



Draft Joint Core Strategy Consultation Response Report

April 2014

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1. INTRODUCTION

Purpose and format of the report

- 1.1 This report relates to the Draft Joint Core Strategy (JCS) consultation, which was held between October and December 2013. It sets out the consultation activities that were undertaken during this time and a summary of the main issues identified through the representations that were received.
- 1.2 Section 2 of the report sets out a summary of the representations that were submitted in response to the key questions that were prepared. In section 3 a summary is provided of the representations by policy area, which follows the structure of the consultation document; introductory section, strategic policies, core policies, Strategic Allocation policies, delivery policies, and monitoring and review. Under each policy summary, the report sets out the main changes that have been made to the policy, which are to be taken forward into the Pre Submission version of the Joint Core Strategy. Section 4 provides a summary of the representations made to the Sustainability Appraisal and Habitats Regulations Assessment that accompanied the Draft JCS. Section 5 presents an overview of three petition-style responses that were received by local campaign groups in response to the consultation. Finally, Section 6 provides a schedule of 'omission sites' that were promoted through the consultation. These are sites which were not included within the draft Strategic Allocations in the consultation document and have subsequently been promoted by the landowner, private individuals or other agencies for development.
- 1.3 Please note this report does not set out the detail of each response that was made and does not include an officer response to each representation. Full representations can be viewed by visiting the JCS website at www.gct-jcs.org and clicking on the 'public consultation' link. The online facility allows users to browse by individual, organisation or key words.

Consultation summary

- 1.4 The Draft Joint Core Strategy consultation lasted for 9 weeks between 15th October and 13th December 2013.
- 1.5 The consultation document and other related information, including various evidence base studies and the Sustainability Appraisal, were made available on the JCS website at www.gct-jcs.org. Copies of the consultation document were also made available at a number of 'deposit locations' across the JCS area, including the three JCS Council offices and all local libraries within the JCS area. These were accompanied by hard copy questionnaires that could be completed and returned using pre-paid envelopes. Information on how to access further information electronically was also provided.
- 1.6 The following actions were undertaken to raise awareness of the consultation:

- Email / letter notification to all contacts on the JCS consultation database;
- Press notice and various press articles;
- Radio interviews with key officers;
- Information stands at each of the JCS Council offices;
- Information and posters at 'deposit locations';
- Preparation of a summary leaflet, made available at 'deposit locations', consultation events and offered to elected Members for distribution to communities (see appendix 2);
- Community consultation events (discussed in more detail below);
- Parish Council event (discussed in more detail below);

Public consultation events

1.7 To further ensure awareness of the Draft JCS consultation and in order to engage with the local community, 14 public consultation events were held in locations across the JCS area. In most cases these were facilitated by the Gloucestershire Rural Community Council (GRCC).

1.8 The public consultation events provided attendees with an exhibition explaining in broad terms what the JCS is, what the issues are and how these issues could be addressed. At each event, two identical presentations were made at different times by senior officers, and officers were on hand at all other times to advise and answer questions. The presentation was also uploaded on the JCS website. Hard copy questionnaires were made available for attendees to complete as well as summary leaflets that could be taken away.



1.9 The community consultation events were held in locations accessible to the communities that would be most affected by the JCS proposals, for example those in close proximity to the proposed Strategic Allocations. Events were also held in Gloucester city centre, Cheltenham and Tewkesbury town centres, and the villages of Bishop's Cleeve, Winchcombe, Apperley and Alderton. Consultation on the Tewkesbury Borough Plan scoping stage took place alongside the Draft JCS consultation. Further details of where and when these events were held are provided below:

Location	Date	Time
Ashchurch Village Hall	Thursday 17 October 2013	18:00 – 20:30
Leckhampton Village Hall	Saturday 19 October 2013	14:30 – 17:00
Bishop's Cleeve Primary School	Monday 21 October 2013	18:00 – 20:30
Innsworth Community Hall	Tuesday 22 October 2013	18:00 – 20:30
Shurdington Social Centre	Thursday 24 October 2013	18:00 – 20:30
Regents Arcade, Cheltenham	Friday 25 October 2013	12:30 – 15:00
Winchcombe Abbey Fields Community Centre	Wednesday 30 October 2013	18:00 – 20:30
Cheltenham Civil Service Club, Uckington	Monday 4 November 2013	18:00 – 20:30
Brockworth Community Centre	Thursday 7 November 2013	17:30 – 20:00
Eastgate Shopping Centre, Gloucester	Friday 8 November 2013	12:30 – 15:00
Churchdown GL3 Community Hub	Saturday 9 November 2013	12:30 – 15:00
Tewkesbury Town Hall	Tuesday 12 November 2013	12:30 – 15:00
Apperley Village Hall	Wednesday 13 November 2013	18:00 – 20:30
Alderton Parish Hall	Thursday 14 November 2013	18:00 – 20:30

1.10 In total, 864 people attended the consultation events. 86 questionnaire responses were received at these events, though many more were taken and completed at home, either as hard copies or through the online consultation system.

Parish Council event

1.11 To ensure involvement with the various Parish and Town Councils, a Parish and Town Council event was held at Tewkesbury Borough Council on 16 October 2013, to which representatives from each Parish and Town Council in Tewkesbury Borough were invited to attend the event. The event provided them with an opportunity to engage with officers and be informed of the forthcoming Draft JCS consultation. It also provided information on the Tewkesbury Borough Plan and neighbourhood and Parish Plans, including their relationship with the JCS. For the first part of the event, attendees were invited to view an exhibition on the Draft JCS, as was displayed at other consultation events, and officers were on hand to answer any questions. Following this, attendees were given a presentation on the Draft JCS and consultation, again as was undertaken at all other consultation events. The event closed with a question and answer session.

Online consultation system

1.12 In order to facilitate the consultation process, the JCS authorities use a specialised electronic response system, designed for managing and analysing planning consultations on development plan documents. By using this system, respondents were able to download the consultation document in its entirety, view different sections/policies of the document separately and look in more detail at copies of the maps.

1.13 In terms of handling the responses, the system allows respondents to make comments against the different sections/policies of the document. Respondents also had the option of responding to the questionnaire online. In all cases, draft and final responses are viewable to the respondent as well as any responses made to previous consultations, if applicable. Likewise, respondents will be able to view previous responses when responding to the Pre Submission consultation.

Headline outputs

1.14 The consultation generated a significant number of responses. The headline outputs are set out below:

Total respondents

1.15 Approximately 2,500 responses were received to the Draft JCS consultation. As illustrated in figure 1 below, comments were submitted to us in a number of different ways; 34% of which were by response cards, 30% by email, 22% through the online consultation system and 14% by paper.

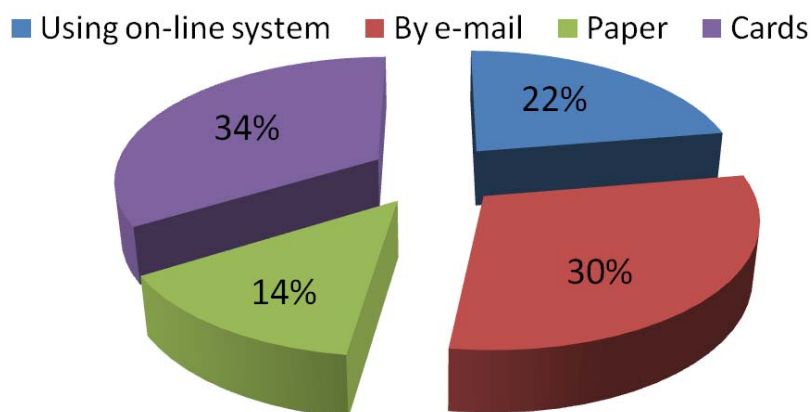


Figure 1: Percentage of representations by response type

Total comments

1.16 Overall, the submitted representations amounted to just over 4,200 separate comments. We also received 400 questionnaires, 86 of which were completed and submitted at the consultation events. Figure 2 below breaks down the number of comments received by each chapter. Figure 3 provides a breakdown of the number of comments received by each policy area, highlighting some of the policies that received the highest number of responses.

Figure 2: Number of comments received by chapter

Chapter	Number of comments
Chapter 1 - Introduction	70
Chapter 2 - Vision and Objectives	122
Chapter 3 - Strategic Policies	866
Chapter 4 - Core Policies	1,071
Chapter 5 - Strategic Allocation Policies	1,821
Chapter 6 - Delivery Policies	239
Chapter 7 - Monitoring and Review	8
Chapter 8 - Proposals Plan	8
TOTAL NUMBER OF COMMENTS	4,205

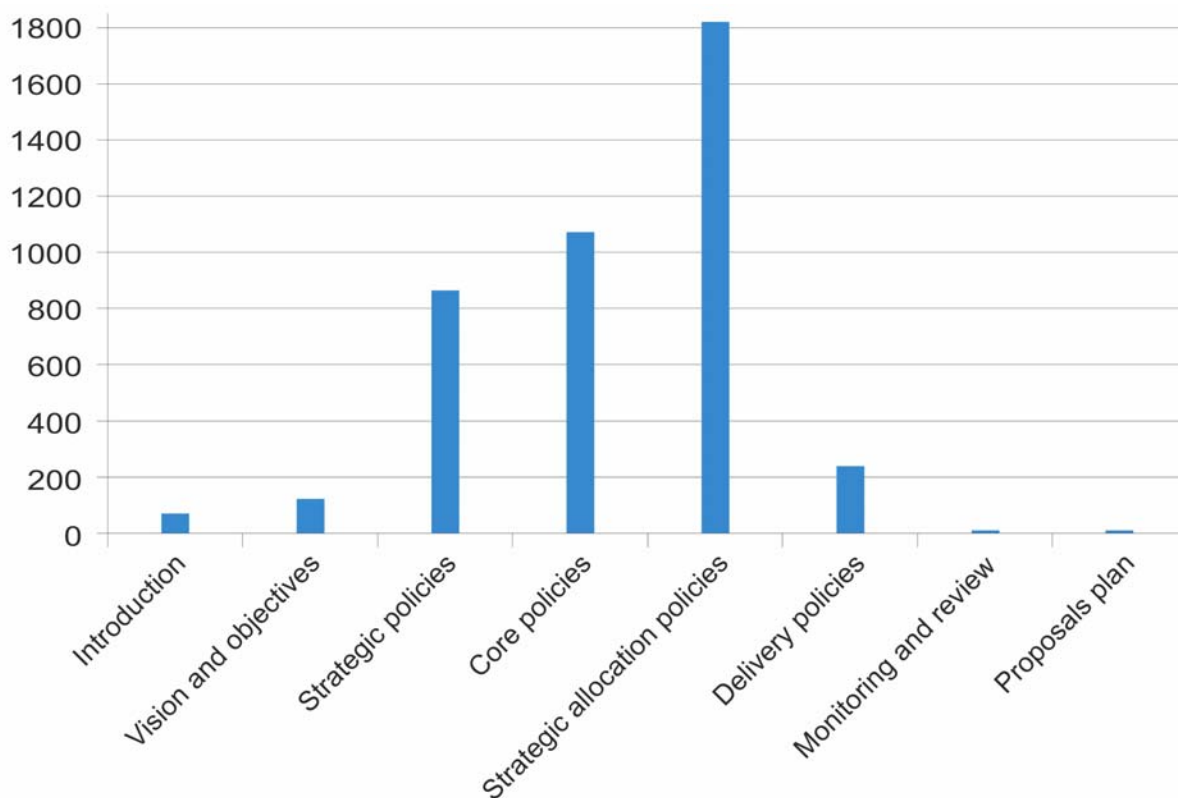
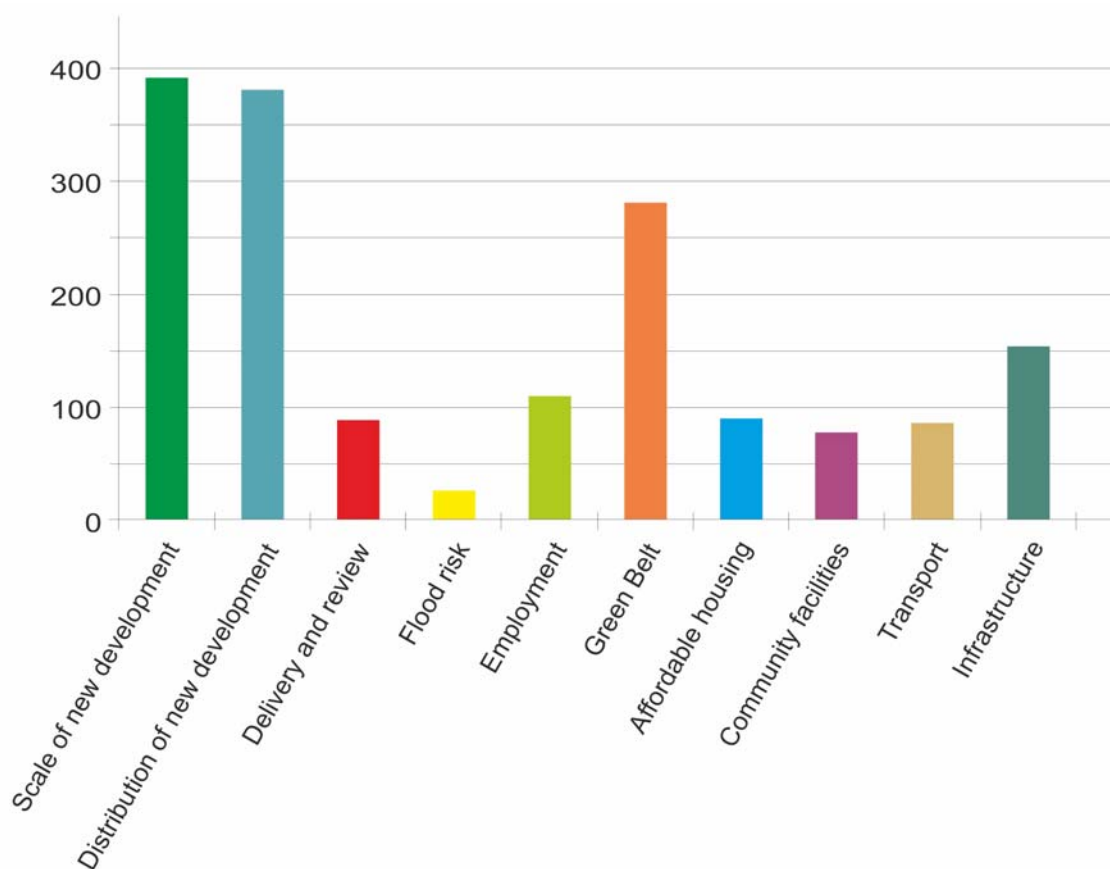


Figure 3: Number of comments received by policy

Policy	Number of comments
Strategic Policies	
Scale of New Development – SP1	391
Distribution of New Development – SP2	384
Delivery & Review – SP3	87
Core Policies	
Employment – E1	109
Retail Hierarchy and Town Centres – E2	25
Presumption in Favour of Sustainable Development – S1	14
Flood Risk Management - S2	26
Sustainable Design and Construction – S3	85
Design Requirements – S4	23
Green Belt – S5	281
Landscape Policy – S6	20
Cotswold Area of Outstanding Natural Beauty – S7	16
Built and Historic Environment – S8	16
Conservation and Improvement of Biodiversity & Geodiversity – S9	26
Green Infrastructure – S10	28
Renewable Energy Development – S11	8
Residential Development – C1	71
Housing Mix and Standards – C2	29
Affordable Housing – C3	90
Gypsy, Traveller and Travelling Showpeople - C4	21
Community Facilities – C5	77
Supporting Healthy Lifestyles and Wellbeing – C6	17
Transport Requirements – C7	86
Requirements for Strategic Allocations – SA1	77
Innsworth and Twigworth Urban Extension – A1	62

North Churchdown Urban Extension – A2	179
South Churchdown Urban Extension – A3	187
North Brockworth Urban Extension – A4	78
North West Cheltenham Urban Extension – A5	105
South Cheltenham – Leckhampton Urban Extension – A6	284
South Cheltenham – Up Hatherley Urban Extension – A7	812
MOD Site at Ashchurch Strategic Allocation – A8	25
Ashchurch Strategic Allocation – A9	12
Infrastructure – D1	153
Assessments – D2	16
Transport Assessments and Travel Plans – D3	58
Master Plans and Design Briefs – D4	12



2. QUESTIONNAIRE RESPONSES

- 2.1 To inform responses, a questionnaire was prepared which set out four key questions in relation to the Draft JCS (see appendix 1). It also included an open ended question which provided an opportunity for any other comments to be made.
- 2.2 The questionnaires were made available at each of the 14 public consultation events held across the JCS area. They were also made available in electronic form through the JCS website. In total, 400 questionnaires were submitted; 86 at the public consultation events and 314 via the online questionnaire facility. The section that follows provides a summary of the main responses made to each of the questions.

Question 1: Do you think our strategy of focusing on urban extensions (i.e. development sites located around Gloucester and Cheltenham) is the correct one? If not, where would you propose to locate new development?

- Creation of a new town should be considered.
- Objection to any urban extensions to Cheltenham.
- Strong view that brownfield sites should be developed before greenfield sites are released.
- The JCS should consider modest sized sites throughout the whole county.
- Investigate empty properties for the provision of new housing.
- Greater flexibility needs to be built into the plan.
- Yes – strategy helps to maintain the gap between the urban areas of Gloucester and Cheltenham.
- Support strategy as it avoids building near the River Severn.
- Support strategy but the scale and density should be reduced.
- Objection to strategy which supports large scale development at Tewkesbury, which is already overwhelmed by development.
- Support strategy which offers a suitable distribution of housing needs in the right areas/sites.
- Concern regarding the loss of agricultural land.

