APPENDIX 2

JCS Main Modifications

(including Twigworth Strategic Allocation)

JCS Table of Main Modifications

Explanation of columns

Column Number	**1**	**2**		**4**
Column title	**Proposed Modification number**	**Paragraph in Pre-Submission JCS**	**JCS Pre-Submission original text with track changes**	**Reason**
Column Description	Column contains reference for each modification Reference coding: PMM 0001 (sequential)	Column identifies the paragraph or policy to which the modifications relate where appropriate Section or policy; Paragraph or other when appropriate	Column identifies the part of the text within the JCS Pre-Submission version to which the main modification relates. Text to be deleted is ~~'struckthrough'~~ and *new text to be added is in red and italics.* Text that remains in black is not changed from the Pre-Submission version. E.g. ~~Housing~~ *Employment* led development is expected to generate ~~minimal~~ *substantial* growth **NOTE PARAGRPAH NUMBERING IS NOT CORRECT DUE TO DELETIONS/ADDITIONS**	Column explains the reason for the change

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
PMM001	Part 2 2.1	***The Gloucester City Vision 2012-2022*** Gloucester will be a flourishing, modern and ambitious City, which all residents can enjoy. *We will work to encourage sustainable economic growth for the City's expanding population by driving forward its regeneration programme. This will strengthen the City, particularly its centre and make the most of our infrastructure.*	Text added to update the City Vision
PMM002	Part 2 2.4	By 2031 Gloucester will have established its historic central core as a place for inward investment and opportunity. Key urban sites, including King's Square, Greater Blackfriars, Greater Greyfriars and the railway corridor, will have been successfully regenerated to provide new jobs and housing within central areas of the City to meet the needs of its naturally growing population and to encourage inward investment. The King's Quarter regeneration will have played a key role in increasing the vitality and viability of the City centre environment ~~and~~ shopping and *leisure* experience, combined with improved pedestrian, cycle and public transport improvements, *including a new bus station*. A vital and viable City centre will have raised Gloucester's profile as a strong, well-connected and resilient location where people will be proud to live and work in the economic and administrative capital of Gloucestershire.	This section updated to reflect the ongoing work at Kings Quarter.
PMM003	Part 2 2.23	Areas of the borough which lie at the edges of Gloucester and Cheltenham will play an important role in accommodating development through urban extensions. ~~to meet the needs of all three authorities~~.	This text deleted because of the changes to the apportionment mechanism in the JCS post interim report.
PMM004	Part 2 Para 2.29	Gloucester and Cheltenham are the main economic hubs for Gloucestershire and draw in a significant number of commuters. This places a considerable strain on the central areas in terms of traffic congestion and pollution. Increasing self-containment remains a key challenge for the area. Offering alternative modes of transport ~~(such as cycling or buses)~~ is easier to achieve in the major urban areas which are compact and thus offer potential for improvements to *public transport,* local cycling and	

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		pedestrian links. However, in the rural areas, maintaining and improving public transport is more challenging. *A further key challenge in meeting the objectively assessed need for development in the JCS area is the degree to which land within the JCS area is significantly constrained by flood plain, areas of Green Belt and the Cotswolds Area of Outstanding Natural Beauty (AONB). The JCS authorities have reviewed the capacities of their urban areas, i.e. those sites which already have planning permission or which are part of planned regeneration, and found they can support just over 60% of the identified need.* *While early consultations examined the possibility of focussing development solely on urban areas this was predicted to lead to adverse consequences to the economic growth of the area, and would be likely to result in harm to the amenity of the City and town through increases in density and the loss of open spaces. Through consultation the possibility of a new town taking the remainder of the development need, creating sustainable urban extensions to the existing City and town areas, or dispersing new development throughout all settlements in the area have been considered as options and tested through the Sustainability Appraisal. All of these potential solutions would lead to the development of areas currently within the Green Belt or AONB. The solution of identifying and allocating strategic allocations closest to where the development need is generated has been found to be the most sustainable and strongly supported through consultation. However, this has meant that in order to release land for development the existing Green Belt has been reviewed and a new Green Belt boundary has been required, creating new and lasting defensible boundaries for the designation.*	Wording added to identify flood plain, AONB and Green Belt as key challenges to meeting need in the JCS area and how the spatial strategy sought to address these constraints.
PMM005	Strategic Objective 1 new bullet point	**Ambition 1 – a thriving economy** ***Strategic Objective 1 – Building a strong and competitive urban economy*** • *Increasing access to high speed broadband for both urban and rural areas, to drive investment and employment opportunities and to enhance quality of life and access to services*	Objective 1, Provision of high speed broadband emphasised as an important part of economic growth. To reflect this, it is now specifically mentioned as a

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
			plan objective, whereas before it was a monitoring indicator. This reflects the inspector's remarks on this topic during examination.
PMM006	Strategic Objective 4 & 6 4th bullet point 4th bullet point	**Ambition 2 – a sustainable natural, built and historic environment** ***Strategic Objective 4 – Conserving and enhancing the environment*** • Within the ~~JCS~~ *Development Plan*, review the current Green Belt boundary with a view to releasing land to help meet the long-term development needs of the area that cannot be accommodated elsewhere, whilst providing a long-term permanent boundary for the future. ***Strategic Objective 6 – Meeting the challenges of climate*** • Encouraging and facilitating ~~the development of~~ low- and zero-carbon energy development and *the* implementation of Sustainable Drainage Systems (SUDS) ~~in accordance with existing standards and, where appropriate, exceeding them.~~	Objective 4 – Change to "Development Plan" to indicate that district plans can also make local changes to the Green Belt as per the revised policy SD6 Objective 6, Changed to reflect changes in national policy and guidance on the role of planning in regard to this topic.
PMM007	Strategic Objective 7, 8 & 9	**Ambition 3 - a healthy, safe and inclusive community** ***Strategic Objective 7 – Promoting sustainable transport*** Reduce the need to travel and the reliance on the car by: • Improving opportunities for *public transport,* walking and cycling by making routes more convenient, safe and attractive • *Improving existing and* providing *new* frequent public transport links and safe walking and	Objective 7 amended to strengthen the ambition to improve opportunities for public and sustainable transport.

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		cycling routes in all new developments • Improving access to services in rural and urban areas through new development, improved integrated transport links and supporting local and community led transport initiatives *in the Local Transport Plan throughout the JCS area* • *Promoting bus priority on key public transport corridors identified in the Local Transport Plan throughout the JCS area.* ***Strategic Objective 8 – Delivering a wide choice of quality*** • Delivering*, at least,* a sufficient number of market and affordable ~~housing~~ *houses* ***Strategic Objective 9 – Promoting healthy communities*** • In partnership with others, creating stronger communities by reducing inequality and social exclusion*, enhancing opportunities for high quality education,* and thereby increasing social well-being • In partnership with others, encouraging healthy lifestyles and a well society through access to key community facilities and services, *including sport, recreation and leisure facilities,* open spaces and sustainable transport*, including public transport.*	Strategic Objective 8, clarifying that housing provision is "at least" in accordance with NPPFs requirement to provide a wide choice of high quality homes. Objective 9, additional text further emphasising the role of education, sport and public transport in promoting healthy communities.
PMM008	3.1.1	**PART 3 -** ***The JCS Spatial Strategy*** ~~**Strategic Policies**~~ This part sets out key ~~strategic~~ spatial policies for the JCS area. Policy SP1 sets out the overall strategy	Title change to reflect that all policies in the plan are strategic and this policy sets out the spatial

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		concerning the amount of development required, and Policy SP2 sets out the distribution of new development. These two policies, combined with Policy SD2 on the economy, provide the spatial strategy for the plan. This strategy, together with its aims, is expressed in relevant policies throughout the plan and will be supported by forthcoming district plans and neighbourhood plans. Each policy highlights which of the strategic objectives it addresses.	strategy for development.
PMM009	3.1.5	~~The latest Department for Communities and Local Government (DCLG) household projections indicate that the baseline demographic projection for the JCS area is 28,500 new homes. Whilst this provides the starting point in assessing the level of future needs, the JCS has not used this to define the OAN for the area, as this level of growth assumes that there will be no increase in household formation levels over the plan period to 2031. This is an unlikely scenario. The current rate of household formation is a reaction in part to the recession, but over time the economic climate is likely to improve and the difficulties in the housing market should ease. This will enable young adults who have been particularly disadvantaged by the recession - currently living with parents or sharing accommodation - to form their own households.~~	Text deleted and updated position on OAN is presented in the following and explanatory text.
PMM010	3.1.6	The plan must be based on up-to-date evidence. The OAN for the JCS has been independently assessed by consultants Nathaniel Lichfield & Partners (NLP) and the Cambridge Centre for Housing and Planning Research (CCHPR). In considering this evidence, the JCS authorities have concluded that the OAN for the JCS area is *33,500* ~~within a range of about 30,500 to 38,000~~ dwellings and *a minimum of 192 hectares of B-class employment land to support approximately 39,500 new jobs* ~~about 21,000 to 28,000 jobs~~. This level of development would reflect both demographic and economic projections *and aspirations*, and is considered to be a sensible assessment of both the future housing needs ~~of the area~~ and the economic potential of the JCS area. ~~to make a partial return to household formation trends that existed before the recession.~~ *Through the examination of the plan, the Inspector has recommended that an additional 5% be added to the OAN to increase the provision of affordable housing and add flexibility. This brings the total housing requirement figure to 35,175.*	To update position on evidence for OAN and employment land and job growth. To include 5% uplift to OAN for affordable housing and flexibility.
PMM011	3.1.7	~~The CCHPR has also examined alternative scenarios and further detail of this work is included in the JCS~~	Updated position on OAN

