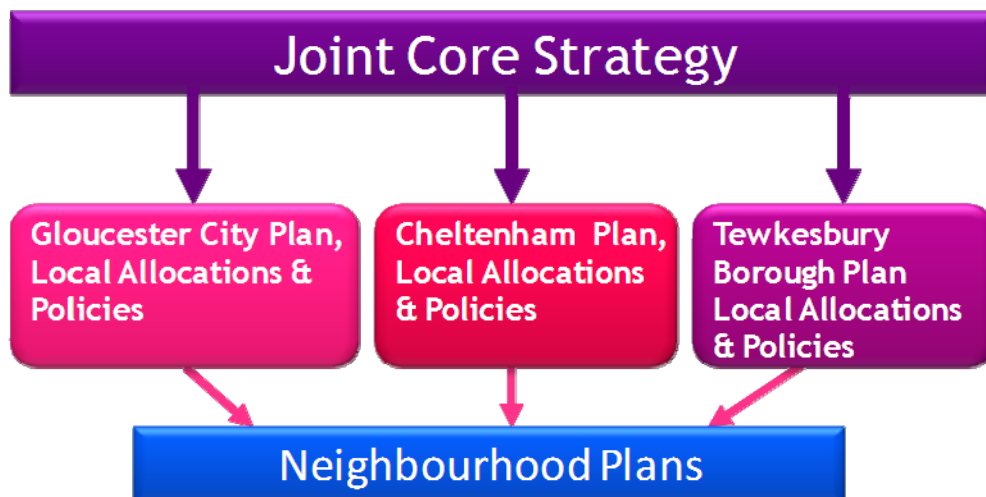
## **What is the Joint Core Strategy?**

1.3 The Joint Core Strategy (JCS) is an important part of the new development plan for Gloucester, Cheltenham and Tewkesbury and covers the area shown in the map below. As a planning document, which looks to reflect the priorities of government, residents, businesses, local service providers and other stakeholders, the JCS has been prepared within the context of national policy and having regard to the diverse aspirations and local characteristics that make up the area. The stage of plan making now reached is the Pre Submission stage.

1.4 The JCS sets out the long term vision and objectives for the area together with strategic policies for shaping new development and broad locations for new development up to 2031. Together, these policies help to provide a strategic planning framework for the JCS area, which guides future planning decisions and help to achieve the overall vision for the area.



1.5 Whilst the JCS provides the higher level or strategic part of the Local Plan for the area, more detailed, locally specific planning policies will be set out in the Gloucester City Plan, Cheltenham Plan and Tewkesbury Borough Plan, collectively called District Plans. These will include local allocations of land for development and local policies to guide decisions on planning applications. They also form part of the Local Plan and will need to reflect and be consistent with the policies in the JCS as set out in the diagram below



1.6 The same applies to neighbourhood plans. Where a parish or other designated community wishes to prepare a neighbourhood plan for their area, it must be in general conformity with strategic policies in the local plan. Whilst neighbourhood plans can promote more development than is set out in the local plan, they cannot be used to stop



new development proposed in the local plan. The JCS authorities will work with town and parish councils and community groups to provide advice in producing neighbourhood plans.

1.7 Pending adoption of the new local plan the 'saved' policies in the adopted city and borough plans will remain in use until they are fully replaced by relevant strategic and local policies.

1.8 More information on the more detailed documents that each of the local authorities is preparing is available from the websites of Gloucester City, Cheltenham Borough and Tewkesbury Borough councils.

1.9 The Joint Core Strategy Pre Submission is an emerging development plan document and should be read as a whole and accorded increasing weight as it progresses closer to adoption. When taking planning decisions, the document should be accorded status as a material consideration demonstrating our intentions as to the direction of future plan making.

### **Why a joint plan?**

1.10 There are strong linkages between the three local authority areas with Cheltenham and Gloucester City being the main economic drivers for Gloucestershire. Most people who work here also live in the area and many communities choose to use each other's town centres, leisure and health facilities, amenities and countryside, regardless of which local authority area they live in. It therefore makes sense to work together to plan for this area in a consistent and coherent way across the boundaries to benefit the community as a whole. In some respects it may be considered that the JCS is both in advance of and exemplifies the Duty to Co-operate discussed below.

### **Relationship with National Policy Guidance**

1.11 Core strategies must comply with national planning policy, which is set out in the National Planning Policy Framework (NPPF). This is a document prepared and issued by the Government which sets out planning policy at a national level on a variety of topics. It is important that the JCS is in conformity with the NPPF.

1.12 In addition, the Government has recently published 'National Planning Policy Guidance' (NPPG), which provides more information regarding areas of the NPPF and which have been considered and reflected in this Pre-Submission Joint Core Strategy.

### **Relationship with Sustainable Community Strategies**

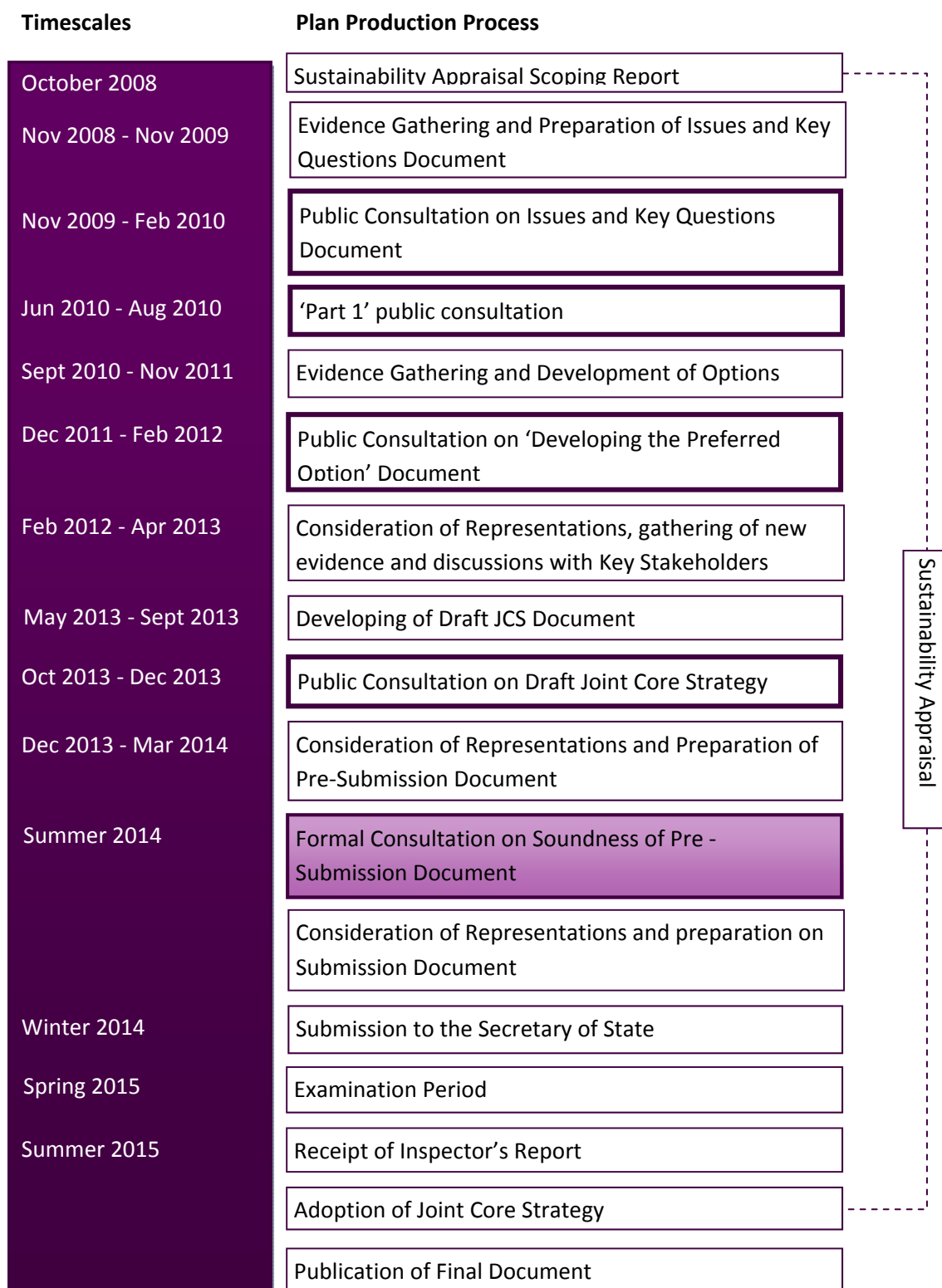
1.13 The JCS is informed by the community ambitions set out in the three Sustainable Community Strategies for each authority, which have been summarised as: A sustainable natural and built environment, a thriving economy and a healthy, safe and inclusive community.

### **Duty to Co-operate**

1.14 The JCS area does not operate or exist in isolation. Local planning authorities are expected to take account of different geographical areas. Through the preparation of any development plan, there must be an ongoing process of cooperation with other public bodies. This requirement is set out in legislation. The 'duty to cooperate' in the Localism Act 2011 requires local authorities to take a lead on strategic planning and tackle issues that impact on a 'larger than local' area and cut across administrative boundaries. .

1.15 The JCS authorities are continually working together and with relevant neighbouring authorities and organisations to ensure that matters of a strategic nature are properly considered and addressed, within the context of the duty to cooperate. Further information is available on the JCS website.

### What stage has the JCS reached?



1.16 The Pre-Submission Joint Core Strategy is available for public consultation between (X.X) and (X.X). Consultation at this stage is focused on the soundness of the plan and its compliance with the NPPF. Soundness means that the JCS is:

- Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is practical to do so consistently with the presumption in favour of sustainable development
- Justified - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
- Effective - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy - the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

It is important therefore to ensure that representations address these issues. The closing date for the consultation is (X.X).

### Previous consultations

1.17 Joint Core Strategy has been in preparation since 2008 and there have been a number of different consultations to inform its development as set out in the diagram above. The Pre-Submission document represents the penultimate stage of consultation before it is submitted to the Government for independent examination.

1.18 The most recent iteration is the 'Draft Joint Core Strategy', which was subject to consultation during the autumn/winter of 2013. A significant number of representations were received and a 'Consultation Summary Report' has been prepared which summarises the main comments made and the way in which these comments have been considered by the JCS authorities. This, along with the outputs from other consultations, is available to view or to download from the JCS website.

### Evidence Base

1.19 Core strategies must be based on robust up-to-date evidence to inform decision and plan making. The list of documents and sources comprising this evidence is set out on the JCS website at [www.gct-jcs.org/EvidenceBase](http://www.gct-jcs.org/EvidenceBase).

### Sustainability Appraisal

1.20 Planning legislation requires that the JCS must be subject to an appraisal of sustainability (known as a Sustainability Appraisal (SA)). A SA is a systematic process that evaluates the predicted social, economic and environmental effects of the JCS. European and UK legislation require that the JCS is also subject to a Strategic Environmental Assessment (SEA), a process that considers the likely significant effects of implementing the JCS on the environment. Government advises that these two processes (SA and SEA) should be carried out together. As a result an integrated SA/ SEA process is in place for the JCS. In addition, the SA/SEA process



undertaken for the JCS also considers equality issues under the Equality Act 2010. 1.21  
The Habitats Regulation Assessment process for the JCS informs the SA but is undertaken and reported separately.

1.22 The SA/SEA process for the JCS began in 2008 with the production of an initial SA/SEA scoping report and since 2012, the process has been progressed by independent SA/SEA specialist consultants Enfusion. All documents which report the findings of the SA/SEA process throughout the various stages of plan making for the JCS, are available online at [www.gct-jcs.org/SustainabilityAppraisal](http://www.gct-jcs.org/SustainabilityAppraisal)

1.23 SA/SEA is an ongoing and iterative process and consequently the assessment occurs over the various stages of plan making. The SA/SEA process allows consideration of reasonable strategic options or alternatives. It is used to assess the extent to which the emerging JCS will help to achieve relevant environmental, economic and social objectives and as a result, it helps to prepare a JCS which will contribute to the achievement of sustainable development. An addendum to the JCS Sustainability Appraisal has been prepared and has informed the preparation of the Pre Submission JCS

### **Delivery, Monitoring and Review**

1.24 Whilst the JCS can allocate sites and local authorities can discuss with landowners and developers how to best bring their sites forward in the allocated locations, there is always a risk that sites may not come forward as planned during the anticipated time scale. There is a need for monitoring and review and a clear strategy to explain what the JCS authorities will do should there be any barriers to delivering development as proposed by Policies SP1 and SP2, and also to respond to changing circumstances.

1.25 The strategy sets out key principles, but many proposals need to be developed through more detailed policy documents, such as the district plans and development briefs which will take time to prepare. Large sites will take time to master plan and commence development, especially where significant infrastructure is required. There is likely to be a contingency supply of homes from unallocated sites, including capacity delivered through the urban areas and across rural service centres and service villages. This provides some buffer for slippage in the anticipated delivery of larger sites

1.26 Delivering the strategy will also require a wide range of private, public sector and voluntary bodies working together. In preparing the strategy, the JCS authorities have worked with infrastructure providers and landowners/developers to establish that the allocated strategic sites are deliverable. If circumstances change, the JCS authorities will implement the measures set out below to ensure that the required housing and employment needs will still be met during the plan period. Any requirement to bring forward additional sites or alternative strategies will need to be in line with the distribution strategy of this plan as set out in the policy.

1.27 The NPPF requires plans to be flexible and responsive to change. If monitoring indicates that delivery problems are emerging or that circumstances are changing in other ways, the JCS authorities will consider implementing some or all of the following measures to bring forward development:

- working with developers and infrastructure providers to remove obstacles to the delivery of sites;
- seeking alternative sources of funding if problems with infrastructure provision is delaying development of key strategic sites;
- the early release of safeguarded land

- identifying alternative site(s) in general accordance with the distribution strategy of this plan as set out in policy SP1 and SP2 which may be delivered through district plans;
- working with other authorities under the Duty to Co-operate.

1.28 To reflect the government's emphasis on flexibility, the JCS will be reviewed in whole or in part within five years of its adoption. This will allow time for the plan's policies and proposals to take effect, lead-in times for development and other changes in the plan's evidence base over a 20-year period. Subsequent reviews will take place when the authorities consider them to be necessary. Wherever possible the JCS authorities will seek to work in co-operation with other councils to align future plan review timescales.

**Structure of this document:**

Chapter 2 sets out the vision for the development of the JCS area until 2031. This is followed by the implications of the vision for each district and the key challenges facing the JCS area. This is followed by strategic objectives to deliver the vision for the area which have been grouped under the headings of the three Sustainable Community Strategy (SCS) ambitions:

Chapter 3 contains the strategic policies for the JCS area, setting out the overall amount and distribution of new development together with delivery policies.

Chapter 4 presents a number of sustainable development policies relating to the entire JCS area. These have also been grouped under the headings of the three SCS ambitions.

Chapter 5 is concerned with the delivery of infrastructure in association with new development.

Chapter 6 sets out an overarching strategic allocations policy together with policies defining each of the strategic allocations.

Chapter 7 sets out how the objectives and policies of the plan will be monitored and reviewed over its duration.

Chapter 8 comprises the Proposals Plan for the JCS.

## PART 2 - Vision and Objectives

2.1 Having considered the key challenges for the JCS area, established through earlier consultations, a vision has developed which sets out what type of place the JCS area will be by 2031 (the end date of the JCS). The starting point for the JCS vision was the three Sustainable Community Strategy visions already identified through community consultation:

*The Gloucester City Vision 2012-2022:*

Gloucester will be a flourishing, modern and ambitious City, which all residents can enjoy.

*Cheltenham Sustainable Community Strategy Vision 2008 -2028:*

We want Cheltenham to deliver a sustainable quality of life, where people, families, their communities and businesses thrive; and in a way which cherishes our cultural and natural heritage, reduces our impact on climate change and does not compromise the quality of life of present and future generations.

*Tewkesbury Sustainable Community Strategy Vision 2008 - 2028:*

A borough of healthy, strong, thriving and sustainable communities, both rural and urban, where people want to live, work and visit.

2.2 The JCS vision has been further refined through engagement and discussion with stakeholders, the JCS Sustainability Appraisal and the JCS evidence base, including extensive public consultation. Whilst being aspirational, the vision for the JCS area is deliverable and seeks to bring forward change in a manner that reflects what is important to Gloucester , Cheltenham and Tewkesbury and their communities.

### Vision

By 2031 Gloucester City, Cheltenham Borough and Tewkesbury Borough will have continued to develop as highly attractive and accessible places in which to live, work and socialise.

The Joint Core Strategy area will be recognised nationally as enjoying a vibrant, competitive economy with increased job opportunities and a strong reputation for being an attractive place in which to invest.

The character and identity of individual communities will have been retained while improved access to housing will have addressed the needs of young families, single people and the elderly.

New developments will have been built to the highest possible standards of design and focused on protecting the quality and distinctiveness of each community. Established in sustainable locations, without increasing the risk of flooding, they will have been designed with sensitivity towards existing villages, towns and cities and with respect for the natural and built environment.

As a result of a strong commitment to the housing and employment needs of the existing and growing population, all residents and businesses will benefit from the improved infrastructure, which will include roads, public transport and services, and community facilities.

## Area descriptions

2.3 The historic cathedral city of Gloucester is the county town for Gloucestershire. It is bordered by the flood plains of the River Severn and the canal to the west, the motorway and rising land to the east and south, linking into the Cotswold Area of Outstanding Natural Beauty (AONB), and agricultural land to the north and east. Robinswood Hill and Churchdown Hill form two local landmarks. The city is a growing and transforming place and is delivering an ambitious regeneration programme with the overall aim of revitalising the city and its centre.

### ***What does the vision mean for Gloucester city and adjoining communities?***

2.4 By 2031 Gloucester will have established its historic central core as a place for inward investment and opportunity. Key urban sites, including King's Square, Greater Blackfriars, Greater Greyfriars and the railway corridor, will have been successfully regenerated to provide new jobs and homes within central areas of the city to meet the needs of its naturally growing population and to encourage inward investment. The King's Quarter regeneration will have played a key role in increasing the vitality and viability of the city centre environment and shopping experience combined with improved pedestrian, cycle and public transport improvements. A vital and viable city centre will have raised Gloucester city's profile as a strong, well connected and resilient location to be proud to live and work in as the economic and administrative capital of the county.

2.5 New high-quality business parks will be developed to retain and attract investment, thereby supporting the economic resilience of Gloucester city and the surrounding area.

2.6 However, there is limited capacity to accommodate all of these competing development objectives within the urban area. Consequently, some peripheral development is needed to achieve these.

2.7 The waterfront will be embraced, reinforcing links between the river and canal, regeneration areas and the city centre and raising the profile of its architectural history and roman origins. In turn, this will improve investor confidence and tourist appeal. Its links with the A40 corridor and with Cheltenham will be used to support the potential of the city to attract investors and visitors alike.

2.8 Gloucester's natural environment will continue to be safeguarded and improved, particularly through the protection and enhancement of landscape features and key habitats within the city's boundary, such as Robinswood Hill and adjacent to it at Chosen Hill.

### ***What does the vision mean for Cheltenham Borough and adjoining communities?***

2.9 Cheltenham's development pattern is encompassed on all sides by the Cotswold Area of Outstanding Natural Beauty (AONB) and green belt. Within the borough are a number of villages such as Prestbury, Leckhampton, Charlton Kings and Swindon Village which, although significantly influenced by the expansion of Cheltenham, retain their own character and 'village' feel.. The town is characterised by its high quality historic environment, set within a formal garden townscape and a wider open landscape, defined by the Cotswolds Area of Outstanding Natural Beauty and the green belt. This is effective in delineating Cheltenham from the neighbouring City of Gloucester and the settlement of Bishop's Cleeve. Public consultation has emphasised the importance of retaining the

separation of Cheltenham and protecting the qualities which make the borough unique such as retaining and protecting its regency character, tree lined promenades and streets and attractive green spaces and squares.

2.10 Cheltenham will continue to follow the principles that has seen it referred to as ‘a town within a park’; retaining its regency character, tree-lined promenades and streets, attractive green spaces and squares while creating contemporary, new developments set within attractive new green spaces and based around the regency design principles and complementing the existing character.

2.11 The town itself will continue to be a sub-regional focal point for economic and cultural activity and, therefore, it is important that the borough makes provision for affordable homes, jobs, infrastructure and facilities over the next 20 years to support mixed and balanced communities and attract inward investment.

2.12 However, there is limited capacity to accommodate all of these competing development objectives within the urban area. Consequently, some peripheral development is needed.

2.13 The borough has an ageing stock of employment sites and in recent times companies have relocated away from the area. This could be addressed through the provision of high quality, modern premises both in the town centre and in the form of a number of appropriate scale business parks elsewhere in the borough in order to retain and attract investment, thereby supporting the economic resilience of Cheltenham and the wider JCS area.

2.14 Retail and tourism will continue to make a major contribution to Cheltenham’s economy. In order to ensure this, Cheltenham Development Task Force will deliver new sites through the redevelopment of North Place and Royal Well, improving links with the Lower High Street, Brewery and Montpellier shopping areas.

### ***What does the vision mean for Tewkesbury borough?***

2.15 Tewkesbury is an attractive rural market town with a significant number of heritage assets and a high quality historic environment. It forms part of a wider related area incorporating Northway, Ashchurch and Wheat-pieces. Tewkesbury town lies at the confluence of the Severn and Avon rivers and these riversides offer great potential as a leisure destination and in attracting investment. Much of the remainder of Tewkesbury Borough is largely rural in character with over half of the population living in rural settlements (including market towns and villages) and hamlets/individual dwellings in the countryside. There are also significant areas of the borough, which lie at the urban fringes of both Gloucester and Cheltenham.

2.16 The borough’s landscape is diverse; ranging from the largely flat Severn Vale to the wooded slopes of the Area of Outstanding Natural Beauty (AONB) bordering Cotswolds district to suburban development around the fringes of Cheltenham and Gloucester, as well as Tewkesbury town itself. Much of the western part of the borough is in an area of high risk of flooding.

2.17 By 2031, Tewkesbury town will have strengthened its role as a desirable place to live and work, and will continue to be a popular visitor destination. The town will enjoy a strong reputation across the county and further afield, with unique attractions and thriving day and night-time economies fulfilling a role that complements larger nearby centres and supports the rural borough.



2.18 The Tewkesbury Town Centre Masterplan will look to deliver the redevelopment of key sites across the town centre, and a clear move to embrace Tewkesbury town's unique riverside location will be the catalyst for such changes. It may also offer opportunities for improved flood mitigation schemes to reduce the impact of future flooding events on the town.

2.19 Additional high quality business development will retain and attract investment, thereby supporting the economic resilience of Tewkesbury town and the surrounding area. All development in the area will recognise the importance and prevalence of flooding issues in the area reducing the regularity and severity of such risks as far as is practicably possible.

2.20 The character of the rural area will be protected and enhanced. Opportunities for farm diversification for employment or rural tourism could further support the rural economy and will be encouraged. There are existing pockets of rural deprivation, partly the result of isolation from key services or employment opportunities. These issues will be addressed through the conversion of vacant and derelict premises, development of appropriate-scale businesses and better broadband provision. Additional housing will help to support existing and new services in rural areas and help to improve self sufficiency of rural settlements.

2.21 Public transport will be improved, particularly the access between the larger rural settlements and the main urban areas. Notwithstanding this, the ability to serve the entire rural hinterland is limited and the importance of the car will continue.

2.22 By 2031, the rural areas will be prosperous and playing their part in the JCS economy. Rural communities will be vibrant and not simply dormitories for the urban areas, with good access to services and availability of affordable housing. In addition to any special provision through a Green Infrastructure Strategy, distinctive landscape character will have been protected, landscape features maintained and enhanced, and the countryside will be richer in wildlife with improved access for all. The tranquility of the countryside will have been safeguarded, and noise and light pollution minimised. New development will be appropriate in scale, design and energy efficiency. The green belt will be managed to enhance its contribution to the landscape, biodiversity and access.

2.23 Areas of the borough which lie at the edge of Gloucester and Cheltenham will play an important role in accommodating development through urban extensions to meet the needs of all three authorities.

### **Key challenges**

2.24 The overall trend for the JCS area, as a whole, is towards an ageing population. This reflects a national trend but is more pronounced in this area due to migration of pensioners from other parts of the country. This raises challenges in the provision of appropriate health and transport services, combined with a shrinking workforce as well as a reduction in average household size. Across the JCS area, evidence has shown that there is currently a net outflow of young people (aged 15 to 29 years), which is weakening the potential of the local workforce and making it a less attractive area for businesses. Against this trend, Gloucester city is expected to see a significant rise in the young and working age population. To maintain a thriving economy and remain an attractive area for business the number of dwellings and jobs needs to be more closely aligned.

2.25 The JCS addresses the needs of an increasing elderly population, coupled with natural growth in the existing population and shrinking household sizes (due to more single households, more lone parents and smaller families). This may mean that some young people move away or live with their parents into their 30s, while older people remain in unsuitable homes which do not meet their needs. Hence, the housing evidence has identified a need of around 1,525 new homes per year which need to be accommodated in the JCS area over the next 20 years to provide adequate housing for its residents.

2.26 For young people the key issue in the area is not just the availability of housing, but also the price of housing. In the JCS area, the house price to earnings ratio is around 6 to 1 for people under 40 in 2011 (meaning the average house price is six times the average earnings of people under 40). There has been insufficient delivery of homes in recent years to lower this ratio. Whilst over 8,266 new homes have been delivered in the JCS area between 2006 and 2011, only 2,015 of these were affordable. That equates to about 400 new affordable homes per year. Housing need in both the rural and urban areas remains a pressing issue.

2.27 The largest employment sector is public administration, with other important sector being tourism and finance. Diversifying the employment base to increase the number of knowledge based jobs remains a key challenge for the area. Unemployment figures have been rising in the county since May 2008 and nearly doubled by 2009 having widespread impacts on almost all sections of the local economy. Since the 2007 recession, vacancy rates of shops have increased in both larger and smaller centres. Furthermore, there are now high numbers of young people aged 16 to 18 years who are not in education, training or employment. All of this indicates a need for more employment and training opportunities in the JCS area to remain a competitive location providing companies with the opportunity to move or expand within the area and support young people to enter the workforce.

2.28 While the JCS area is considered to be relatively affluent, this is not uniform across the area. There are pockets of deprivation including eight of the most deprived wards in England, which suffer from low incomes, unemployment, poor health and housing, low educational attainment and crime and disorder. Tackling levels of deprivation through measures such as more frequent public transport, more community and health facilities remains a pressing issue.

2.29 Gloucester and Cheltenham are the main economic hubs for Gloucestershire and draw in a significant number of commuters. This places a considerable strain on the central areas in terms of traffic congestion and pollution. Increasing self-containment remains a key challenge for the area. Offering alternative modes of transport (such as cycling or buses) is easier to achieve in the major urban areas which are compact and thus offer potential for improvements to local cycling and pedestrian links. However, in the rural areas, maintaining and improving public transport is more challenging.

2.30 Climate change and its local manifestation of more frequent and more severe flooding is also a major issue in the JCS area as much of the area is low-lying and a significant proportion of existing residential properties are already at risk of flooding. Identifying new sites for development which will be outside areas liable to flooding, and improving resilience of existing areas to flooding, is another key challenge of the plan.

## Strategic Objectives

2.31 To support and deliver the vision, the JCS sets out the following objectives. The aim is to achieve a sustainable balance that responds to the key challenges identified above and meets the overall needs of the JCS area.

2.32 A number of strategic objectives, closely aligned with the ambitions of the sustainable community strategies, were put forward in previous consultation documents. Following the publication of the NPPF, the headings of the objectives were amended and the objectives themselves have been refined following public consultation. Their impact on the environment, community and the economy has been tested through the sustainability appraisal process.

2.33 The objectives do not repeat national planning guidance which will be applied as a matter of course, but have identified spatial issues of local importance. Each policy specifies which of these objectives it is contributing towards.

## Ambition 1 - A Thriving Economy

### ***Strategic Objective 1 - Building a strong and competitive urban economy***

Develop the potential of the JCS area for further economic and commercial investment by:

- Providing the right conditions and sufficient land in appropriate locations to support existing businesses and attract new ones, particularly from the major, high-tech and knowledge based industries, tourism, retail and the leisure sector to rebalance the local economy away from its public sector dominance, improve the area's economic resilience, support a highly skilled workforce and continue to provide a focus for economic growth within the county.
- Providing the right environment, in partnership with others such as the Local Enterprise Partnership (LEP), for business start-ups, entrepreneurship and the improvement and expansion of education and training facilities to develop the skills employers need.
- Developing the area's role as a tourist destination, building on its unique characteristics and festival culture that already exist in the JCS area.

### ***Strategic Objective 2 - Ensuring vitality of town centres***

Creating the conditions for maintaining and strengthening a balanced hierarchy and network of city, town and district centres by:

- Providing for sufficient retail, leisure, employment, social, cultural, tourist and other appropriate uses within the designated centres to improve their vitality and viability, supporting accessibility and environmental improvements and town centre regeneration measures.
- Prioritising the delivery of key regeneration sites.
- Supporting a diverse retail offer across the three main designated centres of Gloucester, Cheltenham and Tewkesbury to complement each other and thereby increase competitiveness with centres outside the JCS area.

### ***Strategic Objective 3 - Supporting a prosperous rural economy***

Facilitating rural employment generation and diversification by:

- Supporting the needs of agricultural businesses, encouraging farm diversification, the development of small rural business units, the conversion of existing buildings for rural business use, appropriate expansion of existing businesses and home working.
- Supporting and safeguarding, in partnership with others, the provision and retention of village shops that serve the everyday needs of a local community

## Ambition 2- A sustainable natural, built and historic environment

### ***Strategic Objective 4 - Conserving and enhancing the environment***

- Protect and enhance the JCS area's unique historic environment, its archaeological heritage and geological assets.
- Conserve, manage and enhance the area's unique natural environment and great biodiversity, including its waterways, Sites of Special Scientific Interest (SSSI), the Cotswold AONB, and areas of landscape and biodiversity importance and maximise the opportunities to use land for active flood plain.
- Ensure all new developments, where appropriate, supports green infrastructure and improves existing green infrastructure within urban and rural areas to provide movement corridors for people and wildlife.
- Review the current green belt boundary with a view to releasing land to help meet the long term development needs of the area that cannot be accommodated elsewhere, whilst providing a long term permanent boundary for the future.

### ***Strategic Objective 5 - Delivering excellent design in new developments***

Ensuring that all new developments are valued by residents as they:

- Are well integrated with existing communities and provide well-located infrastructure which meets the needs of residents;
- Create a strong sense of place through high quality and inclusive design that respects and enhances local distinctiveness

### ***Strategic Objective 6 - Meeting the challenges of climate change***

Making the fullest contribution possible to the mitigation of, and adaptation to, climate change and the transition to a low carbon economy, by:

- Making the best use of land by maximising the use of previously developed land and encouraging higher density developments in central locations, whilst promoting food security by protecting the highest grade agricultural land and allotments.
- Reducing the use of fossil fuels by increasing self-containment of settlements through mixed use developments and providing new developments in sustainable locations.
- In partnership with others, promoting the efficient use of natural resources, the re-use and recycling of resources, the production and consumption of renewable energy and the decentralisation of energy generation.
- Encouraging and facilitating the development of low and zero carbon energy development and implementation of Sustainable Drainage Systems in accordance with existing standards and, where appropriate, exceeding them.
- Ensuring that new development is located in areas which are not liable to flooding, that existing infrastructure is adequately protected from the threat of flooding and that existing flood defences are protected and enhanced.

## **Ambition 3 - A healthy, safe and inclusive community**

### ***Strategic Objective 7 - Promoting sustainable transport***

Reducing the need to travel and the reliance on the car by:

Improve opportunities for walking and cycling by making routes more convenient, safer and attractive

- Providing frequent public transport links and safe walking and cycling routes in all new developments.
- Improving access to services in rural and urban areas through new development, improved integrated transport links and supporting local and community led transport initiatives.

### ***Strategic Objective 8 - Delivering a wide choice of quality homes***

Delivering good quality new housing to meet the needs of the current and future population and ensure greater affordability for all sectors of the community by:

- Delivering a sufficient number of market and affordable housing.
- Delivering residential developments that are supported by the necessary transport, community and social infrastructure, such as schools, open space, playing pitches and health facilities.
- Delivering housing of the right size, type and tenure to ensure the creation of mixed communities located in sustainable locations with good access to jobs and services.
- Meeting the housing needs of all age groups, vulnerable groups and gypsies, travellers and travelling showpeople.

### ***Strategic Objective 9 - Promoting healthy communities***

Promote development that contributes to a healthy population by:

- Providing for good access to the countryside and all open spaces through the retention and development of a comprehensive green infrastructure network.
- In partnership with others, creating stronger communities by reducing inequality and social exclusion and thereby increasing social wellbeing.
- In partnership with others, encouraging healthy lifestyles and a well society through access to key community facilities and services, open spaces and sustainable transport.
- Ensuring that environmental quality and air quality is protected.

# PART 3 - Strategic Policies

3.1.1 This chapter sets out key strategic spatial policies for the JCS area. Policy SP1 sets out the overall strategy concerning the amount of development, and Policy SP2 the distribution of new development. These two policies, combined with policy E1 on the economy, provide the spatial strategy for the plan. This strategy, together with its aims, is expressed in relevant policies throughout the plan and also within the subordinate district and neighbourhood plans being prepared concurrently. Each policy highlights which strategic objectives it addresses.

## POLICY SP 1 - SCALE OF NEW DEVELOPMENT

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### Background

3.1.2 The issue of how much development will be needed in the JCS area until 2031 has generated considerable debate and comment at each stage of the plan's preparation. The amount of development required for future housing and employment is referred to in the National Planning Policy Framework as "objectively assessed need" (OAN), and it is important that this is an assessment of need based on evidence.

3.1.3 One of the biggest challenges facing the JCS authorities is to accommodate the level of growth the area is likely to need in terms of housing, employment and infrastructure, whilst continuing to protect the natural and built environment that makes this area such an attractive place to live and work. This requires a balance to be struck between protecting these cherished assets, whilst ensuring that existing and future generations are able to form households, find work and make a valuable contribution to a strong community.

3.1.4 The starting point for establishing the levels of development to be planned for is the NPPF, which requires local authorities to establish the objectively assessed need for housing. The NPPF sets out that planning should '***proactively drive and support sustainable economic development to deliver the homes, businesses and industrial units that the country needs***' and that '***every effort should be made objectively to identify and then meet the housing, business and other development needs of the area.***' The NPPF goes on to say that, when plan making, councils should use their evidence base to ensure that their local plans meet the '***full, objectively assessed needs for market and affordable housing in the housing market area as far as is consistent with the policies set out in this framework.***'

3.1.5 The latest Department for Communities and Local Government (DCLG) household projections indicate that the baseline demographic projection for the JCS area is 28,500 new homes. Whilst this provides the starting point in assessing the level of future needs, the JCS has not used this to define the objectively assessed need for the area, as this level of growth assumes that there will be no increase in household formation levels over the plan period to 2031. This is an unlikely scenario. The current rate of household formation is a reaction in part to the recession, but over time the economic climate is likely to

improve and the difficulties in the housing market should ease. This will enable young adults who have been particularly disadvantaged by the recession - currently living with parents or sharing accommodation - to form their own households.

3.1.6 In the draft JCS, the level of objectively assessed need was established as in the range of 33,200-37,400 dwellings, and the lower end of the range was selected as an appropriate response. The draft JCS therefore set a requirement for 33,200 new homes and enough land to support 21,800 new jobs in the plan period to 2031. This level of development reflected both demographic and economic projections; as such it was considered to be a sensible assessment of the future housing needs of the area for all age groups, and the economic potential of the JCS area to make a partial return to household formation trends before the recession. It was also a level that would meet the 3 ambitions of the JCS in terms of supporting a thriving economy, a sustainable natural and built environment and a healthy, safe and inclusive community.