Question 2: Do you think that we have identified the right sites based upon the strategy mentioned in Question 1? If not, which other sites in the JCS area would you suggest and why?

- Increase the amount of affordable housing in villages. Equally, no affordable housing in villages.
- Concern regarding the loss of villages in the wider urban area (coalescence).
- A number of alternative sites/locations submitted for consideration through the plan; these are identified in the main body of the report.
- Suggestion that development should be focused in the north of the UK.
- Amount of development proposed for the urban extensions is too high.
- Concern regarding the ability of infrastructure at the urban extensions and in the wider locality to cope with the proposed levels of development, for example traffic and congestion. More site based evidence is required.

- Objection to the fact that many of the Strategic Allocations would lead to the loss of Green Belt land.
- Concern regarding the impact the proposed Strategic Allocations would have on fluvial flooding and surface water run-off. Particular concerns at proposed Strategic Allocations A1 (Innsworth/Twigworth), A2 (Churchdown), A3 (Churchdown), A5 (North West Cheltenham) and A8 (MOD Ashchurch).
- Concerns expressed regarding potential contamination at proposed Strategic Allocation A5 – North West Cheltenham.
- Suggestion that proposed Strategic Allocation A9 – Ashchurch, could accommodate a higher quantum of development.
- Concern over the number of traveller sites identified for Tewkesbury Borough.
- Development of sites would require improvements to M5 junction 10.
- Question the sustainability of proposed Strategic Allocation A5 – North West Cheltenham.
- Support proposed Strategic Allocations, but more land needs to be allocated for housing (within the allocations) to achieve the strategic objectives of the JCS.
- Concern over the existence of ridge and furrow on the greenfield area of proposed Strategic Allocation A8 – Ashchurch.
- The longterm future of Camp Imjin at Innsworth needs to be monitored given proposed restructuring and possible relocation. If the site became available before 2031 it could make a significant contribution to development needs.

Question 3: Is this the right list of rural service centres and service villages and is this the appropriate amount of new development for them?

- Concern that the amount of development proposed for the rural service centres and service villages could lead to a loss of village feel and character. Policies need to acknowledge importance of maintaining character.
- Concern regarding accessibility of Alderton. 'Access' weighting should be considered as a key indicator of suitability for sustainable development and thereby designation of 'service village' status.
- Should identify more rural service villages and service centres – encourage small-scale development in all villages to: encourage sustainability and viability in rural areas; enable young people to stay in their family area; sustain services; decrease numbers in each service village; and decrease numbers/amount of urban extensions.
- Amount of new development to be identified for rural locations should be higher.
- Deferring delivery of rural sites to district plans will impact on timely delivery.
- Concern with how existing infrastructure will cope with proposed levels of development.
- Concern regarding over-development at Bishop's Cleeve and Winchcombe and the ability of infrastructure and facilities to cope.
- List of rural service centres should include Churchdown and Brockworth.
- Support for Bishop's Cleeve and Winchcombe as rural service centres.
- Support for Highnam, Maisemore and Woodmancote as service villages.
- Should be no distinction between 'rural service centres' and 'service villages' – they should all just be called 'rural settlements'.

- There should be a limit on development e.g. maximum percentage increase.
- There should not be any rural development.
- All service villages should have a shop / general store.
- Size of the urban extensions should be increased to reduce the amount of development in rural areas.
- Settlement Audit is incorrect in some instances.
- Concern at the inclusion of Coombe Hill as a service village.
- Other potential service villages to be considered – Gretton, Teddington, Buckland, Laverton, Stanton, Greet, Woolstone, Dixton, Stanley Pontlarge and Staverton.
- Urban extensions will affect the viability of services in the service villages/centres.
- Policies need to be clearer about the importance of access to services and facilities in rural areas.
- No significant development at Shurdington or Little Witcombe.
- Objection to the inclusion of Dumbleton.
- No more development at Highnam.
- Higher development potential at Highnam.
- Development in the AONB needs to be limited and sensitive.
- Principle correct but care should be taken not to overdevelop areas and overload services.

Question 4: Is there any aspect of the strategy that you wish to question or comment on as a result of additional or alternative evidence? For example, do you have alternative information or evidence for how much housing and employment should be provided, or what infrastructure is required to support the proposed growth?

- Concern regarding household size assumptions.
- Green Belt review does not appear to have full regard to extant permissions and operational waste management uses at Wingmoor Farm West.
- Questions as to whether sufficient land is identified in the Draft JCS to provide for the objectively assessed need.

Do you have any further comments?

- Objectively assessed housing need is too high. New data from ONS must be taken into account.
- Create a balance between market and rented housing.
- Ensure community facilities are provided within the proposed Strategic Allocations.
- Lack of plan or evidence as to how jobs growth might be achieved.

Summary of changes made to the plan

- Issues raised through the questionnaire responses have been reflected in the changes made to the relevant policies, as detailed in section 3 of this report.

3. DOCUMENT RESPONSES

- 3.1 This section summarises the key points which were raised by respondents, broken down by each policy. Below each summary, a short section has been included setting out the changes that have been made to the policy, which have been carried forward to the Pre Submission version of the Joint Core Strategy.
- 3.2 Respondents are advised to read the whole Pre Submission version of the JCS alongside this summary report to fully understand how their representations have been taken into consideration.
- 3.3 The structure of the Pre Submission Plan has been changed in order to improve its coherence and as a result topic areas, policies and supporting text have been moved around. This should be taken into consideration when respondents are searching for amendments to policies on which they originally made representations.
- 3.4 Not all changes are the result of representations but are a result of the professional judgement of the range of officers who have been involved in plan preparation, including planning, transport, landscape and heritage officers. Changes have also been made to reflect updated evidence, for example Transport Modelling, the findings of the Strategic Housing Market Assessment (SHMA) and the Historic Landscape Assessment.

Chapter 1 – Introduction

Duty to Cooperate

- Introduction should mention how the duty to cooperate has been applied in practice in determining the appropriate locations for growth.
- There should be more consideration of how the JCS authorities have co-operated with other authorities outside the JCS area, including other Gloucestershire authorities, South Gloucestershire and South Worcestershire authorities. Concern that other authorities are developing their own plans without complying with the need to cooperate with neighbouring councils.
- Requirement to participate in a programme of mineral-specific joint working.
- The councils should produce a duty to cooperate statement to show what measures have been taken to satisfy the duty and how any issues arising have been addressed.
- Representations from neighbouring authorities confirm a commitment to continue the positive joint working that has been carried out to date and to fulfil the requirements of the duty to cooperate.

Plan period

- The plan period is too long given the economic uncertainty.
- Plan period is likely to barely be in conformity with the NPPF, which demands a 15 year horizon from the time of adoption.
- The plan should give more consideration to what happens after 20 years.

Relationship with other plans

- Delivery of District Plans is required within the same timescale as the JCS.
- Real weight should be given to the contribution of communities through Parish Plans, Village Design Statements and Neighbourhood Plans before decisions on development and services are made.

Structure of the document

- At paragraph 1.20 the diagram, should include a reference to the historic environment.

Summary of changes made to the plan

Duty to Cooperate

- Wording slightly amended to clarify that the JCS authorities are working with other local authorities and organisations under the duty to cooperate to address strategic planning issues.

Relationship with other plans

- The structure of the planning documents and resource availability means that the JCS must be taken forward slightly ahead of the lower level district plans.

Structure of the document

- Diagram at paragraph 1.20 has been amended.
- New wording added to better communicate the purpose and role of the Sustainability Appraisal.
- New delivery, monitoring and review section added to better communicate how these will be achieved.

Chapter 2 – Vision and Objectives

Vision

- There is general support for the vision.
- Some concern with its delivery.
- Concern that the vision is not supported throughout the rest of the document.
- Sustainable development, climate change, flood risk and biodiversity permeate much better throughout the JCS now than in the previous version.
- Vision should reflect the entire plan period, recognising the current and future improvement in the economy.
- Vision should encourage new development to respond to the character and identity of individual communities, highlighting the differences between areas and the requirement for differing sensitive approaches to development.
- Should refer to the contribution of the historic environment to the quality and distinctiveness of the wider landscape and existing settlements.
- Demographic makeup of the JCS area and how all needs are to be met should be clarified.
- Should focus on Central Gloucester as a whole and the need to invest in it to deliver the vision.
- References under paragraphs 2.8 (for Gloucester) and 2.23 (for Tewkesbury) are supported; however a similar commitment should be made for Cheltenham.
- Consideration should be given to the potential for Gloucester's additional needs to be accommodated within Stroud District.
- Requirement for a clear economic vision.
- Greater priority needs to be given to connectivity and bus priority.
- Supporting healthy lifestyles should be included as part of the vision.
- Vision does not clearly define how the area will function any differently than it already does.
- Vision statement and its accompanying narrative do not provide tangible aspirations that will assist in the delivery of sustainable development.
- The vision should also encourage other types of development as well as housing and employment, including sport, recreation and leisure.

Strategic Objectives

- General support for the objectives included in the plan.
- Concern that the objectives are a generic set of statements and could do more to guide development.
- Objectives are aspirational but not realistically achievable.

Strategic Objective 1

- Should mention the role of the bus in the urban economy.

Strategic Objective 2

- Should mention the role of the bus in supporting retail visits and spend in urban centres.

- Concern that placing more housing on the edge of the urban area will not support the objective to ensure the vitality of town centres.

Strategic Objective 3

- Should be broadened to include support for all types of existing rural businesses.

Strategic Objective 4

- Needs to mention the protection of ground and surface water.
- Should be balanced with the need for rural development and diversification initiatives on farms.

Strategic Objective 5

- Should refer to all new and existing development.
- Should acknowledge the role that quality contemporary design can play in new developments.

Ambition 3

- Needs a greater emphasis on safety and measures to reduce the fear of crime.

Strategic Objective 6

- Should refer to BMV (Best and Most Versatile) land when referring to higher grades of agricultural land.
- Should be amended to include a study of the SuDS standards to ensure that they will not encourage or permit the establishment of mosquitoes or other colonies of insects that will harm persons in the vicinity.
- Needs to mention energy generation such as solar panels, eco-friendly electric car and cycle charge points.

Strategic Objective 7

- General support for objectives that reduce driving, though concern that this is difficult to deliver.
- Objective is endangered by the proposals to remove the current Cheltenham Racecourse park and ride from the Green Belt.
- Suggested that continuity of walking and cycling routes should be reflected in this objective.

Strategic Objective 9

- Role of the bus is missing.
- Not supported by the proposals to reduce existing Green Belt land.
- The wording 'in partnership with others' should be clarified.

Summary of changes made to the plan

Vision

- Vision has been amended to make specific reference to the historic environment.

Strategic Objective 1

- The wording “*favourable conditions*” has been replaced with “*the right environment*” at the second bullet point.
- The wording “*in the south west*” in the third bullet point has been deleted.

Strategic Objective 2

- The word “*leisure*” has been added to the first bullet point.
- The wording “*main designated centres*” has been added to the third bullet point.

Strategic Objective 3

- First bullet point has been amended to allow for appropriate expansion of existing rural businesses.

Ambition 2

- Amended to refer to the historic environment.

Strategic Objective 4

- Third bullet point has been amended to require improvements/contributions to green infrastructure “*where appropriate*”, acknowledging that there are some cases where this would be difficult to achieve.

Strategic Objective 5

- Wording has been amended to clarify the requirements of the objective.

Strategic Objective 6

- Amended to require national standards as a minimum, with higher standards where appropriate.

Strategic Objective 7

- First bullet point has been amended to clarify the requirements of the objective.
- Third bullet point has been amended to refer to “*integrated transport links*”.

Strategic Objective 8

- Second bullet has been amended to refer to playing pitches.
- At the third bullet, “*cycle/footpaths*” has been replaced with “*sustainable transport*”.

Chapter 3 – Strategic policies

Policy SP1 – Scale of new development

- Agree that there needs to be new housing but not at the levels proposed.
- Objection to the assumptions used to establish Objectively Assessed Need, for example birth rate, inward migration, household size and growth in employment.
- Objection to pushing forward the calculations for Objectively Assessed Need when the ONS will be publishing more up-to-date population figures. These should be factored in rather than relying on assumptions that could be wrong.
- The proposed housing numbers are far higher than the housing that has been delivered in the JCS area over the last few decades and assume a much higher population growth than has been the case. Concern therefore that they are incorrect.
- Objection to forecasting housing requirements over a 20 year period. There are too many variables and therefore inherent uncertainties.
- Household size assumptions are not correct and do not match up with historic data.
- Housing and employment numbers proposed in the Draft JCS are too low. To be fully compliant with the economic growth aspirations of the NPPF and Draft JCS a significantly higher number of new homes and jobs will be required; at least to the upper level of the Objectively Assessed Need identified in the Draft JCS, though some submissions suggest higher still.
- No indication that affordable housing has been appropriately assessed when considering the formulation of the housing target.
- Concern that the impact of concealed households and economic migration patterns has not been considered in appropriate detail.
- Need to ensure capacity in urban area and rural village is maximised in order to minimise the need for urban extensions.
- Significant need for more housing at Cheltenham above and beyond the 10,000 figure identified in the Draft JCS.
- Concern regarding the sites assumptions used to establish the urban capacities; it assumes all sites will come forward and this is not the case. Additional capacity will therefore need to be found elsewhere.
- Support for methodology employed in establishing Objectively Assessed Need, which is in accordance with paragraph 47 of the NPPF.
- Objectively Assessed Need should factor in historic undersupply of housing.
- In its current state the Draft JCS is not compliant with the NPPF.
- JCS relies too heavily on the assumptions of the Regional Spatial Strategy (RSS) which contained significant errors. There should be no influence from the RSS.
- Draft JCS identifies a shortfall of employment land and this should be increased. Proposed level of employment land does not correlate with the amount of housing proposed.
- Clear evidence of historic undersupply of housing delivery in Tewkesbury Borough and an additional 20% housing buffer should apply.
- Concern at the use of the 'graduated housing requirement'. Not clear if the JCS authorities are intending to use the graduated housing requirement as no mention is made in the Draft JCS. Objections to the use of this approach.

Summary of changes made to the policy

- Policy amended to reflect updated evidence and a revision to the OAN requested by Members of the JCS authorities.

Policy SP2 – Distribution of new development

3.1 Please note that a number of other potential sites were submitted for consideration through the JCS, referred to as ‘omission sites’. Details of these are set out in more detail in section 6 of this report.

Policy wording

- There should be more focus on urban capacity and brownfield sites. Some concern that the capacity of potential sites in such areas has been underestimated. The JCS should include a ‘brownfield first’ policy and encourage the re-use of vacant properties.
- Over-reliance on strategic urban extensions - should be more focus on smaller deliverable sites in the earlier years of the plan and on rural settlements.
- Additional sites will be needed in order to meet the requirement.
- Concern that the numbers identified are too high (SP1), that this should be revised and a distribution strategy prepared to reflect this higher number.
- Concern that the numbers identified are too low.
- Support for the exclusion of AONB designated land from the site selection process.
- Support for the distribution strategy that identifies urban extensions to the main urban areas as the focus of growth and the most sustainable locations.
- Objection to the distribution strategy that identifies urban extensions to the main urban areas. They are not sustainable and contrary to the Government’s planning policy on Green Belt.
- Support for the inclusion of ‘safeguarded areas’ to allow flexibility in the delivery of the plan.
- Other districts in Gloucestershire and other neighbouring authorities should help to provide for the level of housing need required.
- Concern about the infrastructure requirements of the proposed Strategic Allocations, the ability to deliver them, and the likely impact of this on existing infrastructure and communities in the wider area.
- The distribution strategy does not adequately consider the role and function of Tewkesbury town.
- Distribution strategy offers the opportunity for securing high quality transport connections with new development, with a potential modal shift and reduction in longevity of local trips, but must be underpinned by a robust and defensible analysis that demonstrates this is achievable.

Table SP2a

- District capacities identified at Table SP2a are an overestimation and do not align with the realistic housing supply identified in district Strategic Housing Land

Availability Assessments (SHLAAs). Additional land will therefore need to be found elsewhere to address this.

Rural service villages and service centres

- Support for a figure of 880 residential units for the rural areas.
- Concern about the accuracy and potential application of the Settlement Audit. Several potential inaccuracies have been identified and it should be reviewed to ensure correctness.
- Support for the redevelopment of brownfield sites in the rural villages.
- It is not clear how service villages and rural service centres have been identified.
- A larger number of rural settlements should be identified for development in order to provide for local housing need and create sustainable communities.

Summary of changes made to the policy

- Policy amended to reflect updated evidence and a revision to the OAN requested by Members of the JCS authorities.
- Policy amended to reflect changes to SP1, updated data on urban capacity and windfalls.
- Removal of Strategic Allocations at Up Hatherley and Twigworth sector of the Innsworth and Twigworth Strategic Allocation, as put forward by Members of the JCS authorities.
- Amendments made to the list of service villages within Tewkesbury Borough. Added Twigworth and Stoke Orchard, and deletion of Apperley, Ashleworth, Dumbleton and Little Witcombe.

Policy SP3 – Delivery and review

- Support approach to review the JCS at regular intervals.
- Concern that the timescales set out in Policy SP3 are too vague and lack the flexibility that the NPPF requires. Plans should have the ability to adapt to rapid change.
- Allocated development sites will not come forward as anticipated in the JCS due to the long lead-in times of the strategic urban extensions. In those circumstances there should be an early release of safeguarded land, including the release of additional Green Belt land, to ensure a continuous 5-year supply of deliverable housing sites.
- No additional information is provided as to what length of delay or shortfall of housing from strategic sites would lead to a shortfall.
- Policy could provide a mechanism for sites to come forward outside of the development plan process, in accordance with paragraph 14 of the NPPF, where there is a clear shortfall in provision.
- Should refer to liaison with Stroud District and Wychavon District.
- Proposed release of Green Belt land for development should be undertaken as an option only once a comprehensive assessment of all non-Green Belt land has been undertaken.