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		~~evidence base. This work has highlighted the particular impact of the recession on the 25-34 year-old age group, as well as their ability to form households as the economy recovers; it is therefore considered that the most credible option for the JCS would be to focus on this age group's potential to form households and has been a principal factor in identifying the OAN for about 30,500 dwellings.~~	calculation is presented in the explanatory text.
PMM012	3.1.7	*The requirements set out in Policy SP1 reflect the evidence and take into account the following key issues:* • *Population growth and changing household size* • *The effect of, and prospects for, economic growth* • *The dynamics of the local housing market* • *Landscape and environmental constraints* • *Infrastructure capacity and deliverability* • *Role and function of the Green Belt* • *The Duty to Co-operate across local authority boundaries.*	Paragraph moved from the explanation section of Policy SP1.
PMM013	Policy SP1 – The Need for New Development	**Policy SP1: The Need for New Development** 1. During the plan period, provision will be made to meet the need for *approximately* ~~about~~ ~~30,500~~ *35,175* new homes and *a minimum of 192 hectares of B-class employment* land to support *approximately* ~~about 28,000~~ *39,500* new jobs. 2. This is to be delivered by development within existing urban areas through district plans, existing commitments, urban extensions to Cheltenham and Gloucester, and the provision of Strategic Allocations at Ashchurch. This strategy aims to locate jobs near to the economically active population, increasing sustainability, and reducing out-commuting thereby reducing carbon emissions from unsustainable car use. 3. This housing requirement for each local authority will be as follows: • Gloucester ~~11,300~~ *at least 14,359* new homes • Cheltenham ~~9,100~~ *at least 10,917* new homes • Tewkesbury ~~10,100~~ *at least 9,899* new homes	(1) Housing and employment figures updated. Policy clarifies B class employment land requirement. Policy paragraphs split into two. Re-numbered (3) Updated housing requirement for each district. (previous 3 deleted) Policy point removed from SP1 and moved to the Delivery, Monitoring and Review section which provides greater detail on the

JCS Table of Main Modifications

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td></td><td></td><td>~~3. The appropriate level of new housing and employment will be monitored and a review undertaken five years following the adoption of the JCS and periodically thereafter, taking into account the most up-to-date evidence available at that time.~~

This policy contributes towards achieving Objectives 1, 2, 3, 6, 7 and 8.</td><td>review mechanism.</td></tr>
<tr><td>PMM014</td><td>3.1.8
3.1.9
3.1.10</td><td>~~There are inevitably significant uncertainties when planning for a 20-year period, but within the lifetime of the JCS it is expected that the economy will at least partially recover, that the mortgage lending situation will improve, and that the housing market will also improve from its current position. This would result in a return towards previous trends in household formation rates. If household formation rates for the 25–34-year-old age group were to make a partial recovery to previous trends, providing more opportunity for younger adults to form households, this would imply a requirement for about 30,500 additional homes.~~

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

~~This level of development proposed is at an overall rate higher than that observed in the JCS area overall since 1991 and would represent an increase in housing supply in line with the aims of NPPF and the best available information of the likely levels of housing required by 2031. In order to provide a level of flexibility, land has been allocated in Policy SP2 to provide for a slightly higher number of dwellings, with additional safeguarded sites.~~

<table><tr><th colspan="2">~~Annual JCS Housing Delivery~~</th><th>~~Annual JCS Housing Requirement~~</th></tr><tr><td>~~1991-2001~~</td><td>~~2001-2011~~</td><td>~~2011-2031~~</td></tr><tr><td>~~1326~~</td><td>~~1450~~</td><td>~~1525~~</td></tr></table></td><td>Text deleted and updated position on OAN presented in explanatory text.

Text updated and moved to delivery section of policy SP1</td></tr>
<tr><td>PMM015</td><td>3.1.8</td><td>The assessment of the OAN for housing follows the approach indicated by the NPPF and the PPG and</td><td>Explanatory text updated</td></tr>
</table>

JCS Table of Main Modifications

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td></td><td>3.1.9</td><td>takes as its starting point the latest official population forecasts and household projections. For the JCS this has meant using the Office for National Statistics (ONS) 2012 Sub-national Population Projections for England (May 2014) and the Department for Communities and Local Government (DCLG) 2012-based household projections (February 2015). However, the OAN assessment has also used the most recent evidence on how the population has changed. As such the assessment has been further adjusted to take into account the ONS 2014 Mid-Year Estimates (June 2015) and the latest ONS estimates for international migration statistics (August 2015). Using the latest available population and household formation data produced a demographically based estimate of the OAN for the JCS area of 31,830 homes over the plan period to 2031, as set out in Table SP1a below.

Table SP1a Demographic housing needs in the JCS area
<table>
<tr><th></th><th>Gloucester</th><th>Cheltenham</th><th>Tewkesbury</th><th>JCS</th></tr>
<tr><td>Demographic OAN 2011-31</td><td>13,290</td><td>9,900</td><td>8,640</td><td>31,830</td></tr>
</table>

Whilst this provides an important starting point in calculating the OAN for housing it is also important to consider the impact of economic growth forecasts and aspirations. This will ensure that sufficient housing is made available to support the delivery of employment and job growth.</td><td>to set out latest evidence behind demographic-based OAN.</td></tr>
<tr><td>PMM016</td><td>3.1.11
3.1.12
3.1.13</td><td>With regard to employment, it is important that the JCS reflects the spirit of the NPPF in helping to ensure that the ‘planning system does everything it can to support sustainable economic growth’. Local employment need has been independently assessed by consultants NLP, to provide a robust analysis of employment potential in the area to ensure that JCS plans for a sufficient level of jobs and employment land to support growth aspirations. To do this assessment the latest economic forecasts have been used, utilising data from three independent forecasters: Cambridge Econometrics, Experian and Oxford Economics. These outputs have also been considered against local intelligence on forecast growth of specific sectors which included targeted consultation with the GFirst Local Enterprise Partnership and</td><td>Updated text to provide an overview of how the employment land and job aspirations were reached.</td></tr>
</table>

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		local businesses. The assessment has also taken into account past trends and an analysis of supply and demand including loss of employment land to other uses. The evidence presented by NLP identifies that the JCS should establish a minimum requirement for B class employment land of 192 hectares to support positive business growth aspirations for a minimum additional 39,500 jobs. ~~which identified the potential to create around 21,000-28,000 jobs to support a thriving economy. This assessment has been further informed by the emerging Strategic Economic Plan (SEP) of the Gloucestershire Local Enterprise Partnership (GFirst LEP). The baseline evidence provided by NLP indicates that between 34 and 60 hectares of employment land should be provided over the plan period, which would reflect recent economic growth forecasts for the JCS area.~~ ~~The JCS has identified strategic employment sites to allow for this level of development, and has planned for the higher end of the range indicated, in order to provide sufficient flexibility for employment needs not anticipated by the evidence base e.g. unexpected changes in economic circumstances, and to help deliver the aspirations of the emerging SEP prepared by the Gloucestershire Local Enterprise Partnership. On this basis the JCS allocates about 64 hectares of additional employment land via new strategic sites, supported by protection and redevelopment of existing sites within urban areas, and enabling of new sites within these areas. This will be monitored over the plan period, along with the impact of higher economic activity rates, to consider any effects on the balance between housing provision and realising economic potential.~~ ~~The requirements set out in Policy SP1 reflect the evidence and take into account the following key issues:~~ ~~• Population growth and changing household size~~ ~~• The effect of, and prospects for, economic growth~~ ~~• The dynamics of the local housing market~~ ~~• Landscape and environmental constraints~~ ~~• Infrastructure capacity and deliverability~~	Text moved to background section of policy SP1

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td></td><td></td><td>• ~~Role and function of the Green Belt~~
• ~~The Duty to Co-operate across local authority boundaries.~~</td><td></td></tr>
<tr><td>PMM017</td><td>3.1.11
3.1.12
3.1.13</td><td>In order to support aspirational economic growth the JCS has considered whether an economic uplift to the demographic OAN is required to support jobs. Having estimated the population needed in 2031 to provide the labour force implied by the three job forecasts, the number of homes needed to accommodate that population growth has been calculated using the household formation rates from DCLG's 2012-based household projections. The average of the three forecasts was taken which produced an economic 'policy-on' OAN of 33,500 dwellings.

Economic growth has been planned for at the JCS-wide level as a functioning economic area. The LEP strategy for economic growth, as set out in the Strategic Economic Plan, is focused on the M5 growth corridor running through the heart of the JCS area and not any particular authority. Therefore economic growth needs to be seen in the JCS area-wide context. This is a different approach from housing where each district has its own specifically assessed needs and requirements. Therefore, it is difficult to attribute the housing needs resulting from any additional policy-on economic uplift to specific areas. Nevertheless, the JCS has sought to distribute this uplift in dwellings in accordance with the amount of employment land potential in each authority area and with the spatial strategy set out at Policy SP2. This has resulted in the policy-on OAN for each area set out at Table SP1b.

Table SP1b 'Policy-On' economic uplift OAN
<table>
<tr><th></th><th>Gloucester</th><th>Cheltenham</th><th>Tewkesbury</th><th>JCS</th></tr>
<tr><td>Policy-on OAN 2011-31</td><td>13,675</td><td>10,395</td><td>9,425</td><td>33,500</td></tr>
</table>

The employment forecasts for the JCS area are subject to considerable uncertainty and this is demonstrated in the way that they can change over a relatively short period of time. However, the JCS authorities believe that by establishing an OAN of 33,500 dwellings, this will ensure that economic</td><td>New text to provide an overview of how the OAN has taken into account the economic growth needs of the area.

Text to explain how the economic uplift to the OAN has been distributed</td></tr>
</table>

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td></td><td></td><td>growth in the area is not constrained by the supply of housing.

Further to the economic uplift an additional 5% increase has been applied to the economic led OAN. This 5% has been added in order to boost the delivery of affordable housing as well as providing additional flexibility to the supply of land and boosting housing delivery in general. This further uplift has resulted in an overall housing requirement for the JCS area of 35,175 dwellings over the plan period. The resulting requirement for each area is set out at Table SP1c.