3.1.7 The plan must be based on up to date evidence and further advice has been sought since the publication of the draft JCS in October 2013 on population and household projections and on economic forecasts. Whilst new information on future population and household projections is expected later this year, this is not expected to lead to a significant changes to the demographic information on which the draft JCS was based. Recent economic forecasts do however present a more optimistic future for the area than has been suggested for some time, with an average growth forecast of about 28,000 jobs to 2031; at this stage, this additional growth appears to be within the range currently being planned for in the JCS, but this is a key area to be monitored to ensure that the area's economy is able to grow and ensure a healthy economic future.

3.1.8 The objectively assessed need for the JCS has been independently assessed by consultants Nathaniel Lichfield and Partners and the Cambridge Centre for Housing and Planning Research. In considering this evidence, the JCS authorities have concluded that the objectively assessed need for the JCS area is within a range of about 30,500 to 38,000 dwellings and about 21,000 to 28,000 jobs.

3.1.9 The Cambridge Centre for Housing and Planning Research has also examined alternative scenarios to the "Partial return to trend" scenario on which the draft JCS was based. This was on the basis that there is no single "right" answer but a range within which it can be reasonably argued that the objectively assessed need for housing lies. The conclusion of this work advises that the "Partial return to trend" scenario would continue to represent a reasonable central case for establishing the level of objectively assessed need, but that there are two credible alternative options. The JCS authorities consider that, as a result of this latest advice, the most credible option focuses on a partial return to trend to enable the 25 to 34 year old age group to form households; this would imply an objectively assessed need of 30,500 dwellings.



## Policy SP1: Scale of New Development

During the plan period provision will be made for about 30,500 new homes and land to support about 28,000 new jobs. This is to be delivered through development within existing urban areas through district plans, existing commitments, urban extensions to Cheltenham and Gloucester and the provision of strategic allocations at Ashchurch. This strategy aims to locate jobs near to the economically active population, increasing sustainability, reducing out-commuting thereby reducing carbon emissions from unsustainable car use.

This housing requirement for each local authority will be as follows:-

- Cheltenham 9,100 new homes
- Gloucester 11,300 new homes
- Tewkesbury 10,100 new homes

The appropriate level of new homes and employment will be monitored and a review undertaken 5 years following the adoption of the JCS and periodically thereafter, taking into account the most up to date evidence available at that time.

**This policy contributes towards achieving Objectives 1,2,3,6,7 and 8.**

### Explanation

3.1.10 There are inevitably significant uncertainties when planning for a 20 year period, but within the lifetime of the JCS it is expected that the economy will at least partially recover, the mortgage lending situation will improve, and that the housing market will also improve from its current position. This would result in a return towards previous trends in household formation rates. If household formation rates for the 25 - 34 year old age group were to make a partial recovery to previous trends, providing more opportunity for younger adults to form households, this would imply a requirement for about 30,500 additional homes.

3.1.11 Whilst the baseline demographic projections support the need for 28,500 dwellings, the JCS plans for a minimum of 30,500 new dwellings, in order to better meet the aspirations of younger adults to form households. This has been selected as an appropriate response to the available evidence, coupled with a commitment to monitoring and early review.

3.1.12 The level of development proposed is at an overall rate higher than that observed in the JCS area overall since 1991 and would represent an increase in housing supply in line with the aims of NPPF and the best available information of the likely levels of housing required by 2031. In order to provide a level of flexibility, land has been allocated to provide about 30,500 dwellings, with additional safeguarded sites.

| Annual JCS Housing Delivery |           | Annual JCS Housing Requirement |
|-----------------------------|-----------|--------------------------------|
| 1991-2001                   | 2001-2011 | 2011-2031                      |
| 1,326                       | 1,450     | 1,525                          |

3.1.13 With regard to employment, it is important that the JCS reflects the spirit of the NPPF in helping to ensure that the *'planning system does everything it can to support sustainable economic growth.'* Local employment need has been independently assessed by consultants Nathaniel Lichfield and Partners, which identified the potential to create around 21,000 to 28,000 jobs to support a thriving economy. This assessment has been further informed by the emerging Strategic Economic Plan of the Gloucestershire Local Enterprise Partnership. The baseline evidence provided by Nathaniel Lichfield and Partners indicates that between 34 and 60 hectares of employment land should be provided over the plan period, which would reflect recent economic growth forecasts for the JCS area.

3.1.14 The JCS has identified strategic employment sites to allow for this level of development, and has planned for the higher end of the range indicated, in order to provide sufficient flexibility for employment needs not anticipated by the evidence base e.g. unexpected changes in economic circumstances and to help deliver the aspirations of the emerging Strategic Economic Plan prepared by the Gloucestershire Local Enterprise Partnership. On this basis the JCS allocates about 64 hectares of additional employment land via new strategic sites, supported by protection of existing sites within urban areas and enabling of new sites within these areas. This will be monitored over the plan period, along with the impact of higher economic activity rates and the how this impacts on the balance between housing provision and realising economic potential.

3.1.14 The requirements set out in Policy SP1 reflect the evidence and take into account the following key issues:

- Population growth and changing household size.
- The effect of, and prospects for, economic growth.
- The dynamics of the local housing market.
- Landscape and environmental constraints.
- Infrastructure capacity and deliverability.
- Role and function of the green belt.
- The duty to co-operate across local authority boundaries.

## Delivery

3.1.15 To assess the performance of the JCS, a separate monitoring framework is included in the plan, setting out the key indicators and contingencies that will be critical to the successful delivery of the plan strategy.

3.1.16 Where policies are not being delivered against the plan objectives and strategy as intended, the Annual Monitoring Reports of the three councils will suggest actions needed to address any issues. In addition to annual monitoring, a five yearly cycle of comprehensive monitoring and review of the JCS will be established. The review process would need to commence in advance of the review dates to enable any new or amended policies to be adopted in a timely manner.

3.1.17 The three councils will review the appropriate level of new homes and employment land and examine all available evidence sources including demographic evidence, economic conditions and forecasts; if required additional evidence reports will be commissioned. If evidence suggests that additional provision of homes or land for employment is required, the review will consider the appropriate response, including the possible need for additional allocations, the early release of any safeguarded sites and the need for assistance from other neighbouring authorities, as part of the duty to co-operate

## **POLICY SP 2 - DISTRIBUTION OF NEW DEVELOPMENT**

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### **Background**

3.2.1 Both the level and distribution of housing and employment is influenced by the vision of the JCS, and informed by sustainability principles and by the JCS Sustainability Appraisal process, which must be translated into an overarching strategy for the JCS area. Policy SP2 sets out this strategy and identifies the distribution of new development across the area. Additional policy on employment and the economy is provided by policy E1. The proposals plan in Chapter 8 shows the distribution.

3.2.2 It has long been recognised that Gloucester and Cheltenham cannot wholly meet their development requirements within their administrative areas, and as such collaborative working across boundaries through the duty to co-operate is necessary. This was previously addressed through the Gloucestershire County Structure Plan and the draft Regional Spatial Strategy, which identified both Gloucester and Cheltenham as being amongst the region's Strategically Significant Towns and Cities. All of the Gloucestershire local planning authorities are working together, within the context of the Duty to Cooperate, to ensure that Local Plans properly address strategic planning and cross boundary issues. A wider memorandum of understanding is currently being progressed between all Gloucestershire districts covering issues requiring joint working. In particular, the Gloucestershire authorities have worked together on an update of the Strategic Housing Market Assessment.

3.2.3 The JCS authorities have also specifically agreed with Stroud District Council to take a strategic approach in their respective Local Plans, and to develop strategies which seek to meet objectively assessed development and infrastructure requirements in their respective Local Plans. Consideration will be given to meeting unmet requirements from another local planning authority in the housing market area, where it is reasonable to do so and consistent with achieving sustainable development.

3.2.4 The three JCS Authorities want to concentrate new development in and around the existing urban areas of Cheltenham and Gloucester to meet their needs, to balance employment and housing needs and provide new development close to where it is needed, and where it can benefit from the existing and enhanced sustainable transport network. Most of this development will be in the form of urban extensions within Tewkesbury Borough, because of the nature of the administrative boundaries in the JCS area. Tewkesbury town plays a smaller role in accommodating new development due to its size and the rural areas will accommodate a lower amount of new development, most of which already has planning permission

## Policy SP2: Distribution of New Development

The amount of development and its distribution is set out in tables SP.2a and 2b (at the end of this section of the plan), and indicated on the Proposals Plan.

To support their economic roles as the principal providers of jobs, services and homes, and in the interests of promoting sustainable transport, development will be focused at **Gloucester** and **Cheltenham**, including urban extensions to these areas.

Over the plan period to 2031, land will be provided for about 30,500 new homes and for about 64 hectares of employment land, to support about 28,000 new jobs.

**Gloucester and its urban extensions will accommodate about 10,800 new homes**

**Cheltenham and its urban extensions will accommodate about 10,500 new homes**

Whilst planning to meet the development needs of Gloucester and Cheltenham in and adjoining the two urban areas through the proposed urban extensions, no wider provision will be made elsewhere within Tewkesbury Borough to meet these unmet needs.

**Within Tewkesbury Borough development will accommodate about 9,740 new homes.**

**This will be met:**

- Through urban extensions to Gloucester and Cheltenham
- Through strategic allocations at Ashchurch
- Through smaller scale development meeting local needs at Tewkesbury town in accordance with its role as a market town, and at rural service centres and service villages.

**Rural service centres and service villages** as identified in table SP.2c below will accommodate lower levels of development to be allocated through the Tewkesbury Borough Plan and neighbourhood plans, proportional to their size and function and also reflecting their proximity and accessibility to Cheltenham and Gloucester and taking into account the environmental, economic and social impacts. Over the plan period to 2031,

- The rural service centres will accommodate 1860 new homes, and
- The service villages will accommodate 880 new homes

**In the remainder of the rural area, Policy C1 will apply.**

**This policy contributes towards achieving Objectives 1, 3, 4, 5, 6, 7 and 8.**

## Explanation

3.2.5 The guiding principle of policy SP2 is that need is met where it arises, so that Gloucester and Cheltenham, together with their immediate wider areas, remain the primary focus for growth. This reflects the urban-focused economic vision and support for urban regeneration for the JCS area.

3.2.6 In order to assess how much land is available to meet the JCS area's needs, the authorities have reviewed all potential sources of housing land supply. The potential land supply between 2011 and 2031 comes from a number of sources. Firstly, houses that have been built between 2011 and 2014 count towards meeting needs in the early part of the plan; secondly sites which have already been granted planning permission and are being built out; thirdly allocated sites in existing adopted local plans. In addition we have included sites identified through the Strategic Housing Land Availability Process, although these do not consider all constraints which could prevent sites coming forward.

3.2.7 We have made assumptions as to how many windfall sites (sites which are not allocated in local plans but come forward through planning applications) will be granted permission across the plan period in each district, reflecting the most recent guidance included in the National Planning Policy Guidance.

3.2.8 There are also further sites to be identified through the district plans. Work on the Gloucester plan is already well advanced, Cheltenham and Tewkesbury Borough's district level plans are less far forward in the plan preparation process and there is some uncertainty as to how many homes will be eventually allocated and when they will be delivered. In total these sources of land supply are thought to be able to provide for just over 62% of the identified need (18,885 homes), predominantly within the urban areas. The local plan urban capacity figures that are being set out in this document are an estimate based on the best information available at this time. There is also uncertainty about the choices councils will wish to make when the district plans are progressed to a more advanced stage. Therefore it is essential that enough land is allocated on sites of strategic scale to provide flexibility if or when this occurs, ensuring that the overall requirements for the JCS area as a whole are met and the plan is sound.

3.2.9 Recognising that there is insufficient land inside the existing urban boundaries of Gloucester and Cheltenham, together with commitments within Tewkesbury town, to accommodate their housing and employment needs, there was a need to find land for at least 38% of the JCS needs (12,184 homes). Hence, urban extensions to Gloucester and Cheltenham have been identified, together with strategic allocations at Ashchurch (including a major brownfield site), to accommodate the remaining 38% of growth. As concluded by the Sustainability Appraisal, **urban extensions** are considered to be the most sustainable locations for new development (following existing urban areas) as they can share transport, social and service infrastructure with existing urban areas and are located close to essential services. Further information on the approach to the distribution of development is set out in the 'Spatial Options' topic paper (October 2013).

3.2.10 The next step was to consider the potential for urban extensions and strategic allocations across the JCS area. This selection process began with a comprehensive assessment of land surrounding the three main centres. In order to identify and assess the options for development on the edge of urban areas, a study was undertaken - the 'Broad Locations Report'. This helped to identify the broad locations which offered the best scope for additional development set out within the Broad Locations Report (October 2011). This work was further refined through the Strategic Allocations Report (October 2013) which considers the potential for strategic development within and around the periphery of all three centres. These reports draw together the relevant evidence base

produced so far on site specific issues including flooding, biodiversity, green belt, landscape and other constraints. One of the principal environmental constraints across the area is the risk of flooding. This is of paramount importance and locations should only be identified in these locations following a sequential test, and where appropriate an exceptions text, which sets out that there are no other preferable locations.

3.2.11 Following the consultation on the draft JCS in Oct to Dec 2013, the JCS councils have reviewed both the level of development required and the suitability of the strategic allocations. This has resulted in minor changes to site capacities.

3.2.12 The total number of dwellings that could be provided is about 31,070; this is slightly higher than the objectively assessed need of 30,500 which is considered acceptable as this allows some flexibility reflecting guidance set out in NPPF. In addition, the strategic allocation site at Ashchurch is a large site and it is anticipated that not all of the site may be delivered within the plan period to 2031. It is estimated that a further 600 dwellings will be delivered post 2031 and form part of the overall supply. This will be reviewed and should circumstances change will be brought forward before 2031.

3.2.13 The four urban extensions proposed to meet the needs of Gloucester are all located within Tewkesbury Borough. The two urban extensions proposed to meet the needs of Cheltenham fall across the administrative areas of Cheltenham and Tewkesbury.

3.2.14 The three authorities have prepared a detailed housing trajectory setting out when development is likely to take place. This work also includes an assessment of the five year housing land supply position; details of this assessment are set out in the Housing Topic Paper.

3.2.15 It is anticipated that the majority of development on the urban extensions and strategic allocation will be started within the first part of the plan period in order to ensure an on-going supply of housing and employment development to 2031, recognising that there are some outstanding issues which need to be resolved on some sites. These sites will be supported by sustainable transport links and a range of other higher order services and facilities, such as community centres, schools and medical centres etc. Further information is set out in **Policy SA1 and the infrastructure policies of the JCS**.

3.2.16 The JCS area is constrained by green belt land, areas at risk of flooding and the Cotswolds Area of Outstanding Natural Beauty, which is the highest landscape national designation within the JCS area. It is considered that land within the AONB is not an appropriate location for urban extensions and has therefore been excluded from this site selection process. Green belts are not a landscape designation and do not share the same characteristics of AONB designation. The fundamental aim of green belt policy is to prevent urban sprawl by keeping land permanently open.

3.2.17 An assessment of the green belt boundary was undertaken to identify areas which could accommodate development needs without undermining the purpose of the green belt. The assessment suggested redrawing the green belt boundary which would ensure that it would continue to deliver its primary function of preventing Gloucester and Cheltenham as well as Cheltenham and Bishop's Cleeve from coalescing. The JCS green belt assessment (November 2011) is available on the JCS website.

3.2.18 The green belt boundary has been amended, as shown on the green belt map; further detail on green belt policy is set out in **Policy S5**.

3.2.19 Beyond Gloucester and Cheltenham, smaller scale development will be accommodated at Tewkesbury town in accordance with its role as a market town. The starting point for the distribution of development in the rural areas was drawn from the evidence set out within the Rural Area Settlement Audit, updated in 2013. There are two settlements, Bishop's Cleeve and Winchcombe, which offer a higher range of services and facilities within the rural areas; these are defined as rural service centres.

3.2.20 In addition, there are a number of freestanding villages within Tewkesbury Borough which are considered to be suitable locations for some limited residential development. These villages were assessed as having two or more primary services, two or more secondary services and benefiting from bus services and/or road access to a major employment area by the 2013 Rural Area Settlement Audit and updated by further evidence as available. These settlements are defined as **service villages**. The retention of services is intrinsically linked to the size and distribution of the resident population and it is important that these services remain viable. A total of 2,740 homes will be accommodated across the rural area over the plan period to 2031; this development will be concentrated on the service settlements. More development will be accommodated at the rural services centres than at the service villages. Approximately two thirds of the development has already been delivered or committed, but the remainder will be allocated through the Tewkesbury Borough Plan and neighbourhood plans.



**Table SP2a**

| Allocations to meet housing requirements                                     | Net additional dwellings | Ha of employment land                                |
|--|--------------------------|--|
| <b>Total requirement for Gloucester City Council is 11,300 until 2031</b>    |                          |  |
| District capacity *  | 7823                     | To be determined through the Gloucester City Plan    |
| Urban extension capacity   | 2988                     | 26.5 ha  |
| Innsworth  |                          |  |
| North Churchdown   |                          |  |
| South Churchdown   |                          |  |
| Brockworth   |                          |  |
| Total Supply   | 10811                    | 26.5   |
| <b>Total requirement for Cheltenham Borough Council is 9,100 until 2031</b>  |                          |  |
| District capacity *  | 4811                     | To be determined through the Cheltenham Plan         |
| Urban extension capacity   | 5707                     | 23.4 ha  |
| North West Cheltenham  |                          |  |
| South Cheltenham - Leckhampton   |                          |  |
| Total Supply   | 10518                    | 23.4   |
| <b>Total requirement for Tewkesbury Borough Council is 10,100 until 2031</b> |                          |  |
| District capacity *  | 3511                     | To be determined through the Tewkesbury Borough Plan |
| Rural Service Centres and Service Villages                                   | 2740                     |  |
| Former MOD site strategic allocation **                                      | 2125                     | 20 ha (replacement of existing use)                  |
| Ashchurch strategic allocation   |                          | 14.3 ha  |
| Urban extension capacity   | 1364                     |  |
| Innsworth  |                          |  |
| North Churchdown   |                          |  |
| South Churchdown   |                          |  |
| Brockworth   |                          |  |
| North West Cheltenham  |                          |  |
| South Cheltenham - Leckhampton   |                          |  |
| Total Supply   | 9740                     | 34.3   |
| <b>Total requirement for JCS Area is 30,500 until 2031</b>                   |                          |  |
| <b>Total JCS Area</b>  | 31069                    | 64.2 ha (plus 20 ha replaced at Ashchurch)           |

\*District capacity and allocation for rural service centres and service villages is made up of past delivery (from 2011), commitments, windfalls and potential city and borough plan allocations on smaller sites. Capacity identified totals 18,885 (62% of identified requirements)

\*\*Please note: This site is allocated to accommodate higher numbers than shown (details are set out in policy A8). The additional homes are currently expected to be delivered post 2031.

**Table SP2b**

| <b>Sites</b>                       | <b>Gloucester City</b> | <b>Cheltenham Borough</b> | <b>Tewkesbury Borough</b> | <b>Total number of proposed new dwellings</b> |
|------------------------------------|------------------------|---------------------------|---------------------------|---|
| <b>New sites - urban extension</b> |                        |                           |                           |   |
| A1 Innsworth                       | 900                    |                           | 350                       | 1250  |
| A2 North Churchdown                | 383                    |                           | 149                       | 532   |
| A3 South Churchdown                | 625                    |                           | 243                       | 868   |
| A4 North Brockworth                | 1080                   |                           | 420                       | 1500  |
| A5 North West Cheltenham           |                        | 4605                      | 180                       | 4785  |
| A6 South Chelt Leckhampton         |                        | 1102                      | 22                        | 1124  |
| A8 MOD Site at Ashchurch           |                        |                           | 2125                      | 2125  |
| <b>Total</b>                       | <b>2988</b>            | <b>5707</b>               | <b>3489</b>               | <b>12184</b>                                  |

\*The four urban extensions to meet the needs of Gloucester are all located within Tewkesbury Borough. The two urban extensions proposed to meet the needs of Cheltenham, fall across the administrative areas of Cheltenham and Tewkesbury. The share of the urban extension numbers between districts reflects the share of Tewkesbury's population living on the edge of Gloucester and Cheltenham, for Gloucester/Tewkesbury the ration is 72%/28% and for Cheltenham/Tewkesbury the ratio is 94%/6%, this is set out in more detail in the Housing Topic Paper.

\*\*Please note: This site is allocated to accommodate higher numbers than shown details are set out in policy A8). The additional homes are currently expected to be delivered post 2031.

**Table SP.2c: Settlement hierarchy**

| Settlement tier       | Settlements  |
|-----------------------|--|
| Principal urban areas | Cheltenham<br>Gloucester   |
| Market towns          | Tewkesbury   |
| Rural service centres | Bishop's Cleeve<br>Winchcombe  |
| Service villages      | Alderton<br>Coombe Hill<br>Gotherington<br>Highnam<br>Maisemore<br>Minsterworth<br>Norton<br>Shurdington<br>Stoke Orchard<br>Toddington (inc. New Town)<br>Twigworth<br>Twyning (inc. Church End)<br>Woodmancote |

# PART 4 - Sustainable Development Policies

## SD1 - PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

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### Background

4.1.1 The National Planning Policy Framework recognises that sustainable development is about change for the better. It is about positive growth, and making economic, environmental and social progress for this and future generations. To achieve sustainable development, economic, social and environmental gains should be sought jointly.

#### Policy SD1: Presumption in Favour of Sustainable Development

Unless parameters I and II below apply, through their development plans the Joint Core Strategy Authorities will positively seek to meet the objectively assessed development needs of the area incorporating sufficient flexibility to adapt rapidly to change.

Planning applications that accord with this Joint Core Strategy (and with subsequent district plans or neighbourhood plans) will be approved, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the council will grant permission unless material considerations indicate otherwise, and unless:

- I. Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole, or
- II. Specific policies in that framework indicate that development should be restricted.

### Explanation

4.1.2 In line with Government policy advice, the JCS authorities have adopted a positive approach in seeking to meet the objectively assessed development needs of the JCS area. The policies in the JCS provide a clear framework to guide development that creates positive, sustainable growth, therefore following the presumption in favour of sustainable development, enabling proposals that accord with the Plan objectives to be approved without delay. This policy is therefore at the heart of decision taking when assessing planning applications.

4.1.3 In future years, policies may become out of date. To enable the council to continue to take a sustainably positive approach to decision making, applicants for planning permission will need to assist by submitting evidence to demonstrate how the benefits of the proposal outweigh any adverse impacts. In this way economic, social and environmental responsibilities can continue to be met without compromising the ability of future generations to meet their own needs and well-being.

## SD2 - EMPLOYMENT

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### Background

4.2.1 National policy identifies a clear role for the planning system to support sustainable economic growth. In particular, local plans should be proactive in meeting the development needs of business. The three councils are now working with adjoining authorities and local businesses through the Gloucestershire Local Enterprise Partnership (GFirst LEP) to develop and deliver a Growth Plan for Gloucestershire as a whole.

4.2.2 Employment in the NPPF is considered in a wider sense than the traditional industrial, office and warehousing (B1, B2 and B8 uses). For example uses such as retail, hotels, tourism, leisure facilities, education, health services and residential care, (referred to as non B use classes) can also be large employment providers. This policy covers job generating uses such as business, industry and tourism, retailing is covered in Policy SD3. More detailed policies will be included in district plans.

### Policy SD2 - Employment

Employment related development will be supported:

- at Strategic Allocations, in line with policy SA1; or
- for development of new or existing buildings within Cheltenham, Gloucester and Tewkesbury town; or
- in rural service centres and service villages where proposals for small scale employment development will be supported if they are of an appropriate size and scale; or
- in the wider countryside when:
  - located within or adjacent to a settlement and of an appropriate scale and character;
  - employment-generating farm diversification projects, which are of an appropriate scale and use, particularly where they involve the reuse of appropriate redundant, non-residential buildings.

Notwithstanding the above, major office development will be directed to the town centres of Gloucester, Cheltenham and Tewkesbury and strategic allocations in the first instance.

**This policy contributes towards achieving Objectives 1 and 3.**

### Explanation

4.2.3 The JCS area is a strong functional economic area with a resilient economy and a diverse economic base, with excellent connectivity to the Midlands and the South West via the M5 corridor. Key future employment sectors include construction, wholesale, knowledge based industry, advanced engineering, creative industry, recreation, media

activities, finance, professional services, public administration and defence, residential care and social work and health. It is important that the JCS strategy reflects and takes account of these opportunities for business growth.

4.2.4 The Gloucestershire Local Enterprise Partnership (LEP) is developing a Strategic Growth Plan to deliver its vision which will set out how sustainable growth will be achieved across the county and through the economic programme. The LEP has three priorities:

**Promotion:** To promote Gloucestershire as a great place to work, visit and invest.

**Connection:** To develop the infrastructure that will support economic growth.

**Skills:** To create a highly employable and productive population.

4.2.5 This policy aims to support employment development and economic prosperity by taking an economic led urban focused development approach, with the primary aim of attracting investment and development to the main urban areas and the strategic allocations in the plan area. The strategy seeks to deliver strong robust and resilient urban areas which create jobs and wealth. This in turn will support the on-going regeneration programmes of Gloucester and Cheltenham urban areas.

4.2.6 For this reason, we are seeking to promote the centres of Gloucester, Cheltenham and Tewkesbury and the strategic allocations as locations for Major Office Development which will encourage the growth of the economy and provision of high quality employment in sustainable locations. Major office development is defined for the purposes of this policy, in line with the Town and Country Planning (Development Management Procedure) (England) Order 2010, as any application for office uses where the floor space exceeds 1,000 square metres or the site area is 1 hectare or more.

4.2.7 Employment uses, such as retail, leisure facilities, education, health services and residential care (non B uses) are predicted to provide over two thirds of the projected job growth across the area. Whilst these sectors do not usually generate a specific employment land requirement, the mix of future job opportunities generated will be as important as specifically allocating parcels of land for employment provision. Employment forecasts show that the greatest B Class employment growth will be in the office sector (B1a/b Use Class) with a decline in manufacturing and industrial jobs (B2) and with minimal growth in warehousing (B8) sector jobs.

4.2.8 To assess how the need for employment land can be met each council has prepared a Strategic Assessment of Land Availability. Initial assessments suggest that, overall; the JCS already has a good stock of employment land. However, not all existing sites are suitable for meeting modern employment needs and a range of available sites and premises is needed not only to meet the requirements of potential new businesses but also to allow for the expansion of existing firms without the need to relocate. Moreover, because of the constrained supply of employment land in the urban areas, the JCS authorities will wish to evaluate the implications of changes of use. As such policies on the safeguarding of employment sites will be set out in District Plans.

4.2.9 Providing start up space that can be easily accessed by those establishing new businesses is also vital to stimulate innovation and entrepreneurship within the JCS area, developments are especially encouraged which provide a range of types and sizes of units including start-up and flexible workspaces. More information and guidance in this respect will come forward in district plans. Where specialised skills are available, clusters of enterprises can add value to the economy. This spatial strategy can support skills

development by encouraging the provision and expansion of suitable education and training facilities with access in person and by electronic means.

4.2.10 The JCS authorities seek to support economic growth in the JCS' rural areas and take a positive approach encouraging the growth and development of new and existing enterprises.

4.2.11 Employment generating farm diversification projects and the reuse of rural buildings, or the creation of well-designed new buildings, which are of an appropriate scale and use, will be supported wherever they accord with the other policies in the Development Plan.

4.2.12 The availability of advanced ICT infrastructure including high speed broadband access is important for the success of the local economy and skills development. Good transport connections and adequate provision of other infrastructure is also essential to support people in employment.

### **Delivery**

4.2.13 The JCS authorities will work collaboratively with developers, businesses and the LEP to ensure that the needs of employers and the business community are being met.



## SD3 - RETAIL HIERARCHY AND TOWN CENTRES

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### Background

4.3.1 City and town centres are at the heart of our communities, and as such it is critical that we seek to maintain and improve them to ensure their long term role and wider function, promoting their competitiveness whilst ensuring their roles are complementary. Town centres have an important role in providing for a range of different shops, services and facilities that are important to the community, as well as providing an important economic function in terms of employment generation but also as key tourist attractions in their own right.

4.3.2 Due to the recession and recent changes in the behaviour of shoppers, such as the increase in online shopping; the nature of town centres is changing. Hence, it is important that policies are put in place that allows town centres the flexibility to diversify whilst supporting their vitality and viability, but also to promote competitiveness in order to provide individuality, choice and diversity. The NPPF places significant weight on the importance of designated town centres and encourages local planning authorities to put in place appropriate policies that will help to maintain and enhance their vitality and viability. It recognises that successful town centres are about more than shopping and that they need a range of complimentary uses to attract visitors and to prosper.

### Policy SD3 - Retail Hierarchy and Town Centres

The areas' centres as defined below will be supported and strengthened to ensure that they continue to be the focus of communities. Initiatives which safeguard and enhance their role and function will be supported. The hierarchy of centres in the JCS area is:

**Town/city centres**  
Cheltenham and Gloucester

**Market town**  
Tewkesbury

**Rural service centres serving their rural hinterland**  
Winchcombe and Bishop's Cleeve

The exact town centre boundaries and primary and secondary shopping frontages to be protected will be defined in District Plans. The aim in defining boundaries and frontages will be to retain the predominance of town centre uses in general and retail uses in particular.

Over the plan period to 2031 provision will be made for the following new floor space requirements in the existing designated centres:

|                | Convenience goods floorspace capacity (sq.m net) | Comparison goods floorspace capacity (sq.m net) |
|----------------|--|---|
| Cheltenham     | 0  | 69997   |
| Gloucester     | 0  | 41957   |
| Tewkesbury     | 0  | 821   |
| Winchcombe     | 248 sq m   | 445   |
| Bishops Cleeve | 1197 sq m  | 626   |

The allocation of appropriate sites for the above floor space requirements will be set out in the district plans having regard to the key principles set out above.

The following **key principles** will be drawn upon in the determination of relevant planning applications:

1. New residential, retail, leisure, culture, tourism, office development and community facilities that contribute to the vitality and viability of designated centres will be promoted and supported.
2. City/town centre development will be of a scale that is appropriate to its role and function as set out above and will not compromise the health of other centres or sustainable development principles.
3. Proposals for retail and other main town centre uses that are **not located in a designated centre**, or are not in accordance with a policy in either the JCS or district plans, will be robustly assessed against the requirements of the sequential test and impact test, as set out in national planning guidance, or locally defined impact assessment thresholds as appropriate.
4. The provision of new local centres of an appropriate scale to provide for the everyday needs of new communities through the identified Strategic Allocations (see Part 6 of this document) will be permitted.

**This policy contributes towards achieving Objective 2.**

## Justification

4.3.3 In the JCS area there is a range of different centres providing different roles and functions. The two main urban centres are Gloucester City and Cheltenham, which offer the widest range of shopping opportunities and attract people from a significant distance.

4.3.4 Cheltenham town centre is a particularly strong retail centre which supports traditional high street stores alongside independent retailers and high end boutiques and galleries; this forms an important element along with its heritage assets for tourism. As such it performs within the sub-regional context and is second to only Bristol in the south west in terms of shopping choice on offer. It is important therefore that this is recognised, protected and where possible, enhanced. Investment is ongoing, focused on bringing forward improvements to create better linkages between the High Street, Promenade and Lower High Street shopping areas.

4.3.5 Gloucester city centre has a smaller catchment but nevertheless provides for a good range of shops and is performing well for a city of its size, offering a good range of shops services and facilities, along with key heritage assets of national importance such as Gloucester Cathedral, which attracts significant numbers of visitors.

4.3.6 The JCS Retail Study identified several underlying weaknesses in Gloucester that need to be addressed. This includes a lack of significant investment in new retail floorspace over the recent past as well as connections between the centre with the wider footfall generators such as Gloucester Docks/Quays, the Cathedral and the bus/rail interchange. It is important therefore that key city centre regeneration proposals, such as King's Quarter, are protected from inappropriate developments elsewhere and realised in the context of the clear strategy for the city centre in its City Plan.

4.3.7 In addition to Gloucester and Cheltenham, there are other designated centres in the JCS area that provide an important, but more localised function. This includes the market town of Tewkesbury which provides for a more localised catchment for Tewkesbury town and the surrounding rural hinterland. Tewkesbury forms the focus for food shopping in the north of the JCS area, but offers limited comparison good shopping, the focus for this being at the other larger centres.

4.3.8 Below this, the rural service centres of Winchcombe and Bishop's Cleeve which provide for both their residents as well as their rural hinterland as well. Winchcombe and Tewkesbury also function as important tourist destinations.

4.3.9 The policy set out above has been prepared in the context of the NPPF and has been informed by the JCS Retail Study (Phase 1 and Phase 1 Update) prepared by DPDS retail consultants for the JCS authorities. The Retail Study identified floor space requirements for convenience (food) and comparison (clothes, furniture etc) shopping in the existing town centres until 2031. Where the table in the policy shows '0' this is due to existing planning commitments already providing the required floorspace. It also provided an analysis of the health of the different designated centres in the JCS area, with the exception of the smaller local centres, which have been assessed separately. This understanding of the health of the different town centres has helped to inform policy at JCS level and will also form a key part of the evidence in preparing the district plans.

## **Delivery**

4.3.10 This is a strategic level policy that aims to set out broad principles for retail and town centres across the JCS area. There are several key elements that the policy will not do, but which will be addressed through the lower level district plans and/or city/town centre strategies. This includes for example the establishment of detailed city/town centre boundaries, Primary and Secondary Shopping Areas, the allocation of sites to provide for identified need and the identification of locally defined thresholds for impact assessments (as necessary) .

## SD4 - SUSTAINABLE DESIGN AND CONSTRUCTION

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### Background

4.4.1 The built environment plays a key role all aspects of sustainability. It directly affects the quality of life of those who live in, visit and enjoy the JCS area. Development proposals must be designed and constructed in such a way as to maximise the principles of sustainability both as they relate to individual buildings and to the integration of new development into new and existing communities.

4.4.2 Development has a significant and direct impact on the environment, through the use of finite natural resources such as water and minerals, in addition to the generation of carbon emissions and waste. Sustainable design and construction seeks to use these resources efficiently and decrease waste both during the construction, use and decommissioning phases of development schemes. The use of sustainable design and construction techniques can affect how communities grow and serves to foster knowledge and care for the natural environment and resources.

4.4.3 The NPPF identifies a number of ways in which planning authorities can support the move to a low carbon future. These include planning for development which reduces greenhouse gas emissions, actively supporting energy efficiently improvements in existing buildings and ensuring that planning policy is consistent with the Government's zero carbon buildings policy and adopts nationally described standards.

4.4.4 The Government's zero carbon buildings policy requires all new domestic developments to be zero carbon by 2016, and all commercial developments by 2019. The Building Research Establishment Environmental Assessment Method (BREEAM) is the nationally recognised standard for sustainable design and construction.

### Core Policy SD4: Sustainable Design and Construction

Development proposals will demonstrate how they contribute to the aims of sustainability by increasing energy efficiency, minimising waste and avoiding the unnecessary pollution of air, harm to the water environment, and contamination of land or interference in other natural systems. In doing so, proposals (including changes to existing buildings) will be expected to achieve and, where viable, exceed applicable national standards.

All development will be expected to be adaptable to climate change in respect of the design, layout, siting, orientation and function of both buildings and associated external spaces. Proposals must demonstrate that development is designed to use water efficiently, will not adversely affect water quality and will not hinder the ability of a water body to meet the requirements of the Water Framework Directive.

Waste created through the process of construction should be carefully managed and reduced wherever possible. Major planning applications must be accompanied by a waste minimisation statement which demonstrates how the development will seek to minimise waste and sustainably re-use waste materials whenever possible during the lifespan of the development.

To avoid unnecessary sterilisation of identified mineral resources, prior extraction should be undertaken where it is practical, taking into account environmental acceptability and economic viability relating both to extraction of the mineral(s) and subsequent implementation of the non-minerals development of the site.