- Objection to the possibility of further future Green Belt reviews which will lead to its further erosion and would not result in a long term permanent boundary.
- Should be a focus on delivering housing that already has planning permission. Green Belt does not have to be sacrificed yet and may not need to be at all when a review of housing numbers is undertaken.
- Policy needs to make clear what will happen if reviews suggest a higher housing figure than currently being planned for is necessary. It needs to set out a strategy for addressing any shortfall.

Summary of changes made to the policy

- Following a review of this policy, it has been concluded that it should not to be included as a planning policy in the Pre Submission document. Policy SP3 has therefore been deleted.
- Much of the wording has however been retained and included as text in the new delivery, monitoring and review section in the introduction to the Pre Submission document.

Chapter 4 – Core policies

Ambition 1 – A Thriving Economy

Policy E1 – Employment

Economic Strategy

- The quantity of employment land should be reviewed in light of appropriate amendments of policies SP1 and SP2.

Change of use

- Policy does not define 'employment' when it refers to a change of use from an employment site. Also no guidance as to the meaning of 'actively marketed', 'no longer viable' and 'not suitable'.
- Unclear whether all bullet points need to be satisfied.
- Unclear whether the policy applies to redevelopment as well as change of use.
- Not a strategic consideration and should be addressed in the district plans as every area is different.
- Policy takes no account that it is now largely permitted development to change of use from B1 offices to residential without the need for planning permission.
- Policy should reflect paragraph 22 of the NPPF which suggests that market signals should be used to assess the suitability of a change of use away from a long standing employment use.
- The requirement for a 12-month marketing period places an unnecessary regulatory burden on employment sites from being put towards equally productive economic uses. There is also some support for this approach.
- Change of existing employment uses should include a level of flexibility, in line with paragraph 7.11 of the NLP report and paragraphs 21 and 22 of the NPPF.
- Requirement for evidence that the site is no longer viable as an employment site and not suitable for other employment generating uses is too onerous.

Highway Capacity

- Important to ensure that there is an up-to-date transport evidence base to support any application, along with any mitigation proposals as appropriate.
- The significant travel demand that will be generated by the allocations on the M5 needs to be fully understood.
- The JCS does not appear to recognise the importance of the Strategic Road Network (SRN) and its role in enabling and sustaining economic growth.

Local Enterprise Partnership (LEP)

- Concern about the LEP's economic ambitions and plans. The LEP are not elected or accountable and will not engage with local community groups.
- Concern that the LEP is fixated on development around motorway junctions which is likely to be unsustainable in transport terms and contribute to further car use.

Mixed employment uses

- The NLP Review identifies the importance of non B-Class Uses in job provision. Policy E1 does not specifically recognise the wider possibilities of employment provision that may be presented through a Sui Generis Use.
- Policy should not allow residential development adjacent or close to Royal Mail handling facilities.
- Emerging policies may wish to distinguish between key strategic sites requiring protection and those where a more flexible approach, supporting reuse for other job creation purposes may be more appropriate to deliver growth prospects.
- Support for the recognition in the policy that new jobs will primarily be outside the traditional B class uses, including retail jobs.
- There needs to be consideration and inclusion within the policy of mixed uses. The JCS needs to make clearer that employment should be considered in broad terms, not just B1, B2, and B8.
- The opportunities and implications of home-working need to be considered, assessed and taken into account.

Previously Developed Land (PDL)

- The policy should be amended to allow for new employment uses to be provided on previously developed sites.

Safeguarding employment sites

- Policy does not provide sufficient flexibility to cater for future changes in circumstances.
- Policy needs to be reworded so that employment sites are released when there is no prospect of letting for an employment use, as per paragraph 22 of the NPPF.

Summary of changes made to the policy

- The policy has been scaled back to be of a more strategic nature, appropriate to the role of the JCS.
- Further detail to be provided through the lower level district plans.

Policy E2 – Retail hierarchy and town centres

Policy wording

- Support for the general thrust of the policy that seeks to support and strengthen designated centres in the JCS area.
- Support for the policy stating the importance of applying the sequential test and impact test for all main town centre uses. From a highways perspective, these types of developments tend to generate a large number of trips and it is important to get their location right.
- Important to ensure that jobs and houses are provided in the rural villages in order to make them more self-sufficient.
- Paragraph 23 of the NPPF requires local planning authorities to set policies for the consideration of proposals for main town centre uses that cannot be accommodated in or adjacent to town centres, for example garden centres that have a high space

requirement to low value ratio of goods. Policy should be amended to refer to such specialist uses.

- Tewkesbury should appear above rather than alongside Bishop's Cleeve and Winchcombe given its higher status as a market town rather than a rural service centre.
- Request for the JCS to establish exact town centre boundaries and the allocation of sites to meet the identified floorspace requirements rather than deferring it for inclusion in the lower level district plans, as set out in Policy E2. This issue is considered strategic and there is also an issue with timescales.
- Not clear how the identified floorspace capacities have been derived – they do not tally with the JCS Retail Study Phase 1.
- Town centre shopping should be encouraged through the provision of centrally placed car parks, at a reasonable price.
- Support inclusion of reference to the Kings Quarter regeneration site in Gloucester, which will make an important contribution to vitality and viability.
- Greater flexibility should be given to the demands placed on development to ensure that quality, sustainable and much needed investment is not stifled and the development remains viable, for example in terms of BREEAM requirements.
- Concern regarding the ability of town centre sites to provide for the full identified floorspace requirements as set out in the JCS Retail Study. Other appropriate sites should be identified for complementary retail development and the policy as written is considered unduly restrictive.
- Concern about the impact of the policy on small, independent guest houses, B&Bs and hotels. The policy should not place restrictions on the change of use of such accommodation to other uses.
- Policy fails to address the issues of vacant existing retail units in the city and town centres or adequately address tourism. It should focus on a wider range of initiatives to improve the city and town centres.
- Important to focus on maintaining and improving the city and town centres, particularly Gloucester, which is in drastic need of improvement.
- Important to acknowledge the importance of maintaining and improving the historic environment, for example through historic regeneration.

Evidence base

- It is not clear how some of the elements of the JCS Retail Study Phase 1 have been established – for example there is a lack of clarity over how the centre turnovers and the turnover of assumed retail commitments have been derived.
- An update to the study needs to be undertaken to ensure it is as up-to-date as possible – for example whether or not the identified commitments have been brought forward.
- Question the apportionment of the comparison goods floorspace capacity and suggest that centres in greater need of investment (Gloucester, Tewkesbury) should benefit from more significant growth. The figures should be rebalanced following a review of the different centres to accommodate new retail floorspace.
- Floorspace requirements are excessive and it will be difficult to deliver the figure for Cheltenham town centre and will lead to a massive increase in the out-of-centre retailing, which in turn will undermine the town centre.

Summary of changes made to the policy

Policy wording

- Estimated floorspace requirements for the plan period have been amended to reflect a more up-to-date assessment provided as part of the JCS evidence base.
- Town centre hierarchy amended slightly to clearly show that Tewkesbury is identified as a 'market town' and Bishop's Cleeve and Winchcombe are identified as 'rural service centres serving their rural hinterland'.

Delivery section

- Delivery section sets out more clearly what the roles of the JCS and lower level district plans are in terms of policy for town centres.

Ambition 2 – A sustainable natural and built environment

Policy S1 – Presumption in favour of sustainable development

- General support for the policy.
- The policy is unnecessary given it is set out already in the NPPF and carries appropriate weight. There is a risk in repeating national policy if it is then changed during the life of the plan. In this case it could result in future conflict as to how planning applications might be considered.
- Concern that developers will interpret the 'presumption in favour of development' as guaranteed planning permission.
- Question the placement of the policy under Ambition 2 as sustainable development encompasses economic, social and environmental issues.
- Housing development cannot be sustainable unless it is built entirely from renewable resources, is self-sufficient, is provided with no new service roads, and for every unit in it, one existing house is demolished and land is given back to nature.
- Support for the strategy as this will produce sustainable extensions to existing communities.
- The Draft JCS fails to properly take account of the implications of this policy.

Summary of changes made to the policy

- Policy S1 has been retained and redrafted to include reference to the first limb of NPPF paragraph 14, as this had previously been omitted from the policy.

Policy S2 – Flood risk management

Environment Agency flood maps

- Concern that the Environment Agency's mapping of the Gloucester floodplain is out of date and only maps fluvial flooding.
- Concern that flooding often occurs outside identified flood zones. The proposals do not take into account the danger of flooding as the result of development on the edge of the floodplain.

- The Environment Agency published a new national updated flood map for surface water in December 2013, which should be used to inform the evidence base and referenced within the JCS.

Sustainable Drainage Systems (SuDS)

- Questions over how long SuDS will last and who would be responsible for their maintenance.
- SuDS should be incorporated into all new development.
- Reference to groundwater should be added to take account of infiltration methods of SuDS and their need to ensure good water quality.
- Support for the inclusion of retrofitting SuDS. There may be areas where managed retreat would be appropriate and this could be added to the policy at this point.
- Reference to SuDS and commuted sums is an out-of-date option unsupported by the Government. The present intention of DEFRA is to secure financial contributions as part of a standalone arrangement involving individual householders at the point of occupation.
- Attention is drawn to the RSPB and Wildfowl and Wetland Trust's 'A guide for Local Authorities and Developers: Sustainable Drainage Systems Maximising the Potential for People and Wildlife', which is believed to cover all of the relevant issues.

Surface water flooding

- Outlying villages have considerable issues with surface water flooding due to saturated ground. Concern about the impact of large scale development.
- The justification text should mention the county's surface water information.

Sequential test

- The policy is too restrictive, particularly where the sequential test is applied and should recognise where development sites have wider sustainability and economic benefits.

Strategic Allocations

- Concern over flood risk at sites A1, A2, A3, A5, A6, A7 and A8.
- A8 - Concerns about the assessment of flood risk to properties upstream within the Carrant Brook catchment from changes to floodplain dynamics and surface water attenuation. Development will lead to run-off and more flooding.
- Development will destroy existing fields which have a key role as water meadows and in minimising/avoiding flooding.

Policy wording

- Green infrastructure should be referred to in this policy as it is also relevant to Flood Risk Management. SuDS for example can be designed to provide opportunities for wildlife, and green infrastructure can provide natural flood defence.
- Policy aims should be clarified in terms of ensuring new development is safe and that flood risk is not increased.
- Paragraph 4.29 should cover the full range of issues associated with flood risk management maintenance.

Other points

- Conflict between paragraph 2.19 and this policy as it may be necessary in some cases to build on Flood Zones 2 and 3 to regenerate Tewkesbury town.
- Do flood prevention measures demonstrate an awareness of heritage assets in their location and design?

Summary of changes made to the policy

- Policy S2 now sits within the Infrastructure suite of policies in the Pre Submission JCS.
- Policy text now includes reference to ensuring that any risk to the safety of individuals or communities from flooding should not be increased.

Policy S3 – Sustainable design and construction

General comments

- The policy requirements would be best met through the Building Regulations procedure rather than at a policy level. Need to ensure that the policy requirements do not unnecessarily repeat standards required by Building Regulations.
- The requirements are likely to become out of date early in the life of the Plan as changes to other guidance and regulations take place. Suggested that the policy is used to guide development rather than require specific actions against guidance/standards that may be withdrawn in future.
- Should be acknowledged that the Government sees a reduced role for Local Development Frameworks in the setting of standards that relate to either the technical or functional performance of a development.
- To require on-site or near-site renewables or low carbon energy sources requires further justification to be supported by the policy.
- Ensure that affordable houses are built to the same high standards.
- Support for the mention of Green Infrastructure in the policy.

Design

- Focus should be on reducing energy use in the first place through the fabric of a building. This has the potential to be more sustainable in the long term.
- Should ensure that the design of new developments is sympathetic to existing properties.

Policy wording

- Suggestion that new policies/standards may be used in the context of this policy in the future raises uncertainty for the development industry, especially if they are different from any national building regulations.
- The reference to encouraging the concept of living roofs is welcomed, but would benefit from expansion to incorporate other built-in structures such as bat and bird roosts.
- Policy should be amended to include a reference to trees and woods being used as a natural asset to help underpin sustainable design and construction.

Code for Sustainable Homes

- Should be reviewed in light of the Government's recent consultation on housing standards - Code for Sustainable Homes may be removed and consequently this element of the policy is likely not to be needed in the future. Recommended that the reference to Code for Sustainable Homes is removed, or that the policy is amended in light of the new housing standards once published.
- JCS should set out a new 'Gloucestershire' standard on what is expected of developers and which requires more than the minimum Sustainable Homes and BREEAM requirements identified.
- No national policy to support the policy requirement.

BREEAM (Building Research Establishment Environmental Assessment Methodology):

- Concern that the policy is too prescriptive and does not allow any flexibility in its application. It is also not in line with BREEAM guidance and the NPPF. Greater weight should be given to other benefits of schemes when assessing the sustainability credentials of a development.
- Requirements do not appear to have considered the impact on the viability of development.
- Questionable whether the method of calculation improves sustainability at all levels.
- Implementation of BREEAM standards as a policy is not necessarily an appropriate method of testing sustainable criteria in buildings which have variable use patterns.
- How will the requirements be balanced against any restrictions on historic buildings or in conservation areas?
- Questions about the use of the BREEAM standard for domestic refurbishments - do not necessarily accurately reflect what is ultimately built.

Summary of changes made to the policy

- Policy S3 has been substantially re-drafted to take account of both internal advice and external representations.
- The policy and its explanatory text have been clarified to aid decision making.
- Reference to the Code for Sustainable Homes has been removed due to changes in Government policy.
- Text referring to waste minimisation and minerals has been added to the policy.

Policy S4 – Design requirements

Evidence base

- No evidence as to why cyclists and pedestrians are given the highest priority in the policy.

Policy wording

- Policy should acknowledge viability and the role of complementary design, which should not be limited to reflecting the attributes of the JCS area. Ignores the role that new developments can play in upgrading poorer quality contexts.
- Principle A is considered too inflexible.

- Principle B should relate to walking, cycling and public transport networks.
- Principles C and D could be simplified.
- Principle E should refer to fire and be strengthened to ensure design minimises opportunities for crime and the fear of crime.
- Policy does not appear to relate to industrial development.
- Policy requirements need to be proportionate and commensurate to the scale of development.
- Some elements of the policy are aspirational rather than realistic.
- Policy does not give consideration to context of the historic environment and should be amended as such.
- Policies S4 and D4 should be combined as they serve the same purpose.
- Concern over policy's urban focus and potential disadvantage to rural locations, particularly principle G.
- Concern that the policy simply relates to all development and subsequent implementation difficulties.
- Policy does not provide design criteria for specialist development e.g. care homes.

Summary of changes made to the policy

- Policy S4 has been amended to incorporate the former Draft JCS Policy D4 (Master Plans and Design Briefs).

Policy S5 – Green Belt

Policy/evidence base

- Policy is going against the conclusions of the Green Belt review which assessed many of the proposed sites as 'significant' to the value of the Green Belt. These sites should therefore not be removed from the Green Belt.
- Localism should mean that the value of the Green Belt is more important than meeting the OAN.
- Green Belt review process was not sufficiently comprehensive or robust and needs an early review. A more comprehensive Green Belt review and site allocation process is required if the JCS requires more sites to meet the OAN.
- A new town should be fully and properly considered, as this would reduce the impact on the Green Belt.
- Before releasing Green Belt sites non-Green Belt sites should be released anywhere within the JCS area, particularly around Ashchurch.
- Need a stronger focus on brownfield first.
- 2011 Green Belt review identified parcels of land that were too large, particularly around settlements. By looking at smaller parcels it would be possible to consider a larger number of small sites, which would have less overall impact on the Green Belt.
- Removal of Green Belt around the Racecourse and Shurdington is not needed for strategic purposes.
- The exceptional circumstances that lead to the need to redraw the Green Belt must be used to inform and define the revised boundaries to ensure that development is guided to the areas where the contribution to the strategic principles of the Green Belt are least.

- The process of Green Belt boundary changes has not been properly sustainability assessed.
- Need to release more land to meet the OAN, particularly in the rural service villages.
- No written justification as to how the revised Green Belt boundaries were arrived at.
- Existing Green Belt boundary plan is incorrect, for example the airport boundary.
- Green Belt should be extended to the north of Bishop's Cleeve.

Sites requested to be taken out of the Green Belt

- Further Green Belt releases required at Shurdington.
- Proposed new safeguarded site at North West Cheltenham.
- Brockworth Garden Centre – Green Belt Review concluded that the site made a limited contribution to the purposes of the Green Belt.
- Gloucestershire Airport - part of the airport should be removed from the Green Belt to increase flexibility for commercial development.
- CCV site adjacent to the A40.
- Extra space in the 'built up area' of the racecourse to be in the next version of the JCS to allow for growth.
- Land at Shaw Green Lane - does not contribute to the stated purpose of the designation. This site is currently surrounded on three sides by development and any scheme that were to come forward would therefore not increase sprawl or encroach onto the countryside.
- Brookfield Road, Churchdown

Safeguarded sites

- Land at Boddington (2011/12 SHLAA ref SUB26) should be removed from the Green Belt for future use.
- Safeguarded site at North Cheltenham should be included to meet the full OAN of the JCS area.
- Support for the safeguarded site to the west of Cheltenham.