Table SP1c 'Policy-On' OAN with 5% Uplift
<table>
<tr><th></th><th>Gloucester</th><th>Cheltenham</th><th>Tewkesbury</th><th>JCS</th></tr>
<tr><td>Policy-on OAN + 5% Uplift 2011-31</td><td>14,359</td><td>10,917</td><td>9,899</td><td>35,175</td></tr>
</table></td><td>Text to explain the application of an addition 5% uplift to the OAN for affordable housing and flexibility..</td></tr>
<tr><td>PMM018</td><td>3.1.14
3.1.15
3.1.16</td><td>Delivery

The JCS plans for a significant level of housing and employment development to meet the needs of the area over the plan period. The level of housing development proposed is at an overall rate higher than that observed in the JCS area overall since 1991 and would represent an increase in housing supply in line with the aims of NPPF and the best available information of the likely levels of housing required by 2031.
<table>
<tr><th colspan="2">Annual JCS Housing Delivery</th><th>Annual JCS Housing Requirement</th></tr>
<tr><td>1991-2001</td><td>2001-2011</td><td>2011-2031</td></tr>
<tr><td>1326</td><td>1450</td><td>1759</td></tr>
</table>
Policy SP2 provides the spatial strategy how development will be distributed and delivered across the JCS</td><td>Text updated and moved from explanation section of policy SP1 9 (with deletion in relation to oversupply against the housing requirement). Further explanation provided in Policy SP2.

Summary explanation of the role of different sites and plans in meeting development needs.</td></tr>
</table>

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		area. A key part of the delivery will be through the development of the Strategic Allocation sites that are identified through Policy SA1. These large sites will make a key contribution towards the housing and employment needs of the area. However, there is a significant role to play for the individual district capacities of each authority which will be delivered through non-strategic allocations in the district plans. This may also include Neighbourhood Plans which could identify local sites and policies for future neighbourhood level growth. ~~**Delivery**~~ To assess the performance of the JCS*, including delivery against the OAN,* a separate monitoring framework is included in the plan, setting out the key indicators and contingencies that will be critical to the successful delivery of the plan strategy. The *monitoring arrangements set out in the Delivery, Monitoring and Review section* ~~authorities' monitoring reports (AMRs)~~ will ~~have a role in~~ *enable the JCS authorities to* identify~~ing~~ *how* ~~where~~ policies *and sites* are ~~not~~ delivering against the plan objectives and strategy ~~as intended~~. The *monitoring* ~~AMRs~~ may also suggest courses of action to address *any* ~~these~~ issues. ~~In addition to annual monitoring, a five-yearly cycle of comprehensive monitoring and review of the JCS will be established. The review process would need to commence in advance of the review dates to enable any new or amended policies to be adopted in a timely manner.~~ *Further details are provided within the Delivery, Monitoring and Review section*. ~~The three councils will review the appropriate level of new housing and employment land and examine all available evidence sources, including demographic evidence, economic conditions and forecasts; if required, additional evidence reports will be commissioned. If evidence suggests that additional provision of housing or land for employment is required, the review will consider the appropriate response, including the possible need for additional allocations, the early release of any safeguarded sites and the need for assistance from other neighbouring authorities, as part of the Duty to Co-operate.~~	Redrafted to indicate that monitoring arrangements are more comprehensive than just the AMR. Further details on monitoring and review is provided in Delivery, Monitoring and Review section.
PMM019	3.2.1	Both the level and distribution of housing and employment is influenced by the vision of the JCS, and	Text to provide added

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
	3.2.2 3.2.3	informed by sustainability principles and by the JCS Sustainability Appraisal process, which ~~must be~~ *has been* translated into an overarching strategy for the JCS area. Policy SP2 sets out this strategy and identifies the distribution of new development across the area. Additional policy on employment and the economy is provided by Policy SD2. The proposals plan 'JCS Key Diagram' shows the distribution at Appendix 2. It has long been recognised that Gloucester and Cheltenham cannot wholly meet their development requirements within their administrative areas, and as such collaborative working across boundaries through the Duty to Co-operate is necessary. This was previously addressed through the Gloucestershire County Structure Plan and the draft Regional Spatial Strategy (RSS), which identified both Gloucester and Cheltenham as being amongst the region's strategically significant cities and towns. All the Gloucestershire local planning authorities are working together, within the context of the Duty to Co-operate, to ensure that new Development Plan Documents properly address strategic planning and cross-boundary issues. A wider memorandum of understanding is ~~currently being progressed~~ *maintained* between all Gloucestershire districts covering issues which require joint working. *In addition, the Gloucestershire authorities have entered into a devolution bid which sets out the commitment to work together to progress strategic plans in the event of the creation of a devolved authority*. ~~In particular, the Gloucestershire authorities have worked together on an update of the Strategic Housing Market Assessment (SHMA).~~ The JCS authorities have also specifically agreed with Stroud District Council to take a strategic approach in the review of their ~~respective~~ development plans, and to develop strategies which seek to meet objectively assessed development and infrastructure requirements in the review of their respective Development Plan Documents. *The JCS authorities will also continue to work with the South Worcestershire authorities, and Wychavon District Council in particular, in relation to future development needs.* Consideration will be given t*o* meeting unmet requirements from another local planning authority *with*in *and outside* the housing market area, where it is reasonable to do so and consistent with achieving sustainable development.	detail on the Gloucestershire devolution bid. Explanatory text on the joint working with the South Worcestershire authorities.
PMM020	Policy SP2: Distribution of	~~**Policy SP2: Distribution of New Development**~~	(2) (3) (4) Policy updated with latest housing needs

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
	New Development	~~1. To support their economic roles as the principal providers of jobs, services and housing, and in the interests of promoting sustainable transport, development will be focused at **Gloucester** and **Cheltenham**, including urban extensions to these areas.~~ ~~2. Over the plan period to 2031, land will be provided for about 31,040 new homes and for about 64 hectares of employment land, to support about 28,000 new jobs.~~ ~~• **Gloucester and its urban extensions will accommodate about 11,943 new homes**~~ ~~• **Cheltenham and its urban extensions will accommodate about 10,720 new homes**~~ ~~• **Elsewhere within Tewkesbury Borough development will accommodate about 8,377 new homes**~~ ~~**3. This will be met:**~~ ~~• Through strategic allocations at Ashchurch~~ ~~• Through smaller scale development meeting local needs at Tewkesbury town in accordance with its role as a market town, and at rural service centres and service villages.~~ ~~4. Whilst planning to meet the development needs of Gloucester and Cheltenham in and adjoining the two urban areas through the proposed urban extensions, no wider provision will be made elsewhere within Tewkesbury Borough to meet these unmet needs.~~ ~~5. **Rural service centres** and **service villages** as identified in Table SP2c below will accommodate lower levels of development to be allocated through the Tewkesbury Borough Plan and Neighbourhood Plans, proportional to their size and function, and also reflecting their proximity and accessibility to Cheltenham and Gloucester and taking into account the environmental, economic and social impacts. Over the plan period to 2031:~~	figures for each authority area. Policy includes an update on the sources of supply that are allocated and identified through the JCS, including Strategic Allocations, district capacity, existing commitments, and other sites covered by MoAs. This provides clarity on the distribution of housing planned through the JCS area. (6) Addition to clarify that reference to SD11 relates to residential development only. (7) Policy point to provide further clarification. Policy seeks for the unmet needs to be addressed through the plan making process through identified Strategic Allocations. (8) Additional policy point to address the role of plan review in identifying any

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		~~• The rural service centres will accommodate 1860 new homes, and~~ ~~• The service villages will accommodate 752 new homes~~ ~~6. In the **remainder of the rural area, Policy SD11** will apply.~~ ~~(The amount of development and its distribution is set out in Tables SP2a and SP2b [*at the end of this section of the plan*], and indicated on the JCS Key Diagram at Appendix 2.)~~ ~~**This policy contributes towards achieving Objectives 1, 2, 3, 4, 5, 6, 7, 8 and 9.**~~ ***Policy SP2: Distribution of New Development*** *1. To support their economic roles as the principal providers of jobs, services and housing, and in the interests of promoting sustainable transport, development will be focused at Gloucester and Cheltenham, including urban extensions to these areas.* *2. To meet the needs of Gloucester City the JCS will make provision for at least 14,359 new homes. At least 13,047 will be provided within the Gloucester City administrative boundary, including the Winnycroft Strategic Allocation, and urban extensions at Innsworth and Twigworth, South Churchdown and North Brockworth within Tewkesbury Borough defined in Policy SA1, and sites covered by any Memoranda of Agreement.* *3. To meet the needs of Cheltenham Borough the JCS will make provision for at least 10,996 new homes. This will be provided within the Cheltenham Borough administrative boundary and cross-boundary urban extensions at North West Cheltenham and West Cheltenham (both of which are partly within Tewkesbury Borough) defined in Policy SA1, and commitments covered by any Memoranda of Agreement.* *4. To meet the needs of Tewkesbury Borough, outside of the urban extensions to Gloucester and*	further Strategic Allocations. (9) To provide latest requirement of employment land.