Major planning applications must be submitted with an Energy Statement that clearly indicates the methods used to calculate predicted annual energy demand and associated annual CO2 emissions.

Where viable, such developments should secure 10% or more of their energy demand from decentralised (on or near site) and renewable or low carbon energy sources (including the use of combined heat and power where appropriate).

**This policy contributes towards achieving Objectives 5 and 6.**

## Explanation

4.4.5 Whilst minimum standards for sustainable construction are delivered through the building control framework and required for all developments, applicants are encouraged to meet higher standards wherever possible, and doing so may increase the sustainability of the proposal as a whole.

4.4.6 Proposals to apply the relevant elements of sustainable construction frameworks such as the 'Code for Sustainable Homes' and BREEAM (Building Research Establishment Environmental Assessment Method) could be used to corroborate higher performance.

4.4.7 Energy efficiency and the use of decentralised and renewable or low carbon energy is only one aspect of sustainable design and construction. It is also important to ensure that high standards of water efficiency are achieved along with other measures such as recycling construction materials, provision for the recycling of household waste, the use of sustainably sourced materials and the protection and enhancement of ecological features on a development site.

4.4.8 Global temperatures are projected to continue rising, bringing changes in weather patterns, rising sea levels and increased frequency and intensity of extreme weather for the UK. (Defra 2010). Therefore, adaptation to reduce the impact of climate change will be necessary, for example through flood mitigation, heat proofing, open space provision, shading, water retention for irrigation, landscaping, and associated measures.

4.4.9 The Gloucestershire Waste Core Strategy was formally adopted in November 2012 and forms part of the statutory Development Plan. It is supported by a Supplementary Planning Document entitled "Waste Minimisation in Development Projects." The approach set out in that document is endorsed by the Joint Core Strategy authorities and will be used in decision taking.

4.4.10 The British Geological Survey mineral resource map for Gloucestershire suggests that sand, gravel and limestone resources are present in the JCS area. To avoid the unnecessary sterilisation of these important mineral resources the Gloucestershire Minerals Local Plan (prepared by the County Council) is required to define Minerals Safeguarding Areas along with appropriate policies for managing development. When designated these will be shown on the JCS proposals map when it is next reviewed. Applicants for non-mineral development that might potentially sterilise such resources will be required to carry out a mineral assessment in consultation with the Mineral Planning Authority. In the interests of sustainable development, where it is environmentally and economically viable, practical and acceptable to do so, provision should be made for prior extraction of the mineral, ideally to be used within the new development.

4.4.11 With regard to localised energy creation, the NPPF states that to help increase renewable and low carbon energy, local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or

low carbon sources. Gloucestershire County Council commissioned a study into renewable energy capacity across the county (Entec 2010).

4.4.12 It showed how various development scenarios could generate fairly high percentages of on-site energy. In most development scenarios a base of 10% was viable and it is this figure that we propose is used across the JCS as a base line.

## **Delivery**

4.4.13 In order to ensure development is adaptable to climate change proposals should have regard to the following non-exhaustive list of requirements:

- Minimisation of flood risk by appropriate siting, drainage, and treatment of surface areas to ensure rain water permeability in compliance with policy INF3;
- Reduction in urban heat island effect through the use of Green Infrastructure elements such as living roofs and walls surfaced with plants or grass, increased tree cover including planting of street trees and use and construction of water flows in compliance with policy INF4; and
- The need to control overheating of buildings through passive design in compliance with policy SD5

Appropriate use of these features can also help to contribute to energy efficiency and CO<sub>2</sub> emission reduction, as well as potentially bringing amenity and biodiversity benefits.

4.4.14 Before considering the use of renewable energy technologies, the design of a development should first identify measures to reduce overall energy demand. This can include choice of building fabric and construction techniques, optimising solar gain, natural lighting and ventilation to reduce the need for space heating, cooling and lighting. Secondly, the design should include measures to use energy more efficiently such as increasing levels of insulation in walls, floors and roofs and improved air tightness. Once the optimum benefit from these first two stages has been achieved, the design should include measures to reach the required proportion of energy demand to be met from renewable or low carbon sources.

4.4.15 Major planning applications are defined for the purposes of this policy as either 10 or more dwellings (or residential development on a site larger than 0.5 hectare), or for any other type of development where the floorspace exceeds 1,000 square metres or site area is 1 hectare or more. In these cases applicants will need to prepare and submit both a Waste Minimisation Statement and Energy Statement (see below) to the local planning authority at the same time as any application.

4.4.16 For calculation purposes, energy demand should be converted to CO<sub>2</sub> emissions. Major planning applications must be submitted with an energy statement that clearly indicates the methods used to calculate predicted annual energy demand and associated annual CO<sub>2</sub> emissions. It should also include the calculations used to determine the renewable energy requirements based on the annual CO<sub>2</sub> emissions.

4.4.17 On occasions where it can be fully and clearly demonstrated that the 10% target is not feasible or viable due to technical or site constraints, we will consider a lower percentage contribution. In such cases, proposals will need to demonstrate the full range of renewable and low carbon technologies that they have considered and the contribution that can be achieved from these towards energy demand.

4.4.18 Delivery of the elements of this policy will come through effective development management practices and may be the subject of more detailed requirements in forthcoming district plans.

## SD5 - DESIGN REQUIREMENTS

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### Background

4.5.1 The NPPF says at paragraph 58 that *'The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.'* It goes on to say that *'Local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area.'*

4.5.2 The principle of requiring new development to provide good design is further reinforced where the NPPF at paragraph 64 says *'Permission should be refused for development that fails to take the opportunities available for improving the character and quality of an area and the way it functions.'*

### Core Policy SD5: Design Requirements

Where appropriate, proposals for development - which may be required to be accompanied by a masterplan and design brief - will need to clearly demonstrate how the following principles have been incorporated:

**e. Context, Character & Sense of Place**

New development should respond positively to, and respect the character of, the site and its surroundings, enhancing local distinctiveness, addressing the urban structure and grain of the locality in terms of street pattern, layout, mass, and form. It should be of a scale, type, density and materials appropriate to the site and its setting. Design should establish a strong sense of place using streetscapes and buildings to create attractive and comfortable places to live and having appropriate regard to the historic environment.

**f. Legibility & Identity**

New development should create clear and logical layouts that create and contribute to a strong and distinctive identity and which are easy to understand and navigate through. This should be achieved through a well-structured and defined public realm, with a clear relationship between uses, buildings, routes and spaces, and through the appropriate use of vistas, landmarks and focal points.

**g. Amenity & Space**

New development should enhance comfort, convenience and enjoyment through assessment of the opportunities for light, privacy and external space, and the avoidance or mitigation of potential disturbances including visual intrusion, noise, smell and pollution.

**h. Public Realm & Landscape**

New development should ensure that the design of landscaped areas, open space and public realm are of high quality, provide a clear structure and constitute an integral and cohesive element within the design.



**i. Safety & Security**

New development should be designed to contribute to safe communities including reducing the risk of fire, conflicts between traffic and cyclists or pedestrians and the likelihood of and fear of crime.

**j. Inclusiveness & Adaptability**

New development should provide for access for all potential users, including people with disabilities, to buildings, spaces and the transport network to ensure the highest standards of inclusive design. Development should also be designed to be adaptable to changing economic, social and environmental requirements.

**k. Movement & Connectivity**

New development should be designed to integrate, where appropriate, with existing development and prioritise movement by sustainable transport modes both through the application of legible connections to the wider movement network and assessment of the hierarchy of transport modes set out in Table S4a below. It should:

- be well integrated with the movement network within and beyond the development itself;
- provide safe and legible connections to the existing walking, cycling and public transport networks;
- ensure accessibility to local services for pedestrians and cyclists and those using public transport;
- ensure links to green infrastructure;
- incorporate, where feasible, facilities for charging plug-in and other ultra-low emission vehicles; and
- be fully consistent with guidance, including that relating to parking provision, set out in the Manual for Gloucestershire Streets and other relevant guidance documents in force at the time.

Detailed requirements of masterplans and design briefs, should the Local Planning Authority consider they are required to accompany proposals, are set out in table S4d. These requirements are not exhaustive.

**This policy contributes towards achieving Objectives 4, 5, 6, 7, 8 and 9.**

## **Explanation**

4.5.3 The quality of our lives is determined in part by the condition of our surrounding environment. Quality of place has an important role in attracting and retaining people, and contributes to the overall quality of life. Urban, architectural and landscape design quality, and the conservation of the historic and natural environment are key elements in creating positive and inspiring places for people. Guidance on some of these elements, together with requirements for design briefs and masterplans prepared by developers is provided in Tables S4b, S4c and S4d below. Prospective developers are advised to have regard to this guidance in meeting the policy requirements set out above.

4.5.4 Good design can make the difference between a high quality and successful development and a mediocre or unsuccessful one. Development at any scale and location should make a positive contribution to providing better places for communities. The quality of the local environment can also play a crucial role in the economic success of an area.

4.5.5 The JCS area encompasses a wide variety of settlement types, whose scale and character varies considerably. Each of these settlements present a distinctive character and identity, with many containing important heritage assets, highly valued green infrastructure and/or built environments that are of considerable quality.

4.5.6 Well-designed buildings and urban spaces help create a sense of place and identity and contribute to civic pride. The consideration of local distinctiveness through high quality design is essential within the design process and can be achieved by either adding to what is locally distinctive or creating a new sense of place, where this is appropriate.

4.5.7 Design plays an important role in shaping a healthy and safe environment and can contribute to healthy and active lifestyles. This is not only through the construction of high quality buildings and public realm but also through the provision of open spaces and other ‘soft’ or ‘green’ infrastructure.

4.5.8 Good design also has a fundamental role in providing safe and secure living environments. This encompasses reducing fear of crime, providing functional solutions to improve security and reducing the risk of fire. Reference to the principles of Secured by Design and other extant relevant guidance will help in providing safe and secure living environments.

4.5.8 To promote healthier lifestyles, assist in climate change mitigation, minimise the volume of car-based travel on the existing highway network and enhance the offer of the wider transport network new developments in or adjacent to urban areas should be designed to promote the use of alternatives to the car. Where infrastructure to enable alternatives does not exist, consideration should be given to its provision where feasible and financially viable.

4.5.9 Table S4a is an assessment hierarchy and is not a hierarchy of provision. The aim, through its application, is to help deliver decisions about development design that seek as a matter of course to reduce CO<sub>2</sub> emissions and promote healthier lifestyles through encouraging walking, cycling and public transport use where possible.

**Table SD5a**

| Hierarchy of Transport Modes |   |
|------------------------------|---|
| Highest                      | <ol style="list-style-type: none"> <li>1. Pedestrians and people with mobility difficulties</li> <li>2. Cyclists</li> <li>3. Public transport and social/ community services</li> <li>4. Access by commercial vehicles</li> <li>5. Ultra-low emission vehicles</li> </ol> |
| Lowest                       | <ol style="list-style-type: none"> <li>6. Other motorised vehicles</li> </ol>   |

Table SD5b

### Principles of Urban Design

#### **Character:**

- create or reinforce a sense of place with its own distinctive identity
- reflect existing topography, landscape and ecology
- utilise a hierarchy of building form and design to reflect the use and importance of buildings
- create focal points and places
- create areas of hard and soft landscaping

#### **Continuity and enclosure:**

- use buildings and trees to define space
- distinguish clearly between public and private spaces, providing continuous building frontages between them where possible

#### **Quality of the public realm:**

- create attractive spaces which provide a variety of interest and experience
- produce comfortable local microclimates
- provide overlooking of streets and spaces, especially main elevations
- design lighting and landscaping to reduce opportunities for crime
- enrich space with well-designed details (e.g. paving, public art, lighting, signs, seats, railings, and other street furniture)
- avoid visual clutter and confusion, especially from signs and advertisements
- design areas for ease of maintenance, particularly in regard to litter collection, mechanical sweeping and the maintenance of planted areas

#### **Ease of movement:**

- promote accessibility to and within an area, particularly on foot, bicycle, and for people with limited mobility
- increase permeability by avoiding culs-de-sac and connecting adjacent streets

#### **Legibility:**

- develop a clear, easily understood image of an area
- retain and create views of existing and new landmarks, skylines and other focal points
- provide recognisable and memorable features, especially at key locations

#### **Durability:**

- create spaces that can adapt easily to changes in need and use
- provide environments which are suitable for their use
- use quality materials

#### **Diversity:**

- where appropriate within buildings, streets or areas, consider a mix of building forms, uses and tenures

Table SD5c

| <b>Principles of Architectural Design</b>   |
|---|
| <p>The architectural design of new buildings and alteration of existing buildings should demonstrate a creative response to a specific site and locality. Particular attention should be paid to:</p>   |
| <p><b>Function</b></p> <ul style="list-style-type: none"><li>• fitness for purpose</li></ul>  |
| <p><b>Character</b></p> <ul style="list-style-type: none"><li>• historical context</li><li>• distinctive features of the locality (such as spatial quality, rhythms, density, scale, style and materials)</li></ul>   |
| <p><b>Layout</b></p> <ul style="list-style-type: none"><li>• the urban grain (the pattern and density of routes, street blocks, plots, spaces and buildings of a locality) and topography of an area</li><li>• the efficient use of land</li></ul>  |
| <p><b>Scale</b></p> <ul style="list-style-type: none"><li>• the size of the building, its elements and its details in relation to its surroundings and the human form</li><li>• massing (the arrangement, volume and shape of a building)</li><li>• height (its effect on shading, views, skylines and street proportion)</li></ul> |
| <p><b>Appearance</b></p> <ul style="list-style-type: none"><li>• materials (high quality and suited to their location and purpose)</li><li>• detailing</li></ul>  |
| <p><b>Landscape</b></p> <ul style="list-style-type: none"><li>• the integration of buildings and landscape.</li></ul>   |

Table SD5d

**Masterplans and Design Briefs to be provided to support planning applications will encompass:**

**(i) A vision which should:**

- Exhibit a high level of ambition and design quality for the creation of tomorrow's places which could be created building on the overall vision for the district and town.
- Show how the vision is guided by achieving a distinctive identity and a strong sense of place that is derived from an understanding of the characteristics of the site, its history and its geography. This will be essential to ensuring the delivery of a place which demonstrates an enduring quality.

**(ii) A masterplan which should:**

- Demonstrate a robust design process including an in-depth assessment of the site and its context, constraints and identifying those issues that have informed the vision for and design of the development.
- Show how consultation with the existing community has been incorporated.
- Show that the design requirements of the scheme work within the vision, and clearly demonstrate how the vision may be achieved.
- Define and respond to local context and create or reinforce local distinctiveness.
- Show a clear development structure and design concept.
- Explain the key elements and development principles of the masterplan to create a simple, robust and structuring framework for development that fixes: land use and density, movement and connectivity and open space and landscape.
- Set out the extent to which it is attempting to impose uniformity across the development areas.
- Contain strategic urban design principles that will be used to inform subsequent more detailed design.
- Adequately set out the design quality standards for architecture, public realm and landscape.
- Contain a mechanism for delivering the vision at more detailed stages, for example design coding.

**(iii) A design brief which should demonstrate:**

- Good levels of integration with the surrounding area both built and natural, in particular maximising existing and potential movement connections with the existing environment to encourage walking, cycling and use of public transport.
- A quality of development that creates a positive sense of place and identity

through the application of high quality urban, architectural and landscape design.

- High level of accessibility and good connections to public transport, community facilities and local services.
- Community facilities, suitable infrastructure and other amenities to meet the needs of all the community, including the provision of education and training facilities, health care, community, leisure and recreation facilities.
- A clear structure of open spaces and landscape network to ensure that open space standards are met and that the new spaces relate well to each other and to existing areas.
- How sustainability matters addressed by other policies of the development plan (including the NPPF) such as those relating to biodiversity, climate change, flooding, historic environment, waste and pollution, safety, green space, and culture and tourism have been taken into account including the efficient use of resources both during construction and when the development is complete.

## **Delivery**

4.5.10 This policy will primarily be delivered through the development management process. Where appropriate, design review panels may be used.

## SD6 - GREEN BELT

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### Background

4.6.1 Green belt is a policy designation which keeps land permanently open to prevent urban sprawl. The green belt in the JCS area seeks to prevent the coalescence of Cheltenham and Gloucester, and Cheltenham and Bishop's Cleeve. The green belt serves five purposes:

- To check the unrestricted sprawl of large built-up areas.
- To prevent neighbouring towns 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 and other urban land.

4.6.2 The JCS authorities commissioned AMEC to carry out a Green Belt Assessment in 2011 which is available to view as part of the JCS evidence base. This work represents the most up to date evidence on this topic and provides an independent evaluation of the wider Green Belt within the JCS area. It is a comprehensive assessment which considers how strategic segments of the Green Belt perform against the purposes of including land within Green Belt.

4.6.3 Throughout the development of the JCS, we have consulted on the spatial strategy for the Plan. The history of the consultations on this issue is included in the JCS Spatial Options Topic Paper 2013 which is available to view as part of the JCS evidence base. The principle of urban extensions to Cheltenham and Gloucester has consistently been deemed the most sustainable throughout the history of this work, and no other option has gained significant support during consultation. When alternative options such as limiting future growth to the existing urban areas or significant rural redistribution have been tested through Sustainability Appraisal they have performed poorly. Further information on the consultation and sustainability testing of alternative spatial strategies can be found in the JCS Spatial Options Topic Paper.

4.6.4 In order for Cheltenham and Gloucester to grow, both in population and economically, land must be made available for sustainable urban extensions. To fail to do so would significantly limit future opportunities for new homes and jobs. Given that development of strategic scale would normally be unsuitable because of the landscape designation status of the AONB and in areas of heightened flood risk in accordance with the NPPF, the Green Belt is the only available reasonable option for urban extensions in most cases within the JCS area. It is for these reasons the Councils considered a Green Belt review was appropriate.

4.6.5 An alternative approach to interpreting and working with the 2011 JCS Green Belt review, and the one which has been taken forward, is to consider the detail sitting behind the AMEC assessment of each individual segment of land assessed. The AMEC report provides a useful matrix of Green Belt assessment results which individually assesses the contribution each segment makes to:

1. Checking the unrestricted sprawl of large built up areas
2. Preventing nearby towns from merging into one another
3. Assisting in safeguarding the countryside from encroachment
4. Preserving the setting and special character of historic towns

4.6.6 Those parts of the Green Belt which make a significant contribution in all 4 categories have not been taken forward as having potential for strategic allocation. This provides a simplistic, but consistent approach, to the consideration of Green Belt in the assessment of potential strategic allocations and therefore necessary alterations to the Green Belt to allow for sustainable development. More information on how the independent Green Belt assessment was used to identify locations for strategic allocations is available to view as part of the JCS evidence base in the 2013 Strategic Allocations Report.

### Policy SD6: Green Belt

To ensure the green belt continues to serve its key functions, it will be protected from harmful development. Within its boundaries, development will be restricted to those limited types of development which are deemed appropriate by the NPPF unless very special circumstances can be demonstrated.

The boundaries of the reviewed Green Belt are identified on the Green Belt map.

Gloucestershire Airport, Cheltenham Racecourse and the waste management sites allocated in the Gloucestershire Waste Core Strategy are designated as developed sites within the Green Belt that are acknowledged as having wider benefits where the co-location of facilities can be determined as essential to their use. Notwithstanding this, further development in any of these locations will need to meet the requirements of Green Belt policy in the NPPF, the requirements of this Plan, requirements set out in County, District or Neighbourhood Plans and not compromise the openness of the Green Belt or increase the risk of urban sprawl.

#### Gloucestershire Airport

Gloucestershire Airport is defined, as shown on the Inset Map 1.

In the functional area of the airport, new structures, buildings or extensions to buildings will only be permitted if they are essential to the operation of the airport and require an airport location.

Elsewhere within the airport, in the non-functional area, business uses which support the airport will be permitted.



### Cheltenham Racecourse

At Cheltenham Racecourse as shown on the Inset Map 2, development, including extensions, will only be permitted where:

- The development is principally related to the business of the racecourse.
- The development does not extend beyond the confines of the 'racecourse policy area' (as shown on Inset Map 2).

### Waste Management Sites

The Gloucestershire Waste Core Strategy allocates sites for waste management facilities within the Green Belt. When determining planning applications, any specific need for waste treatment in a particular location, for example the co-location of related waste facilities, along with proximity to the main sources of arising and the wider environmental benefits of a proposal should be assessed as material factors in decision taking.

### Safeguarded Areas

An area of land West of Cheltenham, as shown on Inset Map 4, will be safeguarded for longer term development needs. A large area of this safeguarded land is also designated as a Development Exclusion Zone, where development which is likely to be significantly affected by odours will not be permitted.

An area of land at North West Cheltenham, as shown on Strategic Allocation Plan 5, will be safeguarded for longer term development needs.

Safeguarded areas are not allocated for development at the present time. Planning permission for the permanent development of safeguarded land (except for uses that would not be deemed inappropriate within the green belt) will only be granted if a future review of the Core Strategy deems the release of this land necessary and appropriate and proposes the development.

Should any land be released in the safeguarded area, development proposals will be assessed against the following criteria:

- Be well integrated and planned as part of an urban extension of strategic scale, directly and substantially linked to the urban area of Cheltenham.
- Be well related to public transport and other existing and planned infrastructure and where it makes a positive contribution to the setting of Cheltenham.
- Not lead to a piecemeal, isolated or inefficient use of land in this area.

**This policy contributes towards achieving Objective 4.**

## Explanation

4.6.7 The NPPF allows the review of Green Belt boundaries in exceptional circumstances and as part of the Core Strategy. Part of these requirements are that local planning authorities take account of the need to promote sustainable patterns of development, not include land which it is unnecessary to keep permanently open, be satisfied that Green Belt boundaries will not need to be altered at the end of the development plan period, and identify areas of 'safeguarded land' between the urban area and the Green Belt for development beyond the plan period.

4.6.8 The justification for amending the green belt boundary to meet objectively identified housing and employment needs and the process that was followed to reach these decisions are set out in Policy SP2 and its supporting text. Where green belt boundaries have been altered, the emphasis has been on identifying a firm boundary, such as a road, building line or watercourse in accordance with the NPPF. These boundaries have been clearly defined using physical features that are readily recognisable and likely to be permanent.

4.6.9 The new boundaries identified on the green belt map have also taken into account longer term need by identifying safeguarded land which may be required beyond this plan period to ensure that the green belt does not need an early review. The safeguarded areas for future growth have been located in an area where the threat of coalescence between Gloucester and Cheltenham, and Cheltenham and Bishop's Cleeve is reduced, and where new development can be fully integrated into the existing urban form.

### Developed sites within the Greenbelt

4.6.10 Gloucestershire Airport is an appropriate use within the green belt and is regarded as a key regional asset and as such the policy seeks to support this role. Because of the airport's location in the green belt, new development will need to be principally airport related, although this would not necessarily preclude its use for other activities where these are appropriate green belt uses. Within the functional airport area only essential airport operational structures are to be located in order to retain the openness of the green belt. An airport related use is one for which an airport location is essential for its operation, for example, terminal buildings, hangars, other essential storage buildings, control towers, areas for handling air freight and parking facilities associated with the airport.

4.6.11 Cheltenham Racecourse is an appropriate use within the green belt and Prestbury Park Racecourse is the principal venue in the country for National Hunt Racing. The racecourse management continually strives to improve facilities for race-goers, often through redevelopment or the construction of new buildings. Proposals of this nature will need to be assessed in relation to the national significance of the venue as well as green belt policy. In order to assess the impact on the surrounding area of open air activities or other forms of recreation or gathering, Cheltenham Borough Council may wish to grant temporary permissions in the first instance.

4.6.12 Because of the racecourse's location in the green belt, new development will need to be well related to the business of the racecourse, although this would not necessarily preclude its use for other activities where these are appropriate green belt uses; particularly buildings related to hosting events or conferences which do not detract from or limit the current use or future growth of the area for horse racing.

4.6.13 The Cheltenham racecourse policy area has been slightly amended from that shown in the 2006 Cheltenham Plan to allow for further growth of facilities required for the business of the racecourse.

4.6.14 Three waste management facilities identified in the Gloucestershire Waste Core Strategy (2012) are within the green belt. When determining planning applications, any specific locational need for waste treatment in a particular location as well as the wider environmental benefits of a proposal should be assessed as a material factor in decision taking. Despite this, considerable weight should be attached to the value of the Green Belt designation as set out in NPPF and in this Plan.

### **Other amendments to the Green Belt boundary**

#### Shurdington

4.6.15 Amendments have been made to the green belt boundary at Shurdington, shown on Inset Map 3, to allow for limited development and to provide a more appropriate boundary.

4.6.16 The amendments to the boundary at Shurdington include the existing playing field to the north of the settlement and also land and existing built development to the south of the settlement. These amendments seek to provide a more appropriate green belt boundary and also to allow for limited development to take place.

#### South West Cheltenham

4.6.17 A small change has been made to the green belt boundary at the South West of Cheltenham (known as the former M&G site) to provide a more appropriate boundary after an implemented permission.

#### North Gloucester

4.6.18 The green belt boundary around North Gloucester has been redrawn to accommodate the strategic allocations and to provide a more appropriate boundary.

### **Safeguarded land**

4.6.19 The new boundaries identified on the green belt map have also taken into account longer term need by identifying safeguarded land which may be required beyond this plan period to ensure that the green belt does not need an early review. The safeguarded areas for future growth have been located in an area where the threat of coalescence between Gloucester and Cheltenham, and Cheltenham and Bishop's Cleeve is reduced, and where new development can be fully integrated into the existing urban form.

4.6.20 Safeguarded areas are not allocated for development at the present time. Planning permission for the permanent development of safeguarded land will only be granted following a Core Strategy review except for uses that would not be deemed inappropriate within the green belt.

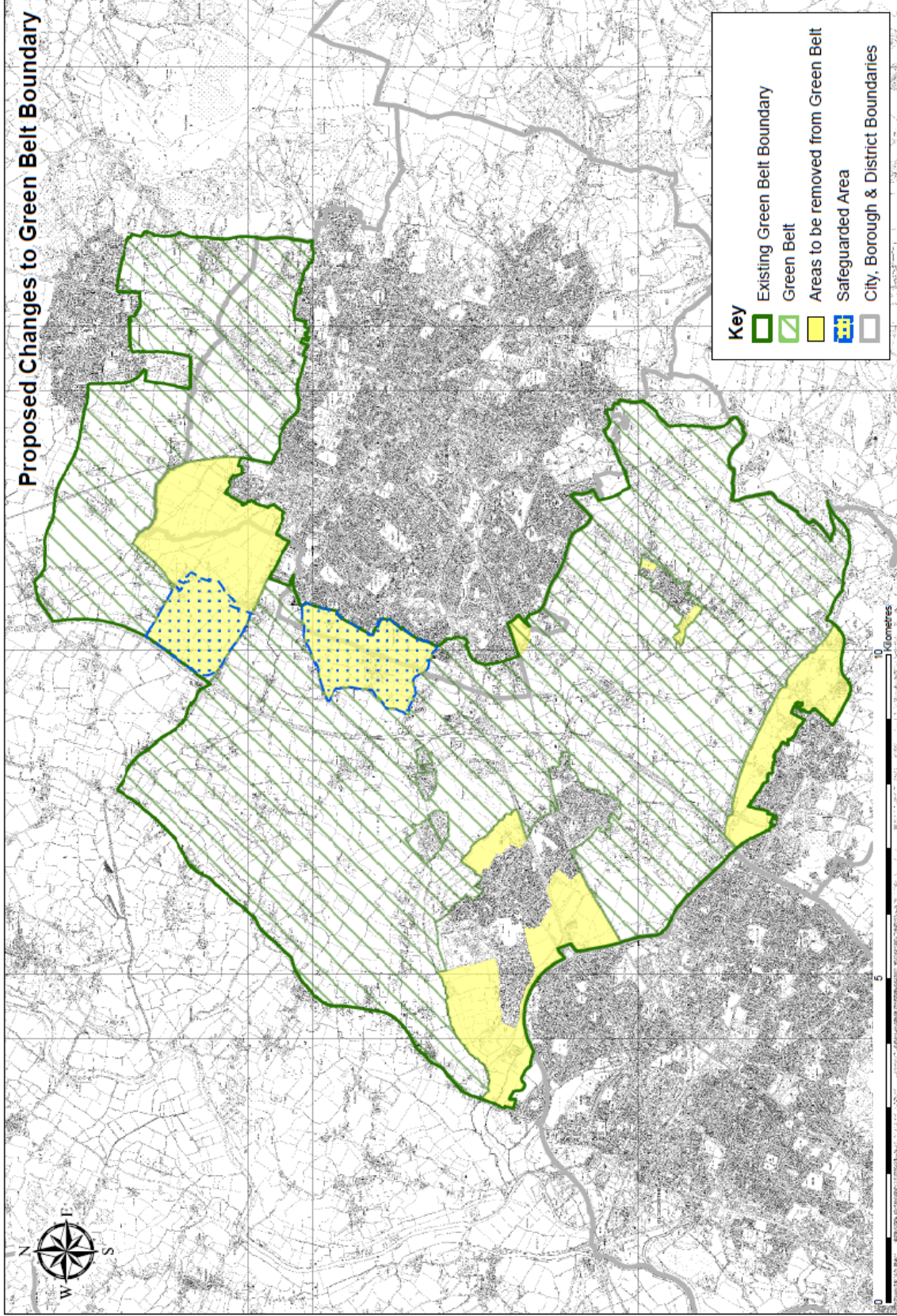
4.6.21 A significant constraint on the safeguarded land at West Cheltenham is the operation of Hayden Sewage Treatment Works, which is a long established site with an area of around 22 hectares. The Sewage Treatment Works emits odour which has the potential to seriously affect any developments that occur nearby. Recent works to upgrade the Treatment Works means that there is potential that the Development Exclusion Zone around the works which is currently identified in the 2006 Cheltenham Borough Local Plan could be reduced in size, however this work is on-going and no results have yet been released.

4.6.22 On review of the Core Strategy, some or all of the land at this location may be genuinely capable of development when needed, particularly if the relocation of Hayden Sewage Treatment Works can be facilitated through redevelopment of the area.

### **Delivery**

4.6.23 Delivery of this policy will be furthered by Development Management and Enforcement procedures to ensure the on-going protection of the green belt from inappropriate development.

Proposed Changes to Green Belt Boundary

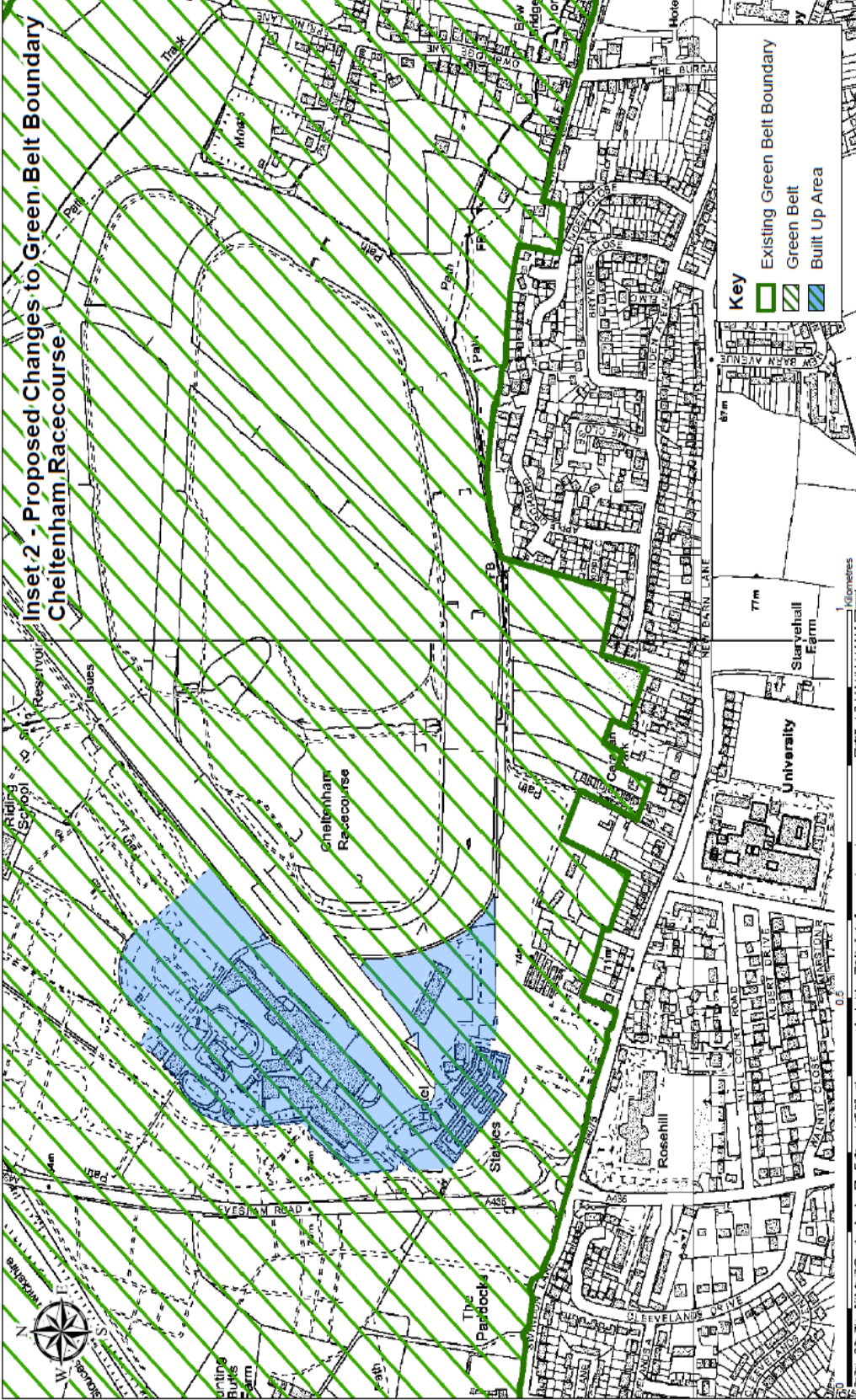


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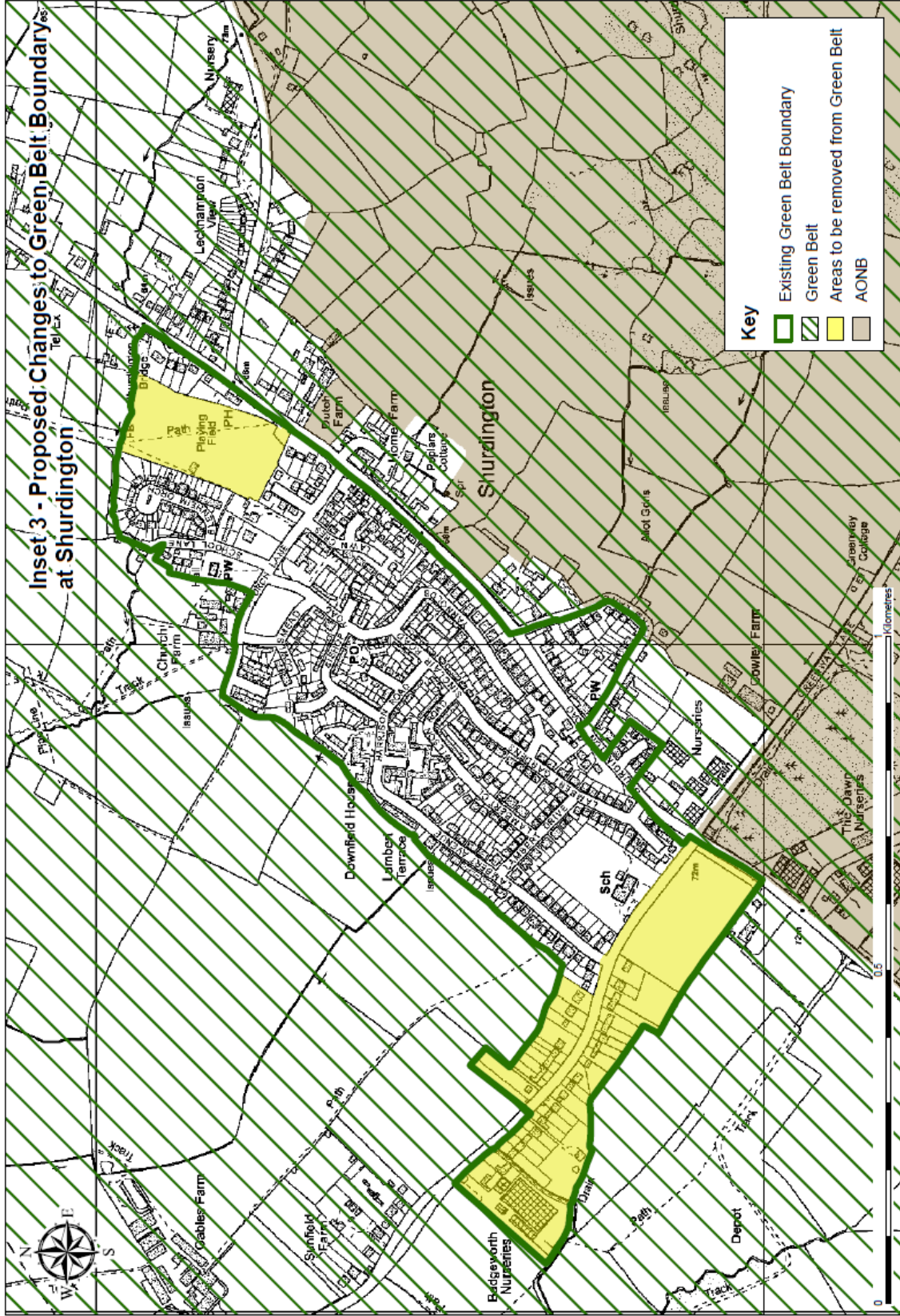




The key and title of this map are incorrect. No changes have been made to the green belt in this area from that shown in the 2006 Cheltenham Borough Local Plan. The area in blue titled "built up area" is mistitled in the key – this area is within the Green Belt and shows the revised "racecourse policy area".