Objections to sites taken out of the Green Belt

- Objection to the removal of land at North Churchdown, South Churchdown and Up Hatherley from the Green Belt. These are in areas identified in the September 2011 JCS Green Belt Assessment as making a 'significant contribution' to Green Belt purposes.

Cheltenham Racecourse

- Cheltenham Green Belt Review (2007) defended this land as Green Belt.
- Opposition to the concept of "tidying up" the Green Belt around the racecourse.
- Concern at the loss of the racecourse park and ride.
- Site has little housing benefit because of lack of access and biodiversity value.
- Removal was not properly discussed at the JCS Member Steering Group and introduced very late.
- Also support for the removal of this site from the Green Belt.

Shurdington

- Opposition to its removal from the Green Belt; deemed critical by the JCS Green Belt review.
- Concern over the loss of the King George playing field and support for a JCS requirement to re-instate if used for development.

Policy Wording

- Should be clarified that the policy proposes to remove land from the Green Belt.

Support

- Requirement for affordable homes necessitates the need to release some Green Belt land.

Summary of changes made to the policy

- Policy includes more detailed background information on work regarding the JCS Green Belt review and the choices that led to site selection in the JCS.
- NPPF requirements for Green Belt review have been identified.
- Text has been included on the currently operational waste sites in the Green Belt.
- West Cheltenham and North West Cheltenham are identified as safeguarded areas.
- The proposal to remove land to the south of Cheltenham racecourse from the Green Belt has been removed.
- Amendments to the Green Belt map have been made to reflect the deletion of Strategic Allocation A7 at Up Hatherley and part of A1 at Twigworth; these areas remain part of the Green Belt.
- The level of public opposition to the removal of land from the Green Belt does not outweigh the identified need for development.

Policy S6 – Landscape policy

Evidence base

- Regarding the JCS Landscape Characterisation Assessment, no evidence has been published on how it has been used within the decision making process in respect of sites. Objection lodged to the use of the study and its robustness until independently examined.
- The document makes no mention of the historic character of the Carrant Valley at T7.

Omissions

- The lower Carrant valley, to the east of the M5 motorway deserves appropriate designation, equivalent to that provided to other small river catchments under Tewkesbury Local Plan Saved Policy LND3.

Policy wording

- Policy should more clearly identify which landscape designations are of particular importance. National landscape designations should be afforded the highest level of protection in accordance with the NPPF.

- Changes proposed to the Green Belt are not in-keeping with this policy.
- Policy should state that proposals will not be permitted where the overall impact of the proposals is detrimental to landscape and townscape sensitivity.
- The policy implies a restrictive approach to development.
- Requests for additional documentation and surveys must be proportionate to each development proposal.
- It is important to protect agricultural Green Belt land.
- Policy should include specific reference to orchards, the orchard industry and its produce

NPPF compliance

- Policy refers to the European Landscape Convention being based on the premise that “all landscapes are important”. NPPF paragraph 14 and Footnote 9 makes clear that landscapes are not all considered equally important in the UK. Planning should take account of the different roles and character of different areas.
- First sentence of the policy departs from the NPPF – where it includes “*protect landscape character...*” the NPPF requires “*recognise the intrinsic character of the landscape...*”

Summary of changes made to the policy

- Policy S6 has been substantially re-drafted to take account of both internal advice and external representations including amendments to allow for a more flexible approach.
- The policy and its explanatory text have been clarified to aid decision making.

Policy S7 – Cotswold Area of Outstanding Natural Beauty

Policy wording

- The test for land adjacent to the Area of Outstanding Natural Beauty (AONB) should be different to that relating to land within the AONB to conform with the NPPF; the reference to adjacent land should be deleted.
- Areas adjacent to the AONB should be covered by Policy S6.
- Support for the reference to the Cotswolds AONB Management Plan 2013 – 2018. Also support for moving this reference to the supporting text.
- It should be made explicit that there is a need to safeguard views from the AONB.
- There should be no building on, or close to, the AONB.
- Policy should set out a more local approach which also covers smaller development - important that the policy provides sufficient flexibility for appropriate development to come forward in such locations.

NPPF compliance

- NPPF does not apply specific restrictions on landscape designations below those of national significance – should not introduce inappropriate restrictions through landscape policies in plans.

- NPPF places great weight on conserving landscape and scenic beauty in AONBs. The conservation of wildlife and cultural heritage, whilst important, are only given great weight in National Parks and the Broads. Thus there is a two-tier approach which is not reflected in Policy S7.
- The policy covers the main responsibilities of local authority decision making as set out in Section 85 of the Countryside and Rights of Way Act 2000 and paragraphs 115 and 116 of the NPPF.

Strategic Allocations

- Concern about the effects of the proposed scale of housing at A6 on the AONB and the extent to which this could be moderated.
- Support for the exclusion of the AONB when considering urban extensions.

Summary of changes made to the policy

- The policy has been substantively retained.
- The supporting text to the policy now provides clearer guidance on the interpretation of 'major' development within the AONB.

Policy S8 – Built and historic environment

Evidence base

- Plan should deliver a positive strategy for the historic environment.
- Concern about the lack of reference to an evidence base to support the historic environment policy.
- Policy does not refer to heritage assets at risk.
- Could the policy refer to the role of other subservient local planning documents in support of the JCS's positive heritage strategy?

Policy wording

- General support for the inclusion of this policy.
- Support for putting heritage assets to viable use.
- Conservation Areas and listed buildings should be preserved.

Strategic Allocations

- Concern that designated heritage assets should be reflected in Strategic Allocation plans. Development proposals should take account of the historic environment.

Summary of changes made to the policy

Evidence base

- Historic environment policy clarified and supporting text expanded to provide more detail relating to:
 - Valued and distinctive elements of the historic environment in the JCS area;
 - The scope of the historic environment evidence base; and

- The combined role of the JCS and district plans in providing a framework for historic environment policies.
- Policy revised to encourage proposals that will secure the future conservation and maintenance of heritage assets at risk.

Policy wording

- Revised policy includes an approach to conserving and enhancing designated and undesignated heritage assets.

Strategic Allocations

- Policy explanation includes information relating to the evidence base; in particular the JCS Historic Environment Assessment 2014.
- In the JCS document as a whole, various policies have been amended in response to comments relating to the historic environment, including the Strategic Allocations policies.

Policy S9 – Conservation and improvement of biodiversity and geodiversity

Policy wording

- Concerns that policy requirements are too onerous and not deliverable in all circumstances.
- Suggestion that development ‘close to’ rather than ‘adjacent’ to locally designated sites should be protected.
- Comments relating to hierarchy of avoidance, mitigation and compensation.
- Comments relating to correct use of terminology for designated sites.
- Policy should refer to the importance of protecting and enhancing ecological links between sites.
- Policy should recognise that some previously developed land can be of high environmental value, in line with NPPF Paragraph 111.
- General support for the policy.

Nature Improvement Areas

- Interest in policy reference to Nature Improvement Areas. Example of the Cotswolds Scarp Nature Improvement Area.

Biodiversity

- Support for protecting and enhancing the local environment, including wildlife habitats, trees and woodland, parks and gardens, and to retain open green spaces.
- Development proposals where the primary objective is to conserve or enhance biodiversity should be permitted.
- Differing views over biodiversity offsetting values.

Strategic Allocations

- Concern over impact of development on Green Belt land on wildlife, habitats and protected areas.

Summary of changes made to the policy

Policy wording

- Policy redrafted to ensure that it is flexible and positive and reflects the requirements of the NPPF.
- Revised policy approach conserves assets for their value rather than proximity to a designated site.
- Approach to hierarchy of avoidance, mitigation and compensation retained and clarified.
- Policy refers to wildlife corridors and ecological stepping stones between sites.
- Policy protects assets of demonstrable value, which does not exclude brownfield sites.
- Policy retains reference to Nature Improvement Areas; further detail provided in supporting text.

Biodiversity

- Revised policy encourages new development to contribute positively to biodiversity and geodiversity.
- Delivery of this policy may include a system of biodiversity offsetting; however this is not specified at the current time.

Policy S10 – Green infrastructure

General comments

- Many respondents support this policy.
- Green infrastructure (GI) should only be provided within new developments where it is appropriate.

Policy wording

- Policy should articulate how the JCS authorities will work with neighbouring authorities to deliver GI improvements.
- Emphasis of the benefits of GI, including Ecosystem Services.
- Need to conserve, protect, enhance and connect existing GI, including ancient woodlands and trees, orchards, hedges and open space, SuDS and the wider landscape, as well as providing new GI.
- Clarification on what constitutes green infrastructure.
- Protection of woodlands, hedgerows and trees is too prescriptive.
- Reference in the policy justification that residents should be within 300m of a GI corridor or asset should be translated into the policy.
- Need for evidence in relation to the policy.

Green space

- Importance of retaining green open space and parklands within urban and built-up areas.
- Every new build should have adequate green space per house.

Strategic allocations

- Lack of clarity around how the policy relates to the Strategic Allocations.

Green infrastructure network map

- Map incorrectly shows the village of Greet within the AONB.

Summary of changes made to the policy

General comments

- Revised policy provides a flexible and aspirational approach to GI provision. Detailed policies will be provided in district plans.
- Delivery section refers to working with neighbours to deliver GI improvements at cross-boundary locations.
- Explanation summarises GI concept and benefits including ecosystem services.
- Policy sets approach to conserving, enhancing and linking GI network. Supporting text includes general definition and examples of GI.
- Policy provisions protecting GI made more general.
- 300m requirement retained in explanation. Other factors as well as distance ought to influence location.
- Explanation describes GI strategy work which constitutes evidence base.

Green Space

- The NPPF, JCS and district plans will together provide a framework of policies to protect public green space.

Strategic Allocations

- Policy specifies that development at Strategic Allocations will be required to deliver connectivity through the site linking urban areas with the wider rural hinterland.

Policy S11 – Renewable energy development

- Paragraph 12 of the National Planning Practice Guidance for renewable and low carbon energy states that the proximity of grid connection infrastructure is an important siting consideration for renewable energy technologies - Policy S11 should support safeguarding and promoting development that seeks to maximise such existing infrastructure.
- Policy should have regard to both renewable energy and heat generation.
- Incinerators and other options have not been mentioned for future development.
- Potential to increase renewable energy production within our existing infrastructure with the latest design approaches.
- Should mention converting existing housing provision to a higher BREEAM standard, which would contribute to reducing energy needs in the short to medium term whilst new energy production facilities are designed and built.
- Opposition to the idea of designating suitable areas for renewable energy – the policy provides an adequate basis for decision-making and for the development of more detailed policies in subsequent district plans.

- First bullet point should refer to “*heritage assets*” rather than “*historic features*” in order to be compliant with NPPF terminology.
- Should include a requirement to ensure that low cost green measures are incorporated into housing design and that new technologies, solar panels, heat pumps etc. are utilised to the full.
- No mention of eco-friendly electric car and cycle charge points.
- Not enough mention of renewable energies, particularly solar and wind.
- Opposition to solar panels and wind farms in the JCS area, particularly within and adjacent to the AONB.

Summary of changes made to the policy

- The requirements of Policy S11 have been substantively retained.
- Amendments to provide greater clarity to the application of the policy and its requirements.
- The policy now sits within the Infrastructure suite of policies in the Pre Submission JCS.

Ambition 3 – A healthy, safe and inclusive community

Policy C1 – Residential development

Use of brownfield land/previously developed buildings

- Development should only be on brownfield sites; the use of brownfield land should be encouraged, a local brownfield target is required, there should be a rigorous approach to identifying brownfield sites for development.
- Brownfield first policy is required.
- Policy should help bring empty homes back into use and encourage sensitive adaptive reuse of buildings.

Policy wording

- Development should not be permitted unless it is in accordance with other plan policies. There should be no adverse impacts on or from development including impacts on health or the strategic road network and transport problems need to be resolved before new housing is built.
- The policy does not provide enough detail regarding mixed use development, rural exception sites and settlement boundaries.
- Concern that the policy precludes or is not flexible enough to allow sustainable greenfield development or the development of ‘omission’ sites.
- The policy should not specify that a rural worker is on site ‘at all times’.
- NPPF paragraph 55 allows residential development under a number of other ‘special circumstances’.
- More housing in villages could work well.

Infill development

- Concern that infilling is only allowed in villages.
- Infill development should only be permitted where it accords with other policies.

- Need to clarify meaning of infilling - maximum of two dwellings is overly restrictive and should only relate to development outside of the rural service centres and service villages.

Rural exception sites

- Policy should reflect the fact that NPPF 54 says local authorities should consider whether some market housing will facilitate affordable housing delivery on rural exception sites

Summary of changes made to the policy

Brownfield

- Improved clarity around approach to brownfield sites. Reference to greenfield has been removed as the list of exceptions relates to both greenfield and brownfield.
- The policy encourages adaptive re-use of buildings.

Policy wording

- Introduction to the policy has been revised and clarifies the approach to greenfield development.
- Policy reference to adverse impacts removed. The plan should be read as a whole. This point is reiterated in the delivery section.
- Further detail on policies is to be provided in the district plans including, for example, infilling and settlement boundaries.
- Reference to rural worker being on site at all times removed as the wording 'readily available' is sufficient.
- The explanation section refers to NPPF paragraph 55.
- The justification has been redrafted.
- Policy allows housing in rural service centres and service villages on previously developed land or in other circumstances.

Infill development

- Approach to infilling clarified; two dwelling restriction removed.

Rural exception sites

- Strategic approach to rural exception sites included in affordable housing policy.

Policy C2 – Housing mix and standards

Evidence base

- There is a need for the policy to take account of the findings of the SHMA.
- There should be more clarity about the type and extent of evidence required. The policy requires evidence of the need to justify development of specialist accommodation.

Housing mix

- Sites should provide a mix of housing; provide low cost, affordable and social housing.
- Appropriate mix does not only relate to the findings of the SHMA.
- Policy should encourage opportunities for self-build accommodation, with emphasis on helping young families in the rural areas.
- Concern about concentrations of student lets.
- Specialist accommodation should be located to have good access to local services.

Lifetime Homes

- Concern that the Lifetime Homes requirements in the Draft JCS are overly restrictive, do not take account of the Government's Review of Housing Standards, are not justified based on evidence and will impact on viability.
- Suggested alternative approaches include replacing the Lifetime Homes requirement with a statement encouraging Lifetime Homes and allow for negotiations on a site by site basis, having regard to other obligations sought on the site and the local demographic.

Housing for older people

- Extra care housing schemes should provide ancillary facilities that are accessible to the wider community.
- Concern that the policy is overly restrictive in relation to older people's accommodation. The policy should include other specialist market housing for the elderly and be more positive with regard to specialist accommodation.
- Recommended that there should be separate policies for 'Homes for older people' and 'Extra care housing'.
- There should be clear evidence of the scale of need associated with the ageing population to support a positive policy approach, including evidence of the proportion required as bungalows, sheltered housing and care homes and recognition that older people tend to live in smaller households. Should also encourage appropriate adaptations or extensions, e.g. to create granny annexes.

Design standards

- The policy should contain an approach to minimum space standards and enhancing access to existing buildings, as well as providing accessible new builds.

Rent, ownership and pricing

- Concern that buy-to-let prevents people getting onto the housing ladder and that new housing should enable younger people onto the property ladder.

Summary of changes made to the policy

Evidence base

- Policy implementation will reflect findings of the SHMA.
- In providing evidence of need of specialist accommodation emphasis is on the local housing evidence base and engaging with the local authority. Further information to be provided in district plans.

Housing mix

- Policy reflects need for size, type, tenure and mix of housing to contribute to a balanced housing market and balanced and sustainable communities.
- Appropriate mix should be informed by local housing evidence base including but not restricted to the SHMA.
- Policy encourages self-build. Explanation refers to needs of families and first-time buyers.
- Any local policies on student accommodation to be provided in district plans.
- Policy states that specialist accommodation should have access to local services.

Lifetime homes

- More flexible approach to accessible and adaptable housing within the policy. Further detail to be provided in district plans.

Housing for older people

- Policy states that Extra Care ancillary facilities should complement those facilities available in the locality and should be made available to the wider community.
- More flexible and inclusive approach to older people's housing and specialist accommodation (including for older people). Any additional detail to be provided in district plans.
- Evidence of scale of need of ageing population provided in the explanation.

Design standards

- Policy contains a strategic approach to minimum space standards. Further information to be provided through district plans subject to findings of the Government's housing standards review.

Rent, ownership and pricing

- Strategic policy is not able to set out an approach to buy-to-let housing as this is an issue outside planning control.

Policy C3 – Affordable housing

Evidence base

- Policy and supporting text to be updated to reflect the findings of the SHMA 2014 and viability testing of the JCS.
- The SHMA includes different requirements for different areas – need to explain how this has informed the JCS approach.
- There should be consistency of approach across the JCS area.
- Reliance of a significant proportion of the population on the private rent sector and the affordability issues arising, notably within Cheltenham, need further analysis.

Policy wording

- Clarity is required about what is required of developers regarding affordable housing percentage requirements and the threshold to be applied to the policy.

- Policy should include the required tenure mix, should be flexible and type/tenure mix should not be micro-managed.
- There should be alternatives to on-site provision, e.g. off-site financial contributions.
- Clarify how the policy will deal with C2 and C3 developments.
- In setting thresholds and requirements, the policy should take account of the fact that smaller scale developments often have smaller profit margins. Requirements could inhibit development of small sites, windfall sites and the 5 year supply. The government's Autumn Statement suggests introducing a 10 dwelling minimum for affordable housing requirements and the policy should reflect this.
- JCS should include an approach to rural exception sites.