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		Cheltenham, the JCS will make provisions for at least 9,899 new homes. At least 7,057 dwellings will be provided through existing commitments, development at Tewkesbury Town in line with its role as a market town, smaller-scale development meeting local needs at Rural Service Centre and Service Villages, and sites covered by any Memoranda of Agreement. *5. Rural service centres and service villages as identified in Table SP2c below will accommodate lower levels of development to be allocated through the Tewkesbury Borough Plan and Neighbourhood Plans, proportional to their size and function, and also reflecting their proximity and accessibility to Cheltenham and Gloucester and taking into account the environmental, economic and social impacts. Over the plan period to 2031:* • *The rural service centres will accommodate 1860 new homes, and* • *The service villages will accommodate 880 new homes* *6. In the remainder of the rural area, Policy SD11 will apply to proposals for residential development.* *7. The unmet needs of Gloucester and Cheltenham, beyond their administrative boundaries, will only be delivered on Strategic Allocation sites allocated through Policy SA1 and any other sites with an agreed sharing mechanism through a Memorandum of Agreement between the relevant local planning authorities.* *8. The identification of any additional urban extensions to help meet the unmet needs of a local planning authority must be undertaken through a review of the plan. Any additional site allocations made through a local plan must be in conformity with the JCS spatial strategy. Consideration will also be given to meeting needs in another local authority area where it is clearly established that they cannot be met within the JCS area, or provide a more sustainable and appropriate option.* *9. To support economic growth in the JCS area, the JCS will make provision for at least 192 hectares of B-class employment land. At least 84 hectares of B class employment land will be delivered on strategic Allocation sites as detailed at Policy SA1. Any further capacity will be identified in District*	

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		Plans. *(The amount of development and its distribution is set out in Tables SP2a and SP2b [at the end of this section of the plan], and indicated on the JCS Key Diagram at Appendix 2)* ***This policy contributes towards achieving Objectives 1, 2, 3, 4, 5, 6, 7, 8 and 9.***	
PMM021	3.2.5 3.2.6 3.2.7 3.2.8 3.2.9	**Explanation** The guiding principle of Policy SP2 is that need is met where it arises, so that Gloucester and Cheltenham, together with their immediate wider areas, remain the primary focus for growth. This reflects the urban-focused economic vision and support for urban regeneration for the JCS area. In order to assess how much land is available to meet the JCS area's needs, the authorities have reviewed all potential sources of housing land supply. The potential land supply between 2011 and 2031 comes from a number of sources. Firstly, houses that have been built between 2011 and 2016~~4~~ count towards meeting needs in the early part of the plan; secondly, sites which have already been granted planning permission*, including those that* ~~and~~ are being built out; thirdly, allocated sites in existing adopted development plans. In addition, we have been informed by the ~~Strategic Housing Land Availability Assessment (SHLAA)~~ *Strategic Assessment of Land Availability (SALA)* process, although this does not consider all constraints which could prevent sites coming forward. ~~We have made~~ *An* assumption~~s~~ *has been made* as to how many windfall sites (sites which are not allocated in development plans but come forward through planning applications) will be granted permission across the plan period in each district, reflecting the most recent guidance included in national PPG. There are also further sites to be identified through the district plans. Work on the Gloucester *City Plan, Cheltenham Borough Plan and Tewkesbury Borough Plan are advancing alongside the JCS and will bring forward allocations to deliver each area's identified district capacity.* ~~plan is already well advanced,~~	Amended to use latest terminology of Strategic Assessment of Land Availability. Updated wording regarding the district plans. Figures for district capacity and strategic allocation supply updated with latest trajectory information. Text removed relating to uncertainty of district level plans as there is greater certainty due to further development of these plans.

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		~~Cheltenham and Tewkesbury Borough's district level plans are less far forward in the plan preparation process and there is some uncertainty as to how many homes will eventually be allocated and when they will be delivered.~~ In total, these sources of land supply are thought to be able to provide for ~~just over~~ *approximately 56%*~~62%~~ of the *housing to be delivered in the JCS* ~~identified need~~ (*19,700* ~~18,856~~ homes), predominantly within the urban areas. The urban capacity figures that are being set out in this document are an estimate based on the best information available at this time. ~~There is also uncertainty about the choices councils will wish to make when the District plans are progressed to a more advanced stage.~~ Therefore it is essential that enough land is allocated on sites of strategic scale to provide flexibility ~~if or when this occurs,~~ ensuring that the overall requirements for the JCS area as a whole are met and the plan is sound. Recognising that there is insufficient land inside the existing urban boundaries of Gloucester and Cheltenham, together with commitments within Tewkesbury town, to accommodate their housing and employment needs, there was a need to find *additional* land ~~for at least 38% of~~ *to meet* the JCS needs ~~(11,644 homes)~~. Hence, urban extensions to Gloucester and Cheltenham have been identified~~, together with Strategic Allocations at Ashchurch (including a major brownfield site), to~~ *which would* accommodate ~~the remaining~~ *approximately 35%* of *the housing supply identified in the JCS*~~growth~~. As concluded by the ~~SA~~ *Sustainability Appraisal*, urban extensions are considered to be the most sustainable locations for new development (following existing urban areas) as they can share transport, social and service infrastructure with existing urban areas and are located close to essential services. Further information on the approach to the distribution of development is set out in the 'Spatial Options' topic paper (October 2013), available along with the other evidence base documents mentioned in this chapter on the JCS website at www.gct-jcs.org/EvidenceBase/	
PMM022	3.2.10 3.2.11	~~The next step was to consider the potential for urban extensions and Strategic Allocations across the JCS area. This selection process began with a comprehensive assessment of land surrounding the three main centres. In order to identify and assess the options for development on the edge of urban areas, a study was undertaken - the 'Broad Locations Report' (October 2011). This helped to identify the broad locations which offered the best scope for additional development. This work was further refined through the Strategic Allocations Report (October 2013) which considers the potential for strategic development within and around the periphery of all three centres. These reports draw together the~~	Explanatory text on site selection process and spatial strategy removed and abbreviated through new and update text. This is to increase readability of the document.

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		~~relevant evidence base produced so far on site-specific issues including flooding, biodiversity, Green Belt, landscape and other constraints. One of the principal environmental constraints across the area is the risk of flooding, and significant work assessing flood risk has been undertaken through the Strategic Flood Risk Assessment level 1 and 2 studies available on the JCS website This is of paramount importance and development potential can only be identified in locations prone to flooding following a sequential test, and where appropriate an exceptions text, which sets out that there are no other preferable locations.~~ ~~Following the consultation on the draft JCS between October and December 2013, the JCS councils have reviewed both the level of development required and the suitability of the Strategic Allocations. This has resulted in minor changes to site capacities.~~ *The locations for the urban extensions and Strategic Allocations have been derived through a selection process involving a comprehensive assessment of land surrounding the three main centres of Gloucester, Cheltenham and Tewkesbury. Critically, this process has been informed by detailed evidence base on site-specific issues including flooding, biodiversity, Green Belt, landscape and visual sensitivity, transport and infrastructure as well as being subject to assessment through the Sustainability Appraisal. The development of the site selection process is detailed through the Broad Locations Report (October 2011) and the Strategic Allocations Report (2013).* *It is anticipated that development on the urban extensions and strategic allocation will be started within the early part of the plan period in order to ensure an on-going supply of housing and employment development to 2031, recognising that there are some outstanding issues which need to be resolved on some sites. These sites will be supported by sustainable transport links and a range of other higher order services and facilities, such as community centres, schools and medical centres etc. Further information is set out in Policy SA1 and the infrastructure policies of the JCS.* *Beyond Gloucester, Cheltenham and the Strategic Allocations, further development will be accommodated within Tewkesbury Borough. Tewkesbury Town, in accordance with its role as a market town, will deliver smaller-scale development. For the wider rural area, the starting point for the*	

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		distribution of development was drawn from the evidence set out within the Rural Area Settlement Audit, updated in 2015, available to view on the JCS website. There are two settlements, Bishop's Cleeve and Winchcombe, which offer a higher range of services and facilities within the rural areas; these are defined as rural service centres. *In addition, there are a number of freestanding villages within Tewkesbury Borough which are considered to be suitable locations for some limited residential development. These villages were assessed as having two or more primary services, two or more secondary services and benefiting from bus services and/or road access to a major employment area by the 2015 Rural Area Settlement Audit Refresh and updated by further evidence as available. These settlements are defined as service villages. The retention of services is intrinsically linked to the size and distribution of the resident population and it is important that these services remain viable. About 2,740 homes will be accommodated across the rural area over the plan period to 2031; this development will be concentrated on the rural service centres and service villages. More development will be accommodated at the rural service centres than at the service villages. Approximately two-thirds of the development has already been delivered or committed, but the remainder will be allocated through the Tewkesbury Borough Plan and neighbourhood plans.*	
PMM023	3.2.12 3.2.13 3.2.14	~~The total number of dwellings that could be provided is about 31,040; this is slightly higher than the OAN of 30,500 which is considered acceptable as this allows some flexibility, reflecting guidance set out in NPPF. In addition, the strategic allocation site at Ashchurch is a large site and it is anticipated that not all the site may be delivered within the plan period to 2031. It is estimated that a further 600 dwellings will be delivered post 2031 and form part of the overall supply. This will be reviewed and, should circumstances change, will be brought forward before 2031.~~ *The total number of dwellings that is being provided for within the JCS area is approximately 31,100, which includes a contribution from Wychavon. This is lower than the overall housing requirement (including economic and 5% uplift) of 35,175. This shortfall occurs in meeting the needs of both Gloucester City and Tewkesbury Borough.* *In meeting the needs of Gloucester it has been necessary to allocate sites on the edge of the urban area in Tewkesbury Borough. However, due to significant constraints and availability of land it has not been possible to allocate sites in the JCS to meet all of Gloucester's need over the plan period. Nevertheless, Gloucester has a good supply of housing land for the short to medium term that will enable it to meet its*	Update on the latest housing requirement and explanation that the JCS identifies development that is lower than this requirement. Text provided to explain the situation regarding the housing supply at Gloucester and how any shortfall at the end of the plan period would be addressed.