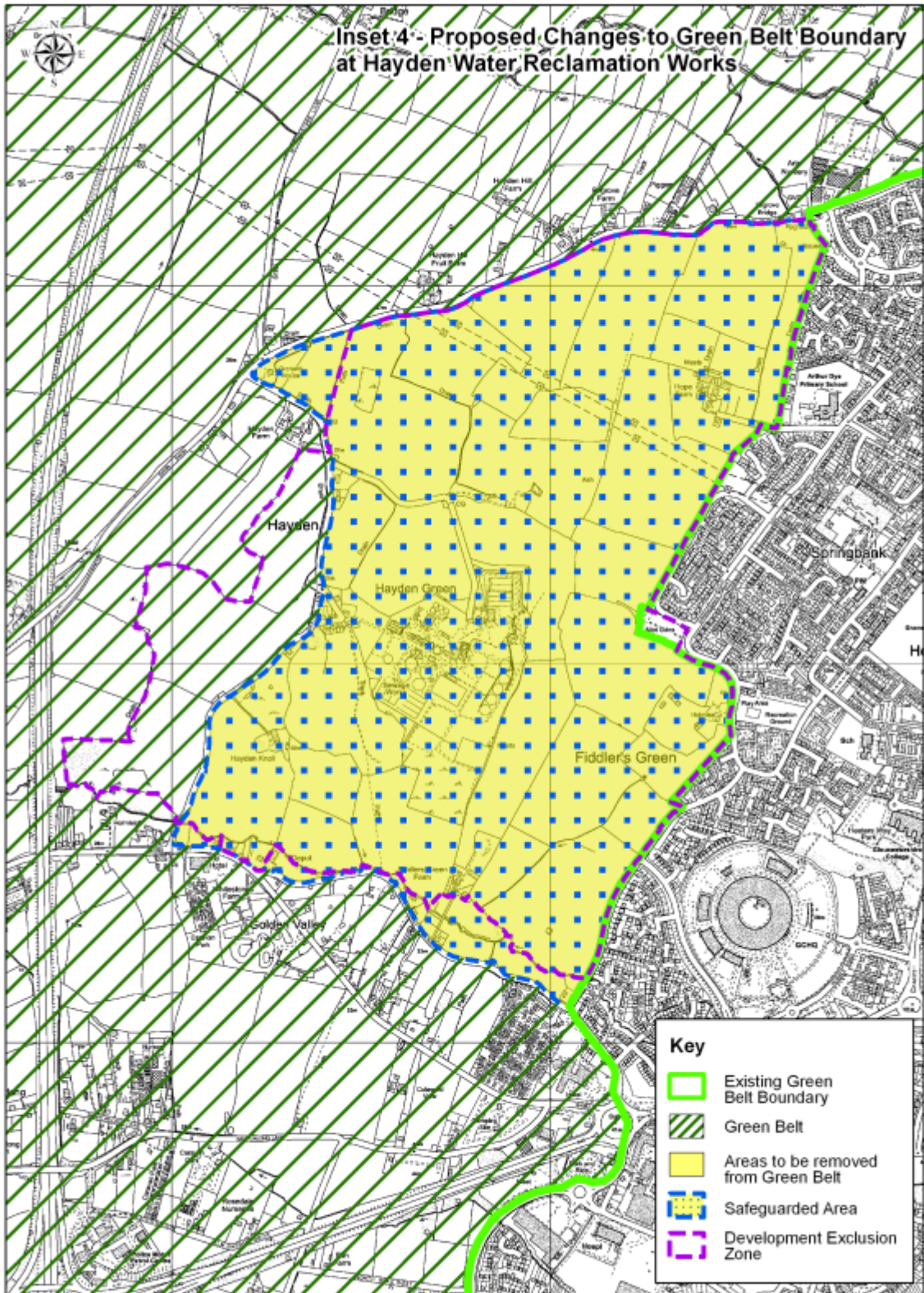






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## SD7 - LANDSCAPE

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### Background

4.7.1 The JCS area contains a wide variety of landscapes, ranging from the Cotswolds Area of Outstanding Natural Beauty (AONB) in the east to the River Severn and its floodplain in the west. The different landscapes have been characterised by landscape assessment work, which forms a baseline against which change can be measured. Landscape character is defined as the distinct and recognisable pattern of elements that occur consistently in a particular type of landscape. It is based on the combination and relationships between the physical features of the landscape such as landform, geology, soils, ecology and vegetation, land use and human settlement. It creates the particular sense of place of different areas of the landscape.

4.7.2 The landscape of the JCS area provides the setting for its towns and villages. Landscape character is a key component of an area's identity and development will be required to respect it. Landscape proposals for new development should be appropriate to the landscape character of the locality and contribute to local distinctiveness.

### Policy SD7: Landscape

Development will seek to protect landscape character for its own intrinsic beauty and for its benefit to economic, environmental and social well-being.

Proposals will have regard to the local distinctiveness and historic character of the different landscapes in the JCS area drawing, as appropriate, upon existing Landscape Character Assessments and the Landscape Character and Sensitivity Analysis. They will be required to demonstrate how the development will protect or enhance landscape character and avoid detrimental effects on types, patterns and features which make a significant contribution to the character, history and setting of a settlement or area.

All applications for development will consider the landscape and visual sensitivity of the area in which they are to be located or which they may affect. Planning applications will be supported by a Landscape and Visual Impact Assessment, where, at the discretion of the local planning authority, one is required. Proposals for appropriate mitigation and enhancement measures should also accompany applications.

**This policy contributes towards achieving Objective 4.**

### Explanation

4.7.3 Landscape character is a key component of the European Landscape Convention (Council of Europe), which seeks to protect, manage and create landscapes, and is based on the premise that all landscapes are important. A key component in implementing the convention is the National Character Areas map of England, which sets out landscape character on a broad scale, with the principal areas in the JCS area being the Severn and Avon Vale (NCA106) and the Cotswolds (NCA107). National Character Area Profiles have been prepared by Natural England for both these areas and identify key features and enhancement opportunities. The importance of landscape protection - both at national

and local level - is reflected in the National Planning Policy Framework where, together with protection of nationally designated landscape areas, government requires the planning system to protect and enhance within the local environment “valued landscapes, geological conservation interests and soils” (paragraph 109).

4.7.4 The relevant Landscape Character Assessments (LCAs) for the JCA area are those for the Cotswolds AONB and for Gloucestershire as a whole. The Gloucestershire LCA divides the county into landscape character areas and identifies a number of different landscape types and the key issues for their conservation and enhancement. The findings of the LCA are a key factor to be considered in the design of developments and in assessing their impacts.

4.7.5 In the urban fringe areas a Landscape Characterisation and Sensitivity Analysis (LCSA) has been undertaken. This identifies in more detail the landscape character and sensitivity of potential development sites around Gloucester, Cheltenham and Tewkesbury. It should be used to assess the impact of developments in the urban fringe areas. The analysis grades sensitivity in five categories from low to high with high-medium and high categories being particularly sensitive to development.

4.7.6 In areas outside the area covered by the LCSA the Local Planning Authority will advise whether an assessment should be included with an application for development to demonstrate that sensitivity has been taken into account.

4.7.7 It is important that landscape character is assessed in process terms separately from visual impact in evaluating the potential impact of development. These two elements, when considered together, enable an assessment to be made of the sensitivity of different landscapes to change.

#### **Delivery**

4.7.8 This policy will primarily be delivered through the development management process and via implementation of other policies within the plan, such as policy SD5.

## SD8 - COTSWOLD AREA OF OUTSTANDING NATURAL BEAUTY

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### Background

4.8.1 The Cotswolds Area of Outstanding Natural Beauty (AONB) is the largest AONB in the country. Its management is co-ordinated through the Cotswolds Conservation Board. NPPF section 116 confers on AONBs protection from major development, making clear that permission should only be granted in exceptional circumstances and where it can be demonstrated to be in the public interest. For the purposes of policy SD8 whether or not a proposal constitutes major development will be considered as set out at paragraph x.xx below. Detailed policies for the management of development in or affecting the AONB will be set out in relevant District Plans.

#### Policy SD8: Cotswolds Area of Outstanding Natural Beauty (AONB)

All development proposals in or adjacent to the Cotswolds AONB will be required to conserve and, where appropriate, enhance its landscape, scenic beauty, wildlife, cultural heritage and other special qualities. Proposals will be required to be consistent with the policies set out in the Cotswolds AONB Management Plan.

**This policy contributes towards achieving Objective 4.**

### Explanation

4.8.2 The Cotswolds Area of Outstanding Natural Beauty (AONB) is nationally designated for its landscape importance. Each local authority has a statutory duty under the Countryside and Rights of Way Act 2000 (Section 85) to *'have regard to the purpose of conserving and enhancing the natural beauty of the AONB'*. In fulfilling this duty Cheltenham and Tewkesbury Borough councils will continue to work in conjunction with the Cotswolds Conservation Board. The board has prepared the Cotswolds AONB Management Plan 2013-2018 to guide its management and this has been endorsed as policy by the local authorities. The Management Plan is supported by more detailed guidance on a range of topics including a landscape strategy and associated guidance underpinned by the Cotswolds AONB Landscape Character Assessment. The plan and guidance are material considerations in determining planning applications in or affecting the AONB.

4.8.3 Development close to, but outside, the AONB boundary has the potential to have a detrimental impact on its setting through, for example, its impact upon key views or its impact upon landscape character in and around the AONB boundary. Proposals likely to affect the setting of the AONB must fully consider any potential impacts.

4.8.4 Major development can be defined in quantitative terms - a threshold number of dwellings, for example. However, it follows from appreciation of the JCS area's varied natural form that consideration of what constitutes "major" development is both a matter of context and a matter of fact and degree: what is deemed to be "major" in one area may not be deemed to be so in another. The sensitivity of the Cotswolds Area of Outstanding Natural Beauty and its setting is a good example. The JCS therefore does not provide a quantitative definition of "major development" here as this would be misleading and inflexible within the context of a policy largely concerned with qualitative issues.

Where policy SD8 is invoked, it will therefore be a matter for the determining authority to advise applicants as to whether or not their proposal constitutes major development.

## **Delivery**

4.8.5 This policy will primarily be delivered through the development management process.



## SD9 - HISTORIC ENVIRONMENT

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### Background

4.9.1 The JCS and district plans will together provide a framework of policies for securing the conservation, enhancement, improvement and enjoyment of the historic environment. These policies will be supported where appropriate by local strategies, partnership projects and urban regeneration initiatives including local transport improvement schemes.

4.9.2 The historic environment provides a tangible link with our past and is worth preserving for its own sake and for future generations. It forms a central part of our cultural heritage and contributes to our sense of community identity. It also provides the character and distinctiveness that is so important to a positive sense of place.

4.9.3 The JCS area has a rich and diverse historic environment which is evident in the survival of individual historic assets including some 4,888 listed buildings, 35 conservation areas, 88 scheduled ancient monuments and other sites of historic interest such as battlefields, parks, gardens, landscapes and archaeological sites. These include important historical features such as Gloucester's Roman remains, cathedral, canal corridor and docks; the Regency architecture and town planning of Cheltenham; and Tewkesbury's historic core, waterways, medieval abbey, Wars of the Roses Battlefield, market towns and villages with mediaeval origins, wider rural landscapes and agricultural heritage. The architecture of all three districts has also been influenced by the availability of Cotswold building stone.

4.9.4 New forms of development can enhance or erode the appearance, character and distinctiveness of our historic environment. A key challenge for the future is therefore to manage change in a way that realises the regeneration potential of the area while protecting and capitalising on its unique heritage.

### Policy SD9 - Historic Environment

The built, natural and cultural heritage of Gloucester City, Cheltenham town, Tewkesbury town, smaller historic settlements and the wider countryside will continue to be valued and promoted for their important contribution to local identity, quality of life and the economy.

Development should make a positive contribution to local character and distinctiveness, having regard to valued and distinctive elements of the historic environment.

Designated and undesignated heritage assets, and their settings, will be conserved and enhanced as appropriate to their significance and for their important contribution to local character, distinctiveness and sense of place. Consideration will also be given to the contribution made by heritage assets to supporting sustainable communities and the local economy. Development should aim to sustain and enhance the significance of heritage assets and put them to viable uses consistent with their conservation whilst improving accessibility where appropriate.

Proposals that will secure the future conservation and maintenance of heritage assets and their settings that are at risk through neglect, decay or other threats will be encouraged. Proposals that will bring vacant or derelict heritage assets back into appropriate use will also be encouraged.

Development proposals at strategic allocations must have regard to the findings and recommendations of the JCS Historic Environment Assessment (or any subsequent revision).

**This policy contributes towards achieving Objectives 1, 2, 4 and 5.**

## Explanation

4.9.5 The three districts in the JCS area individually enjoy and collectively share elements of an historic and cultural identity and a strong sense of place. Distinctive elements of the historic environment include, but are not limited to:

- a) Historic cores and their settings within the main urban areas;
- b) Historic suburbs and their settings within the main urban areas;
- c) Smaller historic settlements and their settings both within Tewkesbury Borough and on the edges of Gloucester and Cheltenham (including former villages);
- d) Areas of Victorian and Edwardian development which survive with a high degree of integrity including terraced housing and its associated amenities;
- e) Areas of extensive suburban development which date from before the Second World War, including public housing and private developments of semi-detached and detached housing;
- f) Public open spaces, including Victorian and Edwardian municipal parks and gardens and cemeteries;
- g) Private open spaces including those associated with ecclesiastical, educational, canal or dockside or riverside uses;
- h) The Gloucester and Sharpness Canal and its associated infrastructure of dockland ancillary buildings and structures;
- i) Buildings, structures and archaeological remains of traditional countryside skills, traditional manufacturing, traditional transportation, and associated practices; and
- j) Archaeological evidence of the development of the JCS area, including its urban and rural settlements, individual archaeological sites and structures, the wider historic landscape, and those currently unidentified heritage assets that may be discovered in the future;
- k) The vernacular architecture of the Cotswolds and the Severn valley.

4.9.6 New development should complement and relate to its surroundings, not only in terms of its appearance but also in the way that it functions. This will require developers to consider the relationships between buildings, relationships of buildings to their settings, relationships with adjacent land uses and the wider landscape, all of which contribute to local character and distinctiveness.

4.9.7 Heritage assets are a major factor in defining local character and distinctiveness. They also contribute to the success of the local economy by generating inward investment and tourism, which in turn helps to secure the long term future of our heritage.



Designated heritage assets include world heritage sites, scheduled monuments, listed buildings, protected wreck sites, registered parks and gardens, registered battlefields, and conservation areas designated under the relevant legislation. Undesignated heritage assets include archaeological sites, historic designated landscapes, historic buildings and other structures including local listing.

4.9.8 The JCS authorities and their partners, including the County Council and English Heritage, maintain an evidence base relating to the historic environment. This is an important source of information for developers. It also informs local strategies, initiatives and partnership projects associated with the conservation and enhancement of the historic environment, regeneration and place shaping, as well as the development management process. The evidence base includes Historic Environment Records maintained by Gloucestershire County Council and Gloucester City Council; Conservation Area Character Appraisals and Management Plans for each local authority; local listing including Cheltenham's Index of Buildings of Local Interest; Heritage at Risk registers held by English Heritage and supplemented by local records; Gloucestershire Historic Landscape Characterisation and other assessments of landscape character and sensitivity (refer to Policy S6); and information held by the Gloucestershire Records Office.

4.9.9 The JCS Historic Environment Assessment 2014 has also been undertaken in order to provide a review of the historic environment at strategic allocations. The assessment is based on existing archaeological and historical records and surveys of built heritage and historic landscape character. It considers the impact of potential development on the historic environment resource within and surrounding each of the strategic allocation areas. It also provides advice on planning requirements and on further assessments that will need to be carried out prior to development as well as suggesting mitigation measures. Development proposals at strategic allocations must have regard to the findings and recommendations of the JCS Historic Environment Assessment (or any subsequent revision).

## **Delivery**

4.9.10 The NPPF provides a framework for conserving and enhancing the historic environment, which sits alongside a range of legislative regimes associated with planning and heritage. Policy SD9 reinforces that framework. To ensure that the historic environment makes a positive contribution towards wider social, cultural, economic and environmental benefits, the JCS takes a holistic approach and Policy SD9 should be read in association with other policies, particularly those relating to design, landscape and social or environmental infrastructure. District plans will provide supplementary policies as required, having regard to the variety, significance and condition of heritage assets in each local authority area.

4.9.11 Delivery of this policy will be through a range of mechanisms and funding streams. Local partnerships will have an important role to play, through regeneration and place shaping initiatives including local transport improvement schemes. Funding sources will include central funds such as the Heritage Lottery Fund and developer contributions made through Section 106 or the Community Infrastructure Levy. The historic environment will also be conserved and enhanced through careful development management. Effective delivery will require close liaison with landscape, conservation and archaeology experts and consultation with bodies such as English Heritage and national amenity groups.

4.9.11 Development proposals must describe the significance of any heritage assets affected, including any contribution made by their setting. Proposals should also be supported by proportionate evidence demonstrating that the historic character and distinctiveness of the locality have been assessed and taken into account when preparing

proposals. Where a development site includes, or has potential to include, heritage assets with archaeological interest, a desk-based assessment and, where necessary, a field evaluation must be submitted to the planning authority. Developers are required to record and advance understanding of any heritage assets to be lost (wholly or in part) through development and must provide this information to the relevant local authority for inclusion in the appropriate Historic Environment Record.

## SD10 - BIODIVERSITY AND GEODIVERSITY

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### Background

4.10.1 The natural environment within the JCS area includes a wide range of geological and farmed landscapes, green open spaces, wildlife habitats and ecosystems such as the Severn catchment and Cotswold escarpment which are recognised for their importance locally, nationally and internationally.

4.10.2 It is intended that all development should, wherever possible, make a positive contribution to biodiversity and geodiversity in the JCS area, helping to establish and reinforce networks for wildlife and protect and enhance geological assets, whilst being co-ordinated with the development of multi-purpose green infrastructure.

4.10.3 The purpose of the biodiversity and geodiversity policy is to ensure that individual assets and the quality of the natural environment in the future is planned, protected and enhanced at a strategic scale, recognising that networks extend across local authority boundaries. This requires the planning system to respect landscape features of importance for biodiversity and geodiversity, such as hills and floodplains supporting a wide variety of rock exposures, grasslands, woodlands, rivers and streams. It also means ensuring that important habitats and species are protected and where possible restored.

### Policy SD10: Biodiversity and Geodiversity

The biodiversity and geological resource of the JCS area will be protected and enhanced in order to establish and reinforce ecological networks that are resilient to current and future pressures. Improved community access will be encouraged so far as is compatible with the conservation of special features and interests.

This will be achieved by:

- Ensuring that European Protected Species and National Protected Species are safeguarded in accordance with the law.
- Conserving and enhancing biodiversity and geodiversity on internationally, nationally and locally designated sites, and other assets of demonstrable value where these make a contribution to the wider network.
- Encouraging new development to contribute positively to biodiversity and geodiversity whilst linking with wider networks of green infrastructure. For example by incorporating habitat features into the design to assist in the creation and enhancement of wildlife corridors and ecological stepping stones between sites.
- Encouraging the creation, restoration and beneficial management of priority landscapes, priority habitats and populations of priority species. For example by securing improvements to Strategic Nature Areas (as set out on the Gloucestershire Nature Map) and Nature Improvement Areas.

Any development that has the potential to have a likely significant effect on an international site will be subject to a Habitats Regulations Assessment.

Within nationally designated sites, development will not be permitted unless it is necessary for appropriate on-site management measures and proposals can demonstrate that there will be no adverse impacts on the notified special interest features of the site.

Development within locally designated sites will not be permitted where it would have an adverse impact on the registered interest features or criteria for which the site was listed, and harm cannot be avoided or satisfactorily mitigated.

Harm to the biodiversity or geodiversity of an undesignated site or asset should be avoided where possible. Where there is a risk of harm as a consequence of development, this should be mitigated by integrating enhancements into the scheme that are appropriate to the location and satisfactory to the local planning authority. If harm cannot be mitigated on-site then, exceptionally, compensatory enhancements off-site may be acceptable.

**This policy contributes towards achieving Objective 4.**

## Explanation

4.10.4 The conservation and enhancement of biodiversity (variety of life) has been an international, national and local priority since the Rio Convention in 1992. National priorities were set out in the UK Biodiversity Action Plan (UKBAP), first published in 1994 and more recently replaced by the UK post-2010 Biodiversity Framework (2012). The government has also published Biodiversity 2020, a strategy for England's wildlife and ecosystem services (2011).

4.10.5 Gloucestershire contains a large number of protected sites which can be categorised into international, national and local sites. International sites include Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites (globally protected wetlands). Any development that has potential to have a likely significant effect on an international site (either alone or in combination with other plans or projects) will be subject to a Habitats Regulations Assessment. This includes a screening process followed by the completion of an Appropriate Assessment (if required) as set out in the European Union Habitats Directive 92/42 EEC. Development that would adversely affect the integrity of any SPA, SAC or Ramsar site will need to demonstrate exceptional requirements relating to the absence of alternative solutions and imperative reasons of overriding public interest.

4.10.6 National sites include Sites of Special Scientific Interest (SSSI). Local sites include Local Nature Reserves (LNR), Key Wildlife Sites (KWS) and Regionally Important Geological Sites (RIGS). These sites are subject to national and local policy protection.

4.10.7 The JCS provides an opportunity to deliver some of the objectives and complement the work programme of the Local Nature Partnership (LNP). The three local authorities are each a partner organisation of the LNP helping to deliver actions to address the needs of priority species and habitats as well as plans for other biodiversity and geodiversity assets of local importance or interest. The Gloucestershire Nature Map sets out spatial priorities for ecological conservation and enhancement across the county. A key part of this is the identification of a number of Strategic Nature Areas (SNAs), which are the key landscape-

scale blocks of land where characteristic habitats that typify the county can be expanded and linked to support wildlife. Partnerships of local authorities, local communities, landowners and the private sector are also able to identify Nature Improvement Areas (NIA), such as the Cotswold Scarp NIA. These are the places which offer the best opportunities for habitat restoration on a significant scale with the greatest benefits for wildlife and are largely based on SNAs.

4.10.8 Geodiversity conservation concerns the protection, management and enhancement of geological formations. Advice is available through the Gloucestershire Geology Trust. It is likely that during the lifetime of the JCS a Geodiversity Action Plan will be developed for Gloucestershire that will provide more detailed advice on the conservation of geodiversity.

## **Delivery**

4.10.11 Delivery will be achieved within the context of international and national legal frameworks, countywide initiatives and local strategies for biodiversity and geodiversity. Nature conservation will also be an important consideration within the Cotswold Area of Outstanding Natural Beauty. District plans will support the JCS by identifying and mapping components of the local ecological network, including internationally, nationally and locally designated sites. District plans may also, as appropriate, include the boundaries of SNAs and NIAs which have been identified as priority areas for habitat creation and restoration. Where necessary, district plans will provide additional detail and guidance for decision makers. This may include information on the approach to securing developer contributions, and recommendations for habitat enhancements associated with new development such as nesting boxes.

4.10.12 The development management process will contribute to delivery by protecting sites, habitats and species in accordance with national and local policies and other relevant legal requirements. The NPPF is clear that the presumption in favour of sustainable development does not apply where development requiring Appropriate Assessment under the Birds or Habitats Directives is being considered, planned or determined.

4.10.13 Enhancements will be secured through the design of development and via planning conditions and obligations including S106 agreements and the Community Infrastructure Levy. To deliver these enhancements, developers and local authorities should work with appropriate partner organisations including the LNP and Gloucestershire Geology Trust.

4.10.14 The JCS requires developers to avoid harm to biodiversity or, where this is not possible, to incorporate mitigation measures into the design of developments. For situations where measures cannot be provided on-site, the local authorities may in certain circumstances consider a system of 'biodiversity offsetting'. In addressing the impacts of potential developments on geodiversity it is intended that the councils will follow a similar approach to that proposed for biodiversity, based on avoidance, on-site mitigation and off-site compensation (for example by improving the exposure of the geological feature).

# SD11 - RESIDENTIAL DEVELOPMENT

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## Background

4.11.1 The JCS guides new housing development to sustainable and accessible locations as set out in policy SP2. Policy SD11 provides further detail around the appropriate locations for residential development in the JCS area. Some of these locations will be sites that are allocated for residential development through district and neighbourhood plans, while other ‘windfall’ sites will come forward unexpectedly.

4.11.2 Throughout the plan period, local authorities are required to maintain a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements. If the authorities fail to do this then it may be difficult to prevent ad hoc development occurring on greenfield land. This policy therefore sets an approach to residential development to assist in delivering the scale and distribution of development set out in policies SP1 and SP2. The policy approach directs residential development to previously developed (brownfield) land. However, the available previously developed sites in the JCS area are not sufficient to maintain a five year supply so some greenfield sites will be allocated for development through the JCS, district plans and neighbourhood plans.

### Policy SD11 - Residential Development

Within the JCS area new housing will be planned in order to deliver the scale and distribution of housing development set out in policies SP1 and SP2.

Housing development will be permitted at strategic allocations and on sites that are allocated by district plans and neighbourhood plans.

On sites that are not allocated, housing development and conversions to dwellings will be permitted on previously developed land in the existing built up areas of Gloucester City, Cheltenham and Tewkesbury towns, rural service centres and service villages.

Housing development on other sites will only be permitted where:

- It is for affordable housing on a rural exception site in accordance with policy SD13, or
- It is infilling within the existing built up areas of cities, towns and villages, or
- It is brought forward through Community Right to Build Orders, or
- There are other specific exceptions/circumstances defined in district plans or neighbourhood plans.

Proposals involving the sensitive, adaptive reuse of vacant or redundant buildings will be encouraged, subject to the requirements of other policies including SD2, INF5 and SD9. Proposals that will bring empty housing back into residential use will also be encouraged.

Residential development should seek to achieve the maximum density compatible with good design, the protection of heritage assets, local amenity, the character and quality of the local environment, and the safety and convenience of the local and strategic road network.

**This policy contributes towards achieving Objectives 6, 8 and 9.**

## **Explanation**

4.11.3 The agreed DCLG definition of a dwelling, based on that used by the census, is “a self-contained unit of accommodation”. Self-containment is where all the rooms (including kitchen bathroom and toilet) in a household’s accommodation are behind a single door which only that household can use.

4.11.4 In accordance with policy SP2, new housing will be delivered within the two main urban centres of Cheltenham and Gloucester and through urban extensions to those centres to meet needs where they arise. Development is directed to Tewkesbury town in accordance with its role as a market town and to rural service centres and service villages. This will include sites allocated in district or neighbourhood plans and additional windfall sites. Windfall development on previously developed land within cities, towns, rural service centres and service villages is supported in principle, subject to the other policies in this strategy and the relevant district and neighbourhood plans. In addition to this, proposals that will bring empty space back into use are encouraged.

4.11.5 Outside cities, towns, rural service centres and service villages, there are generally insufficient facilities to support development and so they are not considered sustainable locations for residential development. Hence, new residential development is not considered appropriate unless specific exceptions are made within JCS, district plan and neighbourhood plan policies. For the purpose of this policy, infill development means the limited filling of an under-developed plot in an otherwise built-up frontage. Additional special circumstances where housing development may be acceptable are listed in NPPF paragraph 55.

4.11.6 Careful and innovative design is the key to achieving the highest appropriate density in a particular location. A proposal which would harm the character of a neighbourhood or site through excessive density, poor design or inadequate open space will not be acceptable. The aim is to secure a more sustainable pattern of development, utilising innovative design to achieve higher densities and to incorporate a mix of land uses where appropriate, whilst retaining the character and quality of the local environment. This is vital in order to ensure the viability of local services and infrastructure such as public transport and low carbon energy provision.

4.11.7 Policy SD3 supports this policy by promoting residential development as part of the mix of uses in designated centres.

## **Delivery**

4.11.8 Delivery will be by developers, registered providers and specialist housing providers working in partnership with local authorities.

4.11.9 In order to deliver the scale and distribution of development set out in policies SP1 and SP2, district plans will include local site allocations and housing supply policies as appropriate to the needs of the area. In Tewkesbury Borough this will include allocations for new housing at rural service centres and service villages, proportional to their size and function and also reflecting their proximity and accessibility to Cheltenham and Gloucester. Any revisions to settlement boundaries will also be made in the relevant district plan and indicated on the associated proposals map.

4.11.10 Where necessary, policies in district plans will support the implementation of this policy, for example by providing detail in relation to rural exception sites, infill development, residential conversions and mixed-use development.

4.11.11 The JCS local authorities carry out an annual assessment of land availability (incorporating the Strategic Housing Land Availability Assessment) to identify sites that may be suitable for housing or other uses. This includes a record of brownfield and greenfield sites within the main settlement areas that may have potential for housing development. The assessment is therefore an important part of the evidence base for the planning of future housing delivery. The JCS authorities are committed to developing a shared methodology with other local authorities in the Housing Market Area and using this work to inform local site allocations and housing supply policies.

4.11.12 All relevant policies in the JCS, district plans and neighbourhood plans will be applied alongside this policy to ensure that proposals have no detrimental impacts, including any impact on the amenity, economy, natural, historic and built environment of their surroundings; on the local or strategic road network; or on the health of current or future residents.



## SD12 - HOUSING MIX AND STANDARDS

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### Background

4.12.1 It is important that new housing development addresses local needs and contributes to the creation of mixed and balanced communities. This means providing sufficient good quality housing of the right sizes, types and mix, in the right places, which will be attractive to and meet the identified needs of different groups in society including families with children, first time buyers, older people, people with disabilities and people wishing to build their own homes. Well designed housing should also be accessible and adaptable to meet people's changing needs, helping to sustain independent living and contributing to a low carbon future.

4.12.2 Balanced communities consisting of a range of housing types can help to achieve a sustainable community by:

- Supporting a wider range of social and community infrastructure such as schools, nurseries, shops and public transport.
- Encouraging stability and community cohesion and fostering an increased sense of local identity and belonging by allowing residents to move house but remain in the same area.
- Creating a more diverse and inclusive community than one dominated by a single accommodation type.
- Reducing the social isolation of particular groups in society such as older people, the young or people with disabilities.

### Policy SD12 - Housing Mix and Standards

#### Housing Mix

Housing development will be required to provide an appropriate mix of dwelling sizes, types and tenures in order to contribute to mixed and balanced communities and a balanced housing market. Development should address the needs of the local area, including the needs of older people, as set out in the local housing evidence base including the most up to date Strategic Housing Market Assessment.

Self-build housing and other innovative housing delivery models will be encouraged as part of an appropriate mix.

Improvements to the quality of the existing housing stock involving remodelling or replacing residential accommodation will be encouraged where this would contribute to better meeting the needs of the local community, subject to the requirements of other policies including SD5 and SD9.

#### Standards

New homes should meet and where possible exceed appropriate minimum space standards.

Homes should be designed to be accessible and adaptable so far as is compatible with the local context and other policies including Policy SD9.

### **Specialist accommodation**

Provision of specialist accommodation, including accommodation for older people, will be supported where there is evidence of a need for this type of accommodation and where the homes/bed spaces will contribute to meeting the needs of the local community.

Specialist accommodation should be located to have good access to local services. In the case of Extra Care housing schemes which provide ancillary facilities on site, these facilities should complement those already available in the locality and should be made available to the wider community.

Schemes that create self-contained units of accommodation will be subject to the requirements of Policy SD13.

**This policy contributes towards achieving Objectives 8 and 9.**

### **Explanation**

4.12.3 It is important to ensure that housing provision is responsive to local market changes and the needs of the local area, providing accommodation for people with different needs and at different stages in their lives. Local authorities are required by the NPPF to plan for a mix of housing and to identify the size, type, tenure and range of housing that is required. This information is contained in the local housing evidence base, which includes the JCS Assessment of Housing Requirements, the Gloucestershire Strategic Housing Market Assessment and other data held by local authorities and their partners. Developers should refer to this evidence base to ensure that their proposals will contribute to mixed and balanced communities and a balanced housing market across the county of Gloucestershire.

4.12.4 In 2011, older people accounted for 13% of the population of the JCS area (NLP Assessment of Housing Needs 2012). This proportion could increase to 20% by 2031. To ensure that people can be housed in suitable accommodation, whilst also stimulating the housing market by enabling older people to downsize, a proportion of new homes in the area should be suited to the needs of older people. This may include smaller and more accessible homes such as bungalows.

4.12.5 Throughout the plan period there will continue to be a need to provide family sized housing in the JCS area. As the economy recovers there is also an increasing need to provide accommodation suited to younger age groups and first time buyers.

4.12.6 New homes should be designed in a way that enables households, including older people, to live comfortably. This will include having adequate space to allow home working or study, space for visitors in homes for older people and space to allow ease of movement in specialist accommodation. Within the JCS area this will be achieved by meeting and exceeding minimum space standards (see delivery section below). New homes should also be built to high standards of sustainable design and construction in accordance with policy SD4.

4.12.7 Properties should also be adaptable in order to meet people's changing needs and help to sustain independent living. In 2011, some 16.8% of the resident population in Gloucestershire had a long-term health problem or disability (SHMA 2014). Developers should therefore ensure that new housing is built to a high standard of accessibility and

adaptability and that a proportion of homes are built in accordance with recognised standards.

4.12.8 Specialist accommodation will play a part in meeting identified needs including the needs of older people and people with disabilities. Specialist accommodation includes wheelchair accessible housing, dementia care housing, nursing homes, retirement villages, continuing care retirement schemes and Extra Care housing.

## **Delivery**

4.12.9 Delivery will be by developers, registered providers, and specialist housing providers working in partnership with local authorities. Where necessary, more detailed and locally specific policies will be provided in district plans to support the implementation of specific elements of this policy, such as housing for older people, self-build housing or specialist accommodation. Requirements for the location and standards of student accommodation and houses in multiple occupation will also be set out in district plans where appropriate.