Viability

- Concerns that the policy does not include viability testing. Policy approach should not threaten the viability of the plan.
- If a development site is not viable then consideration should be given to varying factors (e.g. tenure, design, complementary planning obligations) other than the affordable housing percentage.

Summary of changes made to the policy

Evidence base

- Policy updated to reflect findings of SHMA and viability testing.
- Policy takes shared partnership approach in order to meet need without placing onerous requirements on particular authorities.
- Policy does not contain an approach to the private rent sector.

Policy wording

- Revised policy includes percentage requirements and thresholds.
- Approach to tenure mix is flexible based on housing mix and standards policy.
- Policy incorporates alternatives to on-site provision.
- Approach to C2 and C3 use classes clarified.
- Policy approach reflects the need to consider the viability of smaller sites.
- Policy contains a strategic approach to rural exception sites.

Viability

- Explanation clarifies that the plan and policy have been subject to viability testing.
- Policy approach to viability reflects the need for developers to consider varying factors such as mix or securing subsidy to improve viability.

Policy C4 – Gypsy, Traveller and Travelling Showpeople

Policy wording

- Concern at the number of traveller pitches that are required in Tewkesbury Borough and the imbalance within the JCS area.

- Criteria 1, paragraph 10 of Planning Policy for Traveller Sites (PPTS) states that criteria-based policies should be included “where there is no identified need”. As there is a ‘proven need’, in order to be compliant with national policy, it is suggested this criteria is removed.
- Criteria 2, paragraph 115 of the NPPF only gives weight to the protection of nationally designated areas and it is suggested this is amended accordingly.
- Criteria 2, suggest additional reference to ensure the protection and enhancement of the historic environment.
- Support for wording regarding site provision as part of the urban extensions as it will help provide certainty and prevent ad hoc sites coming forward.
- Objection to the blanket requirement for traveller provision as part of all urban extensions. No consideration given to suitability, viability or management arrangements. Requirement represents an unfair burden on development and is not in accordance with national policy.
- Objection to any provision at site A6 Leckhampton given the low pitch/plot requirement for Cheltenham.
- Policy approach is at odds with national policy which seeks to encourage private traveller site provision, acknowledging some will not be able to provide their own sites. It is not for the development industry to provide the majority of sites in the manner articulated.
- Outright prohibition of development in areas of “*sensitive landscape*” is inconsistent with Policy S6 which contemplates development in rural areas providing “*that landscape and townscape sensitivity have been addressed*”; no justification for the more restrictive approach towards Gypsy and Traveller sites.

Evidence base

- Concern that there is no evidence to support the requirement for traveller site provision in urban extensions. Wrong to pre-judge provision within the urban extensions – every potential site allocation should be assessed against the criteria set out at the second part of Policy C4.
- Concern regarding the methodology used in the Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) in establishing future pitch/plot requirements, for example in terms of tolerated site and concealed households. Underestimates actual accommodation needs.
- Concern regarding the amount of community involvement in the GTAA, which is considered to have been too low.
- Some brief articulation of the spatial findings of the GTAA would also be helpful, including references to patterns of movement and thinking on future transit provision.
- Lack of evidence to support urban extension policy approach; consideration has not been given to alternative site provision strategies.

Site provision

- Site provision should be addressed through the lower level district plans, not the JCS.
- Objection that the policy does not identify specific sites for traveller provision. Request that this is provided, including which urban extensions will be required to make provision.

- There is clearly sufficient land available within the JCS area to meet all of the Gypsy and Traveller requirements and this should be recognised within the JCS.
- Gypsy and Traveller site provision should be more equitably spread across the whole of the county, with preference given to locations close to motorways for ease of travelling for the mobile community.
- Sites should be allocated for specific communities e.g. travelling showpeople.
- Policy should commit to delivering one of two previously identified sites in Gloucester City for the travelling showpeople community; the former Town Ham allotments and land east of Waterwell's Business Park, one of which needs to come forward within the next 5 years.

Summary of changes made to the policy

Evidence base

- Requirements identified by the GTAA have been corrected; an additional pitch was incorrectly identified at Cheltenham Borough.

Policy wording

- Requirement for provision through urban extensions removed from Policy C4 and addressed through Policy SA1.
- Text relating to the consideration of landscape issues for traveller sites removed and instead signposted to landscape and AONB policies elsewhere in the plan.

Delivery

- Additional delivery section added to the supporting text to make clear how the JCS authorities consider site provision for traveller communities will come forward.
- Commitment to establishing an appropriate distribution of future traveller sites, having regard to land supply, through working with other authorities as part of the duty to cooperate.

Policy C5 – Community facilities

Evidence base

- Objections that the evidence base does not contain a playing pitch or built facilities strategy for sport and recreation facilities.

Policy wording

- Specific reference should be made to paragraph 74 of the NPPF to ensure protection of sports pitches and sports facilities. There should also be a requirement for a contribution to the development of both sports pitches and built facilities to meet the increased demand generated by the additional population.
- Suggestion that reference is made to sports and recreation facilities in the delivery section.
- Crime prevention techniques should be incorporated into any emerging development.
- Policy does not define what an 'existing community facility' is and should also include theatres and cinemas.

- Unclear how developers would be expected to demonstrate engagement with the relevant community groups and partner organisations.
- The policy should be clearer and provide an objective basis for analysis.
- Requirements are too onerous; provision of community facilities prior to first occupation can have a significant effect on phasing and viability.
- Does not make sense to safeguard existing facilities, but then leave district plan policies to provide criteria against their loss.
- Extra capacity needs to be planned before houses start to be built.
- Support for the need to integrate new community facilities with existing facilities and, where appropriate, to extend existing facilities rather than provide new local facilities.
- Support for community facilities to be located centrally to the population that they serve and be easily accessible by foot, bike and public transport.

Impact from new housing development

- Concern over the ability of existing facilities, especially education and health services and transport infrastructure, to cope with the new proposed development. Lack of detail regarding the expected requirements and delivery of new services.

Play and sports facilities

- Play and sports facilities should be provided in locations close to new developments.

Emergency services

- Concern that there is no reference to the role of emergency services and the general need to consider the impacts of strategic growth on their delivery.

Summary of changes made to the policy

- A redrafted version of this policy now comprises part of the Infrastructure suite of policies in the Pre Submission version of the JCS.
- The policy has been redrafted to improve flexibility and clarity.
- The requirement to provide facilities prior to first occupation of development has been replaced by a requirement to provide facilities in accordance with the phasing of development in consultation with the local community.

Policy C6 – Supporting healthy lifestyles and wellbeing

General comments on C6 and other comments relating to health and environmental quality

- General support for a policy approach that supports health.
- Comments relating to the benefits of the natural environment, heritage and physical activity.
- Concern that the policy as worded is absolute in its requirements, and reaches beyond planning in its scope.
- Concern that the policy repeats other policies in the JCS.
- New development should not exacerbate unequal or poor health.
- Concern about health risks arising from pollution.

- Concern about impact of development on noise and smell.
- Concern over other issues such as privacy and loss of light.
- Include reference to best agricultural land.
- Tranquillity, light pollution and dark landscapes.

Summary of changes made to the policy

- This policy has been substantially re-drafted.
- Revised policy covers issues relating to health and environmental quality and is complementary to regulatory regimes that protect public amenity.

Policy C7 – Transport requirements

Evidence base

- Lack of transport modelling to support the plan and to assess the impacts of the proposed developments on the existing highways; concern over the direct and cumulative impact of the proposed development on the existing highways.

Policy wording

- Policy C7c should reflect movement throughout the development in the context of emergency provision.
- Policy C7g should ensure that either parking standards are provided, or the basis for calculating site specific suitable levels of parking requirements is much clearer.
- No mention of how future transport proposals would be expected to respond positively to the historic environment.
- Policy should mention Section 106 funding for bus services and congestion mitigation measures.
- There is no mention of accessible public transport within the policy.
- Unrealistic to expect new transport technologies like electric charging plug-in and ultra-low emission vehicle fuelling to take the place of parking facilities for standard road vehicles; this would be restrictive for non-strategic developments.
- The requirements and the phrase “*where appropriate*” need further explanation.

Access

- The policy should consider the adequacy of the road width for access to emergency and service vehicles, for example refuse collection.

Existing congestion

- There are many concerns regarding existing congestion, particularly at south Cheltenham, the Elmbridge Court roundabout, Crickley Hill and the Air Balloon roundabout.
- New Severn bridge is required.

Park and ride

- Suggestions of further park and rides, including at North Churchdown, Highnam, Brockworth and Uckington.

Car parking

- Off-street parking provision should be provided to clear certain streets.
- Removal of Green Belt around racecourse would remove current parking, causing problems in surrounding areas.

Cycling

- Homes should be designed with storage space for cycles.
- Guidance is misleading as local trips by cycle could be over 1 km.
- New developments should be planned around cycle and pedestrian access.
- Network of cycle paths and lanes required to encourage and cater for existing/ new cyclists.

Bus / rail

- Absence of specific targeted and comprehensive measures to deliver bus priority. Bus services should play a more central role in the facilitation of strategic employment and housing growth in the JCS area.
- Concern that the proposed developments would compromise the efficiency of the local bus network, especially at peak times; essential that buses have access to all parts of new developments.
- Policy should require developers to fund any qualitative improvements required to existing facilities and infrastructure.
- Policy should address the potential impacts of development on level crossings.

Pollution

- No provision to focus on public transport as a key means to achieve the local statutory requirement for reducing emissions.
- Lack of assessment of the effects of major traffic along existing routes on air quality.

Summary of changes made to the policy

- In response to the issues raised through the representations, including from the County Highway Authority and the Highways Agency, this policy has been deleted and replaced by two new policies.
- These have been drafted in collaboration with the County Highways Authority and sit in the Infrastructure suite of policies of the Pre Submission JCS.

Chapter 5 – Strategic Allocation policies

Policy SA1 – Requirements for Strategic Allocations

- Policy should highlight more clearly the level and types of green space.
- Penultimate bullet point to Policy A5 relating to bus priority is useful and similar text for the other allocations is needed.
- Support for the inclusion of general development criteria such as protection of employment allocations, provision of infrastructure, green infrastructure, sustainable design, community facilities and flood storage.

- Requirements such as density, site remediation and built edge conditions not required as they are detailed planning matters for later in the process.
- Stringent density assumptions should be removed, and instead be allowed to reflect the individual characteristics of each site. Could be provided as a range.
- Unclear how infrastructure requirements and costs will be identified and apportioned where urban extensions are controlled by more than one landowner or developer.
- Renewable energy requirements should be aligned with the emerging requirements of building regulations.
- Requirements will need to be properly considered against a revised/final Infrastructure Delivery Plan.
- Support provision of Strategic Allocations plans as a way of making sure that green infrastructure and flood risk are properly factored in.
- Given the requirements of Core Policy S2, the requirement of Criterion L for flood storage betterment is unnecessary and restrictive.
- Any retail aspect of the development should be of a scale and format that is proportionate to the strategic development and not lead to a negative impact on designated centres.

Summary of changes made to the Strategic Allocation policies

- Additional capacity work has been undertaken on all of the Strategic Allocations and the site allocation policies now provide a revised indicative site capacity for residential development for each site.
- All other matters related to the master planning, design, delivery and infrastructure requirements of the Strategic Allocations are dealt with by other policies within the plan.

Policy A1 – Innsworth and Twigworth urban extension

Flooding

- Note proposed development boundary aligns with the Environment Agency flood map. However concern that this flood line has been breached on a number of occasions, including the 2007 floods. Concern over the reliability of EA flood maps.
- Concern over the ability of any drainage solution to properly mitigate levels of flood risk.
- Concern over the ability of future budgets to adequately deal with the level of flood risk to make the site suitable.
- This site is subject to flood risk and should not be considered for development; further evidence needs to be undertaken to make absolutely sure site will not flood.
- Responsibility for flood risk mitigation should not be deferred to the developer – the council should develop flood mitigation measures to alleviate the problem.
- Concern regarding the cumulative impact of development downstream.
- Concern development will lead to more surface run-off into the Horsebere Brook and Hatherley Brook.
- Concern over the ability of proposed mitigation measures to alleviate flood risk.
- Concern about impact on flooding along Frogfurlong Lane.

- Existing residents of the area have experienced sewage overflow and contamination when water levels rise.

Highways

- Concern about the impact of additional traffic on existing roads; concern that existing highways cannot be improved in order to be able to accommodate this additional traffic, for example through widening.
- Lack of transport modelling needs to be addressed.
- Link between A38 and A40 would be useful but difficult to design.
- Opportunities to improve existing bus services.

Green Belt

- Objection to the loss of Green Belt. AMEC Green Belt study found Green Belt land at Innsworth/Twigworth to be important in maintaining the gap between Gloucester and Cheltenham and should not be considered for development; concerns regarding the interpretation of the study.
- Other non-Green Belt sites have been explored.

Landscape

- Objection on the basis of landscape quality and important views.
- Down Hatherley Parish Council has produced a Parish Plan which explains why the area's undeveloped and open character is an important part of the local environment and an integral part of people's quality of life, and which provides a strong commitment to maintaining the Green Belt status.
- The landscape and amenity of land towards Twigworth is of greater value than that closer to Innsworth and must be protected from development for as long as possible. This view is supported by the JCS Broad Locations Report which concluded that generally landscape intimacy, hedgerow condition, and historic importance increases north of the Hatherley Brook.
- Concern over impact to agriculture given loss of farmland.

Community facilities

- Concern regarding the ability of the local area to provide employment, schooling, health support, shops and services, community facilities and traffic management.
- Should ensure adequate provision of new community infrastructure to provide for the new community.
- Specific concerns regarding the ability of Gloucestershire Royal Hospital to cope with additional demand.
- Important to ensure provision of adequate green spaces in new development.
- Specific concerns relating to the impact of the proposal at Longlevens in terms of community facilities and highways.

Airport

- Concern regarding the impact of the flight path to Gloucestershire airport and Imjin barracks; proposals do not address the impact of the airport, for example in terms of noise.

- S106 contributions should be directed to addressing impacts on the local community rather than addressing issues arising from the impact of the airport.

Other

- Concern that development would have a prejudicial impact on the redevelopment of Gloucester and Cheltenham.
- Questions as to why this land is now being considered following the refusal of a previous application.
- Support for the urban extension and the benefits that it can provide, for example provision of green infrastructure.
- Issues identified in relation to the presence of high voltage overhead transmission lines which have implications for where new development can be located.
- Site should be deleted as an allocation and identified instead as safeguarded land to allow other sites, such as the MOD site at Ashchurch, to come forward first.

Summary of changes made to the policy

- Re-consideration of the OAN has provided an opportunity to remove the northern part of the former Strategic Allocation A1 at Twigworth.
- The proposal to remove this Strategic Allocation was made by Members of the JCS authorities.
- The now removed portion of the allocation at Twigworth was physically separated from the rest of the proposed allocation at Innsworth by the functional floodplain, which acted as a potential barrier to delivering the site as a comprehensive urban extension.
- The housing allocation at this location is now 1,250 dwellings.

Policy A2 – North Churchdown urban extension, Gloucester

General comments

- Churchdown is too large already; this development is not needed and is disproportionate to Churchdown.
- Development will destroy the local village character.
- Concern that Churchdown will become part of Gloucester.
- Churchdown is being used as a dumping ground for Cheltenham, Gloucester and Tewkesbury.
- Harmful impact on existing establishments, for example kennels/cattery business.
- There should be more focus on brownfield sites, especially in Gloucester.
- Development would breathe new life into Churchdown and would not risk merging Cheltenham and Gloucester.
- Development must be integrated into the existing community and not lead to urban sprawl.
- Better to build a whole new community.

Flood risk

- Concern over existing and potential increase in flooding.

- Would be helpful to highlight that the plan is based on a flood risk sequential test process and that this has been taken into account in allocating sites.

Green Belt

- Green Belt should be retained to protect farmland and countryside and prevent urban sprawl.
- Should look at other non-Green Belt sites, such as Highnam and south of Gloucester, which have good transport links.
- Development would lead to the merging of Cheltenham and Gloucester.
- Concern over loss of countryside.

Access/highways

- Concern over existing congestion on local roads, for example at the Elmbridge Court roundabout.
- HGV impact.
- Insufficient information on traffic impact.
- Improvements required to walking and cycling routes and connections.

Community facilities

- Concern over ability of existing infrastructure, including surgeries, schools and dentists, to cope with the proposed development; many are already at capacity.

Site plan

- Plan should highlight more clearly the level and types of green space required as part of the allocation.

Airport

- Severe impact on current operation and potential future growth of the airfield, which makes a significant contribution to the county's economy.
- No assessments of aircraft noise, public safety, flood risk, transport or infrastructure requirements.
- Development would increase the number of people significantly affected by aircraft noise and could restrict future airport operations, a large part of the site allocation is within noise exposure levels of between 57dB(A) and 63dB(A).
- Development should not be used to fund the airport.
- Logical and sensible to sacrifice land for development, as long as it does not interfere with the airfield operation.
- The potential impact of CAA safety zones and operational needs of the airport may affect the site's development capacity.

Wildlife

- Concern over the loss of wildlife habitats.

Summary of changes made to the policy

- The developable area of this Strategic Allocation has been amended to exclude those parts of the site subject to aircraft noise greater than 57dB(A) and that part of the site that lies within the Instrument Landing System safeguarded area.
- This has resulted in a reduced developable area and an associated reduced number of dwellings that could be delivered at the site.
- The housing allocation at this location is now 528 dwellings.