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		requirements to at least 2028/29. This will allow adequate time for an early review of the plan to explore further the potential for additional sites to meet Gloucester's needs in the longer term towards the end of the plan period. This would also allow the consideration of additional development options that may become available, both within and outside the JCS area. This could include the unlocking of further development opportunities within the urban area, as well as potential new urban extensions in Tewkesbury Borough and Stroud District. The JCS authorities have a Memorandum of Understanding in place with Stroud District in this regard. *At Tewkesbury town there are similar issues with allocating strategic sites that are within the JCS area when taking into account the significant constraints and availability of land around the urban area. This issue has been exacerbated by the decision by the Defence Infrastructure Organisation regarding the delayed release of the MoD Ashchurch site. As a result Tewkesbury Borough has an identified shortfall against the total JCS requirement of approximately 2,800 dwellings. Nevertheless, there are opportunities for development at the MoD Ashchurch site within the plan period if infrastructure constraints can be overcome to release available parts of the site. Similarly there is potential for development at a site at Fiddington once the highway infrastructure needs around the A46 and M5 Junction 9 are established. While these sites cannot be allocated now due to uncertainties over their deliverability and capacity,, a commitment has been set out in the Delivery, Monitoring & Review section to undertaking an immediate review of Tewkesbury's housing supply so that further work on the development potential around the Tewkesbury town and Ashchurch area can be carried out.. Further information is also provided in the JCS Housing Implementation Strategy. In addition, there is joint working with Wychavon District Council to look to bring forward the cross-boundary site at Mitton, adjacent to town. The adopted South Worcestershire Development Plan (2006-2030) already includes a policy commitment to consider, including through a review of the plan, meeting the needs of other authorities within the SWDP area. The site at Mitton is specifically referenced in this context. In addition, the JCS authorities and Wychavon District Council have a Memorandum of Agreement in place which sets out the direction of travel for the delivery of this site and meeting the needs of Tewkesbury.* *As noted above there is currently a significant shortfall identified for Tewkesbury. However, Tewkesbury has an oversupply against its annual requirement from 2011 to 2016 and has a good supply of housing*	Text provided to explain the situation regard the housing supply at Tewkesbury and how any shortfall at the end of the plan period would be addressed. Reference to the Housing Implementation Strategy that will support the plan.

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		land that will enable it to meet its requirements over the short to medium term. An immediate review of the JCS would allow for the remaining shortfall to be addressed by exploring additional sites both within and outside the JCS area, including the potential for additional working with Wychavon District Council. Further information is provided within the Delivery, Monitoring & Review section of this plan. ~~The four urban extensions proposed to help meet the needs of Gloucester are all located within Tewkesbury Borough. The two urban extensions proposed to help meet the needs of Cheltenham fall across the administrative areas of Cheltenham and Tewkesbury.~~ The three authorities have prepared a detailed housing trajectory setting out when development is likely to take place. This work also includes an assessment of the five-year housing land supply position; details of this assessment are set out in the *Housing Implementation Strategy* ~~Housing Background Paper~~, available on the JCS website.	
PMM024	3.2.15 3.2.16 3.2.17 3.2.18 3.2.19 3.2.20	~~It is anticipated that the majority of development on the urban extensions and strategic allocation will be started within the first part of the plan period in order to ensure an on-going supply of housing and employment development to 2031, recognising that there are some outstanding issues which need to be resolved on some sites. These sites will be supported by sustainable transport links and a range of other higher order services and facilities, such as community centres, schools and medical centres etc. Further information is set out in Policy SA1 and the infrastructure policies of the JCS.~~ ~~The JCS area is constrained by Green Belt land, areas at risk of flooding and The Cotswolds AONB, which is the highest national landscape designation within the JCS area. It is considered that land within the AONB is not an appropriate location for urban extensions and it has therefore been excluded from this site selection process. Green Belts are not a landscape designation and do not share the same characteristics as AONB designations. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open.~~ ~~An assessment of the Green Belt boundary was undertaken to identify areas which could accommodate development needs without undermining the purpose of the Green Belt. The assessment suggested redrawing the Green Belt boundary to ensure that it would continue to deliver its primary function of~~	Explanatory text on the spatial strategy deleted and updated and abbreviated text has replaced it. This is to increase readability of the document.

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		~~preventing Gloucester and Cheltenham as well as Cheltenham and Bishop's Cleeve from coalescing. The JCS Green Belt assessment (November 2011) is available on the JCS website.~~ ~~The Green Belt boundary has been amended, as shown on the Green Belt map (see Appendix 3); further detail on Green Belt policy is set out in Policy SD6.~~ ~~Beyond Gloucester and Cheltenham, smaller scale development will be accommodated at Tewkesbury town in accordance with its role as a market town. The starting point for the distribution of development in the rural areas was drawn from the evidence set out within the Rural Area Settlement Audit, updated in 2013, available to view on the JCS website. There are two settlements, Bishop's Cleeve and Winchcombe, which offer a higher range of services and facilities within the rural areas; these are defined as rural service centres.~~ ~~In addition, there are a number of freestanding villages within Tewkesbury Borough which are considered to be suitable locations for some limited residential development. These villages were assessed as having two or more primary services, two or more secondary services and benefiting from bus services and/or road access to a major employment area by the 2013 Rural Area Settlement Audit and updated by further evidence as available. These settlements are defined as service villages. The retention of services is intrinsically linked to the size and distribution of the resident population and it is important that these services remain viable. About 2,612 homes will be accommodated across the rural area over the plan period to 2031; this development will be concentrated on the rural service centres and service villages. More development will be accommodated at the rural service centres than at the service villages. Approximately two-thirds of the development has already been delivered or committed, but the remainder will be allocated through the Tewkesbury Borough Plan and neighbourhood plans.~~	
PMM025	3.2.20	*In regard to employment land the JCS sets the framework for the delivery of a minimum of 192 hectares of B-class employment need. The sources of supply includes a mix of high quality and well-located large strategic sites, existing undeveloped available employment sites, and potential additional smaller sites in the urban and rural areas. The Strategic Allocations are expected to deliver at least 84ha of B-class employment land. Through the district plans each authority will explore the potential to allocate further local employment sites. This will provide choice and flexibility to support delivery of B-class employment*	Updated explanation provided on the issue of employment land supply, including the role of Strategic Allocations and additional sites to be

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		growth. Monitoring of the plan would establish the growth of employment throughout the plan period, including any windfall development, and seek to rectify any shortfall through plan review. This will include through further exploration of growth opportunities at the MoD Ashchurch site and the wider M5 Junction 9 area. *The JCS Economic Update Note (February 2016) assessed the potential employment land supply for each of the districts. This used information provided through the Strategic Assessment of Land Availability to present a broad indicator of potential capacity based on the availability, suitability and deliverability of the sites. It also explored existing undeveloped commitments and existing allocations. This Update Note provided an indicative availability of B-class land of approximately 7ha at Gloucester City, 1ha in Cheltenham Borough and 40ha in Tewkesbury Borough. Further investigation into employment allocations and capacity will be undertaken through the district plans.*	identified through the district plans. Explanation of the potential capacity for new employment sites to be explored through the district plans.
PMM026	3.2.20	***Apportionment of Urban Extensions*** *All three authorities have worked together to find sustainable sites to meet the development needs of the area, transcending their administrative boundaries. As such, the three urban extensions proposed (excluding Winnycroft) to meet the needs of Gloucester are located entirely within Tewkesbury Borough. The two urban extensions proposed to meet the needs of Cheltenham fall across the administrative areas of both Cheltenham and Tewkesbury Borough.* *Under the Duty to Cooperate it is recognised that, regardless of the fact that the majority of the land is within Tewkesbury Borough, the urban extensions are proposed identified to meet the unmet needs of Gloucester or Cheltenham. Therefore dwellings being delivered on urban extensions to Gloucester or Cheltenham will contribute solely to the needs of the area's respective OANs and land supply calculations.*	Explanatory text provided to confirm the apportionment approach being taken on the Strategic Allocation sites.
PMM027	3.2.21 3.2.22	**Delivery** To assess the performance of the JCS, a separate monitoring framework is included in the plan, setting out the key indicators and contingencies that will be critical to the successful delivery of the plan	Delivery section updated to point towards the more detailed Delivery, Monitoring and Review

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td></td><td></td><td>strategy. This is set out within the Delivery, Monitoring and Review section.

The Housing Implementation Strategy provides the detailed trajectory information for the JCS. The trajectory is also included as part of the Delivery, Monitoring and Review section.

The ~~AMRs~~ JCS monitoring will ~~have a role in~~ identify~~ing~~ where Strategic Allocations, proposals or policies are ~~not~~ delivering against the plan objectives and strategy ~~as intended~~. ~~The AMRs may also suggest courses of action to address these issues. In addition to annual monitoring, a five-yearly cycle of comprehensive monitoring and review of the JCS will be established. The review process would need to commence in advance of the review dates to enable any new or amended policies to be adopted in a timely manner.~~</td><td>section of the plan.</td></tr>
<tr><td>PMM028</td><td>Table SP2a: Distribution of Development in the JCS area</td><td><s>Table SP2a: Distribution of development in the JCS area</s>

<table>
<tr><th><s>Distribution of Development</s></th><th><s>Net additional dwellings to 2031</s></th><th><s>Ha. of employment land to 2031</s></th></tr>
<tr><td colspan="3"><s>Gloucester</s></td></tr>
<tr><td colspan="3"><s>Total requirement for Gloucester City Council is 11,300 until 2031</s></td></tr>
<tr><td><s>District capacity*</s></td><td><s>7,793</s></td><td><s>To be determined through the Gloucester City Plan</s></td></tr>
<tr><td><s>Unmet need (to be met by urban extensions to Gloucester and Cheltenham – see Table SP2b)</s></td><td><s>3,507</s></td><td></td></tr>
<tr><td><s>Total</s></td><td><s>11,300</s></td><td><s>26.5 ha</s></td></tr>
<tr><td colspan="3"><s>Cheltenham</s></td></tr>
<tr><td colspan="3"><s>Total requirement for Cheltenham Borough Council is 9,100 until 2031</s></td></tr>
</table></td><td>Table SP2a updated with latest trajectory information and reformatted to make simpler and more readable.</td></tr>
</table>