4.12.10 The Gloucestershire Strategic Housing Market Assessment 2014 provides an indication of the number and proportion of homes of different sizes and tenures that are likely to be required in the county over the plan period. Equivalent data for each local authority area is provided within the document appendices. Developers should refer to this information (or any subsequent publication) and engage with the relevant local authority in drawing up their proposals. For development at strategic allocations it will usually be necessary to consider the needs of more than one local authority area.

4.12.11 Subject to the findings of the government's Housing Standards Review, district plans may in future adopt specific space standards. Until such standards are adopted the JCS authorities will refer to the minimum space standards employed by the Homes and Communities Agency and apply these to all types of housing.

4.12.12 As well as meeting minimum space standards, housing proposals will need to demonstrate how accessibility and adaptability have been considered as part of the design of the scheme. This may include providing a proportion of homes to a recognised standard such as Lifetime Homes where it is appropriate in the view of the local authority. For development at strategic allocations, the standards and proportions to be delivered should be agreed with the local authority. Subject to the findings of the government's Housing Standards Review, district plans may in future adopt specific standards for accessibility and adaptability.

4.12.13 Developers of specialist or supported accommodation should draw on the local housing evidence base and engage with the relevant local authority to ensure that their proposals meet identifiable needs within the local community and that there is a local demand for the type of accommodation they are proposing. The design of specialist accommodation should draw on best practice including guidelines for wheelchair accessible housing (or any equivalent national standard). Proposals should demonstrate how these have been incorporated into the design of the scheme and, where appropriate, how this supports longer term commissioning of services. Developers should also provide evidence of how proposals dovetail with current Health and Social Care Commissioning and future plans.

## SD13 - AFFORDABLE HOUSING

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### Background

4.13.1 Local authorities are required to identify whether there is a need for affordable housing in their area and then plan to meet this need. The NPPF defines affordable housing as: social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices.

4.13.2 There are three main classifications of affordable housing:

- Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime.
- Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).
- Intermediate housing is housing for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.

Homes that do not meet the above definition of affordable housing, such as 'low cost market' housing, are not defined as affordable housing for the purpose of this policy.

### Policy SD13 - Affordable Housing

The JCS local authorities will seek through negotiation to deliver new affordable housing as follows:

- On sites of 5-9 residential units (or covering 0.2 hectares or more of land), 20% affordable housing will be sought.
- On sites of 10 or more residential units (or covering 0.4 hectares or more of land), 40% affordable housing will be sought.

For the purpose of this policy, residential units are dwelling houses (use class C3) and also any self-contained units of accommodation within a residential institution (use class C2). Where a development site has been divided into parts, or is being delivered in phases, the site will be considered as a **whole** for the purpose of determining the appropriate affordable housing requirement.

Where possible, affordable housing should be provided on-site and should be seamlessly integrated and distributed throughout the development scheme. On sites where it is not possible to deliver all affordable housing as on-site provision, the residual requirement should be provided through acceptable alternative mechanisms (such as off-site provision or financial contributions). Further guidance on acceptable mechanisms may be provided in district plans.

Affordable housing must also have regard to meeting the requirements of policy SD12 concerning type, mix, size and tenure of residential development.

The design of affordable housing should meet required standards and be equal to that of market housing in terms of appearance, build quality and materials.

Provisions should be made to ensure that housing will remain at an affordable price for future eligible households, or that subsidy will be recycled for alternative affordable housing provision.

### **Rural exception sites**

In certain circumstances, where there is clear evidence of a local housing need that cannot be met elsewhere, affordable housing will be permitted on rural exception sites. A rural exception site must be within, or on the edge of, a rural settlement. It should be of a small scale and well related to the settlement both functionally and in terms of design.

### **Viability**

Where there is an issue relating to the viability of development that impacts on delivery of the full affordable housing requirement, developers should consider:

- Varying the housing mix and design of the scheme in order to reduce costs whilst having regard to the requirements of other policies in the plan, particularly Policy SD5 and the objective of creating a balanced housing market.
- Securing public subsidy or other commuted sums to assist delivery of affordable housing.

If a development cannot deliver the full affordable housing requirement then a viability assessment in accordance with Policy INF7 will be required.

**This policy contributes towards achieving Objectives 8 and 9.**

## **Explanation**

4.13.3 The need for affordable housing extends to specialist accommodation including housing for older people. Where these types of accommodation create self-contained units they are expected to contribute to the provision of appropriate affordable housing to help meet the wider housing need of the district. Self-containment is where all the rooms (including kitchen, bathroom and toilet) in a household's accommodation are behind a single door which only that household can use. There is sometimes confusion as to whether these units fall into use class defined as a residential institution (C2) or a dwelling house (C3). Our approach is that development which creates living spaces that retain the essential characteristics of a self-contained dwelling, even if some care is provided, will be subject to the affordable housing policy.

4.13.4 The Gloucestershire Strategic Housing Market Assessment (SHMA) 2014 provides evidence relating to affordable housing needs in the JCS area. It includes a Long-Term Balancing Housing Markets (LTBHM) model which informs this policy by providing an indication of the levels of affordable housing required from 2013 to 2031 to achieve a balanced housing market. Policy SD13 has also been informed by:

- Planning commitments at the base date of the LTBHM model (2013).

- The composition (by site size) of expected housing delivery over the plan period, based on Policy SP2. This includes assumptions about district capacity and windfall development that are informed by assessments of land availability and past trends in housing delivery.
- An assessment of the viability of the JCS affordable housing policy and of the JCS as a whole, taking account of the cumulative requirements of all policies.

4.13.5 The policy reflects a strategic partnership approach to affordable housing delivery across the JCS area. This consistency of approach will help to ensure that full housing needs can be met in a way that supports urban regeneration and does not place onerous requirements on any individual local authority. Taking account of the factors listed above, the JCS authorities together will need to deliver 38% affordable housing on sites of 5 or more residential units. Although some sites will deliver 100% affordable housing (for example where the developer is a specialist provider), in recent years many sites have not delivered the full affordable housing requirement due to viability. For these reasons, in order to allow some flexibility in meeting the full affordable housing need, a requirement of 40% is set for development of 10 or more residential units, subject to the viability of development.

4.13.6 Policy SD13 reflects the need to ensure that smaller residential developments remain viable. For this reason, affordable housing is not required on sites of 0-4 residential units. On sites of 5-9 residential units there is a lower affordable housing requirement of 20%.

4.13.7 In accordance with Policy SD12, a flexible approach is taken to the mix of housing tenures, types and sizes to be provided. This will allow local authorities and developers to refer to the most up-to-date evidence on housing need and to take account of the local context. For development at strategic allocations it will usually be necessary to consider the needs of more than one local authority area.

4.13.8 To allow for delivery of rural affordable housing it may be necessary to make an exception to the general locational requirements of Policy SP2 in accordance with Policy SD11. A strategic approach to rural exception sites is therefore provided as part of Policy SD13. When considering proposals for housing on rural exception sites, local authorities will consider whether allowing a limited proportion of market housing would facilitate the provision of new affordable housing. Further policy and guidance will be provided in district plans where required.

## **Delivery**

4.13.9 Affordable housing will be secured through planning conditions and obligations including Section 106 agreements. Planning conditions and obligations will also be used to ensure that affordable homes remain at an affordable price for future eligible households.

4.13.10 Delivery will be by developers, registered providers and specialist housing providers working in partnership with local authorities and, in certain circumstances, the Homes and Community Agency. Early pre-application discussions will be expected in all affordable housing negotiations. Where necessary, district plans will support this policy by providing further policies and guidance on implementation.

4.13.11 The JCS approach to affordable housing delivery is to balance provision across the JCS area. It is, however, recognised that affordable housing need varies across the area with higher levels of need in Gloucester City than other districts. To ensure that provision meets localised needs, the JCS authorities will therefore need to employ a partnership approach to affordable housing nominations. Within the strategic allocations this

affordable housing partnership will have a critical role in determining the proportion of new affordable housing to be allocated to each local authority district.

# SD14 - GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE

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## Background

4.14.1 'Planning Policy for Traveller Sites' was published by the Government in March 2012 and aligns planning policy for traveller communities more closely with other forms of housing. It introduced, for example, the requirement for councils to demonstrate a five year supply of pitches/plots against locally assessed targets based on robust local evidence.

4.14.2 The JCS area has long established Gypsy, Traveller and Travelling Showpeople communities. There are many reasons for this, including excellent road connections, proximity of land close to the urban areas for access to services and employment opportunities, and strong family ties. There are particular concentrations in Tewkesbury Borough, close to the urban areas of Gloucester and Cheltenham.

4.14.3 A Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTTSAA) was published in 2013 which identifies the need for additional pitches/plots for different traveller communities for Gloucestershire between 2013 and 2031. A summary of these needs for the JCS authorities is provided at Paragraph 4.130 and Table C4 and the full report can be downloaded from the JCS website.

### Policy SD14 - Gypsy, Traveller and Travelling Showpeople

All proposals for new Gypsy, Traveller and Travelling Showpeople sites will be assessed against the following criteria:

- There is a proven need for the development and the capacity of the site can be justified for further Gypsy, Traveller and Travelling Showpeople sites, or extensions to existing sites.
- Proposals on sites in areas of sensitive landscape will be considered in accordance with Policy SD7 (Landscape Policy) and Policy SD8 (Cotswold Area of Outstanding Natural Beauty). In all other locations the proposal will not have an unacceptable impact on the character and appearance of the landscape and the amenity of neighbouring properties, and is sensitively designed to mitigate any impact on its surroundings.
- The site has safe and satisfactory vehicular and pedestrian access to the surrounding principal highway network.
- No significant barriers to development exist in terms of flooding, poor drainage, poor ground stability or proximity to other hazardous land or installation where other forms of housing would not be suitable.
- The site is situated in a suitable location in terms of access to local amenities, services and facilities, including schools, shops, health services, libraries and other community facilities.



- The site can be properly serviced and is supplied with essential services, such as water, power, sewerage and drainage, and waste disposal. The site should also be large enough to enable vehicle movements, parking and servicing to take place, having regard to the number of pitches/plots on site, as well as enabling access for service and emergency vehicles, including circulation space along with residential amenity and play areas.

**The policy contributes towards achieving Objectives 8 and 9.**

## Explanation

4.14.4 The Gloucestershire Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTTSAA) sets out the need for new pitches/plots resulting from existing traveller communities in Gloucestershire between 2013 and 2031. Within the JCS area the assessment sets out the requirement for provision of 151 permanent pitches for Gypsies and Travellers (as shown in Table C4 below). Of these, 147 pitches relate to communities that currently reside in Tewkesbury Borough. The assessment further sets out a requirement for 36 permanent plots for Travelling Showpeople, relating to communities that currently reside in Gloucester City and Tewkesbury Borough.

**Table C4 - Permanent Gypsy and Traveller Pitch Requirements in the JCS area**

| Local Authority | 2013 - 2017 |           | 2018 - 2022 |           | 2023 - 2027 |           | 2028 - 2031 |           | Total      |
|-----------------|-------------|-----------|-------------|-----------|-------------|-----------|-------------|-----------|------------|
|                 | Public      | Private   | Public      | Private   | Public      | Private   | Public      | Private   |            |
| Cheltenham      | 0           | 1         | 0           | 0         | 0           | 0         | 0           | 1         | 2          |
| Gloucester      | 0           | 1         | 0           | 0         | 0           | 0         | 0           | 1         | 2          |
| Tewkesbury      | 20          | 44        | 12          | 15        | 13          | 16        | 12          | 15        | 147        |
| <b>Total</b>    | <b>20</b>   | <b>46</b> | <b>12</b>   | <b>15</b> | <b>13</b>   | <b>16</b> | <b>12</b>   | <b>17</b> | <b>151</b> |

4.14.5 The report also sets out that if transit pitches are considered necessary, a transit site of at least 10 pitches should be provided within Gloucestershire, but in a location within the JCS area given the concentration of existing encampments and proximity to main road networks such as the M5 and A40. However, it also recommends that ‘tolerated temporary stopping places’ are used by some authorities as an alternative way of providing for temporary accommodation needs.

4.14.6 The nature of existing provision in Gloucestershire means that a very significant proportion of the needs arise in Tewkesbury Borough. However, ‘Planning Policy for Traveller Sites’, sets out that where there are special or strict planning constraints across an area, local planning authorities should consider working together through the ‘duty-to-cooperate’ to provide for traveller needs, in order to provide more flexibility in the identification of sites, including the preparation of joint development plans. Further to this, the assessment confirms issues with the ability to bring forward sites for traveller communities in urban areas for reasons such as limited land availability and site viability. Depending on the availability of deliverable sites it may also be necessary to work with other Gloucestershire authorities to address needs arising from their communities.

4.14.7 In terms of the JCS, significant development will be coming forward through the strategic allocations and urban extensions. It may be possible for sites for traveller communities to be provided as part of well masterplanned strategic allocations, as required at Policy SA1 and the potential for such provision will be fully considered through the planning process. Further non-strategic site allocations will be considered by each of the JCS authorities in district plans, in the context of locally set targets.

4.14.8 'Planning Policy for Traveller Sites' requires that local planning authorities provide a criterion-based policy in Local Plans. Where need is identified, this policy will form the criteria against which potential site allocations will be assessed. It will also form the policy against which other speculative applications that may come forward should be assessed.

## **Delivery**

4.14.9 The purpose of Policy SD14 is to set out the overall numbers of pitches and plots required within the JCS area for Gypsies, Traveller and Travelling Showpeople, and to set out a criteria based policy for use in the assessment of potential sites. Policy SA1 provides detail with regard to site provision through the JCS.

4.14.10 In order to bring forward adequate numbers of sites for traveller communities, it will also be necessary for site provision to come forward through smaller non-strategic sites, particularly during the first five years of the plan. This will be established through the lower level district plans

# SD15 - HEALTH AND ENVIRONMENTAL QUALITY

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## Background

4.15.1 The JCS contains a framework of policies to support the health and wellbeing of local communities through provision of: appropriate housing, employment opportunities, access to services, walking and cycling routes, green infrastructure, wildlife habitats and a high quality built and historic environment that is clean, safe and accessible. Policies are also in place to address the possible impacts of development including transport impacts, climate change and flooding.

4.15.2 Within the JCS area, a need for new housing and employment development coincides both with areas of existing high environmental quality and areas that are in need of physical regeneration. Policy SD15 aims to ensure that development does not have any unacceptable impacts on human health or environmental quality, and that where possible it secures benefits.

### Policy SD15 - Health and Environmental Quality

High quality development should protect and seek to improve environmental quality. Development should not create or exacerbate conditions that could impact on human health or cause health inequality.

New development must:

- Cause no unacceptable harm to local amenity including the amenity of neighbouring occupants.
- Result in no unacceptable levels of air, noise, water, light or soil pollution or odour, either alone or cumulatively, with respect to relevant national and EU limit values.
- Result in no exposure to unacceptable risk from existing or potential sources of pollution. For example by avoiding placing sensitive uses in locations where national or EU limit values are exceeded, or by incorporating acceptable mitigation measures into development.
- Incorporate, as appropriate, the investigation and remediation of any land contamination within the site.
- Ensure that any risks associated with land instability are satisfactorily resolved.
- Take into account the quality and versatility of any agricultural land affected by proposals, recognising that the best agricultural land is a finite resource.
- Have regard to any areas of tranquillity that are identified in adopted or emerging district and neighbourhood plans.
- Avoid any adverse impact from artificial light on intrinsically dark landscapes.

Proposals for development at strategic allocations, and other development proposals at the discretion of the local planning authority, must be accompanied by a health impact assessment.

## **Explanation**

4.15.3 Levels of health deprivation vary across the JCS area (Index of Multiple Deprivation). Overall levels of deprivation in Cheltenham and Tewkesbury Borough are lower than the English average, while deprivation in Gloucester city is higher than average. However, there are smaller pockets of deprivation across the three districts, revealing health inequality between communities. Sizeable areas of central, north-west and south-east Gloucester are in the most deprived 20% nationally for health, as are smaller pockets in east, west and central Cheltenham and in the south of Tewkesbury town. In all three districts there is a significant difference between the life expectancy in the least and most deprived areas.

4.15.4 There is an increasing body of evidence about the links between planning, health and wellbeing (for example the Marmot Review 2010). Factors that are considered to impact on our physical and mental health include street layout and connectivity, safety and security, opportunities for social interaction and our ability to cope with extreme weather events. These factors are covered by a range of JCS policies including SD5 and infrastructure policies. There is also a link between poor local environmental quality, poor health and socio-economic deprivation. Policy SD15 therefore recognises that the quality of the environment around us is an important determinant of human health. Environmental quality includes the quality of soil, air and water and local levels of noise and light.

4.15.5 Policy SD15 is also supported by Policy SD11, which encourages proposals that bring empty housing back into residential use and Policy SD12, which encourages improvements to the quality of the existing housing stock.

## **Delivery**

4.15.6 The protection and improvement of environmental quality will be achieved through local regeneration initiatives, transport plans and careful development management. Planning conditions and obligations will be used to address risks to environmental quality, secure mitigation measures and help fund ongoing monitoring and management. Developers will need to demonstrate how their proposals meet the criteria of Policy SD15 through submission of relevant plans and technical reports having regard to National Planning Practice Guidance. Specific assessments, such as an assessment of the impact of development on air, noise or light, may be required at the discretion of the local planning authority.

4.15.7 District plans will provide detailed policies, as required, for the protection and promotion of human and environmental health, for example specific standards or criteria relating to noise pollution and air quality management. Local authorities will also give consideration to whether there are any areas of tranquillity that ought to be identified and protected through district plans.

4.15.8 Environmental protection and public health professionals and enforcement officers will have an important role in ensuring that new development complies with regulatory regimes and supports the delivery of national and local objectives. For example, new development in Air Quality Management Areas should be consistent with local air quality action plans.

# PART 5 - INFRASTRUCTURE POLICIES

## Introduction

5.1.1 Successful and sustainable communities depend upon physical, green and social & community infrastructure to meet the needs of residents and businesses. Infrastructure encompasses a very wide range of provision including: transport; public utilities and waste management; flood management measures; social and community infrastructure such as affordable housing, health care facilities and sports provision; green infrastructure; culture, faith and spiritual facilities; education; leisure and tourism; and other community facilities ranging from community meeting halls to children's play areas.

5.1.2 It is important to appreciate that whilst there is a considerable degree of funding from governmental and other public sources, a significant amount of the money for provision of new or enhancement of existing infrastructure comes in the form of financial contributions from developers or in the form of payment in kind through direct provision of facilities or services. Clearly, there is only so much that a developer can be expected to contribute to infrastructure provision without threatening the economic viability of the proposal. This may be particularly so in respect of the redevelopment of brownfield land. In encouraging where feasible the redevelopment of brownfield land, the Local Planning Authorities will on a case by case basis take into account evidence of any mitigating circumstances that affect the viability of redevelopment. Equally, a planning authority cannot reasonably be expected to allow development that will have an unacceptable impact on existing infrastructure.

5.1.3 Where viability appears finely balanced, hard choices may sometimes need to be made in prioritising what is to be provided and/or when it is to come forward during the life of the development. For this reason it is crucial to consider infrastructure provision in the round and not to look at items in isolation from each other. This approach is endorsed by government at page 3 of the National Infrastructure Plan 2013: "The government recognises that meeting the UK's infrastructure ambitions requires a long-term sustainable plan, which means taking a cross-cutting and strategic approach to infrastructure planning, funding, financing and delivery".

5.1.4 Recognition of the need to provide sufficient infrastructure to enable and support sustainable development and economic growth is inherent within the National Planning Policy Framework (NPPF). Whilst infrastructure is referenced frequently throughout the Framework, several Core Planning Principles and key sections relate specifically to it (such as Parts 4, 5, 8 and 10).

5.1.5 In acknowledging the central importance of infrastructure to the delivery of the plan's policies and proposals, the Joint Core Strategy is supported by an Infrastructure Delivery Plan (the JCS IDP). Its function is to assess the infrastructure and services that will be required to support the levels of housing and employment growth proposed in the plan. In doing so, the IDP fulfils several roles:

- it provides evidence supporting the preparation and delivery of the JCS;
- it presents estimated infrastructure costs and secured sources of infrastructure funding, including the potential for developer contributions towards infrastructure through S106 Planning Obligations. In due course it will also be the evidence base underpinning the Community Infrastructure

Levy (CIL) Charging Schedules for each of the three constituent Local Planning Authorities; and

- it identifies whether any Nationally Significant Infrastructure Projects (NSIPs) are expected to come forward within the JCS area. Currently there are no NSIPs in the JCS area registered with the Planning Inspectorate

5.1.6 In addition to enabling development to come forward, securing delivery of infrastructure will contribute to the achievement of JCS objectives. These include limiting flood risk, reducing dependency on the car, and enhancing access to community services within local centres.

## INF1 and INF2 -TRANSPORT

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### Background

5.2.1 Providing choice in modes of travel can help achieve sustainable development while contributing to wider economic, environmental and community objectives. Having access to different ways of travelling also contributes towards the quality of environment, the sense of place created by development and influences the desirability of an area as a place to live or to locate a business.

5.2.2 NPPF states at paragraph 28 that ‘*The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel*’. ONS data on commuting patterns collected from the Annual Population Survey (2010 and 2011) indicate a high proportion of people both living and working within the JCS area. This self-containment highlights the potential for short-distance trips to transfer where appropriate to non-car modes, such as public transport, walking or cycling - something which the NPPF considers, at paragraph 17, to be a core planning principle reiterated at part 4 of the document . Enabling the transfer to non-car modes requires a coordinated approach across several policy and delivery areas, and the JCS seeks to achieve this (see, for example, parameter G of policy SD5). This policy contributes to the delivery of strategy’s ambitions and strategic objectives including:

| Ambition                                    | Strategic Objective  |
|---|--|
| A thriving economy                          | 1) Building a strong and competitive urban economy<br>2) Ensuring vitality of town centres   |
| A sustainable natural and built environment | 4) Conserving and enhancing the environment<br>5) Delivering excellent design in new developments<br>6) Meeting the challenges of climate change |
| A healthy, safe and inclusive community     | 7) Promoting sustainable transport<br>9) Promoting healthy communities   |

5.2.3 The preparation and implementation of transport policy and proposals is not primarily a matter for the development plan (in this case the JCS and emerging district plans). The role of the development plan is to reflect, support and enable the implementation of transport objectives through its land-use policies and proposals.

5.2.4 In the JCS area the Local Highway Authority is Gloucestershire County Council. The County Council manages and maintains the local road network, supports non-commercial passenger transport services and promotes safe and sustainable travel. The Local Transport Plan (LTP) is prepared by the County Council and sits alongside the JCS. In order to get a “full picture” of transport policy and its implementation the two documents need to be read together. The preparation of this and other relevant parts of the JCS is the result of co-operation between the planning authorities and the Local Highway Authority.

5.2.5 The Highways Agency, an Executive Agency of the Department for Transport, manages and maintains the strategic road network including the M5, M50, A40, A46, A417. The Highways Agency also contributes to local transport policy formulation and implementation by engaging with the Local Highway Authority through the periodic LTP review process and other relevant consultations. Ongoing partnership working also happens through regular liaison and operation meetings.

### Policy INF1 - Access to the Transport Network

Developers should aim to provide safe and accessible connections to the transport network to enable travel choice for residents and commuters. All proposals must ensure that:

- the development provides safe vehicular access to the highway network;
- any increased level of car use derived from the development does not result in severe increases in congestion on the network. Severe increase in congestion in this context relates to highway junctions no longer operating within their design capacity;
- any severe increase in congestion likely to arise from development must be mitigated to ensure highway junctions operate within their design capacity; and
- connections should be provided where appropriate to existing walking, cycling and passenger transport networks and should be designed to enable and encourage maximum potential use.

Where a significant amount of new trips is anticipated from a proposed development the local planning authority may require applications to be accompanied by a Travel Plan that has full regard to the criteria set out in paragraph 35 of the National Planning Policy Framework.

**This policy contributes towards achieving Objectives 1, 2, 6, 7, 9**



## Policy INF2 -Safety and Efficiency of the Transport Network

Developers will be required to assess the impact of proposals on the transport network to ensure their proposals will not detrimentally affect its safety or efficiency. All proposals will demonstrate the impact of prospective development on:

- congestion at network pinch-points;
- travel safety within the vicinity of the development; and
- noise and / or atmospheric pollution within the vicinity of the development.

Planning permission will be granted only where the impact of development is not considered to be severe or, where severe impact is considered likely, can be mitigated to the satisfaction of the local planning authority in consultation with the Local Highway Authority.

**This policy contributes towards achieving Objectives 4, 5, 6, 7**

### Explanation

5.2.6 All development influences travel patterns either through new trips on the network or the re-routing of existing trips. This may occur on a micro-level by providing a single access point onto the highway network, or the macro-level where a range of infrastructure improvements are required to provide a range of travel choices for a strategic allocation.

5.2.7 The desired outcome from all development remains a safe and efficient transport network where people feel safe and they have a reasonable variety of travel choices. The degree of choice must be realistic in relation to the proposed development in terms of use, affordability and ongoing maintenance. Policy SD5 at parameter G “Movement and Connectivity” sets out the approach to sustainable travel modes and choice in new development.

5.2.8 The need to mitigate the impact of car based travel in respect of road congestion, health and atmospheric pollution is a key objective of the NPPF. It underpins the requirement in paragraph 32 of the NPPF for development that generates significant amounts of movement to be supported by Transport Statements or Transport Assessments. Proposals should fully consider measures, where feasible, to encourage individuals to walk or cycle for appropriate short distance trips (less than 3 miles) or use passenger transport for longer distance journeys. The impact on passenger transport services needs to be considered to ensure sufficient capacity exists on services and / or car parking facilities at rail stations. A site wide travel plan, as detailed in paragraphs 35 and 36 of the NPPF, is a useful tool when considering how this is best achieved and monitored and the local planning authority may require one to be submitted with proposals.

5.2.9 Where known air or noise quality issues exist and a significant increase in car based travel is expected from a development, all relevant environmental assessments must be completed as part of the planning application process. Particular issues exist at congested junctions within urban areas and on routes with a high volume of slow moving traffic. Gloucester, Cheltenham and Tewkesbury have declared five Air Quality Management Areas (AQMAs) under Section 83 of the Environment Act 1995 where NO<sub>2</sub> exceedances occur due to traffic-related emissions.

## Delivery

5.2.10 The policies will be implemented through the development management process.

5.2.11 The County Council has provided a number of useful documents which provide advice for developers. These are all available through Gloucestershire County Council's website ([www.gloucestershire.gov.uk](http://www.gloucestershire.gov.uk)) and are periodically updated and added to ensure they remain fit for purpose.

- **Local Developer Guide 2013** - provides a brief overview for developers on the type of infrastructure considerations that should be considered when making a planning application
- **Local Transport Plan 2012 to 2026** - provides an overview of the strategic context of the transport network within the county
- **Manual for Gloucestershire Streets** and its appendices - provides guidance to developers, their consultants and design engineers, Local Planning Authorities, Parish and Town Councils and the public on how new development within Gloucestershire can contribute towards the provision of a safe and sustainable transport network within the County.

## INF3 - FLOOD RISK MANAGEMENT

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### Background

5.3.1 Flooding is a significant issue in the JCS area, which covers parts of the Severn and Avon rivers as well as a large number of smaller watercourses. A considerable amount of the land in the west of the area is part of the functional floodplain. The rivers Severn and Avon pose the greatest flood risk within Tewkesbury, particularly during periods of high flows at the place where the two watercourses meet. Nearly all the borough area drains into the Severn, with the exception of small areas in the far east of the borough which ultimately drain into the Thames. Flooding from surface water is also a problem as the draining of surface water is closely linked to main river levels, with the largely impermeable geology and gentle topography of the borough contributing to increased likelihood of surface water flooding.

5.3.2 The majority of flood risk in Gloucester city arises from the smaller river catchments. While the Severn is capable of coming out of its bank and flooding a large area, flood risk is reduced by the presence of defences. Nevertheless, the Severn may contribute to flooding as the effects of high flows in the smaller streams may be worsened by the elevated levels in the Severn, making it difficult for them to discharge

5.3.3 Cheltenham Borough occupies a low-lying urban area of the Lower Severn catchment. Of particular relevance is the River Chelt, which flows through the centre of Cheltenham and is regulated by a flood alleviation scheme. The high degree of urbanisation coupled with the small size of the catchments and impermeable underlying rock mean that the greatest flood risk in the area is from surface water overloading of the old drainage system, particularly during intense rainfall events.

### Policy INF3 - Flood Risk Management

Development proposals must avoid areas at risk of flooding, in accordance with a risk based sequential approach. Proposals must not increase the level of risk to the safety of occupiers of a site, the local community or the wider environment either on the site or elsewhere. For sites of strategic scale, the cumulative impact of the proposed development on flood risk in relation to existing settlements, communities or allocated sites must be assessed and effectively mitigated.

Minimising the risk of flooding and providing resilience to flooding, taking into account climate change, will be achieved by:

- Requiring new development to, where possible, contribute to a reduction in existing flood risk.
- Applying a sequential test for assessment of applications for development giving priority to land in flood zone 1, and, if no suitable land can be found in flood zone 1, applying the exception test.
- Requiring new development that could cause or exacerbate flooding to be subject to a flood risk assessment which conforms to national policy and incorporates the latest available modelling and historic data and information and guidance contained in the authorities' Strategic Flood Risk Assessments and Supplementary Planning Documents, in order to demonstrate it will be safe, without increasing flood risk elsewhere

- Requiring new development to incorporate suitable Sustainable Drainage Systems (SuDS) where appropriate in the view of the local authority to manage surface water drainage: to avoid any increase in discharge into the public sewer system; to ensure that flood risk is not increased on-site or elsewhere; and to protect the quality of the receiving water course and groundwater. Where possible, the authorities will promote the retrofitting of SuDS and encourage development proposals to reduce the overall flood risk through the design and layout of schemes which enhance natural forms of drainage. Developers will be required to fully fund such mitigation measures for the expected lifetime of the development including adequate provision for on-going maintenance.
- Working with key partners, including the Environment Agency and Gloucestershire County Council, to ensure that any risk of flooding from development proposals is appropriately mitigated and the natural environment is protected in all new development.

**This policy contributes towards achieving Objective 6.**

## Explanation

5.3.4 The NPPF seeks to ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas of high risk. Accordingly, in proposing strategic site allocations to meet demand for development the JCS authorities have applied a sequential, risk-based approach to avoid, where possible, flood risk to people and property and to manage any residual risk, taking account of the impacts of climate change.

5.3.5 The Environment Agency regularly updates the 'Flood Map for Planning' showing areas at high (1 in 100 year), medium (1 in 1,000 year) and low (less than 1 in 1,000 year) risk of flooding (These are Flood Zones 3, 2 and 1 respectively). To complement these maps, Gloucestershire County Council, the Lead Local Flood Authority, prepared a Strategic Flood Risk Assessment (SFRA) Level 1 for the county (September 2008). This assessed all forms of flood risk: fluvial (rivers), tidal (sea), surface water, groundwater, sewers and impounded water bodies (reservoirs and canals), in the context of the situation at the time and taking into account the likely impacts of climate change in the future. Gloucestershire County Council also produces Surface Water Management Plans which seek to identify areas more vulnerable to surface water flooding and indicate measures to mitigate this, recognising that it is not economically viable to eliminate flooding altogether.

5.3.6 To provide more site specific information, two SFRA Level 2 reports (October 2011 and April 2013) were commissioned by the JCS authorities. These involved a more detailed review of flood hazard (flood probability, flood depth, flood velocity, rate of onset of flooding) taking into account the presence of flood risk management measures such as flood defences. In doing this, the JCS authorities have applied the definitions used in the Flood and Water Management Act 2010.

5.3.7 As an overarching principle all new development should seek to provide an overall reduction in flood risk. The risk of flooding can be reduced by:

- Using a sequential approach to determining the suitability of land for development.
- Ensuring that all flood risk management infrastructure is maintained over a development's lifetime including flood storage areas, the channel and access culverts.

- Seeking to ensure that watercourses are left in open space and are well integrated into existing Green Infrastructure wherever possible.
- Careful site design, including reconfiguring ground levels or site access points, culvert improvements, channel restoration the use of planting and existing woods and trees to manage flood risk and incorporating Sustainable Drainage Systems (SuDS). Suitable SuDS solutions will vary according to location, for example underground water storage tanks may not necessarily be suitable or desirable. Developers will need to think creatively about the most sustainable SuDS solutions taking into account principles of good design and the effect of the scheme on the development as a whole and its surroundings.
- Considering the cumulative impact of existing and new development

This list is not exhaustive.

5.3.8 The cumulative impact of development of strategic scale will need to be considered as part of the site specific development control process. This cumulative assessment is most appropriate at the sub-catchment scale, where development areas have the potential to influence downstream flows that could impact existing settlements or permitted or allocated developments. The vulnerability of development from other sources of flooding will be considered as well as the effect of the new development on surface water runoff.

5.3.9 Construction that is resilient (rather than resistant) is favoured because it can be achieved more consistently and is less likely to encourage occupiers to remain in buildings that could be inundated by rapidly rising water levels. Flood resistance and resilience measures should not be used to justify development in inappropriate locations and in isolation are unlikely to make all types of development safe.

5.3.10 The JCS authorities will, in principle, support measures proposed by the Environment Agency and others to reduce flood risk, including increasing the quality / quantity of the floodplain, defending areas at risk of flooding and restoring culverted watercourses back to open channels. This will help to reduce flood risk to counteract the increased threat of flooding through climate change, and provide environmental benefits.

## **Delivery**

5.3.11 Paragraph 100 of the NPPF sets out the requirement to adopt a sequential, risk based approach to the location of development at risk of flood.

5.3.12 Technical Guidance to the NPPF requires that where necessary, the Exception Test should now be applied in the circumstances set out by table 1 and 3 of the technical guidance to the NPPF.

5.3.13 In addition to the formal Sequential Test, the NPPF sets out the requirement for developers to apply the sequential approach (see paragraph 103, first bullet point) to locating development within the site.

5.3.14 Developers should carefully follow guidance from the Environment Agency and Gloucestershire County Council, as well as that contained in this Core Strategy and District plans on the correct way to demonstrate that the exception and sequential tests have been properly applied.

5.3.15 Large scale development should contribute to meeting with the objectives of the EU Water Framework Directive in line with the Severn River Basin Management Plan.

## INF4 - GREEN INFRASTRUCTURE

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### Background

5.4.1 The term ‘green infrastructure’ is used to describe the network of high quality green spaces, water courses and other environmental features in an area. Because of the value of green infrastructure, individual features are often described as ‘assets’. These assets may be large or small, natural or manmade, ranging from expansive natural landscapes to individual trees and green roofs.

5.4.2 Strategic green infrastructure assets in the JCS area include the Cotswolds AONB, the River Severn and its washlands and strategic corridors between major assets and populations including rivers, flood plains, pedestrian and cycle routes. These are shown on the Strategic Green Infrastructure Network Map below.

5.4.3 Local green infrastructure assets include but are not limited to public parks, private gardens, recreation grounds, amenity space, play space, allotments, woodlands and orchards. Linear features such as Public Rights of Way, local cycle paths, footpaths, bridleways, railway embankments, roadside verges, hedgerows, rivers, brooks and the floodplain are particularly important for connectivity. Finally, individual features including trees make a valuable contribution to the network.

5.4.4 All development, including development at strategic allocations, should make a positive contribution to green infrastructure in the JCS area, helping to establish and reinforce networks for ecology, recreation and active travel that are resilient to current and future pressures including climate change. The purpose of this policy is to ensure that individual assets and the integrity and connectivity of the network are planned, protected and enhanced, recognising that networks extend across local authority boundaries at landscape scale.

### Policy INF4 - Green Infrastructure

The green infrastructure network of local and strategic importance will be conserved and enhanced, in order to deliver a series of multifunctional, linked green corridors across the JCS area by:

- improving the quantity and/or quality of assets;
- improving linkages between assets in a manner appropriate to the scale of development, and
- designing improvements in a way that supports the cohesive management of green infrastructure.