Policy A3 – South Churchdown urban extension, Gloucester

General comments

- Development would destroy the local village character of Churchdown.
- No provision has been made for the high percentage of elderly people.
- Where will the jobs come from?
- It would be better to build a whole new community.
- Harmful impact on existing establishments, for example kennels/cattery business.
- The site is crossed by high voltage overhead transmission lines, which would need to be taken into account in any development.

Distribution of development

- Churchdown is already too large and densely populated; level of development is disproportionate for Churchdown. Development is not needed.
- Churchdown is being used as a dumping ground for Gloucester.
- Good accessible site to serve the employment needs of Gloucester but should be increased in size and extended to the A417 to the west.
- Proposals would breathe new life into Churchdown. It would not risk merging Cheltenham and Gloucester as the site is already enclosed by Churchdown to the north-east.
- The assessments of flood risk and visual sensitivity underestimate the amount of land suitable for development. Pirton Fields is capable of supporting over 450 dwellings as a strategic development.

Flood risk

- It would be helpful to highlight that the plan is based on a flood risk sequential test process and that this has been taken into account in allocating sites.

Infrastructure

- Concern over ability of existing infrastructure to the north of Gloucester, including surgeries, schools and transport, to cope with the proposed development; many are already at capacity.
- Development must be integrated into the existing community and improve infrastructure, including foot and cycle routes.

Landscape

- Other sites would have less environmental impact.

Green Belt

- The Green Belt Review stated that this area made a significant contribution to the Green Belt and should not be released for development.
- The land south of the A40 around Pirton Court makes a significant contribution to Churchdown's separation from Gloucester and is of great public value
- Concern over loss of wildlife habitat, countryside, green space and farmland.
- Should be more focus on brownfield sites, especially in Gloucester.

Access/highways

- Concern over existing congestion on local roads, for example at the Elmbridge Court roundabout.
- HGV impact.
- Proposed park and ride would worsen traffic.
- Insufficient information on traffic impact on the strategic road network.
- Must have sufficient new infrastructure, including new access onto A40 and an improved bus service.
- Development should be required to improve walking and cycling routes through the site to the east and west and to Elmbridge roundabout. Foot and cycle permeability through the site could overcome the barrier of the A40.

Site plan

- The plan should highlight more clearly the level and types of green space required as part of the Strategic Allocation.

Heritage

- Concern over impact on Pirton Court (listed building).
- No assessment of the significance of designated farmsteads and their setting has been used to inform the principle, proximity, capacity and form of development.

Airport

- Need to consider potential future growth of the airfield.

Summary of changes made to the policy

- The site area considered to be developable at this Strategic Allocation has been increased.
- The housing allocation at this location is now 868 dwellings.

Policy A4 – North Brockworth urban extension, Gloucester

Distribution of development

- Housing should be planned for areas of greatest need; suggested that the housing requirement for Brockworth is only 40 dwellings.
- Development would threaten the village feel of Brockworth and replace it with urban sprawl.

- The proposal would result in further overdevelopment of Brockworth, increasing the population by over 50%.
- There are no jobs available locally.
- Disproportionate amount of development in Tewkesbury Borough and a lack of cooperation with adjoining councils.
- Brockworth should not be an urban extension to Gloucester, which has 6 years' housing land supply.
- Brockworth should be identified as a rural service village.
- Development should be directed towards the unused parts of business parks as opposed to the Green Belt.
- Policy should be amended to reflect the current planning application.

Flood risk

- Flooding is already an issue and will worsen as a result of the proposed development.
- It would be helpful to highlight that the plan is based on a flood risk sequential test process and that this has been taken into account in allocating sites.

Infrastructure

- Concern over the ability of the existing infrastructure to cope with the proposed development, including schools, doctors, dentists and transport.
- The policy needs to include a longer list of priority infrastructure requirements, including major strategic infrastructure.
- The proposed density should be much lower to reflect the edge of city and countryside location; the need to deliver higher housing numbers appears to be driving densities up.
- The policy does not need to include specific requirements for green infrastructure or pedestrian/cycle links as these are covered by other policies in the plan.

Landscape

- Impact on AONB.
- Impact on flora and fauna.
- Loss of important open space (as designated in the Tewkesbury Borough adopted Local Plan).
- Footpaths through the site are regularly used.

Green Belt

- Green Belt review was not fair and balanced and was contrary to the two previous reviews which identified this area as making a positive contribution to the Green Belt.
- Need to preserve good quality agricultural land.
- Loss of access to the countryside, which provides health and well-being benefits.
- Development would be a huge step towards the merging of Gloucester and Cheltenham.

Access/highways

- Concern over the traffic impact of the proposed development.

- There is insufficient evidence on the impact on the strategic road network to render the allocation sound.
- High noise levels and poor air quality for the A417.
- High quality public transport could be provided relatively easily.

Heritage

- Concern over heritage impact; policy understates the significance of national heritage assets within the site, which include the Grade 1 Church of St George and associated listed monuments, grade 2* Brockworth Court, grade 2* Tithe Barn. There is also significant evidence of prehistoric and Roman settlement activity of possible national significance. A thorough historic environment assessment is required.

Site plan

- The plan should highlight more clearly the level and types of green space required as part of the Strategic Allocation.

Summary of changes made to the policy

- The main amendment to this Strategic Allocation is the slightly reduced number of dwellings that the site is considered to yield through development.
- Further work on the site has identified that land adjacent to the M5 motorway plus other areas of the site immediately adjacent to dual carriageways are not suitable for residential development owing to noise constraints.
- The housing allocation at this location is now 1,500 dwellings.

Policy A5 – North West Cheltenham urban extension, Cheltenham

Green Belt

- Support for removal of the site from the Green Belt and urban extension allocation; site is deliverable.
- Objections to the loss of Green Belt land in this area and at the scale proposed.
- Objection to the loss of prime agricultural land, including Grades 1 and 2.
- Concern regarding harm to the landscape, wildlife, the local ecosystem, flora and fauna.

Flooding

- Flooding is already an issue and development will exacerbate this.

Site plan

- Previous appeal decision required a buffer to be included between light industry and any new housing development.
- If development is to go ahead, there needs to be a buffer for Swindon Village, with no access from the new development into the village, including buses.
- Relationship between housing and employment needs careful consideration; suggestion that employment land is located to the west, closer to the M5.

- No need to protect safeguarded land until 2031.
- Since the proposal covers two authorities, there is a need to make sure there is a coordinated approach between Cheltenham and Tewkesbury Borough Councils.

Infrastructure

- Concern that existing infrastructure cannot cope; schools, health services, churches, utilities, broadband, sewage disposal.
- Policy should require provision of a worship/community centre.
- Policy should include a requirement to provide walking and cycling green infrastructure through the site and into Cheltenham. Access should be enhanced for cyclists to local centres of employment, services and education.
- Concern that there is not enough employment to provide for additional population generated through the development of the new homes.

Hazardous waste / landfill / health

- Concern regarding the impact of hazardous waste and landfill sites, including noise and odour; there should be no development within 1km of these sites.
- Proximity to the M5 motorway and railway should be considered; concern regarding impact of air pollution.

Historic environment

- Objection on the basis that the proposed development would swallow up Swindon Village and dilute the distinct character of a small community.
- Lack of evidence to inform the impact on the historic environment assets including the Grade II* Church of St Mary Magdalen, Grade II* Church of St Lawrence and Swindon Village Conservation Area.

Highways

- Concern regarding the impact in the local highways network, which is considered to already be at gridlock; a Traffic Management Plan is necessary.
- Make junction 10 four-way to reduce congestion on existing urban areas.
- Impact on M5 and Junction 10 needs to be addressed through robust transport evidence.
- Suggestion of a Park and Ride.

Summary of changes made to the policy

- This Strategic Allocation remains largely unchanged from the Draft JCS.
- The housing allocation at this location is now 4,785 dwellings.

Policy A6 – South Cheltenham – Leckhampton urban extension, Cheltenham

Flood risk

- Concern over increased flood risk.
- Would be helpful to highlight that the plan is based on a flood risk sequential test process and that this has been taken into account in allocating sites.

Infrastructure

- Inadequate infrastructure capacity, including emergency services, schools, doctors, transport, employment, water supply and sewage treatment.

Landscape

- Loss of countryside and wildlife habitat.
- Loss of views towards Leckhampton Hill, and impact on views to and from the Cotswold Escarpment.
- Impact on mental, physical, emotional health from the loss of green space.
- Impact on the AONB.
- Loss of smallholdings for livestock, horticulture and small orchards.
- Loss of valued and well used informal open space.
- The allocation does not encroach on the AONB.

Green Belt

- Concern over loss of Green Belt.
- Proposal would lead to the coalescence of Cheltenham and Gloucester.

Access/highways

- The proposal would create major transport disruption on Shurdington Road and adjoining areas including Shurdington and Brockworth.
- Road safety dangers to motorists, cyclists and pedestrians.
- Increased air and noise pollution and damage to health.
- Further information required about the impact on the Strategic Road Network and necessary enhancements; transport modelling information is critical.
- Need to ensure pedestrian and cycle access is provided to the north and west of the site to create continuous routes towards the town centre and GCHQ.

Community facilities

- Policy should include reference to the provision of a mix of complementary uses in a local centre, in addition to housing.

Site plan

- Should highlight more clearly the level and types of green space required as part of the Strategic Allocation.

Distribution of development

- Proximity and overpowering impact on existing houses.
- Better to build smaller developments on the edge of some villages to minimise the impact on Green Belt, avoid loss of green space and prevent urban sprawl.
- Should use all brownfield and urban/rural capacity before greenfield sites.
- Proposed housing developments are not needed as many younger people are staying in the family home much longer.
- Not enough jobs to support the level of housing proposed; should encourage more people to work from home in villages.
- Need to protect the unique identity of Leckhampton.

- Should use land for city farm/country park. Consideration should be given to the Local Green Space application submitted to Cheltenham Borough Council.
- There should be no large urban extensions in the countryside around Cheltenham.
- Land at Leckhampton represents the most deliverable and sustainable location for growth, and is the only white land and non-Green Belt allocation for Cheltenham.
- The allocation should also include land to the south and west of Kidnappers Lane down to Church Road to ensure comprehensive master planning.
- Farm Lane part of the allocation should be increased to include the area indicated as a landscape buffer.

Summary of changes made to the policy

- An area to the north east of the site has now been included for the purposes of calculating the potential number of homes which the Strategic Allocation could yield.
- The housing allocation at this location is now 1,124 dwellings.

Policy A7 – South Cheltenham – Up Hatherley urban extension, Cheltenham

Policy wording

- No indication of housing mix or affordable housing.

Flood risk

- Concern over increased flood risk.

Infrastructure

- Inadequate infrastructure and facilities, including schools and health; proposed development would worsen this.
- What provision would be included for cyclists?

Landscape

- Concern over the site's proximity to the AONB.
- Impact on wildlife.
- Loss of green space and countryside; loss of access to the countryside.
- Loss of ancient woodland and hedgerows.
- Loss of farmland and food production.

Green Belt

- Objections to the removal of this site from the Green Belt.
- Site was assessed as being critical to the Green Belt in the Green Belt review.
- Up Hatherley Way provides a natural boundary between urban development and the countryside.
- Impact of removal of Green Belt on health and well-being.

Distribution of development

- Harm to property values.
- Impact on Listed Buildings (e.g. Brickhouse Farm).

- Support for the allocation; confirmation that the land is available for development and deliverable, though indication that this site is capable of providing 1000 dwellings.

Access/highways

- Concern over existing congestion and the traffic impact of the proposal.
- Concern over increased pollution, CO2 emissions and loss of fresh air.
- Impact on climate change.
- Increased noise.

Site plan

- There is a need to clarify the extent of the green buffer.

Summary of changes made to the policy

- Re-consideration of the OAN has provided an opportunity to respond to the request by Cheltenham Borough Council to improve the relationship between need and supply for each area.
- The proposal to remove this Strategic Allocation was made by Members of the JCS authorities.

Policy A8 – MOD site Ashchurch Strategic Allocation

General

- General support for proposal if MOD was to vacate the site.
- Support for re-use of brownfield land.
- Questions over the need for development of the greenfield area to the north of the MOD site and its impact on the rural character of the area.
- Support requirement to address contamination issues and open up water courses.

Access/highways

- Significant concerns regarding the proposed scale of development at the site and the implications on the highway network. There are already capacity issues on the A46 and M5 junction 9. Significant mitigation measures would need to be implemented to make this site acceptable.
- Policy needs to require prioritised high quality bus links with Northway, Ashchurch, Tewkesbury, Cheltenham and Gloucester.
- Strategic opportunity to provide a rail/road interchange for distribution of goods and a sustainable, low-carbon supply chain option.

Deliverability/viability

- Concern at intended phasing of site (criterion 4 of policy) which will constrain housing delivery and possibly mean that no housing would be delivered within the plan period.
- Concern over availability of site given it is still occupied by the MOD.
- Concern regarding the viability given the cost of remediating the site ready for development.

Landscape

- Concern regarding the impact of the proposal on views out of the AONB from Bredon Hill. Opportunities exist to mitigate this impact through an increased green infrastructure buffer.
- Good green infrastructure opportunities, with benefits for wildlife and the Cotswold Scarp Nature Improvement Area.
- Boundary of site should be redrawn to remove areas of medium/higher landscape sensitivity.

Summary of changes made to the policy

- This Strategic Allocation remains unchanged.

Policy A9 – Ashchurch Strategic Allocation

Flood risk

- It would be helpful to highlight that the plan is based on a flood risk sequential test process and that this has been taken into account in allocating sites.

Access/ highways

- The impact on the Strategic Road Network of the combination of the allocations at A8 and A9, along with the existing congestion cannot be easily mitigated and would require costly improvements to the A46 and J9 of the M5.
- Development to the south of the A46 has potential implications for pedestrian and cycle movements across the A46 in addition to maintaining traffic flow into Tewkesbury.
- The policy should require prioritised high quality bus links; there is no reference to public transport.
- No development should be permitted until current traffic congestion is resolved.
- Requires improved provision for vulnerable users at A46/M5 junction, as well as good crossing facility for A46.

Employment

- The allocation should not include any retail which would harm Tewkesbury town centre.
- Aware of retail proposal being promoted by the landowner; whilst this would create good employment, additional employment on land to the south of the proposed retail development should be considered as this is an attractive business location.

Site plan

- The plan should highlight more clearly the level and types of green space required as part of the Strategic Allocation.

Summary of changes made to the policy

- This Strategic Allocation remains unchanged.

Chapter 6 – Delivery policies

Policy D1 – Infrastructure

Evidence base

- Policy is dependent on the findings of the IDP - information on how the road systems and current facilities will cope with the proposed level of development is required.

IDP

- Innsworth sewage treatment works has now closed so the IDP will need to reconsider where the flows that were anticipated there will now drain to.
- It also needs to include the relevant Water Framework Directive (WFD) information, such as the WFD status of the receiving watercourses.
- Section 2.3 would benefit from comments on waste water infrastructure for all development locations.
- It would be useful to have further detail whether supply and demand measures imply a specific water-use target for development.

Policy wording

- Concern that the first two paragraphs are contradictory as the reference to 'cumulative impact' in the first paragraph is at odds with the reference in the second paragraph to planning permission being granted when the infrastructure and services to meet the needs of the new development are in place.
- Unclear whether or not the opening paragraph applies to developers in isolation. If this is the case, then the policy is not effective as the provision of some off-site infrastructure and services is dependent on relevant infrastructure providers committing to delivering the infrastructure/services.
- Should be clarified that the policy covers statutory undertaker infrastructure.

General comments

- Concern that there is no connected strategy for housing, transport, jobs, schools etc.
- A more detailed approach to the provision of social, cultural, economic and transport infrastructure should be provided.
- Policy fails to provide any assurance that the required infrastructure will follow the proposed development.
- In accordance with the NPPF, the policy must identify "requirements" and "priority areas" for infrastructure provision (paragraphs 7 and 21) and ensure there is a "reasonable prospect that planned infrastructure is deliverable in a timely fashion" (paragraph 177).

Highways / transport

- There is a lack of basic transport infrastructure planning.
- Insufficient planning in respect of more sustainable means of transport, in particular public transport and cycling.
- Lack of a four way junction at Junction 10 is a major constraint.
- Main operational issues are those caused by cross routing trips across the motorway junctions, increases in demand for movement along the SRN corridors and the

general issues of severance caused by the SRN particularly at Tewkesbury and Ashchurch.

Viability

- Policy should make reference to viability. Should be amended to reflect the fact that infrastructure can only be delivered at a level which takes the viability of development into account.
- Requirement for the viability assessment evidence should not be overly restrictive.

Developer contributions

- Should be recorded that not all infrastructure will necessarily get funded by the developer.
- Policy should be revised to make specific reference to the latest Community Infrastructure Regulations, with specific emphasis on Regulations 122 and 133.
- Suggestion that developers will be expected to address existing deficiencies in infrastructure provision as well as the additional demands arising from the development proposals conflicts with CIL Regulation 122 and NPPF Paragraph 204.
- Local residents should be able to liaise with developers at an early stage regarding contributions for community infrastructure.
- Concern over the way in which smaller scale developments are being allowed within larger development sites, which often leads to a significant reduction in Section 106 monies available to support the development of community facilities.
- JCS should set a strategic context requiring developer contributions towards rail infrastructure where growth areas or significant housing allocations are identified close to existing rail infrastructure.
- Unclear whether the policy requires contributions to assist in infrastructure provision across all three authorities or whether it is to be directed to the authority where development is proposed.
- Policy should clarify required funding sources and what infrastructure items are to be delivered through S106, particularly for infrastructure during the first five years of the plan.