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		~~District capacity* (includes homes proposed via urban extensions A5 and A6 for the area of land falling within the administrative boundary of Cheltenham Borough)~~ — ~~7,375~~ — ~~To be determined through the Cheltenham Plan~~ ~~Unmet need (to be met by urban extensions to Gloucester and Cheltenham – see Table SP2b)~~ — ~~1,725~~ ~~**Total**~~ — ~~9,100~~ — ~~23.4 ha~~ ~~**Tewkesbury**~~ ~~**Total requirement for Tewkesbury Borough Council is 10,100 until 2031**~~ ~~District capacity*~~ — ~~10,640~~ — ~~To be determined through the Tewkesbury Borough Plan~~ ~~Unmet need~~ — ~~0~~ ~~Total~~ — ~~10,640~~ — ~~34.3 ha~~ ~~**TOTAL HOUSING SUPPLY ACROSS THE JCS AREA**~~ — ~~**31,040**~~ — ~~**64.2 (plus 20 replacement of existing use at A8 site strategic allocation)**~~ ~~* District capacity is made up of past delivery (from 2011), commitments, windfalls and potential District Plan allocations on smaller sites. For Cheltenham, the district capacity includes homes proposed via urban extensions A5 and A6 for the area of land falling within the administrative boundary of Cheltenham Borough, the breakdown of which is set out in Table SP2b.~~	

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		Table SP2a: Sources of housing supply in the JCS area	

	Housing Supply
Gloucester City	
Completions	*2,526*
Commitments	*2,237*
Windfall Allowance	*832*
Gloucester City Plan (Further Potential)	*1,937*
Strategic Allocations (Gloucester City)	*620*
Urban Extensions (Tewkesbury Borough)	*4,895*
Supply Total	***13,047***
Cheltenham Borough	
Completions	*1,426*
Commitments	*2,353*
Existing Local Plan Allocations	*10*
Windfall Allowance	*865*
Cheltenham Borough Plan (Further Potential)	*957*
Urban Extensions (Cheltenham Borough)	*2,775*
Urban Extensions (Tewkesbury Borough)	*2,610*
Supply Total	***10,996***
Tewkesbury Borough	
Completions	*2,496*
Deliverable Commitments	*3,148*
Existing Local Plan Allocations	*0*
Windfall Allowance	*598*
Tewkesbury Borough Plan (Further Potential)	*315*
Mitton (Wychavon District)	*500*
Supply Total	***7,057***

JCS Table of Main Modifications

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td>PMM029</td><td>Table SP2b Geographical location of strategic allocation sites</td><td>~~**Table SP2b Geographical location of strategic allocation sites**~~
<table>
<tr><th>~~Strategic Allocations~~</th><th>~~Gloucester City Council~~</th><th>~~Cheltenham Borough Council~~</th><th>~~Tewkesbury Borough Council~~</th><th>~~TOTAL NUMBER OF PROPOSED DWELLINGS~~</th></tr>
<tr><td>~~A1 Innsworth~~</td><td>~~N/A~~</td><td>~~N/A~~</td><td>~~1,250~~</td><td>~~1,250~~</td></tr>
<tr><td>~~A2 North Churchdown~~</td><td>~~N/A~~</td><td>~~N/A~~</td><td>~~532~~</td><td>~~532~~</td></tr>
<tr><td>~~A3 South Churchdown~~</td><td>~~N/A~~</td><td>~~N/A~~</td><td>~~868~~</td><td>~~868~~</td></tr>
<tr><td>~~A4 North Brockworth~~</td><td>~~N/A~~</td><td>~~N/A~~</td><td>~~1,500~~</td><td>~~1,500~~</td></tr>
<tr><td>~~A5 North West Cheltenham~~</td><td>~~N/A~~</td><td>~~1800~~</td><td>~~2,985~~</td><td>~~4,785~~</td></tr>
<tr><td>~~A6 South Cheltenham/ Leckhampton~~</td><td>~~N/A~~</td><td>~~764~~</td><td>~~360~~</td><td>~~1,124~~</td></tr>
<tr><td>~~A8 MoD site at Ashchurch*~~</td><td>~~N/A~~</td><td>~~N/A~~</td><td>~~2,125~~</td><td>~~2,125~~</td></tr>
<tr><td>~~**TOTAL**~~</td><td>~~**0**~~</td><td>~~**2,564**~~</td><td>~~**9,620**~~</td><td>~~**12,184**~~</td></tr>
</table>
~~The urban extensions to help meet the needs of Gloucester are all located within Tewkesbury Borough.~~</td><td>Table SP2b updated and simplified to provide latest information on Strategic Allocation delivery.</td></tr>
</table>

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		~~The two urban extensions to help meet the needs of Cheltenham fall across the administrative areas of Cheltenham and Tewkesbury Boroughs. Further detail on how the urban extensions will be shared out is set out in the Housing Background Paper.~~ ~~* This site is allocated to accommodate higher numbers than shown (details are set out in Policy A8). The additional homes are currently expected to be delivered post 2031.~~ ***Table SP2b Apportionment of Strategic Allocation Sites***	

SUB AREA	*AREA*	*Authority Area*	*Housing Supply*
Gloucester City Supply	*Gloucester City Urban Capacity*	*GCC*	*7,532*
	Winnycroft Urban Extension	*GCC*	*620*
	Innsworth & Twigworth Urban Extension	*TBC*	*2,295*
	South Churchdown Urban Extension	*TBC*	*1,100*
	North Brockworth Urban Extension	*TBC*	*1,500*
Wider Cheltenham Area (WCA) Supply	*Cheltenham District Capacity*	*CBC*	*5,611*
	North West Cheltenham Urban Extension	*CBC/TBC*	*4,285*
	West of Cheltenham Urban Extension	*CBC/TBC*	*1,100*
Tewkesbury Borough Area	*Tewkesbury Borough District Capacity*	*TBC*	*6,557*

JCS Table of Main Modifications

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>Supply</td><td>Mitton</td><td>WDC</td><td>500</td></tr>
<tr><td>Total JCS Area</td><td></td><td></td><td>31,100</td></tr>
</table>
</td><td></td></tr>
<tr><td>PMM030</td><td>Table SP2c: Settlement hierarchy</td><td>Table SP2c: Settlement hierarchy
<table>
<tr><th>Settlement tier</th><th>Settlements</th></tr>
<tr><td>Key Urban Areas</td><td>Cheltenham
Gloucester</td></tr>
<tr><td>Market town</td><td>Tewkesbury</td></tr>
<tr><td>Rural service centres</td><td>Bishop’s Cleeve
Winchcombe</td></tr>
<tr><td>Service villages *</td><td>Alderton
Coombe Hill
Gotherington
Highnam
Maisemore
Minsterworth</td></tr>
</table>
</td><td>Settlement hierarchy updated to remove Twigworth (due to the strategic allocation) and add Stoke Orchard (following the 2015 Settlement Audit Refresh)</td></tr>
</table>

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		Norton Shurdington *Stoke Orchard* Toddington (inc. New Town) ~~Twigworth~~ Twyning Woodmancote * The service village classification was informed by the 201*5*~~3~~ Settlement Audit *Refresh*. The JCS Settlement Audit will be reviewed to support the preparation of the Tewkesbury Borough Plan. The outcomes of the review will be used to ensure that the services villages identified by the JCS are still appropriate when it is submitted for examination. The distribution of development across the service villages will be guided by the Tewkesbury Borough Plan and neighbourhood plans.	
PMM031	SD1	~~**SD1 – PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT**~~ ~~**Background**~~ ~~The NPPF recognises that sustainable development is about change for the better. It is about positive growth, and making economic, environmental and social progress for this and future generations. To achieve sustainable development, economic, social and environmental gains should be sought jointly~~	National Policy and Guidance has now replaced the need for this policy

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		~~Policy SD1: Presumption in Favour of Sustainable Development~~ ~~1. Unless either of the parameters under (3) below apply, through their development plans the Joint Core Strategy Authorities will seek positively to meet the objectively assessed development needs of the area incorporating sufficient flexibility to adapt rapidly to change.~~ ~~2. Planning applications that accord with this Joint Core Strategy (and with subsequent district plans or neighbourhood plans) will be approved, unless material considerations indicate otherwise.~~ ~~3. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision, the council will grant permission unless material considerations indicate otherwise, and unless:~~ ~~i. Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole, or~~ ~~ii. Specific policies in that framework indicate that development should be restricted.~~ ~~**This policy contributes towards achieving all of the JCS Strategic Objectives.**~~ . ~~**Explanation**~~ ~~4.1.2 In line with Government policy advice, the JCS authorities have adopted a positive approach in seeking to meet the objectively assessed development needs of the JCS area. The policies in the JCS provide a clear framework to guide development that creates positive, sustainable growth,~~	

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		~~therefore following the presumption in favour of sustainable development, enabling proposals that accord with the JCS Strategic Objectives to be approved without delay. This policy is therefore at the heart of decision-taking when assessing planning applications.~~ ~~4.1.3 In future years, policies may become out of date. To enable the council to continue to take a sustainably positive approach to decision-making, applicants for planning permission will need to assist by submitting evidence to demonstrate how the benefits of the proposal outweigh any adverse impacts. In this way economic, social and environmental responsibilities can continue to be met without compromising the ability of future generations to meet their own needs and well-being.~~ ~~**Delivery**~~ ~~4.1.4 Delivery of this policy will be furthered by development management and enforcement procedures to ensure that the presumption in favour of sustainable development is applied wherever applicable.~~	
PMM032	SD2 4.2.1	**Background** ~~National policy identifies a clear role for the planning system to support sustainable economic growth. In particular, Development Plan Documents should be proactive in meeting the development needs of business. The three councils are now working with adjoining authorities and local businesses through the Gloucestershire Local Enterprise Partnership (GFirst LEP) to develop and deliver a Growth Plan for Gloucestershire as a whole.~~ *A core planning principle of the NPPF and one of the starting points for the spatial strategy of the JCS is the delivery of sustainable economic development. To reflect this planning principle and to also support the implementation of the Strategic Economic Plan for Gloucestershire (SEP), the JCS has established a*	Re-written for clarification

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		vision to provide the context for economic growth; *"The Joint Core Strategy Area will be recognised nationally as enjoying a vibrant competitive economy with increased job opportunities and a strong reputation for being an attractive place to live and invest".* *This vision is underpinned by three specific strategic objectives to support a thriving economy through* ***building a strong and competitive urban economy, ensuring the vitality of town centres and supporting a prosperous rural economy.***	
PMM033	SD2 4.2.2	In the NPPF, employment is considered in a wider sense than the traditional industrial, office and warehousing (B1, B2 and B8 uses). For example, uses such as retail, hotels, tourism, leisure facilities, education, health services and residential care, (referred to as non-B use classes) can also be large employment providers. This policy covers job-generating uses such as business, industry and tourism~~; shopping and other uses within the a use classes are covered in Policy SD3~~. *Retail and other uses, including those within use class 'A' are not covered by this Policy and are dealt with in Policy SD3.* More detailed policies will be included in district plans. *In order to prevent the incremental loss of existing employment land to non-employment uses, and to ensure an adequate supply and choice of employment land and premises for the employment market, district level plans will contain policies to safeguard existing employment sites. These policies in district plans will only permit changes of use in certain appropriate circumstances to be defined by those plans. This policy is intended to be read alongside these district plan policies when considering development proposals for any area.*	To make clear SD2 is not a retail policy, although retail is part of the wider NPPF definition of employment. In the JCS SD3 contains retail policy so the retail elements of this policy should fall into that policy. This will also make it easier to deal with retail as one policy in the immediate review. Included to make clear the JCS does not contain all of the protection of existing employment land policies which will be developed through the District Plans, relevant to each authority.