Development proposals should consider and contribute positively towards green infrastructure, including the wider landscape context and strategic corridors between major assets and populations. Where new residential development will create, or add to, a need for publicly accessible green space or outdoor space for sports and recreation, this will be fully met in accordance with Policy INF5. Development at Strategic Allocations will be required to deliver connectivity through the site linking urban areas with the wider rural hinterland.

Existing green infrastructure will be protected in a manner that reflects its contribution to ecosystem services (including biodiversity, landscape/townscape quality, the historic environment, public access, recreation and play) and the connectivity of the green infrastructure network. Development proposals that will have an impact on woodlands, hedges and trees will need to include a justification for why this impact cannot be avoided and should incorporate measures acceptable to the local planning authority to mitigate the loss. Mitigation should be provided on-site or, where this is not possible, in the immediate environs of the site.

Where assets are created, retained or replaced within a scheme they should be properly integrated into the design and contribute to local character and distinctiveness. Proposals should also make provisions for future maintenance of green infrastructure.

**This policy contributes towards achieving Objectives 4, 7 and 9.**

## Explanation

5.4.5 According to Natural England, green infrastructure needs to be planned and delivered at all spatial scales from national to neighbourhood levels. The greatest benefits will be gained when this network is designed and managed as a multifunctional resource capable of delivering a wide range of environmental and quality of life benefits (ecosystem services) for local communities. These include social and health benefits associated with recreational space, walking and cycling networks and opportunities for social interaction; environmental benefits such as enhanced biodiversity and flood mitigation; and economic benefits associated with an environment that is attractive to residents, visitors and investors. Design and management of the green infrastructure network should also respect and enhance the character and distinctiveness of an area with regard to habitats and landscape types.

5.4.6 The JCS authorities have produced a Green Infrastructure Strategy based on an assessment of the area's environmental assets. The strategy identifies two key regional/sub-regional green infrastructure assets in the area, the Cotswolds AONB to the east and the River Severn and its washlands to the west. Below this, at an intermediate level, the strategy seeks to link these two assets and the main urban areas through a number of green corridors, most of which are watercourses. At a local level, the strategy identifies watercourse corridors as key green infrastructure assets in the urban areas. Ideally all green infrastructure should link with these areas and form a co-ordinated network. The Green Infrastructure Strategy therefore includes a vision that everyone living in the JCS area can within 300 metres (five minutes' walk time) access a green infrastructure corridor or asset. From there, people will be able to travel through interconnected and multifunctional green spaces to ultimately emerge into the strategic assets of the Cotswold AONB or the Severn and its washlands.

5.4.7 Enhancement of green infrastructure and ecological networks will require existing assets to be retained (where appropriate), improved and better managed, and new features to be created. This could include requiring developer contributions for such provision (for example, a contribution towards the management of the Cotswolds Beechwoods SAC). Policy on developer contributions is set out in Policy INF7. New green infrastructure should combine with established green spaces to thread through and surround the built environment, connecting urban areas and villages with the natural and agricultural areas beyond. This will require delivery of both large and small scale interventions at local, intermediate and strategic/landscape level. Development at

Strategic Allocations will need to deliver connectivity through the site linking urban areas with the wider rural hinterland.

5.4.8 As green infrastructure networks are enhanced by new development it is important that other incidental green infrastructure assets are not lost or allowed to deteriorate. These include private gardens cemeteries and allotments which will not all be identified on local plan proposals maps but are nevertheless an essential element of the wider green infrastructure network.

## **Delivery**

5.4.9 Delivery of a comprehensive green infrastructure network across the JCS area will require a co-ordinated approach to implementing improvements associated with new developments. This will be pursued in the context of Gloucestershire's Strategic Green Infrastructure Framework and the JCS Green Infrastructure Strategy. The JCS local authorities will work with their neighbours beyond the JCS area to deliver green infrastructure improvements in cross-boundary locations.

5.4.10 Delivery will be achieved primarily through the Development Management process. This will include landscaping, trees and other planting that meets the requirements of Policy SD5. Innovative features such as green roofs and living walls can also contribute to the network. Where new development creates a need for publicly accessible green space, developers will need to make provision in accordance with Policy INF5.

5.4.11 Moving towards achieving the vision of the Green Infrastructure Strategy will require each development proposal to consider how it can contribute to improving connectivity in the network. Key linkages between areas of green infrastructure will be targeted through the JCS-wide Strategic Green Infrastructure Map and the urban area green infrastructure maps contained in the Green Infrastructure Strategy. Proposals that improve the accessibility of the green infrastructure network for sports, play and travel, for example by creating, improving or extending footpaths, bridleways and cycling links, will therefore be encouraged. Accessibility improvements should take account of the need to protect the ecological function of these corridors in accordance with Policy SD10.

5.4.12 Where specific policies are required to designate and protect local green infrastructure assets (such as public parks, sports pitches, allotments or local green space) these will be included in district plans and illustrated on associated Proposals Maps. Other detailed policies relating to green infrastructure provision and protection, such as tree planting requirements and Tree Preservation Orders, will also be contained in district plans where necessary. Ancient woodland and veteran trees will be protected in accordance with the NPPF.

5.4.13 Mechanisms and funding streams associated with other countywide and local strategies will help to secure improvements to green infrastructure. These include strategies for parks and open spaces, biodiversity/nature conservation and local transport. Landscape-scale projects that support the delivery of Policy SD10 will particularly be encouraged. Proposals that enable the expansion, buffering and re-connection of native and ancient woodland will also be encouraged.



## INF5 - SOCIAL & COMMUNITY INFRASTRUCTURE

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### Background

5.5.1 Everyone living and working in the JCS area should have access to facilities that meet their everyday needs. Essential social and community infrastructure includes schools, health services, community and spiritual centres, libraries, sports pitches, open space and children’s crèche and play provision. Other cultural and sports facilities such as museums, galleries and entertainment venues serve the community whilst also providing an important tourist attraction. By bringing people together and providing opportunities for social and physical activity, all of these facilities contribute to quality of life, health and wellbeing in the area.

### Policy INF5 - Social & Community Infrastructure

Proposals to develop land or buildings currently or previously in use as a community facility will demonstrate, including evidence of engagement with relevant local community groups and partner organisations, why the facility is no longer required and, as appropriate, how, when and where suitable local replacement facilities will be provided. Provision of replacement facilities will have regard to the locational and other relevant elements of this policy.

Where new residential development will create, or add to, a need for community facilities, it will be fully met as on-site provision and/or as a contribution to facilities or services off-site. New or refurbished provision will be of an appropriate type, standard and size. From an early stage developers will be expected to engage with the relevant local authorities and infrastructure providers and, as appropriate, relevant local community groups where they exist, to ensure that new provision meets the needs of the community that it will serve and is fit for purpose.

Social and community infrastructure should be centrally located to the population it serves and be easily accessible on foot and by bicycle. It should be located so as to have the potential to be well served by public transport. Developers should aim to provide flexible, multi-functional facilities within mixed-use developments, creating shared space which maximises benefits to the community and minimises land-take. In the case of open space “easily accessible” means it is located within reasonable walking distance of the development it serves. New facilities should be accessible to all members of the community and be planned and phased in parallel with new development.

**This policy contributes towards achieving Objectives 7, 8 and 9**

### Explanation

5.5.2 By providing and helping to maintain social and community infrastructure, development has an important role in promoting social well-being and creating healthy, inclusive communities. For the purpose of this policy and having regard to the JCS Infrastructure Delivery Plan, infrastructure in this respect includes: facilities for education and training, health and social care, community and culture, village halls, local shops and pubs, libraries, places of worship, major sporting attractions, leisure centres and

children's play provision. Infrastructure for health, social care and education are essential community facilities that will need to be assessed in accordance with NPPF paragraph 162.

5.5.3 It is important that new development which will add to the combined needs of the community contributes to new or expanded facilities to ensure that these additional needs are met. For provision to be sufficient and timely it must be brought forward in parallel with new housing and other development so that facilities are available for use when needed. Where new development occurs in areas of inequality or undersupply, there may be opportunities to re-connect the area and provide wider benefits. Developers should therefore take opportunities where they exist to integrate new provision with existing facilities (for example by extending a facility) or to provide it in a location that is accessible to residents of neighbouring areas with identified needs.

5.5.4 The right location for a community facility will depend on its scale and function. Facilities that serve the day-to-day needs of a community should be located in local centres close to the communities that they serve and should be fully accessible and inclusive. The location of higher level facilities, such as leisure centres, should be highly accessible to all members of the community and where possible should be directed to an allocated site or an appropriate site in an area of undersupply. All facilities should be accessible by walking, cycling and public transport. Mixed-use development can help to ensure that homes and businesses are close to services and that neighbourhoods are safe, lively and well maintained. Facilities that are flexible and perform a range of functions can also help to generate higher levels of activity whilst making more efficient use of land.

5.5.5 As stated in the introduction, social and community infrastructure is vitally important in ensuring the quality of life and well-being of communities. For this reason, the redevelopment of a community facility will only be acceptable in certain circumstances. For example where the facility will be replaced, or where it can satisfactorily be demonstrated that there is no current or future need or demand, or where a marginal loss will result in improvement or provision of a complementary use. Proposals to build on existing sports and recreational buildings and land should be considered in accordance with the criteria in the NPPF.

## **Delivery**

5.5.6 Delivery will primarily be through the development management process. Through preparation and implementation of the JCS IDP, the three JCS councils and neighbourhood plans will continue to work collaboratively with infrastructure providers, developers and partnership groups to seek to ensure that social and community infrastructure needs of existing and future communities are met.

# INF6 - RENEWABLE ENERGY & LOW CARBON ENERGY DEVELOPMENT

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## Background

5.6.1 Renewable energy is energy that has been derived from natural resources that are generally regenerative or are practically inexhaustible. As well as the more usual renewable technologies such as wind and solar, there is potential for hydro, biomass and biogas. Some of these technologies such as biogas provide opportunities for rural employment as well as biodiversity and landscape benefits.

5.6.2 Some renewable energy technologies such as ground source heat pumps and solar panels can easily form part of a range of sustainable design and construction measures (set out in Policy SD4) and should be readily incorporated into new developments wherever possible taking into account the other policies in this plan.

5.6.3 Commercial renewable energy installations tend to be large as they have to capture the available natural energy from the environment around them and as such they have tended to be controversial. Wind farm development in particular has been perceived as visually intrusive, although generally wind generation is supported by the vast majority of the population (NOP DTI commissioned survey 2006).

5.6.4 The drive for renewable/low carbon sources of energy is not just about reducing greenhouse gas emissions, it also concerns a more secure energy market, long term cheaper energy costs, and importantly for the JCS, retaining money within the local economy. Installation of plant can also support local job creation.

5.6.5 This policy applies to proposals concerning all renewable energy or low carbon energy generating technologies, including wind turbines, biomass generators, anaerobic digestion plants and other energy from waste technologies, hydropower turbines, and ground mounted solar photovoltaic arrays.

### Policy INF6 - Renewable Energy/Low Carbon Energy Development

Proposals for the generation of energy from renewable resources, or low carbon energy development, will be supported, provided the wider environmental, social or economic benefits of the installation would not be outweighed by a significant adverse impact on the local environment taking into account the following factors:

- The impact (or cumulative impact) of the scheme including any associated transmission lines, buildings and access roads on landscape character, local amenity, heritage assets or biodiversity.
- Any effect on a protected area such as the Cotswolds Area of Outstanding Natural Beauty or other designated areas such as the Green Belt
- Any unacceptable adverse impacts on users and residents of the local area, including emissions, noise, odour, and visual amenity including shadow flicker.

Proposals are more likely to be supported when they demonstrate:

- That they have been designed and sited so as to minimise any adverse impacts on the surrounding area.

- Benefits arising directly from the scheme to the local economy, the community and achievement of national targets.
- The feasibility and cost effectiveness of removing any installation and re-instatement of the site in future years.
- The net gain of carbon savings taking into account carbon use through manufacturing and installation of the technology.

**This policy contributes towards achieving Objective 4 and 6.**

## Explanation

5.6.6 The Government has adopted ambitious targets for renewable energy generation. Nationally the expectation is that we will generate 15% of our total energy demand through renewable sources by 2020. This is total energy that includes heat and transport. To achieve this, a step change in the take up of renewables will be needed, and the planning system has a key role to play in this. There are more ambitious targets for 2030 and beyond.

5.6.7 The NPPF makes clear that planning plays a key role in reducing greenhouse emissions and supporting the delivery of renewable and low carbon associated infrastructure. Amongst other things LPAs should have a positive strategy to promote renewable and low carbon energy, have policies that maximise renewables and low carbon development while ensuring their adverse impacts are satisfactorily addressed, and give support to community led initiatives.

5.6.8 The NPPF suggests that LPAs consider identifying suitable areas for renewable energy. Gloucestershire County Council commissioned ENTEC to undertake a study into renewable energy capacity across the county in 2010. It established that 10% on-site energy generation was feasible in most development scenarios, which has been set out in Policy SD4. It also considered renewable/low carbon development at a commercial level and identified wind and biomass as potential resources for the JCS area. Furthermore, it identified that there were no significant grid constraints within the JCS area and that electric and gas grid availability was generally good. The ENTEC study does not provide sufficiently strong evidence on its own to enable the JCS authorities to identify suitable areas for developing renewable energy, however district plans may seek to identify these based on more detailed local evidence, or may seek to provide further guidance on the issue.

## Delivery

5.6.9 Other than through the technologies incorporated into buildings through design and sustainable construction; delivery of renewable energy development will be through the private sector bringing forward proposals for commercial renewable or low carbon energy generation. This may be significantly influenced by the incentive regimes that are in place at a national level whether for heat or electricity.

5.6.10 The JCS authorities will work in partnership with Gloucestershire County Council, the LEP and other partner organisations, to identify and take advantage of opportunities to increase renewable energy generation, such as the potential for providing combined heat and power to new development, wherever it is compliant with the other policies in this plan.

5.6.11 Development Management decision taking will reflect the value and priority attached to moving towards a low carbon economy and more sustainable energy generation.

# INF7 - INFRASTRUCTURE DELIVERY

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## Background

5.7.1 Government says that “The quality of a nation’s infrastructure is one of the foundations of its rate of growth and the living standards of its people. That is why the government has put long-term investment in roads, railways, energy, telecommunications and flood defences at the heart of its growth plan.” (National Infrastructure Plan 2013 p.3). This standpoint is mirrored in the National Planning Policy Framework. There is little further to add in emphasising the importance of infrastructure in all its forms to the community as a whole.

### Policy INF7 - Infrastructure Delivery

Where need is generated as a result of individual site proposals and/or as a consequence of cumulative impact, new development will be served and supported by adequate and appropriate on- and/or off-site infrastructure and services. In identifying infrastructure requirements, development proposals will also demonstrate that full regard has been had, where appropriate, to implementing the requirements of the Joint Core Strategy Infrastructure Delivery Plan.

Where need for additional infrastructure and services and/or impacts on existing infrastructure and services is expected to arise, the local planning authority will seek to secure appropriate and proportionate infrastructure provision in respect of:

- Affordable housing;
- Climate change mitigation / adaptation;
- Community facilities;
- Early Years and Education;
- Health and wellbeing facilities;
- The highway network, traffic management, sustainable transport and disabled people's access;
- Protection of cultural and heritage assets and the potential for their enhancement;
- Protection of environmental assets and the potential for their enhancement ;
- Provision of Green Infrastructure including open space;
- Public realm; and
- Safety and security including emergency ‘blue-light’ services

This list is neither exhaustive nor are its elements mutually exclusive.

Priority for provision will be assessed both on a site by site basis and having regard to the mitigation of cumulative impact together with implementation of the JCS Infrastructure Delivery Plan.

Planning permission will be granted only where sufficient provision has been made for infrastructure and services (together with their continued maintenance) to meet the needs of new development and/or which is required to mitigate the impact of new development upon existing communities. Infrastructure and services must be provided in line with an agreed, phased timescale and in accordance with other requirements of this plan.

**This policy contributes towards achieving Objectives 1, 3, 4, 5, 7, 8 and 9.**

## **Explanation**

5.7.2 Growth and development can have a significant impact upon existing infrastructure and services in an area. It is critical that new proposals integrate as seamlessly as possible with existing provision so that local communities are not unacceptably disturbed, disadvantaged or disrupted, and environmental impact is minimised and the efficiency and competitiveness of the economy is not compromised. The Infrastructure Delivery Plan (IDP), which underpins and accompanies the Joint Core Strategy, sets out the infrastructure that is required to ensure that these objectives are upheld. Operating within a plan-led system, developers are therefore required to encompass implementation of the IDP within their proposals.

5.7.3 The JCS proposes in policies SP1 and SP2 a significant level of growth to 2031 and beyond. Strategic allocations are proposed for several major development sites that are likely to generate the need for new infrastructure and services provided on site and in an integrated manner. In addition, the JCS also recognises the potential impact of smaller-scale proposals that cumulatively will have an impact upon the existing provision and pattern of infrastructure within the area. For this reason the policy incorporates the potential requirement for “off-site” infrastructure as well as dedicated, on-site provision within a development.

5.7.4 It follows from the preceding paragraphs and from the background to this policy, that the provision of infrastructure is a matter of critical importance in the consideration and determination of applications for planning permission. Existing infrastructure may have sufficient capacity to absorb some if not all of the envisaged impact of new development. However, in many instances this may not be the case. Furthermore, where additional provision is needed the JCS authorities acknowledge that it may not be practical and / or economically viable to require a developer to make provision for all required infrastructure identified with their proposal at the outset. Consequently a phased approach to provision and maintenance, fully justified within the application, may be acceptable.. Nevertheless, if sufficient provision cannot be adequately demonstrated both in terms of infrastructure items and necessary maintenance, planning permission is likely to be refused. For the avoidance of doubt, references to “new development” in policy INF7 are not necessarily subject to considerations of scale.

## **Delivery**

5.7.5 This policy will primarily be delivered through the development management process. Prospective developers should begin identification of infrastructure requirements at an early stage in the formulation of a proposal, seeking advice and guidance from infrastructure providers, local authorities and local communities where necessary. There are several policies elsewhere in the JCS that directly or indirectly relate to the provision of infrastructure - prospective developers should read the JCS as a whole.

## INF8 - DEVELOPER CONTRIBUTIONS

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### Background

5.8.1 Planning obligations under Section 106 of the Town and Country Planning Act 1990 are used to mitigate harm that may be caused by a development. Obligations are negotiated as part of the planning application process, either as Unilateral Undertakings or as Agreements. The Act enables Local Planning Authorities and developers to negotiate a range of obligations, which can be linked to financial contributions, be restrictive in nature or require specific works or actions to take place.

5.8.2 The Planning Act 2008 and relevant regulations also make provision for a Community Infrastructure Levy (CIL). Following a formal preparation process that includes independent public examination, through setting a Charging Schedule that sets out local tariffs CIL empowers local planning authorities to make standard charges on all new development over a certain threshold.

5.8.3 The Joint Core Strategy Authorities will continue to use S106 Planning Obligations during a transitional period when consideration is given by each of the three constituent authorities to the introduction of a CIL system. Even where CIL is introduced it is likely that the S.106 mechanism will be retained for use in securing site-specific obligations and particularly in respect of affordable housing.

### Policy INF8 - Developer Contributions

Arrangements for direct implementation or financial contributions towards the provision of infrastructure and services required as a consequence of development including its wider cumulative impact, and provision where appropriate for its maintenance, will be negotiated with developers before the grant of planning permission.

Where, having regard to the on- and/or off-site provision of infrastructure, there is concern relating to the viability of the development, an independent viability assessment, funded by the developer and in proportion with the scale, nature and/or context of the proposal, will be required to accompany planning applications. The submitted assessment and its methodology may be independently appraised.

**This policy contributes towards achieving Objectives 1, 3, 4, 6, 7 and 9**

### Explanation

5.8.4 To secure the best use of land, the JCS authorities need to ensure, through the use of conditions and planning obligations attached to planning permissions, that new development provides for the infrastructure, facilities, amenities and other planning benefits which are necessary to support and serve it, and to offset any consequential or potential loss to the local area which may result from the development.

5.8.5 The JCS authorities recognise that economic viability of development can be finely balanced particularly where significant infrastructure requirements are identified as being needed to make the proposal acceptable to the local planning authority (LPA). The balance may be particularly sensitive in respect of redevelopment of brownfield land and,



where evidence is available, the LPA will be mindful of that in those cases. It is in the interests both of the LPA and the developer that an independent viability assessment is undertaken to enable an objective appraisal to inform negotiations. Whilst the JCS authorities recognise that the viability assessment needs to be proportionate with the nature and scale of the proposal, it should not be assumed that only “major” development as defined in regulations will be subject to this requirement. It will be a matter for the LPA to decide, on a case by case basis, the requirement for and scope of viability assessment.

## **Delivery**

5.8.6 This policy will primarily be delivered through the development management process. Early engagement with the local planning authority at pre-application stage is encouraged. Developers may note in this respect that Gloucestershire County Council has adopted a “Local Developer Guide: Infrastructure & Services with New Development” (February 2013) that relates to infrastructure requirements and associated matters for which it is responsible.

# PART 6 - Strategic Allocations

## POLICY SA1 - STRATEGIC ALLOCATIONS POLICY

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### Background

Strategic policies SP1 and SP2 in Chapter 3 of this plan set out the scale and distribution of development to be delivered across the JCS area in the period to 2031. The identification and delivery of eight strategic allocations on the edge of existing urban areas is an important part of the delivery of the Core Strategy as a whole.

Policy SA1 formally designates these eight strategic allocations and focuses on the need to deliver comprehensive development in each of these areas. Comprehensive development is critical in ensuring that large-scale proposals efficiently use land, maximise the efficient and effective delivery of infrastructure over the life of the development and ensure the protection and enhancement of natural resources.

The Strategic Allocations Report details the process by which the approximate capacity of the sites in table SA1 was calculated. The approach took into account extensive work carried out over a number of years on the developable areas within these allocation boundaries. Once these areas were identified, the yield of homes predicted to arise from the site was reduced to take into account infrastructure and green space requirements. These reductions in yield are in addition to reductions made to allow for areas already identified solely for green infrastructure within the allocation boundaries. Where available, detailed work from prospective developers was assessed and considered along with other available technical reports to ensure that the numbers in table SA1 are as accurate and achievable as possible.

### Policy SA1 - Strategic Allocations Policy

New development will be provided within strategic allocations in order to deliver the scale and distribution of development set out in policies SP1 and SP2.

The strategic allocations are listed in Table SA1 and delineated on Plans A1 to A9 below and are marked on the proposed submission policies map. The red lines on Plans A1 - A9 (not including A7) mark the boundaries of the allocations and are separately and collectively part of this policy.

Proposals must be accompanied by a comprehensive master plan for the strategic allocation. This should demonstrate how new development will integrate with and complement its surroundings in an appropriate manner, in accordance with policy SD5.

Proposals will be required to demonstrate how the provision of new Gypsy, Traveller and Travelling Showpeople sites will be incorporated into development proposals for strategic allocations.

Strategic Allocations which include residential development should seek in all cases to retain and enhance areas of local green space within the boundary of the allocation which meet the criteria in NPPF paragraph 77, whilst delivering the scale and distribution of development required by this policy. This is in addition to the requirements of policy INF 4.

Development proposals should enable a comprehensive scheme to be delivered across the developable area within each strategic allocation. Developers must engage with the relevant infrastructure regulators and providers to ensure implementation of the Infrastructure Delivery Plan or provision of other necessary infrastructure, as appropriate, and in accordance with policies INF7 and INF8. Developers must ensure that strategic allocations provide an appropriate scale and mix of uses, in suitable

**Table SA1**

|                                 | Precise Housing Site Total | Rounded Housing Site Total (Allocation figures) | Precise Housing to be delivered up to 2031 | Hectares of Employment land to be delivered up to 2031 |
|---------------------------------|----------------------------|---|--|--|
| A1 Innsworth                    | 1250                       | 1250  | 1250                                       | 9.1 ha   |
| A2 North Churchdown             | 528                        | 530   | 528  | N/A  |
| A3 South Churchdown             | 868                        | 870   | 868  | 17.4 ha  |
| A4 North Brockworth             | 1500                       | 1500  | 1500                                       | N/A  |
| A5 North West Cheltenham        | 4785                       | 4785  | 4785                                       | 23.4 ha  |
| A6 South Cheltenham Leckhampton | 1124                       | 1125  | 1124                                       | N/A  |
| A8 MOD Site at Ashchurch        | 2726                       | 2726  | 2125                                       | 20 ha*<br><br>* (this is replacement of existing use)  |
| A9 Ashchurch                    | N/A                        | N/A   | N/A  | 14.3 ha  |
| <b>Total</b>                    | <b>12,781</b>              | <b>12,785</b>                                   | <b>12,184</b>                              | <b>64.2 ha</b>   |

## Explanation:

Proposals for development at strategic allocations must have regard to all relevant planning policies in the plan as well as Policy SA1. The JCS identifies a number of specific requirements for strategic allocations and other major developments, which include the following:

| Policy | Requirement   |
|--------|---|
| SD3    | The provision of new local centres of an appropriate scale to provide for the everyday needs of new communities   |
| SD4    | Major planning applications must be accompanied by a waste minimisation statement and an Energy Statement   |
| SD5    | Policy SD5 sets out design requirements including master planning. Master plans are required for all strategic allocations by Policy SA1.   |
| SD7    | Planning applications will be supported by a Landscape and Visual Impact Assessment, where, at the discretion of the local planning authority, one is required.   |
| SD9    | Development proposals at strategic allocations must have regard to the findings and recommendations of the JCS Historic Environment Assessment (or any subsequent revision)                                       |
| SD14   | Policy SD14 sets criteria for proposals for new Gypsy, Traveller and Travelling Showpeople sites. Policy SA1 requires proposals at Strategic Allocations to consider provision of these sites at these locations. |
| SD15   | Proposals for development at strategic allocations must be accompanied by a health impact assessment  |
| INF3   | The cumulative impact of the proposed development on flood risk in relation to existing settlements, communities or allocated sites must be assessed and effectively mitigated                                    |
| INF4   | Development at Strategic Allocations will be required to deliver connectivity through the site linking urban areas with the wider rural hinterland.   |

Development proposals concerning strategic allocations must be in accordance with the provisions of the development plan as a whole, including:

- retained policies from the 2006 Cheltenham and Tewkesbury Local Plans
- adopted or emerging Gloucester, Cheltenham or Tewkesbury District Plans,
- adopted or emerging Minerals or Waste Plans of Gloucestershire County Council

and

- emerging or adopted neighbourhood plans

## Red Line Plans and descriptions

Red lines show the policy allocation area, and are drawn to follow identifiable boundaries such as roads and watercourses wherever available. Areas of land and buildings which may not be suitable or available for redevelopment are included within these boundaries. However site allocations work has indicated that a development of the scale set out in table SA1 will be achievable within these locations.

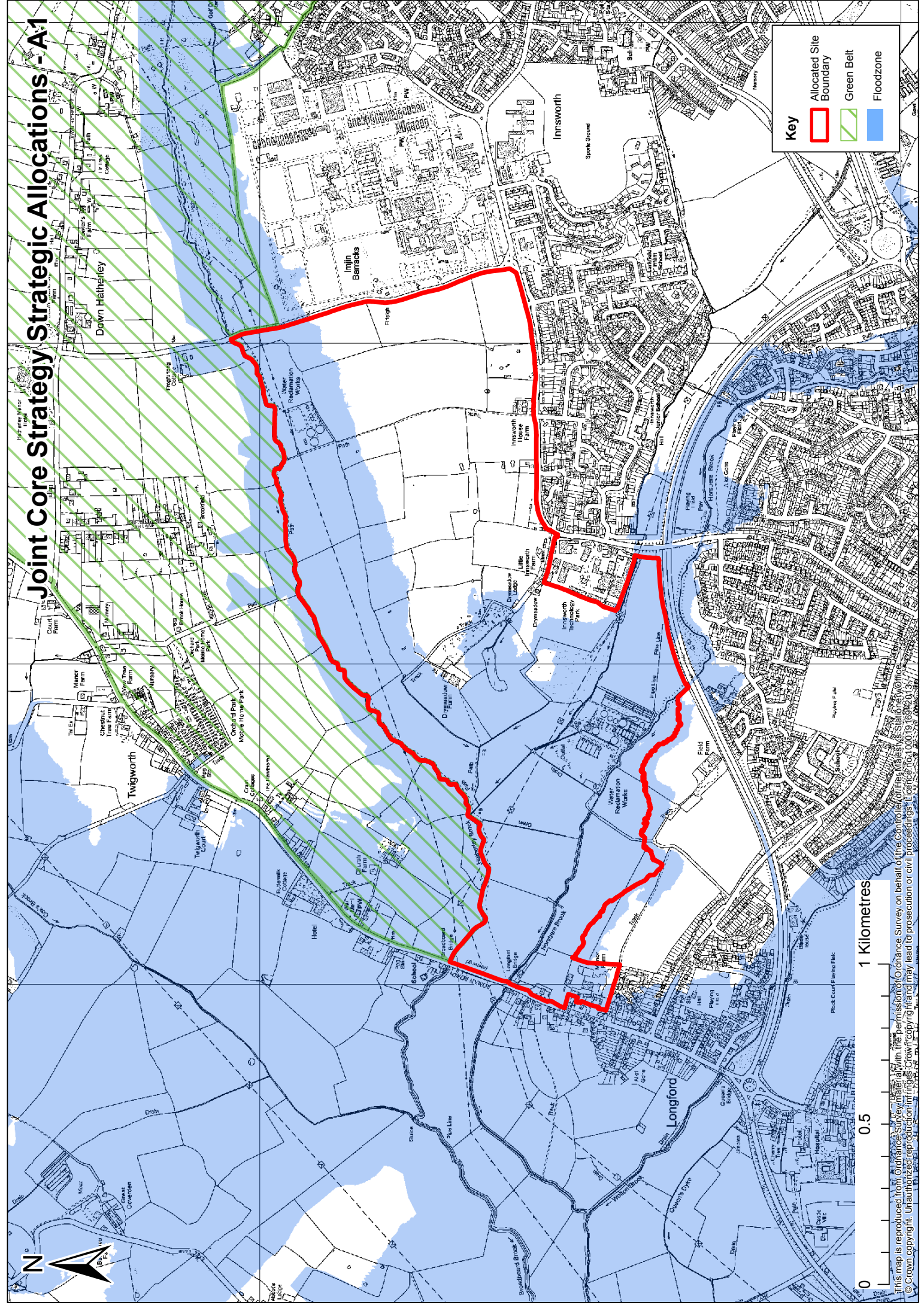
Full regard must be given to the requirements of NPPF, this Plan and District and Neighbourhood Plans when assessing development options for these locations. Proposals should take account of the indicative site layouts prepared as part of this document and ensure that key elements are wherever possible integrated into master planning.

## Plan A1 - Innsworth

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This strategic allocation lies to the north of Gloucester and is bounded by Innsworth Lane and Innsworth Technology Park to the south, open countryside to the west, the Hatherley Brook and its associated floodplain to the north and Frogfurlong Lane and Imjin Barracks to the east. The residential settlement of Innsworth lies to the south of the site. A Site of Special Scientific Interest is situated within the Strategic Allocation to the north west of the site.

# Joint Core Strategy Strategic Allocations - A1



**Key**

- Allocated Site Boundary (Red outline)
- Green Belt (Green hatched)
- Floodzone (Blue)



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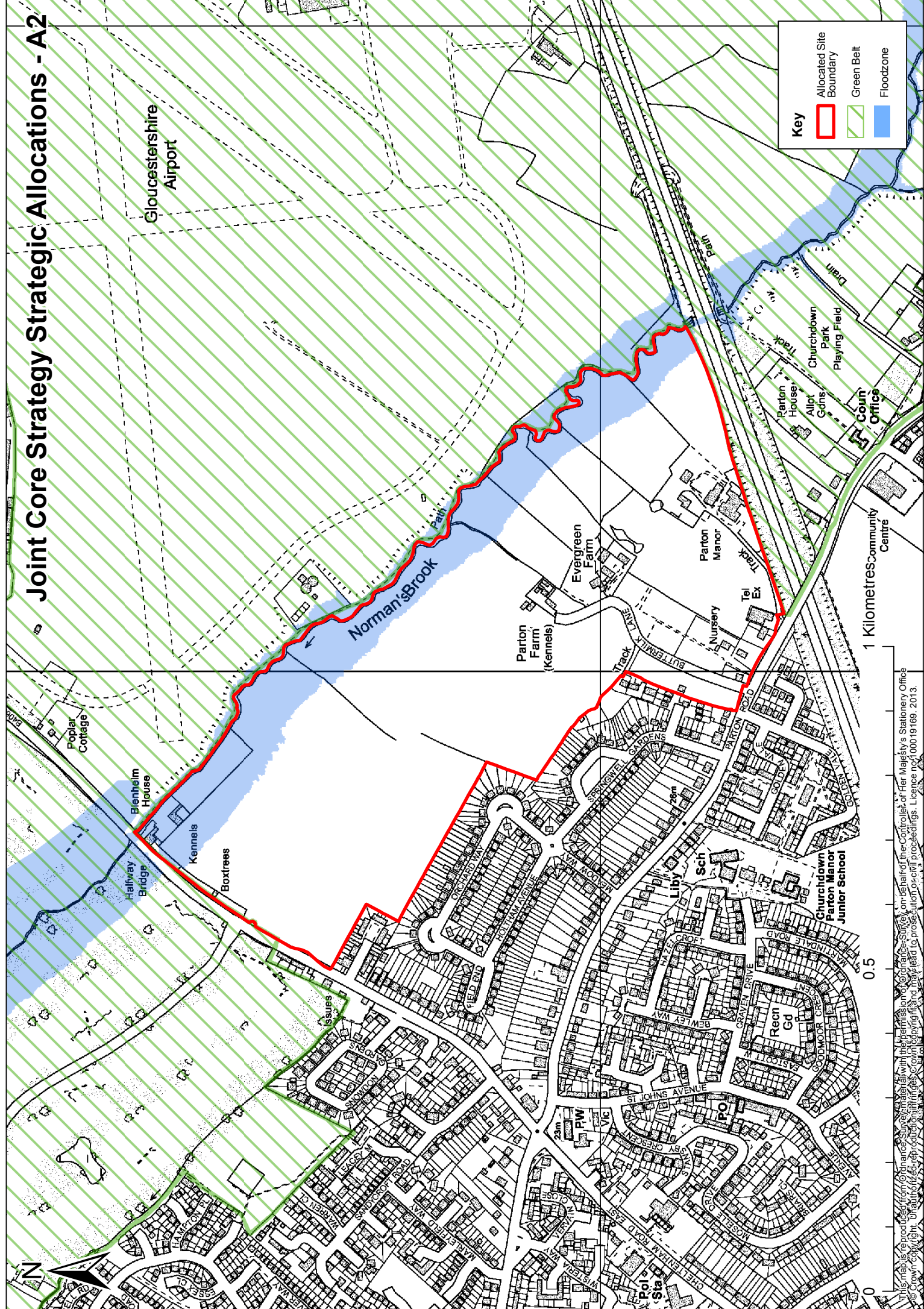
## Plan A2 - North Churchdown

---

This strategic allocation lies to the north of Churchdown and is bounded by the A40 Golden Valley to the south, Parton Road and residential development to the south west, the B4063 to the west and Normans Brook and the airport to the north east. The site is located to the north of the built up area of Churchdown village.