Community facilities

- Concern over the capacity of existing services, including schools and healthcare facilities.

Utilities

- Concern over the capacity of existing services, including energy and water supplies.
- Recommended that a policy covering telecommunications is included.

Strategic Allocations

- Policy should refer to infrastructure constraints in the site allocation policies and if appropriate phase development to be delivered in accordance with the necessary infrastructure.

Summary of changes made to the policy

- This policy and its reasoned justification have been substantially redrafted to improve clarity, to ensure implementation of the JCS Infrastructure Delivery Plan and to have regard to the strategic context of infrastructure provision.
- In response to representations and to further aid clarity an additional policy on developer contributions and viability assessment has been included.
- Both policies now sit within the Infrastructure suite of policies in the Pre Submission JCS.

Policy D2 – Assessments

Policy wording

- The policy should define ‘other major development sites’.
- Policy justification only refers to Health Impact Assessments and should provide justification for the other assessments included in the policy.
- Should include guidance on what a dust assessment or renewable energy statement should comprise.
- To achieve the councils’ obligations to protect and enhance biodiversity major developments would also require an arboricultural report.
- The requirement for a Heritage Impact Assessment is not in line with NPPF terminology; should refer to an assessment of the impact on the significance of affected heritage assets and their settings.

Flexibility

- The policy places an unnecessary burden on planning applications for major development sites as not all items will be applicable in all cases. For example, not all development requires an EIA and this could be considered as part of an EIA Screening or Scoping Exercise.
- The policy should allow for a consideration of the necessary supporting assessments to be undertaken on a site by site basis.
- Some requirements could adequately be considered as part of a supporting Planning/ Design and Access Statement, or by other legislation/guidance.
- It is likely that the list of documents, plans and assessments that should accompany major planning applications will change over time, resulting in the Local Plan being outdated and requiring an immediate review.

Summary of changes made to the policy

- Policy D2 has been deleted but its requirements have been incorporated as appropriate within other policies or supporting text elsewhere within the Pre Submission JCS.

Policy D3 – Transport Assessments and Travel Plans

Policy wording

- There is general support for the policy in principle.
- Support for an independent transport assessment to be undertaken by a party that does not have a vested interest in the application.
- Should be clarified what scale of development would require a pre-application Transport Assessment.
- The meaning of the phrase ‘to the satisfaction of the local planning authority’ is not clear.
- Pre-application Transport Assessments are not required prior to submitting an application.
- Support for discussions in advance of planning submissions.
- Not every impact will be negative or significant enough to require mitigation; policy should request proportionate information in relation to the development being proposed.
- Policy should reflect NPPF wording that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.
- The policy duplicates the second bullet point at Policy D2.
- Background information and justification text requires further references to the contribution of transport, and public transport in particular, to economic growth.
- Travel plans should be used to encourage people to choose sustainable transport modes.

Impact of proposed development

- Concern over the impact of the proposed development on the existing transport network and pollution levels; significant highway improvements would be required.
- Any impact of residential development to the west of the river Severn would need to be alleviated by the construction of a second river crossing.
- The impact of increased traffic arising from new development on the tranquillity of the Cotswolds AONB will require assessment and mitigation.
- Transport problems need to be resolved before new houses are planned or built.

Summary of changes made to the policy

- Policy D3 has been deleted.
- Transport Assessment and travel plans are now referred to in the new transport policies at INF1 and INF2 in the infrastructure suite of policies of the Pre Submission JCS.

Policy D4 – Master plans and design briefs

- Significant amount of crossover/repetition between policies D4 and S4.
- The policy also repeats some pre-existing requirements for planning applications where such information would be contained in Design and Access Statements and Statements of Community Involvement; additional work may impede the delivery of major development sites.

- Not always appropriate to undertake detailed design briefs and a master plan on every housing allocation and major development site.
- The policy does not make it clear what constitutes a major development site.
- Should include a requirement for master plans to have regard to flood risk and drainage requirements.
- Should also include the energy use/provision proposals and waste management proposals within the early master planning stage.
- Should encourage flexible spaces and buildings which can have multiple uses.
- Definition required as to what is meant by the requirement for a Development Brief.
- Should be specified that developers must consult with the communities affected by any proposals.
- Background text should also refer to the built and historic environment.
- Policy should acknowledge the importance of delivery in a robust master plan, including a clear phasing plan and the required infrastructure.
- Policy should be expanded to reflect the need for crime prevention in all developments.

Summary of changes made to the policy

- Policy D4 has been fully consolidated into the text and policy of Policy S4 – Design.

Chapter 7 – Monitoring and review

- Should be clarified how a reduction in carbon emissions from unsustainable car use will be measured.
- Delivery of access to green space should be monitored – all residents should have access to well maintained, high quality and versatile green space within 300 metres.
- Under 'Conserving and Enhancing the Environment, 'Listed Buildings, Conservation Areas and Scheduled Ancient Monuments on the 'at risk register' indicator, the source should include the national Heritage at Risk Register compiled by English Heritage. The Local Authority Buildings at Risk (BAR) registers do not include Scheduled Monuments, Registered Battlefields, Registered Parks or Conservation Areas at Risk.
- Monitoring and review process should be enhanced.
- Under 'Promoting Sustainable Transport', the first target to maintain journeys from a base year of 2011/12 would likely lead to the long term bankruptcy of bus operators. It implies a decline, despite the increase in new homes, when at least 8% growth should be sought. Also needs to include targets to improve average bus journey times per mile during the morning peak.
- 5-year housing land supply assessment and an affordable housing 5-year land supply assessment should be annually updated.
- Recommendation to follow targets set out in the 'Good Practice Guidance for Green Infrastructure and Biodiversity' from the Town and Country Planning Association and Wildlife Trusts.

Summary of changes made to the policy

- The monitoring framework has been revised to take into account the changes made to the policies in the Pre Submission JCS; some of the monitoring indicators have been modified as the policies have developed and requirements have altered to ensure they are relevant to what the plan is trying to achieve.
- Changes to the indicators have also been made to reflect the consultation responses received.
- The background text has been revised to provide improved cross-reference to the introductory chapter, which provides guidance on the review mechanisms for the JCS and the role of monitoring in this process.
- A review of all indicators has been undertaken to ensure that the information required is accessible and that monitoring is realistically achievable. The table below provides a summary of changes made and the reasons for these changes:

Draft JCS indicator	Change for Pre Submission JCS	Reason for change
1. Building a strong and competitive urban economy		
Net additional jobs created by sector (employment generating uses).	Target has changed from 28,400 jobs to 28,000	To reflect Objectively Assessed Need.
Net amount of employment floorspace created by use class (employment generating uses).	Target has changed from 37ha to 34-60ha.	To reflect Objectively Assessed Need.
Working age people with access to employment.	Deleted	This indicator is duplicated in the transport indicators.
Gross Value Added (GVA) per head.	Deleted	GVA figures only available on a county or regional basis.
Economically inactive persons aged 16-64.	New indicator	Gap in employment monitoring identified.
2. Ensuring vitality of town centres		
Health of designated city/town centres (e.g. vacancy rates, comparison goods floorspace, turnover, footfall, zone A rents, choice and variety of offer etc.)	Deleted	Data not readily available.
3. Supporting a prosperous rural economy		
Net additional employment jobs created within the rural areas by sector per annum.	Deleted	Data not readily available. Not strategic; district level indicator.
Health of rural centres (e.g. vacancy rates, comparison goods floorspace, turnover, footfall, zone A rents, choice and variety of offer etc.).	Deleted	Data not readily available.
4. Conserving and enhancing the environment		
Proportion of conservation areas with an up-to-date appraisal.	Deleted	Not strategic; district level indicator.
5. Delivering excellent design in new developments		
Proportion of homes scoring highly	Deleted	No longer a requirement

against Lifetime Homes design criteria.		through Policy C2 – Housing Mix and Standards.
Proportion of Strategic Sites with comprehensive master plans completed and agreed with the Local Planning Authority.	New indicator	Gap in design standards monitoring identified.
6. Meeting the challenges of climate change		
Local Authority CO ₂ emissions (tonnes of CO ₂ per capita).	Deleted	This indicator is duplicated.
Completion of new residential dwellings to Code for Sustainable Homes standards.	Deleted	No longer a requirement through Policy S3 - Sustainable Design and Construction.
Completion of non-residential developments to BREEAM standards.	Deleted	No longer a requirement through Policy S3 - Sustainable Design and Construction.
Completion of major residential-led development to BREEAM standards.	Deleted	No longer a requirement through Policy S3 - Sustainable Design and Construction.
Completion of domestic refurbishments, conversions and new basements to BREEAM standards.	Deleted	Not strategic; district level indicator.
10% of energy demand from major sites derived from decentralised, renewable or low carbon sources	New indicator	Policy requirement through Policy S3 - Sustainable Design and Construction.
8. Delivering a wide choice of quality homes		
Net completion of dwellings within the rural areas.	Deleted	Not strategic; district level indicator.
Net affordable housing completions against annual requirements in the rural areas.	Deleted	Not strategic. District level indicator.
Net additional floorspace from health, community and leisure uses, generally within use classes D1 and D2.	Deleted	This indicator is duplicated.
9. Promoting healthy communities		
Adult (16+) participation in sport per annum.	Deleted	Indicator too specific for objectives of JCS.
Access to green space - % of dwellings having access to: - well maintained, high quality and versatile green space within 300 metres - 20ha green space site within 2km - 100ha green space site within 5km - 500ha green space site within 10km	New indicator	Gap in open space monitoring identified. Partly a policy requirement through Policy C5 - Community Facilities.

Chapter 8 – Proposals Plan

- The plan shows the Strategic Allocations in the Green Belt; this should be amended in the next version of the JCS.

Summary of changes made to the proposals plan

- Cross-hatching which identifies Green Belt land has been removed from the areas identified as Strategic Allocations.
- Green Belt cross-hatching has also been removed from the identified safeguarded areas at West Cheltenham and North West Cheltenham.
- Built form of Gloucester was previously incorrect and has been extended to the south accordingly.
- The northern part of Strategic Allocation A1 at Twigworth has been removed.
- Strategic Allocation A7 (Up Hatherley) has been removed.
- Dumbleton, Apperley, Ashleworth, Little Witcombe have been removed as service villages on the map.
- Stoke Orchard and Twigworth have been added as service villages on the map.

4. SUSTAINABILITY APPRAISAL / HABITATS REGULATIONS ASSESSMENT

4.1 The Draft JCS was informed by a Sustainability Appraisal (SA). The main comments on the Sustainability Appraisal made as part of the public consultation are set out below.

Baseline information

- Some of the baseline information that has been used to inform Sustainability Appraisal is incorrect.
- Objection to broad location T6a 'Land at The Mythe' being found unsuitable on the basis of flood risk, which is contrary to the JCS Strategic Flood Risk Assessment (SFRA) and Environment Agency flood risk evidence. Engineering solutions can be employed to ensure that development would not create any significant additional flood risk.
- Objection to broad location T6a 'Land at The Mythe' assessment in the Strategic Housing Land Availability Assessment (SHLAA) on the basis of local landscape designations, which does not conform with Government guidance. Whilst further landscape evidence has been commissioned, there is no evidence of how this has been used to inform the Draft JCS. It also was not made available for consultation when the Draft JCS was published.
- Inconsistent and contradictory evidence base relating to proposed Strategic Allocation A5 – North West Cheltenham. Consideration should be given to issues such as air quality management (e.g. M5 junction 10), noise from the main line railway, toxic waste at Wingmoor Farm and limited capacity for additional traffic without a new north-west link road.

Strategic development options

- Concern expressed regarding the approach taken to the assessment of strategic development options. No assessment of whether a hybrid of the three distribution scenarios (urban focus; rural dispersal; significant expansion of a new settlement) could result in a more sustainable solution than the options proposed.
- Alternative sensitivity test of 25% rural growth should have been tested.
- Concern with the way that the 'Part 1' JCS consultation is referenced in the Draft JCS SA Report, which is considered factually incorrect and misleading. The Part 1 consultation was for stakeholders only and not a public consultation.

Reasonable alternatives

- It is not clear what the justification is for the limited number and scale of urban extensions located around the Tewkesbury urban area. Tewkesbury is one of the principal urban areas and is not restricted by Green Belt designation. A number were assessed through the 'Developing the Preferred Option' consultation and identified as worthy of further consideration.
- Promotion of broad location T6a as a suitable and sustainable site for development. Offers the opportunity to contribute to the Tewkesbury Northern Relief Road. Site should be fully appraised within the SA/SEA process and subject to public consultation.

- Concerns regarding consistency of approach and conclusions of the Sustainability Appraisal within and between different sites, including for example Land at Mitton, MOD Ashchurch and Brookthorpe with Whaddon.
- Does not make any reference to cross-boundary engagement with the South Worcestershire authorities through the duty to cooperate.
- The Sustainability Appraisal report identifies three locations that were not progressed as they are outside the JCS area. This is not a valid reason to exclude reasonable alternatives that are within the geographical scope of the plan. This is also inconsistent with the approach taken for the Sustainability Appraisal report that informed the 'Developing the Preferred Option' document.
- Objection to the fact that elected Members were not provided with the opportunity to take into account the environmental assessment (Sustainability Appraisal Report) in decision making at the Council meeting at which the Draft JCS was considered.
- The final Sustainability Appraisal should describe more clearly the progression of alternative sites that have been considered and the reasons for selection and rejection of these alternatives. Other missing alternatives (as identified through the Draft JCS consultation) should also be considered through this process.
- The composition of Table 7.1 is not explained in the document, nor is the quantum of development that has been used to test each of the percentages. Furthermore, the table does not relate to the distribution of development contained in the Draft JCS.
- Concern that the areas considered for Strategic Allocations were not considered on an equal or comparable basis, with some areas being reduced in size so as to provide more realistic areas for development

Objectively assessed need

- The SA assessment that informed the Draft JCS did not assess the impact of a higher level of housing provision. The options assessed as part of the 'Developing the Preferred Option' consultation included a range of figures and concluded that the middle point of 36,000 dwellings would offer the most sustainable option. A higher housing figure should therefore be considered.

Other comments

- Concern that comments made to the 'Initial SA' which informed the 'Developing the Preferred Option' consultation had not been considered and taken into account in the preparation of the Draft JCS and the associated Sustainability Appraisal Report.
- SA suggests that the positive effects on the housing objective could be made more certain if new gypsy and traveller sites were required to be provided as part of the new Strategic Allocations rather than just requiring that provision should be considered. This is considered to be a significant error in the approach and the recommendation was made without any assessment of the suitability and desirability of conventional housing sites for/to gypsy and travellers.

Summary of changes made to the SA

- The representations received on the Draft JCS Sustainability Appraisal have been considered in the drafting of the Pre Submission plan and also incorporated into the next version of the Sustainability Appraisal.

5. PETITIONS

- 5.1 In addition to the questionnaire and comments made in relation to specific sections / policies on the Draft JCS document, the JCS authorities received three different standard responses from local organisations, which were submitted by a number of different people. A full schedule of the responses received has been prepared and is available to download from the JCS website at www.gct-jcs.org.

Response card 1

- 5.2 The card was entitled 'Comments and observations on the Joint Core Strategy, 33,000 houses to 2031' and provided a text box for respondents to include their comments.

Response card 2

- 5.3 The response card asked for respondents to confirm whether or not they agreed with the following statements:

1. ***Would the COUNCIL policy on the JCS and their threat to the Cheltenham Greenbelt and Open Countryside affect YOUR VOTE in the local elections next May?***
2. ***Should the JCS focus on providing affordable homes, more social homes rather than market or profit driven houses onto the Greenbelt?***
3. ***Should Cheltenham Council have a brownfield first policy and a JCS focus of continued urban/town regeneration?***

- 5.4 The first point relates to the political views of respondents and is not relevant to plan-making and has not therefore been included in this summary report. The second and third points relate to points of planning and they have therefore been included in this summary table below. The response card also provided a blank space for respondents to provide any further comments.

Response card 3

- 5.5 The response card asked for respondents to confirm whether or not they agreed with the following statements:

- (a) ***In accordance with the NPPF, the JCS must objectively estimate the housing need for Cheltenham and not exaggerate it. Where there is uncertainty the JCS must use the lower figure and land in reserve to respond flexibly if the housing need should turn out to be larger. The JCS must not risk allowing building on the green belt and the Leckhampton fields and then finding too late that this building was not necessary to meet the actual housing need.***
- (b) ***In accordance with the NPPF, the JCS must properly address the need for building a strong, competitive economy and must contain a genuine and realistic plan for fostering employment growth and for the transport and other infrastructure needed to support this.***

- (c) In accordance with the NPPF, the JCS must promote sustainable transport. The housing developments currently proposed in south Cheltenham would have a devastating impact on traffic and completely break the transport system. This is utterly unacceptable.**
- (d) I am personally affected / deeply concerned by the health and accident risks from the traffic queues and pollution that would result from the currently proposed developments.**
- (e) I am deeply concerned over future schooling and the danger that the proposed developments will leave my / many children without local schools.**

5.6 The response card also provided a blank space for respondents to provide any further comments.

Changes made to the plan

- Issues raised through the petitions have been reflected in the changes made to the relevant policies, as detailed in section 3 of this report.

6. OMISSION SITES

- 6.1 As part of the public consultation, 42 sites were submitted for consideration as possible additional sites for development. These are set out below.
- 6.2 In many cases, the sites are already in the planning system, either as allocations, planning applications or considered through the annual Assessment of Land Availability process and had therefore already been considered before the Draft JCS was published for consultation. Smaller, non-strategic sites will be considered in the context of each authority's district plan. No action therefore needs to be taken in relation to these sites.
- 6.3 For the purposes of the Pre Submission plan, only sites over 450 dwellings are considered 'strategic' in the context of the JCS definition. Sites located outside the JCS area would need to be considered with neighbouring authorities through the duty to cooperate, as the JCS authorities cannot allocate land outside the JCS area.