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
PMM034	Policy SD2	Policy SD2: Employment – *except retail development* 1. Employment-related development will be supported: i. *A*~~a~~t Strategic Allocations, in line with Policy SA1*, where it is expected that employment land should normally be used for B class uses, except where it can be demonstrated that non B class uses would support the residential and B class development at that strategic allocation. In order to support key growth sectors or other key local economic drivers, on some Strategic Allocations, priority will be given to specific sectors as set out in detail in the SA site policies*; ~~or~~ ii. *At locations allocated for employment use within the Development Plan* *iii. For the re-development of land already in employment use, or when the proposal involves a change of use from non-B class employment uses to B class uses where the proposal is of appropriate scale and character* *iv. For the development of new employment land within Gloucester City, the Principal Urban Area of Cheltenham and Tewkesbury town,* ~~ii. for development of new or existing buildings within Gloucester, Cheltenham and Tewkesbury town; or~~ ~~iii.~~*v.* in rural service centres and service villages where proposals for small- scale employment development will be supported if they are of an appropriate size and scale; ~~or~~ ~~iv.~~*vi.* in the wider countryside when it is:	

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		• located within or adjacent to a settlement *or existing employment area* and of an appropriate scale and character • employment-generating farm diversification projects, which are of an appropriate scale and use, particularly where they involve the re-use of appropriate redundant, non-residential buildings. *vii. where it allows the growth or expansion of existing business especially in the key growth sectors, subject to all other policies of the plan* *viii. where it would encourage and support the development of small and medium sized enterprises, subject to all other polices of the plan* . ~~2. Notwithstanding the above, major office or retail development will be directed to the main key urban settlements areas of Gloucester, Cheltenham and the market town of Tewkesbury. and Strategic Allocations in the first instance. Any proposal for major retail development will be considered against the sequential test and the impact test and would not normally be acceptable in the Strategic Allocations~~. **This policy contributes towards achieving Objectives 1, 2, 3 and 9.**	Para 26 of NPPF covers this, as does the new Strat. Allocation the Principal Urban Area of Cheltenham and Tewkesbury town policy section above. We don't want to rule out offices on Employment

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
			Strategic Allocations. Retail Development should be in the retail policy
PMM035	4.2.3 4.2.4 4.2.5 4.2.6 4.2.7 4.2.8 4.2.9 4.2.10 4.2.11 4.2.12	**Explanation** The JCS area is a strong, functional, economic area with a resilient economy and a diverse economic base, with excellent connectivity to the Midlands and the South West via the M5 corridor~~. Key future employment sectors include construction, wholesale, knowledge-based industry, advanced engineering, creative industry, recreation, media activities, finance, professional services, public administration and defence, residential care, and social work and health. It is important that the JCS reflects and takes account of these opportunities for business growth.~~ ~~The GFirst LEP is developing a Strategic Economic Plan (SEP) to deliver its vision, which will set out how sustainable growth will be achieved across the county and through the economic programme. The LEP has three priorities:~~ ~~Promotion: To promote Gloucestershire as a great place to work, visit and invest.~~ ~~Connection: To develop the infrastructure that will support economic growth.~~ ~~Skills: To create a highly employable and productive population.~~ *The vision and its objectives of the plan for an urban focused economic strategy, aligning with the notion of a principal urban area within the County; this is based around the promotion and regeneration of the key urban centres of Gloucester and Cheltenham, the market town of Tewkesbury and the wider rural areas of Tewkesbury Borough, supported by strategic allocations in sustainable locations. This strategy fits within the M5 growth corridor established by the SEP and balances economic potential with housing*	Substantial expansion and clarification of the economic explanation.

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		provision for the JCS area as a whole. *Policies SP1, SP2 and SD2 provide the policy context for the delivery of the spatial elements of the economic strategy for the JCS area, with the aim of locating jobs near to the economically active population. Details of JCS strategic employment allocations are set out in policy SP2 and the SA policies. In summary, the JCS strategic allocations include strategic employment land around Junction 9 of the M5, (strategic allocations A8 and A9), near Junction 10 employment land is included in the North West Cheltenham strategic allocation (strategic allocation A5) and at West Cheltenham strategic allocation. In addition, land to the east of junction 10 and to the west of the West Cheltenham strategic allocation is removed from the Green Belt and safeguarded to meet longer-term development needs. In addition to these growth areas within the M5 corridor, the JCS provides for employment land within strategic allocations A1 and A3.* *This provision is in addition to the existing capacity of available employment land and any remaining land from previous development plan allocations within each authority area, extant planning permissions, as well as any employment land allocations that may be made through the City and Borough Local Plans.* *Alongside provision proposed by strategic employment land release, all three of the JCS Councils are actively pursuing and promoting economic growth through a range of strategies and initiatives, which are informing the economic strategies being taken forward through district local plans.* *Key growth sectors and other important local economic drivers* *The main thrust of the economic strategy for the JCS area is to support the M5 growth corridor proposed by the SEP and to support the key growth sectors and smaller local businesses that form the backbone of the local economy. The JCS area and the wider regional economy benefit from key infrastructure and employers, which collectively establish a centre for business and employment.*	

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		M5 growth corridor *The SEP has highlighted the economic growth potential of the M5 corridor, and all of the JCS strategic employment allocations fall within that corridor. The SEP places particular focus around the motorway junctions.* *There is agreement across relevant partners that the upgrading of Junction 10 to an all movements junction will support the economy of the JCS area and that of wider Gloucestershire. It would support accelerated growth of the economy, enabling land to be delivered for mixed use including high value employment. A Junction 10 task group has been set up to establish the timetable for evidencing the business case for the upgrading of this junction of the M5. Given funding timelines, the earliest funding could be available is 2021 with support through the Highways England Road Investment Strategy. All partners on the taskgroup, including the LEP are agreed that junction improvements will unlock the constraint to land currently designated in the JCS as a safeguarded area for development. At this stage, there is no certainty that this funding will be released and it is not therefore possible to anticipate any delivery within the JCS plan period; should funding become available, then the JCS authorities would consider a strategic allocation through a JCS Review.* *There is currently a high level of demand for employment land around Junction 9 and a joint task group has been set up to consider both the development potential and the infrastructure issues that would need to be addressed; this group involves the JCS authorities, Gloucestershire County Council, the LEP, Highways England and the Homes and Communities Agency. There may be further economic development potential at some of the other junctions.* ~~This policy~~ *Policy SD2* aims to support employment development and economic prosperity by taking an economic-led, urban-focused development approach, with the primary aim of attracting investment and development to the main urban areas and the Strategic Allocations in the plan area. The strategy seeks to deliver strong, robust and resilient urban areas which create jobs and wealth. This in turn will support	

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		the on-going regeneration programmes of Gloucester and Cheltenham urban areas. ~~For this reason, we are seeking to promote the centres of Gloucester, Cheltenham and Tewkesbury and some parts of the Strategic Allocations as locations for major office development which will encourage the growth of the economy and provision of high-quality employment in sustainable locations. Major office development is defined for the purposes of this policy, in line with the Town and Country Planning (Development Management Procedure) (England) Order 2010, as any application for office uses where the floor space exceeds 1,000 square metres or the site area is 1 hectare or more.~~ Employment uses, such as retail *(covered in policy SD3)*, leisure facilities, education, health services and residential care (uses outside the 'B classes') are predicted to provide over two-thirds of the projected job growth across the area. Whilst these sectors do not usually generate a specific employment land requirement, the mix of future job opportunities generated will be as important as specifically allocating parcels of land for employment provision. Employment forecasts show that the greatest B- class employment growth will be in the office, research and development sectors (Use Class B1a/b) with a decline in manufacturing and industrial jobs (B2) and with minimal growth in warehousing (B8) sector jobs. *Key growth sectors* *The key economic growth sectors identified in both the SEP and in the work done on behalf of the JCS authorities identify the key growth sectors in the area as:-* • *Aviation* • *Cyber technology* • *Energy* • *Engineering*	