# Joint Core Strategy Strategic Allocations - A2



0.5  
1 Kilometres

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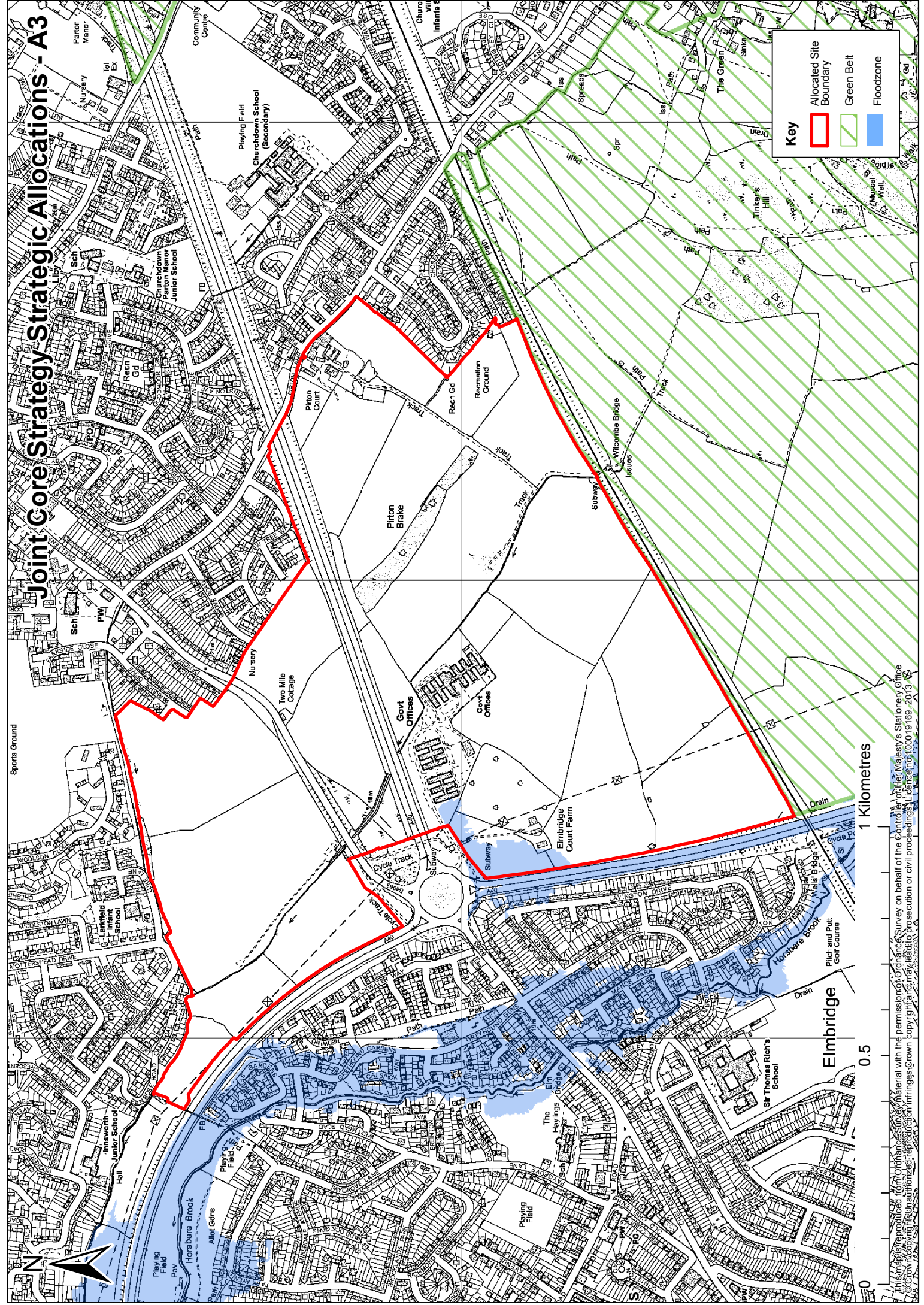
## Plan A3 - South Churchdown




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This strategic allocation lies to the south of Churchdown and Innsworth and is bounded to the west by the A40 and the A417 to the north by Innsworth, to the north east by Churchdown and to the south by the mainline Gloucester to Cheltenham railway. The site is bisected by the A40 Golden Valley dual carriageway. Part of the site is currently the subject of a planning application to the County Council for a Park and Ride facility at Elmbridge. Existing offices and a new emergency fire and ambulance response station are located adjacent to the the Elmbridge Court roundabout at the west of the site. The heritage asset of Pirton Court lies to the north east of the site at Pirton Lane and a historic orchard is located to the west of the site.



# Joint Core Strategy Strategic Allocations - A3



| Key   |                         |
|---|-------------------------|
|  | Allocated Site Boundary |
|  | Green Belt              |
|  | Floodzone               |

1 Kilometres

0.5

0

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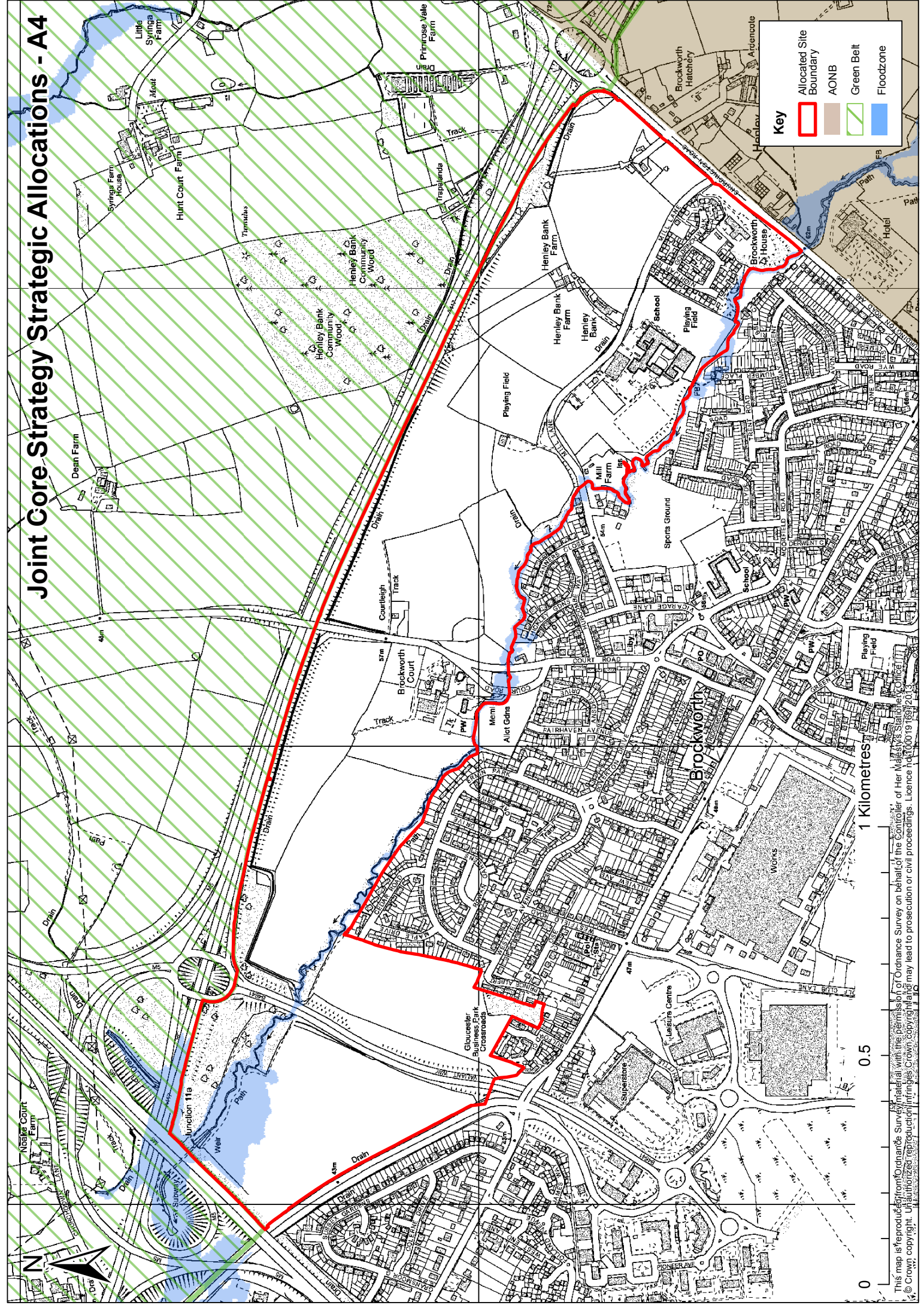
## Plan A4 - North Brockworth

---





This strategic allocation lies to the north of Brockworth and is bounded to the south by Mill Lane and the existing built form of Brockworth and Huccelcote, to the west by the M5, to the north by the A417 dual carriageway and to the east by the A46 Shurdington Road. The site includes the designated heritage assets of St. Nicholas Church and Brockworth Court and roman and medieval archaeology is prevalent across the site. Two historic orchards are located within the site.



# Joint Core Strategy Strategic Allocations - A4



**Key**

|   |                         |
|---|-------------------------|
|  | Allocated Site Boundary |
|  | AONB                    |
|  | Green Belt              |
|  | Floodzone               |

0 0.5 1 Kilometres

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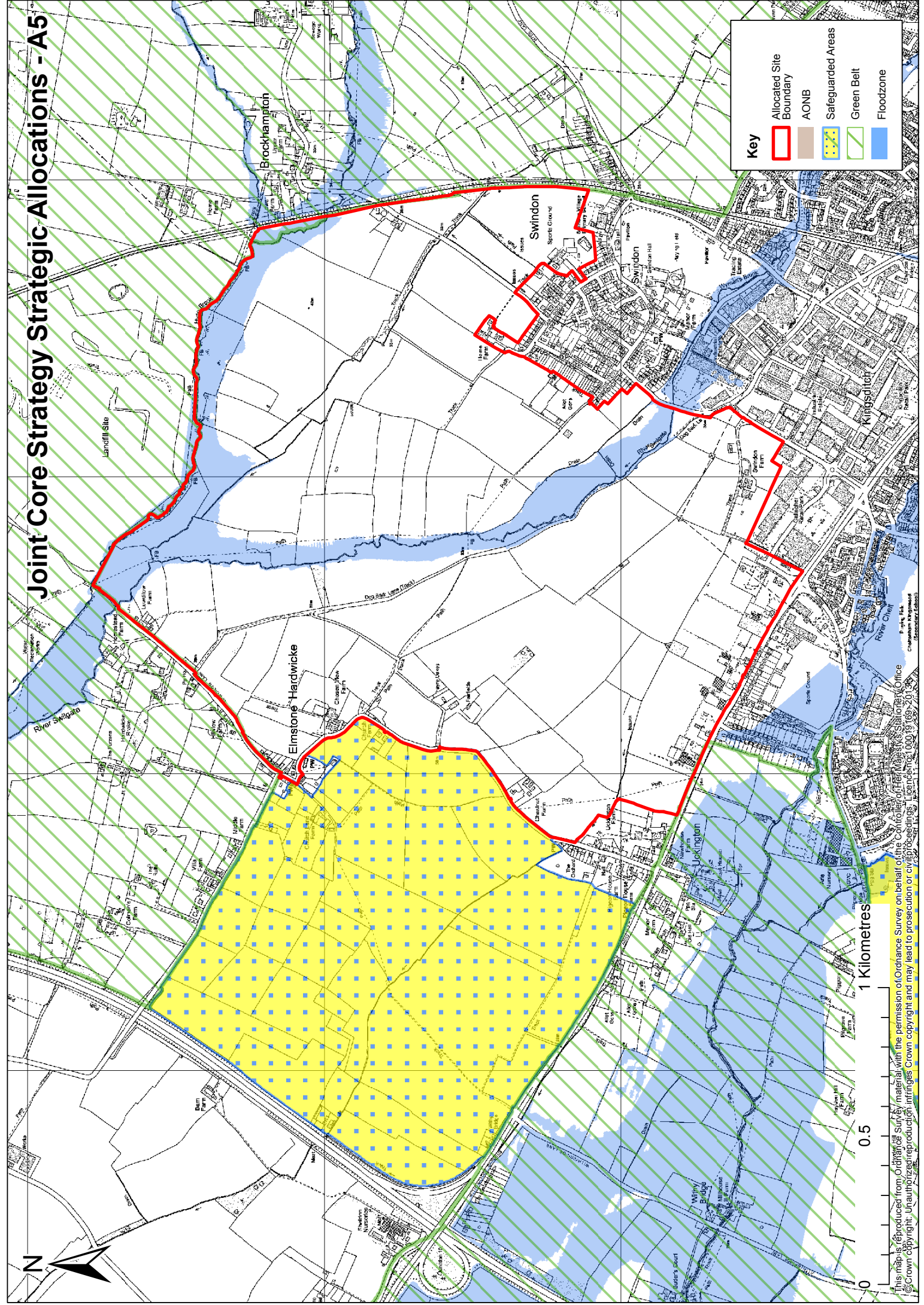
## Plan A5 - North West Cheltenham

---

This strategic allocation is located adjacent to the north western edge of Cheltenham, north of the A4019 Tewkesbury Road and west of the Gallagher Retail Park, Kingsditch Industrial Estate and Swindon Village. The land is predominantly in mixed agricultural use. There are a number of watercourses within the site boundary including the Swilgate, Hyde Brook and Leigh Brook. Two water courses converge towards Elmstone Hardicke have associated land within the functional floodplain.



# Joint Core Strategy Strategic Allocations - A5



**Key**

- Allocated Site Boundary (Red outline)
- AONB (Yellow area with blue dots)
- Safeguarded Areas (Green hatched area)
- Green Belt (Green hatched area)
- Floodzone (Blue area)

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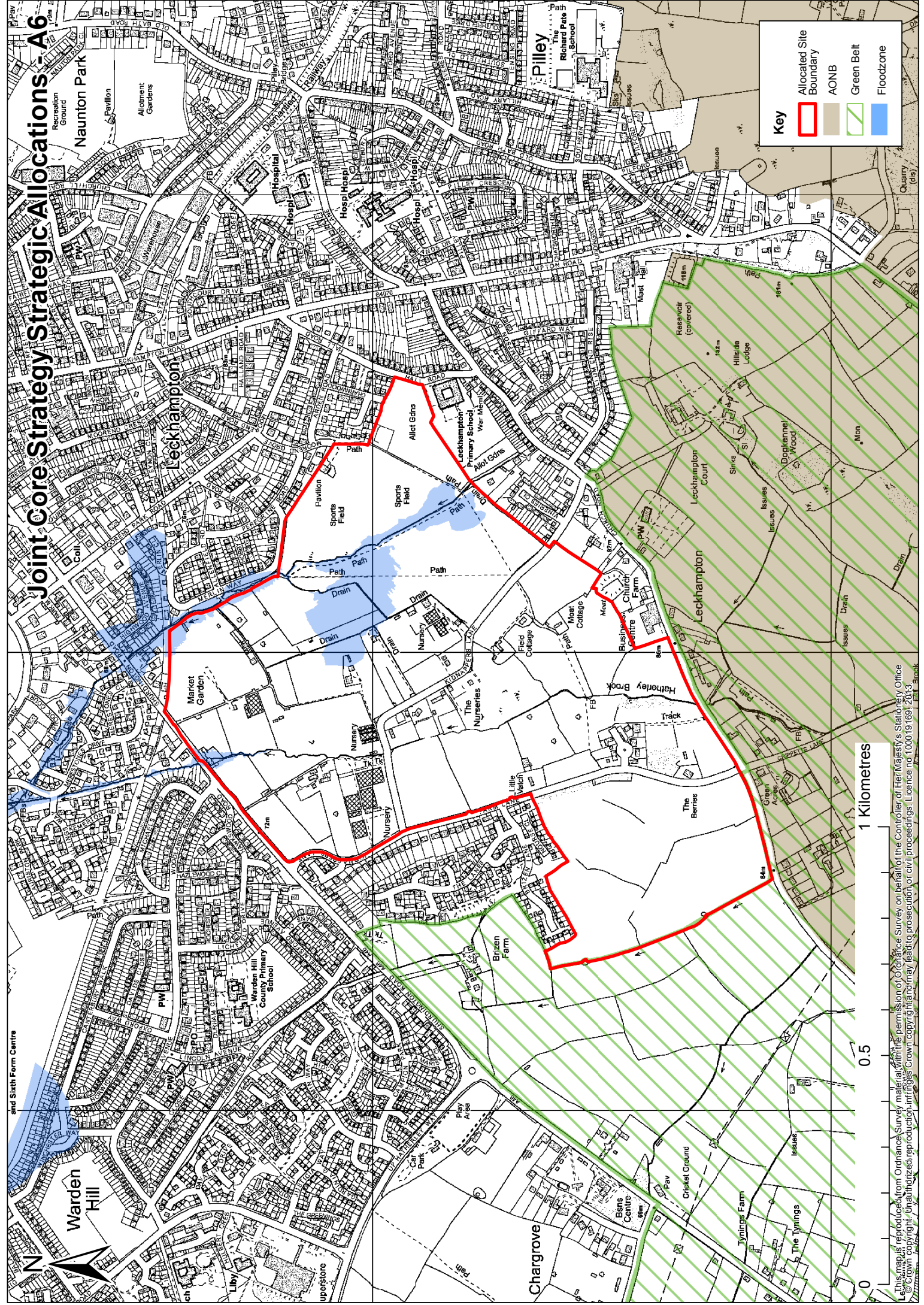
## Plan A6 - South Cheltenham - Leckhampton

---

The strategic allocation area is located to the south of Cheltenham, south of Shurdington road and north of Church Road on the lower slopes of Leckhampton Hill, adjoining the Area of Outstanding Natural Beauty (AONB). The land is divided by Hatherley Brook and crossed diagonally from north-west to south-east by Kidnappers Lane. The area to the north of the strategic allocation contains a mixture of paddocks, allotments, small holdings, nurseries and some dwellings. It is divided by hedges with few specimen trees. This strategic allocation is of local historical importance to Leckhampton, which has long been an area of settlement. The Church, The Rectory, Field Cottage and Moat Cottage are all listed buildings and the moated site is an ancient monument.



# Joint Core Strategy Strategic Allocations - A6



| Key   |                         |
|---|-------------------------|
| <span style="border: 2px solid red; display: inline-block; width: 15px; height: 10px;"></span>  | Allocated Site Boundary |
| <span style="background-color: #d2b48c; display: inline-block; width: 15px; height: 10px;"></span>  | AONB                    |
| <span style="background: repeating-linear-gradient(45deg, transparent, transparent 2px, green 2px, green 4px); display: inline-block; width: 15px; height: 10px;"></span> | Green Belt              |
| <span style="background-color: #add8e6; display: inline-block; width: 15px; height: 10px;"></span>  | Floodzone               |

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## Plan A7 - South Cheltenham - Up Hatherley Way

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Removed

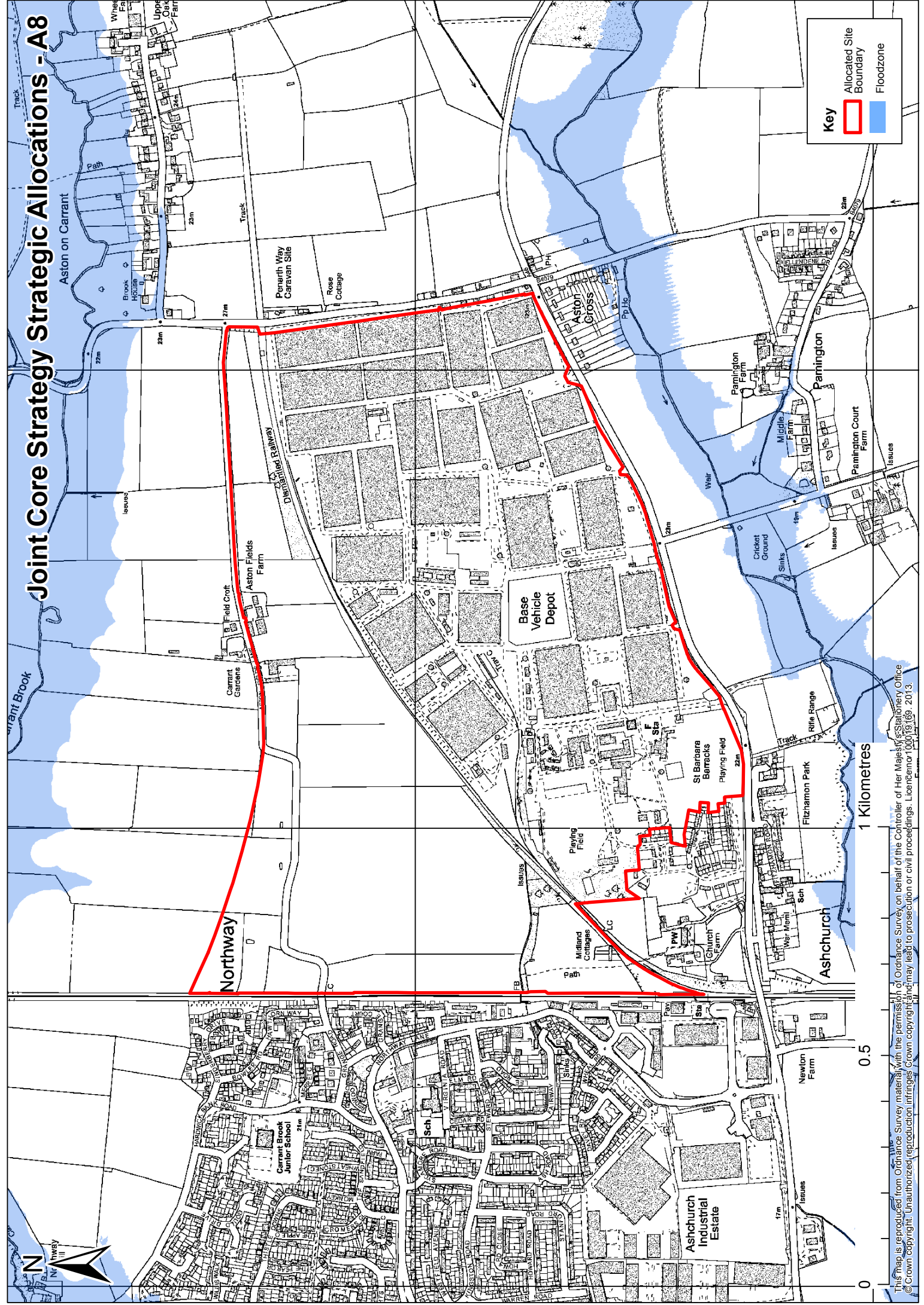
## Plan A8 - MOD Site at Ashchurch

---

Land at this location covers a large area which extends from the A46 northwards to Aston Carrant Lane. The mainline railway provides the western boundary for this strategic allocation. Most of the site is previously developed land, which comprises an army camp. It also has a railway spur which extends into the site from the south west. The northern part of the allocation is green field land which is currently largely agricultural land. The residential area of Ashchurch is situated to the west of the site and open countryside to the north, east and south of the site.



# Joint Core Strategy Strategic Allocations - A8



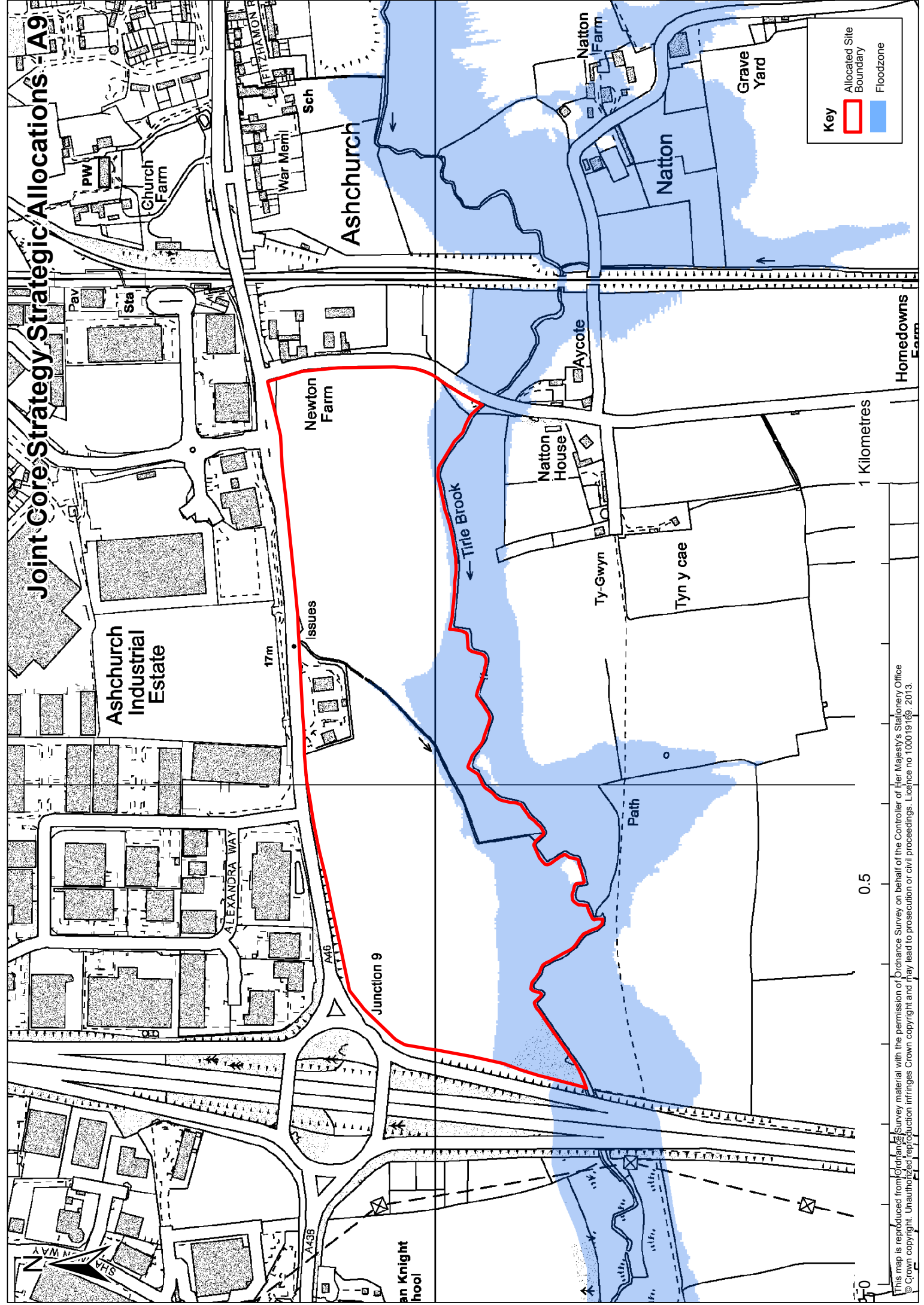
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## Plan A9 - Ashchurch

---

This strategic allocation lies to the south and east of Junction 9 of the M5, immediately south of the A46. It is bounded to the east by the main railway line. The Tirlle Brook forms the southern boundary of the strategic allocation area. The current land use is predominantly agricultural land whereas the adjacent area to the north of the site is characterised by existing employment uses.

# Joint Core Strategy Strategic Allocations - A9



**Key**

- Allocated Site (Red outline)
- Boundary (Black line)
- Floodzone (Blue shading)

1 Kilometre  
0.5

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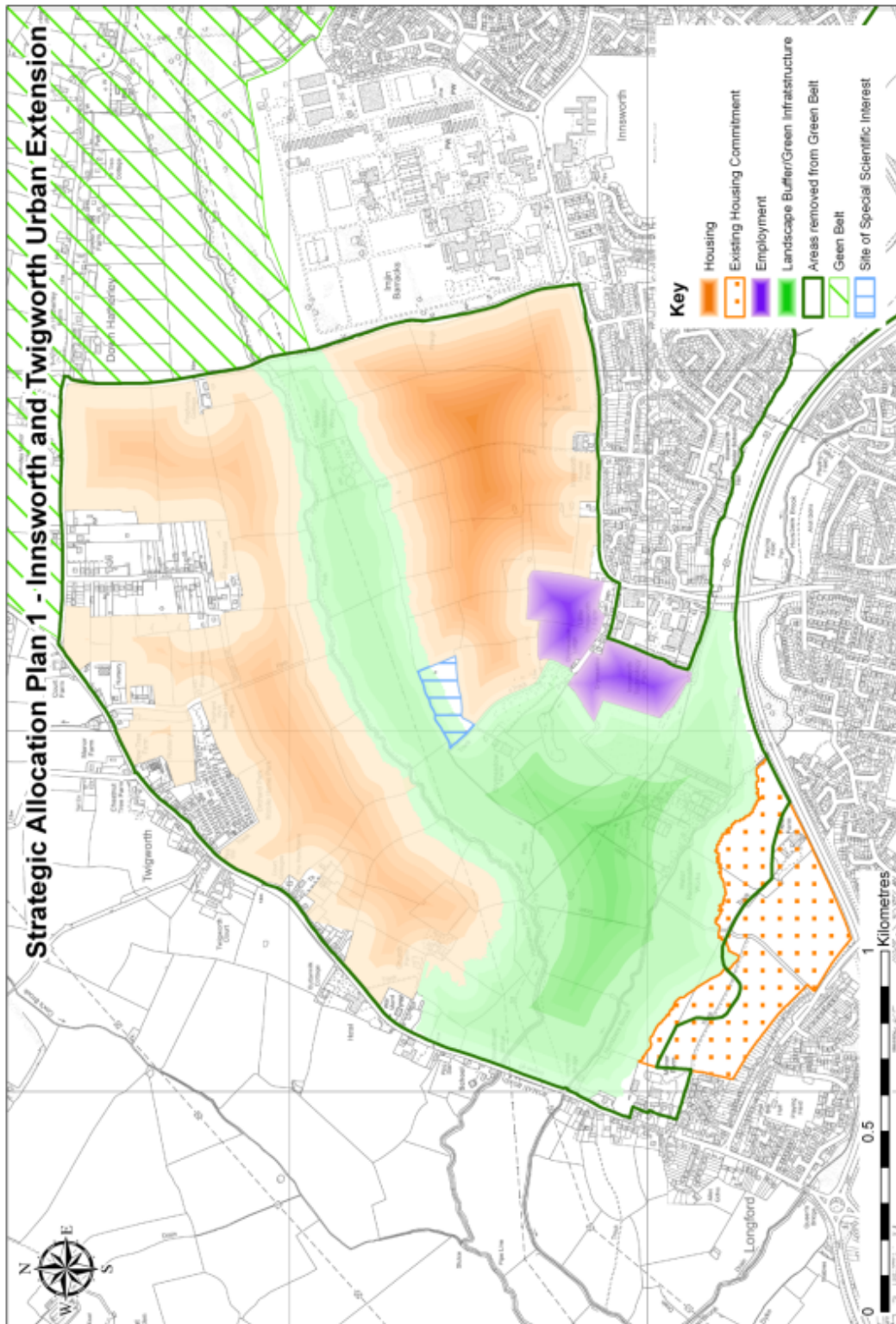
## Indicative site layouts

---

The indicative site layouts have not yet been revised following draft JCS consultation. New more indicative and diagrammatic place shaping layouts will replace these graphics to indicate our work on options for identifying sustainable and achievable developments on the sites. These layouts have been generated using only a specific set of constraints as set out in Strategic Allocations Report and therefore are subject to these limitations. These layouts will not be included in policy and are intended only as guidance.