Site name	Location
Land at Mitton	Wychavon District Council
Land at Whaddon	Stroud District Council
Winnycroft Farm	Gloucester City Council
Land North of Airport	Tewkesbury Borough Council
Land at Pirton Fields	Tewkesbury Borough Council
Brookthorpe with Whaddon	Stroud District Council / Gloucester City Council
Brockworth Garden Centre	Tewkesbury Borough Council
Shurdington	Tewkesbury Borough Council
Whitehouse Farm	Tewkesbury Borough Council
Land west of Cheltenham	Cheltenham Borough Council / Tewkesbury Borough Council
Land west of Lambert Avenue, Shurdington	Tewkesbury Borough Council
Land at Brookfield Road, Cheltenham	Tewkesbury Borough Council
Land at Shaw Green Lane	Cheltenham Borough Council
Extension to Ashchurch/Fiddington employment allocation	Tewkesbury Borough Council
Hayden Green/Fiddlers Green	Tewkesbury Borough Council
Extension of Staverton Employment Area	Tewkesbury Borough Council
Land at Reddings, Cheltenham	Cheltenham Borough Council
Land at Naas Lane, Gloucester	Gloucester City Council
Land north of Shurdington Road	Tewkesbury Borough Council
Land north of Cheltenham	Cheltenham Borough Council
Land adjoining Brook Villa Farm, Shurdington	Tewkesbury Borough Council
Brooklea, Badgeworth	Tewkesbury Borough Council
The Mythe, Tewkesbury	Tewkesbury Borough Council
Land at Alderton	Tewkesbury Borough Council
Land at Twyning	Tewkesbury Borough Council
Gloucestershire Airport	Tewkesbury Borough Council

Land north of Hayden Lane	Tewkesbury Borough Council
The Briars', The Reddings, Cheltenham	Cheltenham Borough Council
Former DVLA Offices, Elmbridge Court	Tewkesbury Borough Council
Former Allard's Hotel, Shurdington	Tewkesbury Borough Council
Land at Rectory Kane, Hempsted	Gloucester City Council
Land at Rea Lane, Hempsted	Gloucester City Council
Land at Twigworth (West of A38)	Tewkesbury Borough Council
Oaklands, Shurdington	Tewkesbury Borough Council
Glenfall Way	Cheltenham Borough Council
Land at south of A46, Ashchurch	Tewkesbury Borough Council
Land at New Barn Lane	Cheltenham Borough Council
Land off Two Hedges Road, Woodmancote	Tewkesbury Borough Council
The Hayloft, Shurdington	Cheltenham Borough Council
Land west of Bredon Road, Tewkesbury	Tewkesbury Borough Council
Land east of Bredon Road, Tewkesbury	Wychavon District Council
Land at Ashchurch/Fiddington	Tewkesbury Borough Council

Changes made to the plan

- No action has been taken in relation to any sites which have already been allocated or otherwise included in table SP2a.
- Any additional sites below the strategic site threshold of 450 dwellings have not been included and will be considered through the relevant district plans.
- Sites outside the JCS area have not been considered.

Appendices

Appendix 1: Draft JCS Consultation Response Form

**DRAFT JOINT CORE STRATEGY 2013
CONSULTATION RESPONSE FORM**

EVENT:

This form can be used to make a response to the Draft JCS consultation. Please feel free to use additional paper as necessary and clearly identify the question to which the comments relate.

Completed response forms should be sent to: Joint Core Strategy Team, Municipal Offices, Promenade, Cheltenham, GL50 9SA and received no later than 5pm on Friday 13 December 2013.

Full documentation can be viewed and comments made via the JCS website at www.gct-jcs.org.

CONTACT DETAILS:

Name:

Postal address (including postcode):

Email address:

If you are responding on behalf of an organisation, please give their details below:

Name:

Postal address (including postcode):

Email address:

CONSULTATION QUESTIONS

QUESTION 1

Do you think our strategy of focusing on urban extensions (i.e. development sites located around Gloucester and Cheltenham) is the correct one? If not, where would you propose to locate the new development?

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QUESTION 2

Do you think that we have identified the right sites based upon the strategy mentioned in question Q1? If not, which other sites within the JCS area would you suggest and why?

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QUESTION 3

Is this the right list of rural service centres and service villages and is this the appropriate amount of new development for them?

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QUESTION 4

Is there any aspect of the strategy that you wish to question or comment on as a result of additional or alternative evidence? For example, do you have alternative information or evidence for how much housing and employment should be provided, or what infrastructure is required to support the proposed growth?

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Do you have any further comments? If yes, please reference the section/paragraph of the draft JCS you are referring to.

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Appendix 2: Draft JCS Consultation Summary Leaflet



Draft Joint Core Strategy

**CONSULTATION
LEAFLET**

October 2013

WHAT IS THE DRAFT JOINT CORE STRATEGY?

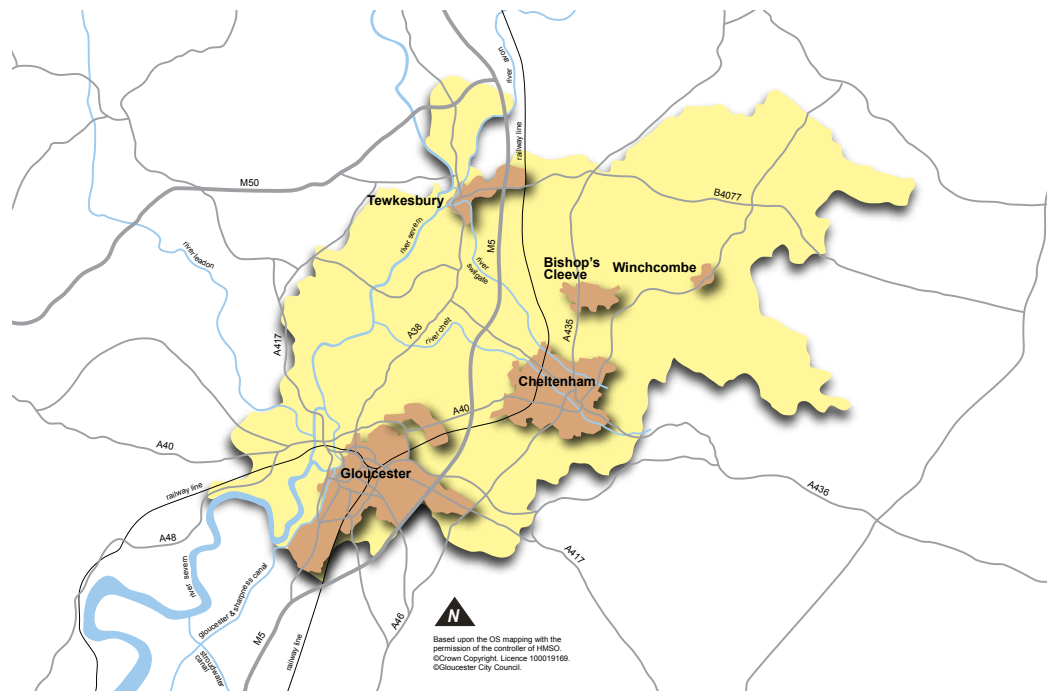
The Draft Joint Core Strategy (JCS) is a consultation version of a planning document, which outlines the main approach to development for Gloucester City, Cheltenham and Tewkesbury boroughs and **covers the period 2011 until 2031**. It sets out the vision, objectives and strategy for locating required housing and employment sites in the JCS area.

In addition, it sets out policies relating to important issues such as flooding, green belt and affordable housing. These policies set out requirements for new developments and are very important as they define what can and cannot be built in the JCS area.

WHY DO WE NEED A JOINT CORE STRATEGY?

All councils are legally required to have a planning strategy to guide future development. **Without a strategy, there is a risk** that ad hoc development will occur and we may not be able to prevent or control this. A strategy will help us to ensure development takes place in a planned

way, protecting and enhancing our green spaces, while meeting our long term development needs. In addition, the Government requires us to work closely with our adjoining councils when developing our planning strategy under the 'duty to cooperate'.



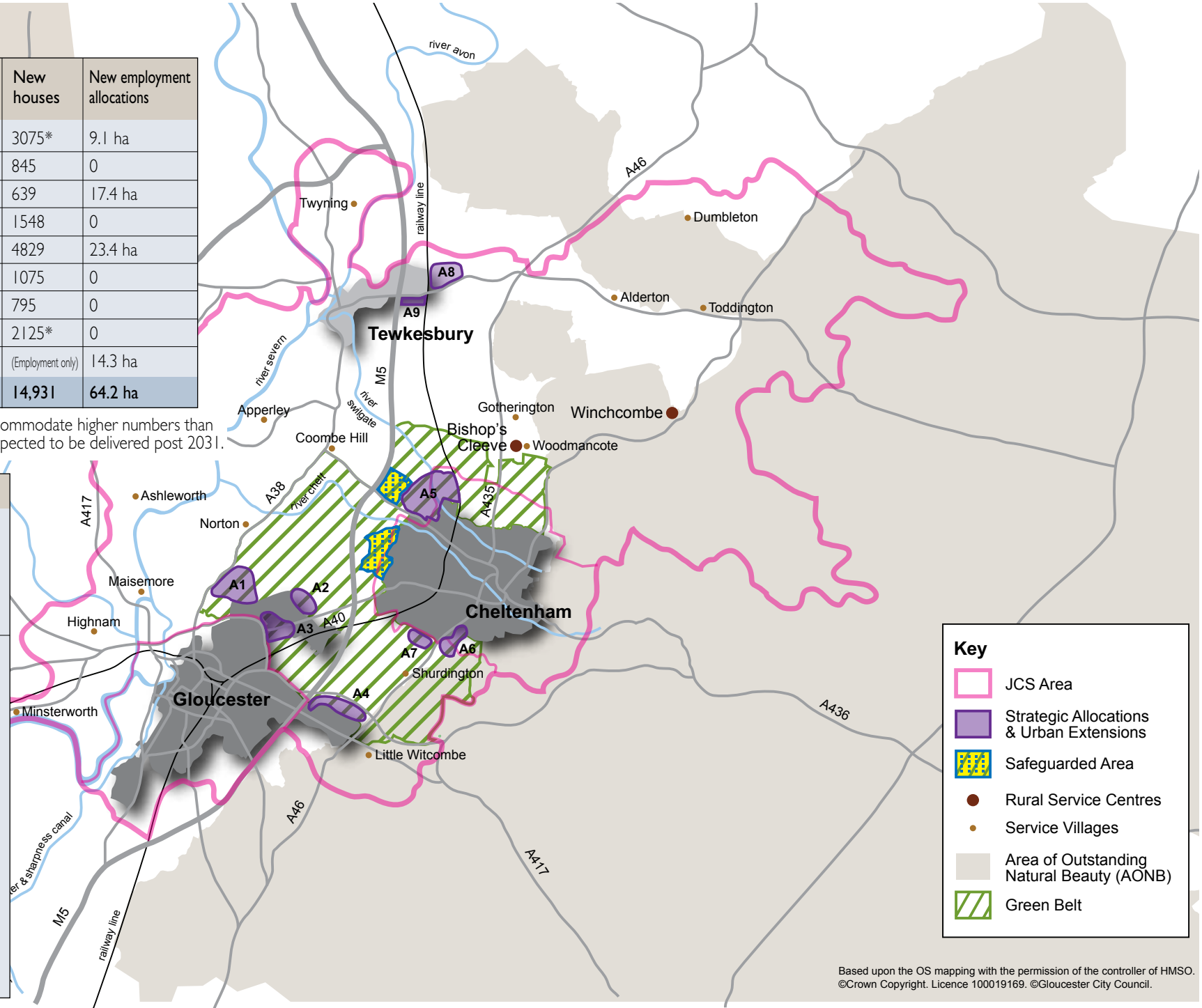
JOINT CORE STRATEGY PROPOSALS PLAN



New sites - urban extension and strategic allocations	New houses	New employment allocations
A.1 Innsworth and Twigworth	3075*	9.1 ha
A.2 North Churchdown	845	0
A.3 South Churchdown	639	17.4 ha
A.4 North Brockworth	1548	0
A.5 North West Cheltenham	4829	23.4 ha
A.6 South Cheltenham - Leckhampton	1075	0
A.7 South Cheltenham - Up Hatherley Way	795	0
A.8 Former MOD site strategic allocation	2125*	0
A.9 Ashchurch strategic allocation	(Employment only)	14.3 ha
Total	14,931	64.2 ha

* Please note: These sites are allocated to accommodate higher numbers than shown. The additional houses are currently expected to be delivered post 2031.

Settlement Tier	Settlements
Rural Service Centres (Accommodate 1860 new homes up to 2031)	Bishop's Cleeve Winchcombe
Service Villages (Accommodate 880 new homes up to 2031)	Alderton (inc Alderton Fields) Apperley Ashleworth Coombe Hill Dumbleton Gotherington Little Witcombe Highnam Maisemore Minsterworth Norton Shurdington Toddington Twigworth (inc Church End) Woodmancote



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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OTHER ISSUES ADDRESSED IN THE JOINT CORE STRATEGY

Ensuring new developments have a minimal impact on existing communities by:

- Requiring high quality design and good linkages to existing communities
- Requiring developers to provide all necessary on and off-site infrastructure and transport enhancements to existing road networks.

Ensuring new developments have a minimal impact on the environment by:

- Locating them in sustainable urban extensions
- Requiring them to be energy efficient and produce on-site energy
- Locating them away from areas liable to flooding
- Locating them away from the Cotswolds AONB
- Safeguarding biodiversity/geodiversity.

Ensuring the new developments will be good places to live by:

- Requiring adequate community facilities
- Supporting healthy living and wellbeing
- Providing housing for all groups of people (including affordable housing, Gypsy and Travellers' accommodation, Lifetime Homes)
- Providing good transport links and green infrastructure.

Supporting the local economy by:

- Safeguarding existing employment land and allocating another 64 hectares of new employment land
- Supporting existing town and city centres
- Excluding areas of land from the Green Belt to allow the Airport and the Racecourse to thrive.



HAVE YOUR SAY

While this consultation document sets out our preferred strategy, it is important for you to give us your feedback, details on back page.

Questions

- Q1** Do you think our strategy of focusing on urban extensions (i.e. development sites located around Gloucester and Cheltenham) is the correct one? If not, where would you propose to locate the new development?
- Q2** Do you think that we have identified the right sites based upon the strategy mentioned in question Q1? If not, which other sites within the JCS area would you suggest and why?
- Q3** Is this the right list of rural service centres and service villages and is this the appropriate amount of new development for them?
- Q4** Is there any aspect of the strategy that you wish to question or comment on as a result of additional or alternative evidence? For example, do you have alternative information or evidence for how much housing and employment should be provided, or what infrastructure is required to support the proposed growth?

WHAT'S NEXT?

Once we have your views we will continue to develop the strategy. There will then be a final consultation stage before the document is considered by an independent inspector and then adopted as the Joint Core Strategy.



TIMETABLE

November 2013 - February 2014
Consideration of Representations and Preparation of Pre-Submission Document

March 2014
Pre-Submission version of Joint Core Strategy to the three Councils, followed by Public Consultation

August 2014
Submission to the Secretary of State

October 2014
Examination of the Joint Core Strategy Conducted by an independent inspector

HOW CAN YOU COMMENT?

To make a comment please look at the full version of the Draft JCS and the background information available on our website at www.gct-jcs.org where you can **comment online**. Hard copies of the document can be viewed in public libraries and each of the council offices, or purchased for £40 + postage. The consultation **starts on Tuesday 15 October** and ends six weeks later on **Tuesday 26 November 2013**.

You can also find out more by dropping into one of our staffed exhibition events in October and November during any of the times below:

Place & Venue	Date	Time
Ashchurch Village Hall	Thurs 17 Oct	6 - 8:30pm
Leckhampton Village Hall	Sat 19 Oct	2:30 - 5pm
Bishop's Cleeve Primary School	Mon 21 Oct	6 - 8:30pm
Innsworth Community Hall	Tues 22 Oct	6 - 8:30pm
Shurdington Social Centre	Thurs 24 Oct	6 - 8:30pm
Cheltenham Regent Arcade	Fri 25 Oct	12.30 - 3pm
Winchcombe Abbey Fields Community Centre	Wed 30 Oct	6 - 8:30pm
Cheltenham Civil Service Club Uckington	Mon 4 Nov	6 - 8:30pm
Brockworth Community Centre	Thurs 7 Nov	5:30 - 8pm
Gloucester Eastgate Shopping Centre	Fri 8 Nov	12.30 - 3pm
Churchdown GL3 Community Hub	Sat 9 Nov	12.30 - 3pm
Tewkesbury Town Hall	Tues 12 Nov	12.30 - 3pm
Apperley Village Hall	Wed 13 Nov	6 - 8:30pm
Alderton Parish Hall	Thurs 14 Nov	6 - 8:30pm

Over the same time period the Tewkesbury Borough Plan is beginning to be prepared and comments are invited on what it should contain. There will be officers at all of the events within Tewkesbury Borough to answer any queries.

This leaflet is available in large print, Braille or audio format on request.

Contact:

Email: info@gct-jcs.org

Telephone: 0800 0731 441

Post: **Joint Core Strategy, Cheltenham Borough Council,
Municipal Offices, Promenade, GL50 9SA**