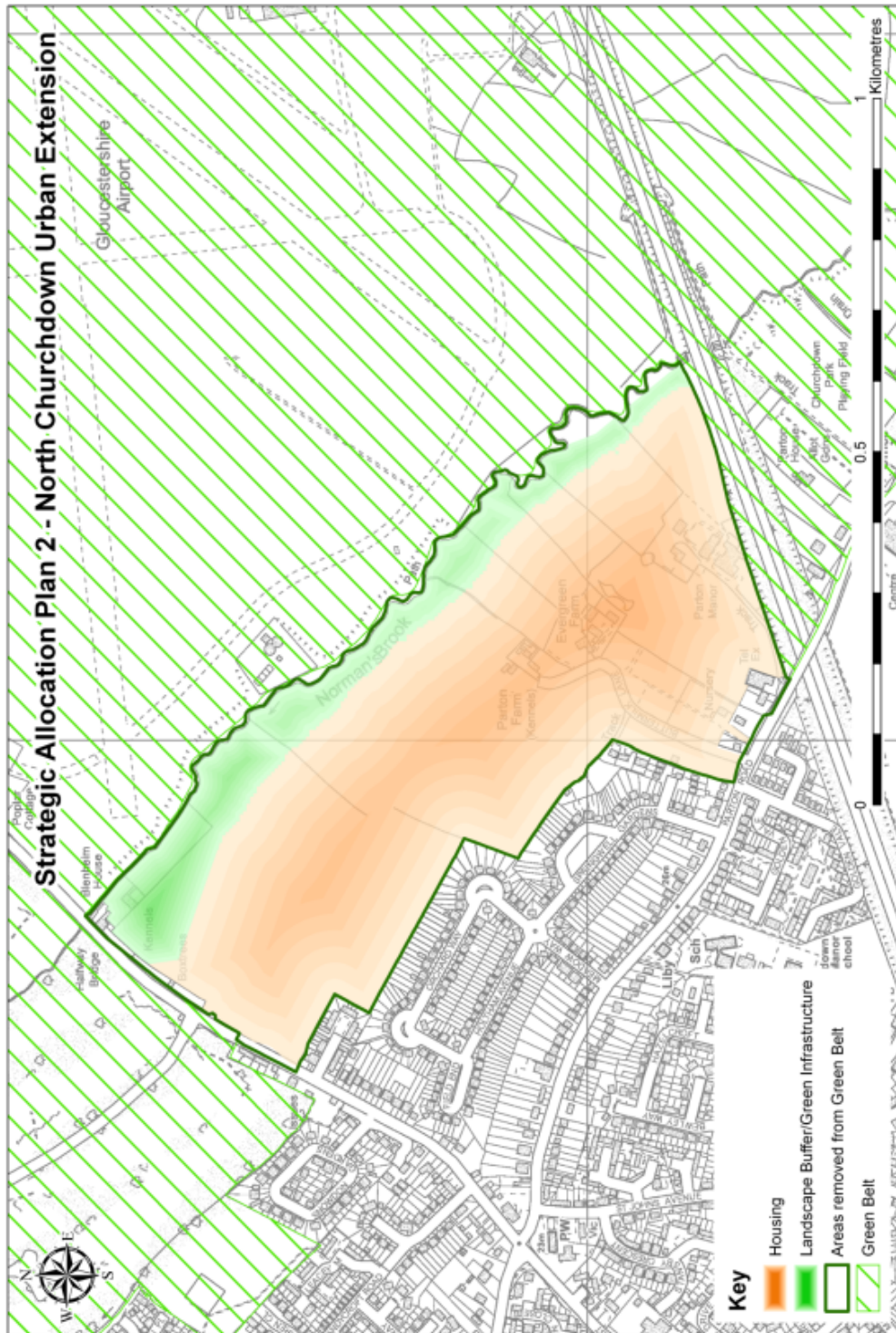


# Indicative site layout 1

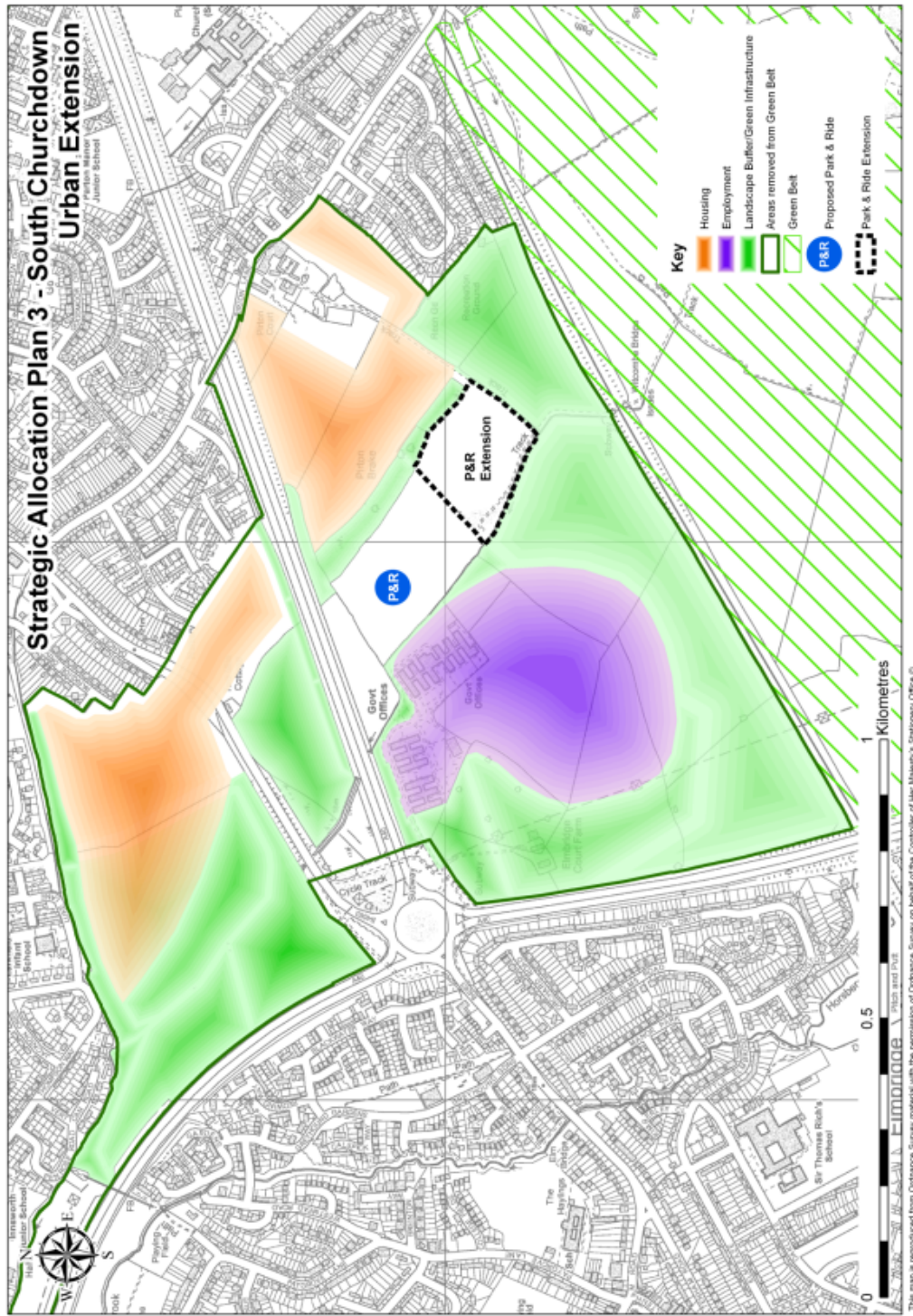




# Indicative site layout 2

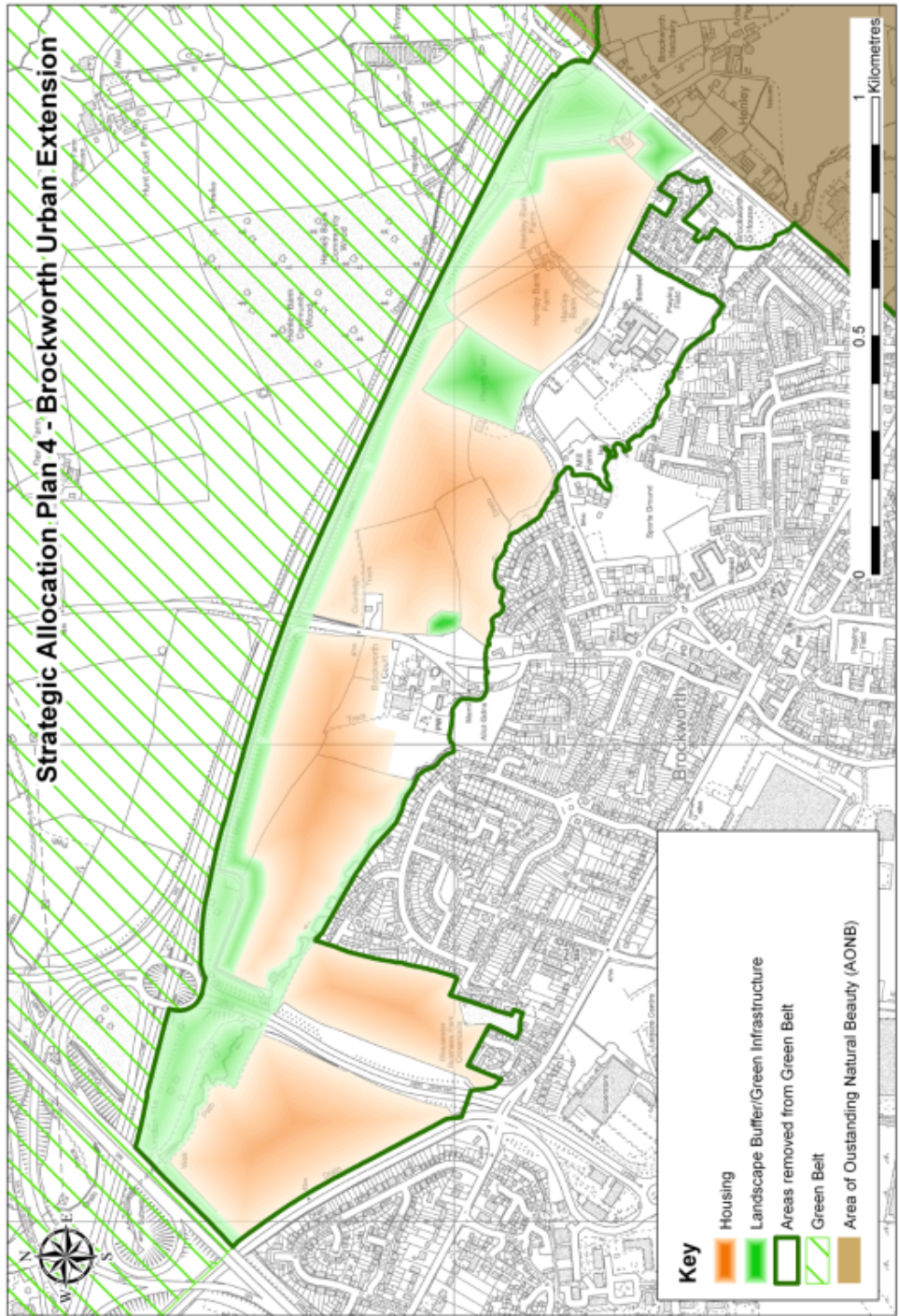


# Indicative site layout 3

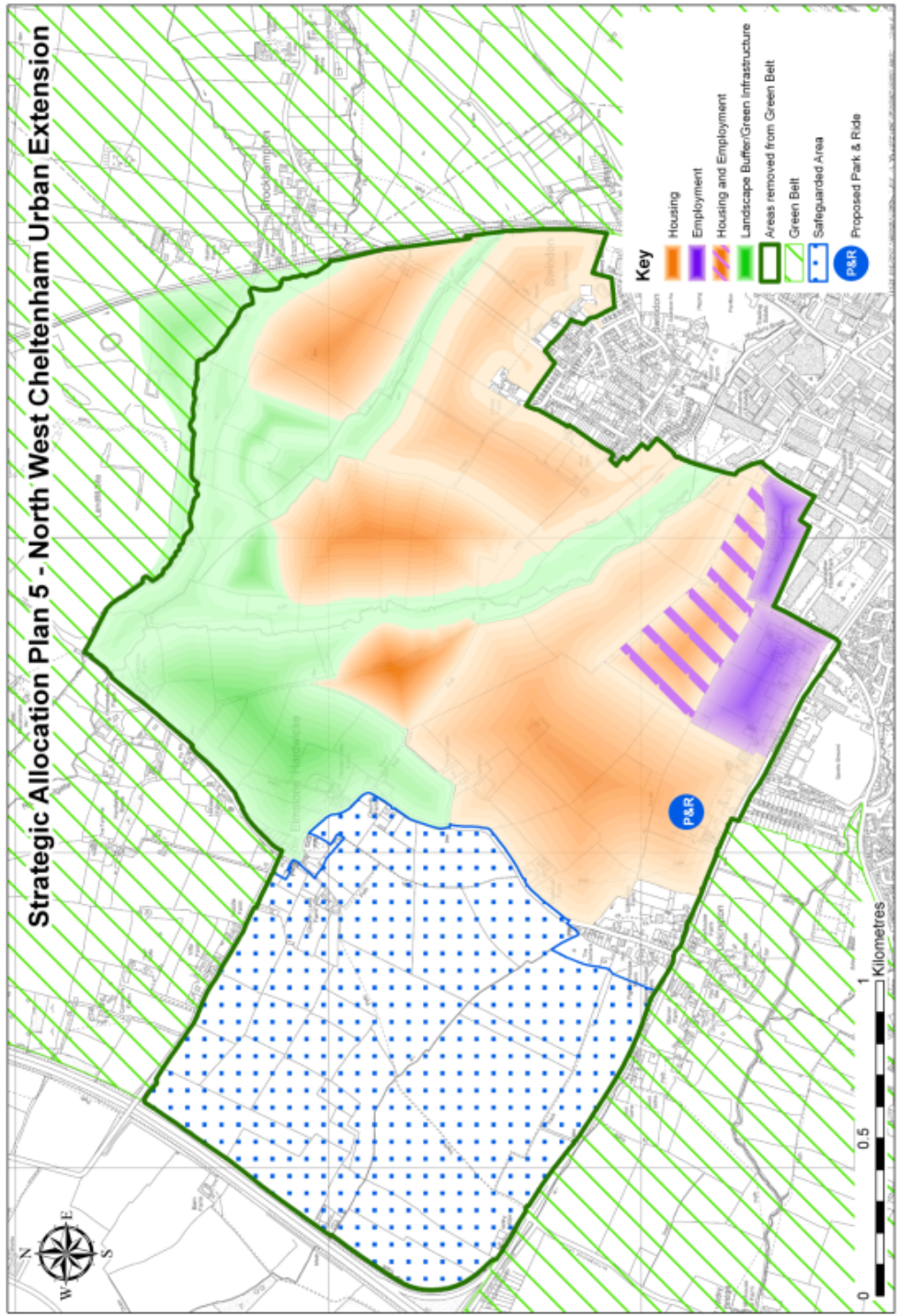




# Indicative site layout 4

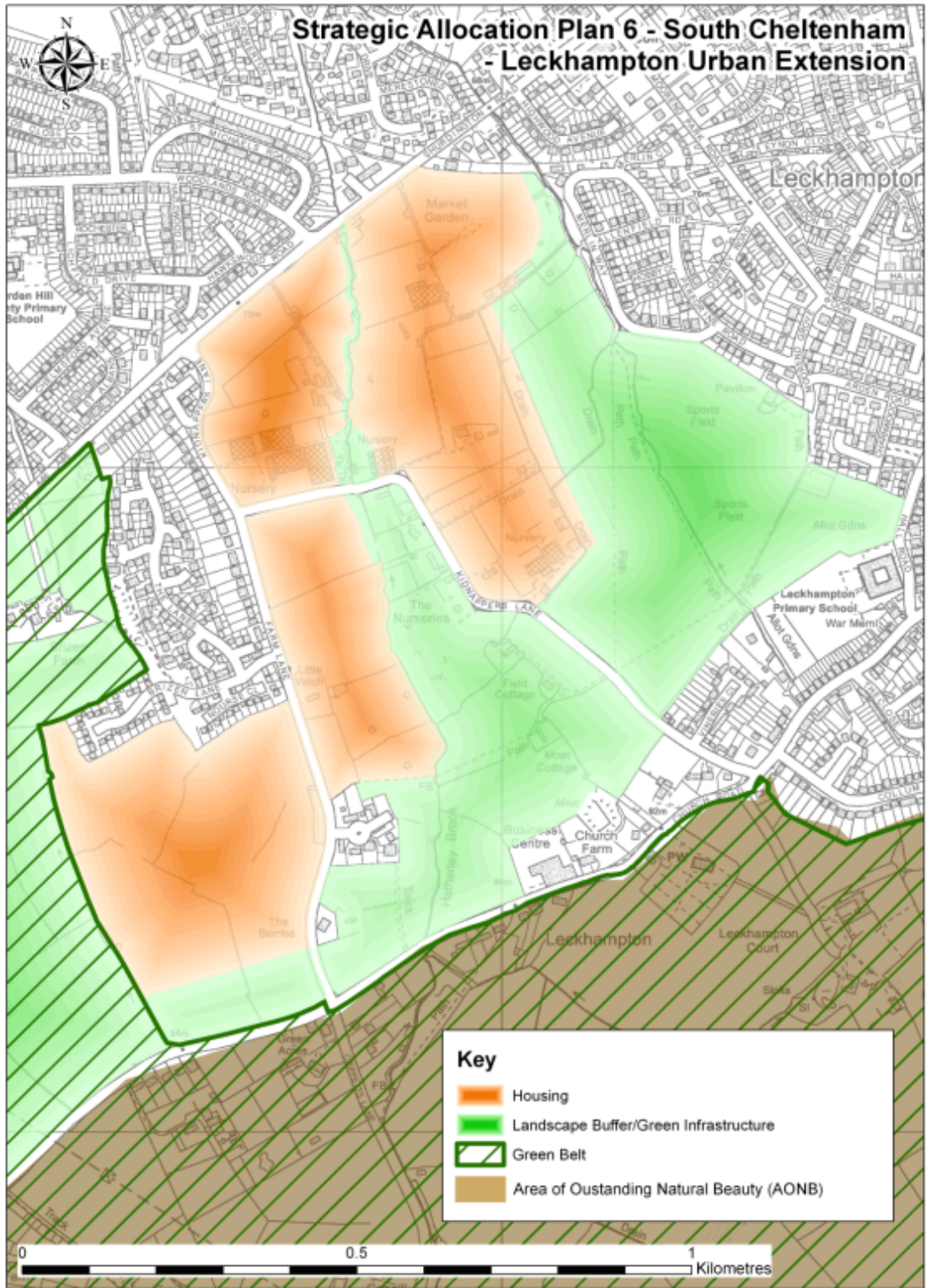


# Indicative site layout 5



# Indicative site layout 6

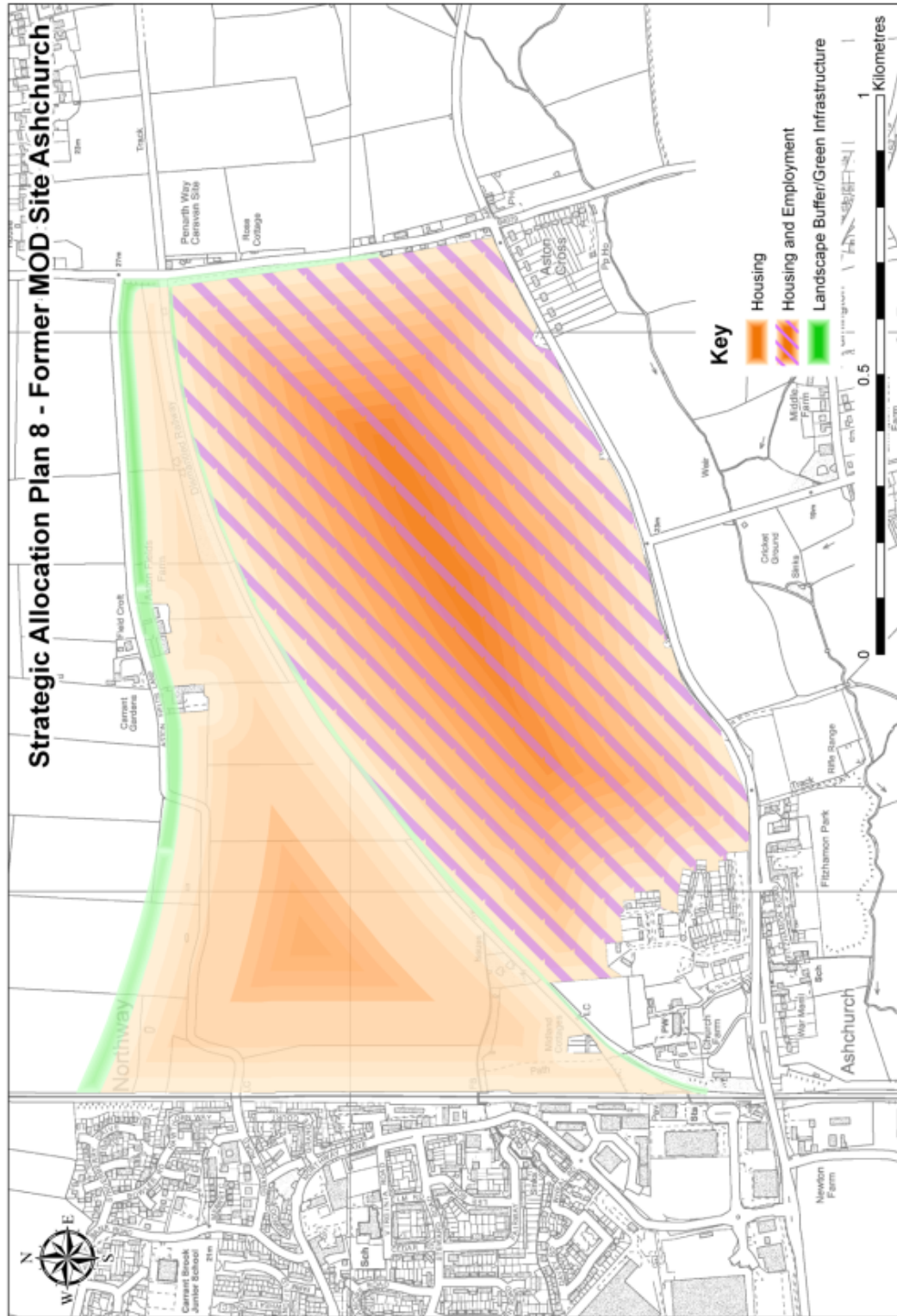




# Indicative site layout 7

Removed

## **Indicative site layout 8**



Indicative site layout 9



## PART 7 - Monitoring & Review



## Background

7.1 Monitoring the performance of the plan is essential to assess the effectiveness of the JCS and to record whether proposals and policies are being implemented and delivered. The outputs of appropriate monitoring will enable the councils to be fully informed of the progress of development in the area and whether a full or partial review of the plan is necessary.

7.2 The NPPF sets out that plans should be flexible to adapt to changing circumstances. As detailed in the JCS Introduction, the councils are committed to reviewing the plan if delivery issues emerge through monitoring and will implement measures to ensure that housing, employment and infrastructure needs are met during the plan period..

7.2 In order to ensure effective monitoring a framework has been prepared setting out key indicators that will track the delivery of the plan.

7.3 The tables below set out the indicators in relation to each JCS objective. They include any specifically identified target, the source of the data, and the frequency of monitoring. The range of indicators reflects the JCS's relationship with other plans and programmes and therefore includes indicators required by central government as part of the 'Single List', 'Contextual Indicators' (CI) which relate to local characteristics and issues of the locality and other 'Local Indicators' such as those from the Local Transport Plan (LTP).

7.4 The monitoring results for each document that comprises the Local Plan will be reported in each Authority's Monitoring Report (AMR). The AMR is required to outline the progress in preparing the documents and assess the extent to which the policies are being implemented and their effectiveness. Where a policy is not meeting its objective, the AMR will explain why and suggest what action should be taken. The monitoring framework itself will be reviewed as part of the AMR.

| <b>Building a strong and competitive urban economy</b>                                 |  |                               |               |
|--|--|-------------------------------|---------------|
| <b>Indicator</b>   | <b>Target</b>  | <b>Source</b>                 | <b>Period</b> |
| Net additional jobs created by sector (employment generating uses).                    | A minimum of 28,000 jobs created over the plan period.         | GCC Inform                    | Annually      |
| Economically inactive persons aged 16-64.  | Maintain levels close to the south west and national average.  | ONS                           | Annually      |
| Net amount of employment floorspace created by use class (employment generating uses). | 34-60ha of employment floorspace created over the plan period. | Annual Employment Monitoring. | Annually      |
| Amount of employment land lost to other non-employment generating uses.                | No target but annually assessed.                               | Annual Employment Monitoring. | Annually      |
| Gross weekly earnings of full time workers.  | Maintain levels close to the south west and national average.  | ONS/NOMIS.                    | Annually      |
| Percentage of residents with NVQ Level 4 qualification and above.                      | Maintain levels close to the south west and national average.  | ONS.                          | Annually      |

|                             |   |            |          |
|-----------------------------|---|------------|----------|
| Net new business start-ups. | To increase business start-ups in the JCS area, improving on the rate of start-ups per 10,000 working age people against other English districts. | GCC Inform | Annually |
|-----------------------------|---|------------|----------|

| Ensuring vitality of town centres   |   |                               |          |
|---|---|-------------------------------|----------|
| Indicator   | Target  | Source                        | Period   |
| Net additional floorspace from retail, leisure, office and other main town centres uses created within defined city/town centres.             | Linked to strategic centre allocations in the City and Borough Plans. | Annual Employment Monitoring. | Annually |
| Net additional floorspace from retail, leisure, office and other main town centre uses created outside designated centres/contrary to policy. | No target but annually assessed.                                      | Annual Employment Monitoring. | Annually |

| Supporting a prosperous rural economy   |   |  |          |
|---|---|--|----------|
| Indicator   | Target  | Source                                       | Period   |
| Number of homes provided with fibre broadband by milestone area against set target.         | Target to be agreed, but progress to be monitored on an annual basis. | Gloucestershire County Council/'FasterShire' | Annually |
| Net additional employment floorspace created within the rural areas by use class per annum. | No target but annually assessed.                                      | Annual Employment Monitoring                 | Annually |
| Net retail floorspace in rural areas (Change of Use from A1)                                | No net loss of floorspace   | Annual Employment Monitoring.                | Annually |

| Conserving and enhancing the environment   |  |  |          |
|--|--|--|----------|
| Indicator  | Target   | Source   | Period   |
| Net changes to Key Wildlife Sites, Special Areas of Conservation, SSSIs, Special Protection Areas, Ramsar sites and other protected areas. | No net loss.   | Gloucestershire Wildlife Trust/Internal Monitoring   | Annually |
| Condition of SSSIs and other areas of landscape and biodiversity importance.   | To maintain the protection of SSSIs and continually manage and enhance areas of landscape and biodiversity importance. | Natural England                                      | Annually |
| Type of development granted permission in the green belt   | No inappropriate development in the green belt   | Internal monitoring                                  | Annually |
| Listed Buildings, Conservation Areas and Scheduled Monuments on the 'at risk   | Align to Local Authority's targets or net reduction on an annual basis.  | Local authority BAR registers.<br>English Heritage - | Annually |

|  |              |                            |          |
|--|--------------|----------------------------|----------|
| register'.   |              | Heritage at Risk register. |          |
| Net changes in the number of Listed Buildings, Registered Parks and Gardens, Conservation Areas, Battlefield and sites of archaeological importance including Scheduled Monuments. | No net loss. | Internal monitoring.       | Annually |

| Delivering excellent design in new developments  |  |                      |          |
|--|--|----------------------|----------|
| Indicator  | Target   | Source               | Period   |
| Proportion of Strategic Sites with comprehensive masterplans completed and agreed with the Local Planning Authority. | All Strategic Sites to have comprehensive masterplans to guide their future development. | Internal monitoring. | Annually |

| Meeting the challenges of climate change   |   |  |          |
|--|---|--|----------|
| Indicator  | Target  | Source   | Period   |
| Per capita reduction in CO2 emissions by local authority area.   | 60% reduction in CO2 emissions across Gloucestershire by 2020/21 from the 2005 baseline year. | Greenhouse Gas Report/LTP3 Annual Progress Report.                       | Annually |
| New developments incorporating Sustainable Drainage Systems (SuDS) development.                                    | No target but monitoring progress.  | Internal monitoring (SA indicator).                                      | Annually |
| Installed Renewable Capacity for Gloucestershire.  | No target but monitoring progress.  | RegenSW Renewable Energy Progress Report - Annual Survey (SA indicator). | Annually |
| 10% of energy demand from major sites derived from decentralised, renewable or low carbon sources                  | All developments over 10 residential units or non-residential development over 1000m2.        | Internal monitoring  | Annually |
| Number of planning permissions granted contrary to Environment Agency advice on flooding or water quality grounds. | No permissions granted contrary to EA advice.   | Internal monitoring.   | Annually |

| Meeting the challenges of climate change                    |  |                              |          |
|---|--|------------------------------|----------|
| Indicator   | Target   | Source                       | Period   |
| Local bus passenger journeys.                               | Maintain and increase journeys from a base year of 2011/12 (21,361). | LTP3 Annual Progress Report. | Annually |
| Annualised index of cycling trips.                          | No target but monitoring progress.                                   | LTP3 Annual Progress Report. | Annually |
| Average journey time per mile during morning peak.          | Maintain and improve journey time.                                   | LTP3 Annual Progress Report  | Annually |
| Morning peak period traffic - number of vehicles travelling | Traffic to remain at current levels compared with 2007-              | LTP3 Annual Progress Report. | Annually |

|                                    |   |                 |                |
|------------------------------------|---|-----------------|----------------|
| towards urban centres.             | 2010 average AM peak period traffic:<br>Gloucester - 5539 vehicles<br>Cheltenham - 12936 vehicles |                 |                |
| Levels of travel self-containment. | Continue to improve on 2011 levels:<br>Gloucester - 66%<br>Cheltenham - 77%<br>Tewkesbury - 39%   | Census returns. | 10 year census |

| <b>Delivering a wide choice of quality homes</b>   |  |                            |               |
|--|--|----------------------------|---------------|
| <b>Indicator</b>   | <b>Target</b>  | <b>Source</b>              | <b>Period</b> |
| Net dwelling completions , based on the set housing requirements and 5 year housing supply                                 | To deliver against the established objectively assessed need over the plan period. | Annual Housing Monitoring. | Annually      |
| Net completions of Gypsy, Traveller and Travelling Showpeople accommodation against requirements, based on the set target. | To deliver against the established objectively assessed need over the plan period. | Annual Housing Monitoring. | Annually      |
| Net affordable housing completions against annual requirements.  | To deliver against the established objectively assessed need over the plan period. | Internal monitoring.       | Annually      |

| <b>Promoting healthy communities</b>  |  |   |               |
|---|--|---|---------------|
| <b>Indicator</b>  | <b>Target</b>  | <b>Source</b>                                   | <b>Period</b> |
| Number of Air Quality Management Areas.   | Reduce the number of Air Quality Management Areas.   | LTP3 Annual Progress Report.                    | Annually      |
| Access to services and facilities by public transport, walking and cycling.                 | 90% of Gloucestershire residents to be able to access services and facilities within a 30-45 minute journey time by public transport, walking and cycling. | LTP3 Annual Progress Report.                    | Annually      |
| Amount of public open space provided in new developments.                                   | That all schemes meet policy standards for the provision of public open space.   | Internal monitoring.                            | Annually      |
| Number of Lower Super Output Areas in the 20% most deprived in England and Gloucestershire. | To reduce the number of Lower Super Output Areas amongst the 20% most deprived in Gloucestershire and England.   | South West Observatory, Indices of Deprivation. | Annually      |
| Number of essential community facilities lost or gained through the development process.    | No loss of community facilities.   | Internal monitoring                             | Annually      |
| Provision of sporting facilities.   | Increase sports facilities in the JCS area as a percentage of regional provision:<br>JCS area - 6% in January 2013.  | Sport England Local Sport Profiles.             | Annually      |
| Access to green space - % of dwellings having access to:<br>- well maintained, high         | Maintain and improve the % of dwellings with sufficient access to green space.   | Internal monitoring                             | Annually      |

|  |  |  |  |
|--|--|--|--|
| quality and versatile green space within 300 metres<br>- 20ha green space site within 2km<br>- 100ha green space site within 5km<br>- 500ha green space site within 10km |  |  |  |
|--|--|--|--|

# Appendices

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| DRAFT JCS  | PUBLICATION JCS   |
|--|---|
| Foreword   | Foreword  |
| EXECUTIVE SUMMARY  | EXECUTIVE SUMMARY   |
| CONTENTS   | CONTENTS  |
| INDEX OF POLICIES  | INDEX OF POLICIES   |
| <b>CHAPTER 1 – INTRODUCTION</b>  | <b>CHAPTER 1 – INTRODUCTION</b>                               |
| <b>CHAPTER 2 – VISION AND OBJECTIVES</b>                                 | <b>CHAPTER 2 – VISION AND OBJECTIVES</b>                      |
| <b>CHAPTER 3 – STRATEGIC POLICIES</b>                                    | <b>CHAPTER 3 – STRATEGIC POLICIES</b>                         |
| POLICY SP 1 – SCALE OF NEW DEVELOPMENT                                   | Policy SP1 – Scale of New Development                         |
| POLICY SP 2 – DISTRIBUTION OF NEW DEVELOPMENT                            | Policy SP2 – Distribution of New Development                  |
| POLICY SP 3 – DELIVERY & REVIEW  | POLICY DELETED AND MOVED INTO TEXT                            |
| <b>CHAPTER 4 – CORE POLICIES</b>   | <b>CHAPTER 4 – SUSTAINABLE DEVELOPMENT POLICIES</b>           |
| <b>AMBITION 1- A THRIVING ECONOMY</b>                                    | AMBITION HEADING REMOVED                                      |
| NO POLICY HERE IN DRAFT JCS  | Policy SD1 – Presumption in Favour of Sustainable Development |
| POLICY E 1 - EMPLOYMENT  | Policy SD2 – Employment                                       |
| POLICY E 2 - RETAIL HIERARCHY AND TOWN CENTRES                           | Policy SD3 – Retail Hierarchy and Town Centres                |
| <b>AMBITION 2 – A SUSTAINABLE NATURAL AND BUILT ENVIRONMENT</b>          | AMBITION HEADING REMOVED                                      |
| POLICY S1 – PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT             | MOVED TO SD1  |
| POLICY S 2 - FLOOD RISK MANAGEMENT                                       | REPLACED BY INF3  |
| POLICY S 3 - SUSTAINABLE DESIGN AND CONSTRUCTION                         | Policy SD4 – Sustainable Design and Construction              |
| POLICY S 4 - DESIGN REQUIREMENTS   | Policy SD5 – Design Requirements                              |
| POLICY S 5 - GREEN BELT  | Policy SD6 – Green Belt                                       |
| POLICY S 6 - LANDSCAPE POLICY  | Policy SD7 – Landscape  |
| POLICY S 7 - COTSWOLD AREA OF OUTSTANDING NATURAL BEAUTY                 | Policy SD8 – Cotswolds Area Of Outstanding Natural Beauty     |
| POLICY S 8 - BUILT AND HISTORIC ENVIRONMENT                              | Policy SD9 – Historic Environment                             |
| POLICY S 9 - CONSERVATION AND IMPROVEMENT OF BIODIVERSITY & GEODIVERSITY | Policy SD10 – Biodiversity and Geodiversity                   |
| POLICY S 10 - GREEN INFRASTRUCTURE                                       | REPLACED BY INF4  |
| POLICY S 11 - RENEWABLE ENERGY DEVELOPMENT                               | REPLACED BY INF6  |
| <b>AMBITION 3 – A HEALTHY, SAFE AND INCLUSIVE COMMUNITY</b>              | AMBITION HEADING REMOVED                                      |
| POLICY C 1 - RESIDENTIAL DEVELOPMENT                                     | Policy SD11 – Residential Development                         |
| POLICY C 2 - HOUSING MIX AND STANDARDS                                   | Policy SD12 – Housing Mix and Standards                       |
| POLICY C 3 - AFFORDABLE HOUSING  | Policy SD13 – Affordable Housing                              |
| POLICY C 4 - GYPSY, TRAVELLER AND TRAVELLING SHOWPEOPLE                  | Policy SD14 – Gypsies, Travellers and Travelling Showpeople   |
| POLICY C 5 - COMMUNITY FACILITIES  | REPLACED BY INF5  |
| POLICY C 6 - SUPPORTING HEALTHY LIFESTYLES AND WELLBEING                 | Policy SD15 – Health and Environmental Quality                |
| POLICY C 7 - TRANSPORT REQUIREMENTS                                      | REPLACED BY INF1 AND INF 2                                    |
| NO EQUIVALENT CHAPTER IN DRAFT JCS                                       | <b>CHAPTER 5 – INFRASTRUCTURE POLICIES</b>                    |
| NO EQUIVALENT POLICY IN DRAFT JCS  | Policy INF1 – Access to the Transport Network                 |
| NO EQUIVALENT POLICY IN DRAFT JCS  | Policy INF2 – Safety and Efficiency of the Transport Network  |
| NO EQUIVALENT POLICY IN DRAFT JCS  | Policy INF3 – Flood Risk Management                           |
| NO EQUIVALENT POLICY IN DRAFT JCS  | Policy INF4 – Green Infrastructure                            |
| NO EQUIVALENT POLICY IN DRAFT JCS  | Policy INF5 – Social and Community Infrastructure             |
| NO EQUIVALENT POLICY IN DRAFT JCS  | Policy INF6 – Renewable Energy/Low Carbon Energy Development  |
| NO EQUIVALENT POLICY IN DRAFT JCS  | Policy INF7 – Infrastructure Delivery                         |
| NO EQUIVALENT POLICY IN DRAFT JCS  | Policy INF8 – Developer Contributions                         |
| <b>CHAPTER 5 – STRATEGIC ALLOCATION POLICIES</b>                         | <b>CHAPTER 6 – STRATEGIC ALLOCATIONS</b>                      |
| POLICY SA1– REQUIREMENTS FOR STRATEGIC ALLOCATIONS                       | Policy SA1 – Strategic Allocations Policy                     |
| NO EQUIVALENT SECTION IN DRAFT JCS                                       | Strategic Allocations Information                             |
| POLICY A1 - INNSWORTH AND TWIGWORTH URBAN EXTENSION, GLOUCESTER          | Subsumed within SA1   |
| POLICY A2 - NORTH CHURCHDOWN URBAN EXTENSION, GLOUCESTER                 | Subsumed within SA1   |
| POLICY A3 - SOUTH CHURCHDOWN URBAN EXTENSION, GLOUCESTER                 | Subsumed within SA1   |
| POLICY A4 - NORTH BROCKWORTH URBAN EXTENSION, GLOUCESTER                 | Subsumed within SA1   |
| POLICY A5 - NORTH WEST CHELTENHAM URBAN EXTENSION, CHELTENHAM            | Subsumed within SA1   |
| POLICY A6 – SOUTH CHELTENHAM-LECKHAMPTON URBAN EXTENSION, CHELTENHAM     | Subsumed within SA1   |
| POLICY A7 – SOUTH CHELTENHAM-UP HATHERLEY URBAN EXTENSION, CHELTENHAM    | Subsumed within SA1   |
| POLICY A8 – MOD SITE AT ASHCHURCH STRATEGIC ALLOCATION                   | Subsumed within SA1   |
| POLICY A9 – ASHCHURCH STRATEGIC ALLOCATION                               | Subsumed within SA1   |
| <b>CHAPTER 6 – DELIVERY POLICIES</b>                                     | CHAPTER DELETED   |
| POLICY D 1 – INFRASTRUCTURE  | REPLACED BY INF POLICIES (PRIMARILY 5, 6 AND 7)               |
| POLICY D 2 – ASSESSMENTS   | INCORPORATED INTO RELEVANT POLICIES                           |



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| POLICY D 3 - TRANSPORT ASSESSMENTS AND TRAVEL PLANS | REPLACED BY INF 1 AND 2                  |
| POLICY D 4 - MASTER PLANS AND DESIGN BRIEFS         | INCORPORATED INTO S4                     |
| <b>CHAPTER 7 – MONITORING AND REVIEW</b>            | <b>CHAPTER 7 – MONITORING AND REVIEW</b> |
| <b>CHAPTER 8 – PROPOSALS PLAN</b>                   | <b>CHAPTER 8 – PROPOSALS PLAN</b>        |