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		• *Financial* • *Information technology* • *Leisure* • *Marketing and public relations* *The SEP includes a range of programmes and interventions to support these key sectors and the growth aspirations of these sectors have played a key role in the JCS approach to economic growth and establish the level of employment land that is likely to be required to meet those aspirations.* To assess how the need for employment land can be met, each council has ~~prepared a Strategic Assessment of Land Availability.~~*assessed how much land is likely to be available, both in terms of larger strategic sites but also sites to allow growth of existing businesses, especially in the key growth sectors, on smaller sites to support the growth of small and medium size enterprises, or where development would support urban regeneration or the rural economy.* ~~Initial assessments suggest that, overall, the JCS already has a good stock of employment land. However, not all existing sites are suitable for meeting modern employment needs, and a range of available sites and premises is needed not only to meet the requirements of potential new businesses but also to allow for the expansion of existing firms without the need to relocate. Moreover,b~~*B*ecause of the constrained supply of employment land in the urban areas, the JCS authorities will wish to evaluate the implications of changes of use. As such, policies on the safeguarding of employment sites will be set out in district plans. Providing start-up space that can be easily accessed by those establishing new businesses is also vital to stimulate innovation and entrepreneurship within the JCS area; developments are especially encouraged which provide a range of types and sizes of units including start-up and flexible workspaces. More information and guidance in this respect will come forward in district plans. Where specialised skills are available, clusters of enterprises can add value to the economy. This spatial strategy can support skills	

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		development by encouraging the provision and expansion of suitable education and training facilities with access in person and by electronic means. The JCS authorities seek to support economic growth in the JCS rural areas and to take a positive approach in encouraging the growth and development of new and existing enterprises. Employment-generating farm diversification projects, and the re-use of rural buildings or the creation of well-designed new buildings which are of an appropriate scale and use, will be supported wherever they accord with the other policies in the development plan. The availability of advanced ICT infrastructure including high-speed broadband access is important for the success of the local economy and skills development. Good transport connections and adequate provision of other infrastructure are also essential to support people in employment. *A number of other enterprises and institutions play a key role in the local economy and are supported by the policies of the JCS, in particular policies SP1, SP2 and SD2.* *Cheltenham racecourse* *Cheltenham Racecourse is a key part of the cultural and economic infrastructure of Gloucestershire, being the most significant visitor attraction in the JCS area and the wider sub-region. It is of international significance, being the principal venue in the UK for National Hunt Racing, on average bringing £50m p.a. to the Cheltenham economy. Ranking 2nd in the list of racecourses drawing the largest meeting attendances and with high television viewing figures (0.9million watched the Cheltenham festival in 2015), it is clear that the Racecourse and its influence underpins the cultural offer, contributing significantly to the economy of Cheltenham.* *The Racecourse's primary function as a racing venue brings significant economic benefits to the region in*	

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		terms of financial income and job creation: • *450,000 visitors attend the 16 racing fixtures, including the 250,000 over the four days of the most recent Festival in March 2015. It is estimated to contribute £50m p.a.to the local tourism economy, including visitor accommodation (around 10,000 bed spaces for overnight accommodation are required during the Festival).* • *The Racecourse currently employs 85 full time staff on site, with the additional employment of around 5,000 staff during the Festival* • *Contractors and sub-contractors in terms of construction (and associated construction materials) and service providers are based locally in Gloucestershire and the racecourse also generates a significant number of indirect jobs* *Cheltenham Racecourse is important to the regional economy and local economy, it is therefore important to continue to improve business operations through future development and enhancement, reinforcing its importance as a tourism and visitor attraction in the region with the potential to generate further employment opportunities.* *Gloucestershire airport* *Gloucestershire Airport is the busiest general aviation airport in the UK, serving a sub-regional catchment of 1.9 million people and over 84,000 businesses. The JCS recognises the strategic importance of the airport and supports the SEP for Gloucestershire, which aims to optimise the contribution and benefit that Gloucestershire Airport and the land around it can make to local communities and the economy. The airport is however located in a sensitive part of the Green Belt and any future development would need to support the airport and aviation-related growth.* *Gloucestershire University*	

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		In common with other university towns, Cheltenham and Gloucester benefit significantly from the presence of their university. In 2015 the University commissioned research to analyse its economic impact on the region, which indicated that the University brings £151.2m of value to Gloucestershire every year. In addition, the University contributes to the social well-being of the region through community work and volunteering, and to its cultural enhancement through activities including support for festivals and links to the arts sector. *In order to thrive, the University needs support to provide sufficient purpose-built accommodation for students, to ensure that it remains competitive in a highly volatile market place. Since 2012, both Cheltenham Borough Council and Gloucester City Council have worked closely with the University to explore the provision of additional student accommodation. Consent was granted in 2015 for the development of a student village at the Pittville campus in Cheltenham. Gloucester City and the County Council are currently planning for the Gloucester campus, including the provision of the University Business School and additional student housing at the Oxstalls Campus at Longlevens and, through further private developments in Gloucester as part of the proposed regeneration of Blackfriars and Quayside. In terms of future growth, there is active engagement between the University and Cheltenham and Gloucester Councils about estate strategy, with a focus on expansion within their existing sites.* *Meanwhile, the University has been adjusting its curriculum to more closely reflect the skills need demanded by the County and working in close liaison with the LEP. The Growth Hub supports new and growing business and is an example of this closer working and is funded through the local growth fund. Future opportunities relate to the growing sectors in cyber security and nuclear industries for which the County has existing advantages.* *Tourism* *There are no specific allocations in the JCS for tourism-related activity but, for all of the Gloucestershire authorities, tourism is an important economic activity and is broadly supported through a range of programmes and initiatives.*	

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		Tewkesbury Borough includes the Severn Vale and the internationally-renowned Cotswolds and the Borough Council supports the tourism sector through international, national and regional marketing and through business support programmes. Tourism supports jobs in the rural economy as well as supporting the vitality and viability of the market towns of Winchcombe and Tewkesbury. The importance of tourism to the rural economy will be recognised in the emerging Tewkesbury Borough Plan (2011-2031), neighbourhood plans. and in the Tewkesbury Borough Economic Strategy. *Gloucester's support for tourism is set out in the Growing Gloucester's Visitor Economy 2014 document, a strategic plan for driving growth in the value of Gloucester's visitor economy. This focuses on maximizing the economic benefits of the visitor economy in terms of visitor spend and job growth, and supporting the provision of good quality hotel accommodation and larger venue space. The City Council is working to deliver a number of major regeneration projects that have the potential to contribute towards addressing these aims.* *Cheltenham Borough is currently undertaking a review of its tourism strategy and is likely to focus on building upon the strengths of collective marketing approach with the Cotswolds (including Tewkesbury) and Gloucester.* *Regeneration* *The reuse and regeneration of sites within the urban areas is a high priority for Gloucester.* *The full strategy for Gloucester is set out clearly in the Regeneration and Economic Development Strategy 2015 – 2020 document, adopted by the City Council in January 2016. The issue of city centre regeneration in particular will be at the heart of the City Plan, being the key development issue for the City over the next decade and more. Mixed use regeneration initiatives to be delivered in the next decade, including Kings Quarter, Blackfriars and Bakers Quay, will be as important as new greenfield site development on the periphery of the city.* *The regeneration of Tewkesbury town centre is a key area of work for the Borough Council. A Tewkesbury*	

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		Town Centre Masterplan: Strategic Framework Document was approved in July 2012, which set out a range of key projects aimed at regenerating the town centre; these include specific projects, such as riverside enhancement, the regeneration of key town centre sites, a new leisure centre, and a programme of marketing and inward investment. *The Cheltenham Development Task Force was established in 2010 by Cheltenham Borough Council with its key partners, including Gloucestershire County Council and the Homes and Community Agency; the Task Force is an arm's length advisory body with the purpose of delivering a host of regeneration outputs loosely associated with the former Civic Pride programme. Key achievements s include delivery of additional housing, including affordable, the redevelopment of a number of town centre brownfield sites, major uplift and investment to public realm in the town centre, new fit-for purpose office accommodation to enable other sites to be redeveloped in due course, key retail projects and investment in public transport. The Task Force was originally focused on a limited area within the town centre but has recently expanded its remit to cover the wider Borough of Cheltenham; this will enable new projects, such as cyber or tech hub growth ambitions to be actively pursued, which align with both the LEP strategic economic plan, the JCS and emerging components of the Cheltenham plan.*	
PMM036	4.2.13	**Delivery** The JCS authorities will work collaboratively with developers, businesses and the LEP to ensure that the needs of employers and the business community are being met. *It is essential that the JCS has sufficient flexibility to act as a catalyst for long- term growth, taking account of the aspirations of the LEP and local businesses, the understanding of extended delivery times for strategic employment sites and to provide commitment to the delivery of improvements at junctions 9 and 10 of the M5.*	
PMM037	SD3	**RETAIL ~~HIERARCHY~~ *AND CITY/TOWN CENTRES***	Chapter title changed to

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
	Title		reflect that the policy contains more than just the Hierarchy of centres. "City and town centres" wording changed to reflect Gloucester City's status as a City.
PMM038	4.3.2	The nature of these centres is changing. This is ~~partly~~ *largely* due to the *structural changes in the retail market and, in particular, the impact of internet shopping* ~~recession~~ ~~and recent changes in the behaviour of shoppers, such as the increase in online shopping~~. It is important that policies are put in place that will allow our centres the flexibility to diversify whilst supporting their vitality and viability, and also to promote competitiveness in order to provide individuality, choice and diversity. The NPPF places significant weight on the importance of designated town centres and encourages local planning authorities to put in place appropriate policies that will help to maintain and enhance their vitality and viability. It recognises that successful centres are about more than shopping and that they need a range of complementary uses to attract visitors and to prosper.	Edited to enhance clarity and update

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
PMM039	Policy SD3	**Policy SD3: Retail ~~Hierarchy~~ *and city / town centres*** ***1. Settlement Hierarchy*** The area's *city and town* centres as defined below will be supported and strengthened to ensure that they continue to be the focus of communities. Initiatives which safeguard and enhance their role and function will be supported. The hierarchy of centres in the JCS area is: **Key Urban Areas** Gloucester *City Centre* and Cheltenham *Town Centre* **Market town** Tewkesbury *Town Centre* **Rural service centres serving their rural hinterland** Winchcombe Town Centre and Bishop's Cleeve Village Centre. ~~2. The exact town centre boundaries and primary and secondary shopping frontages to be protected will be defined in district plans. The aim in defining boundaries and frontages will be to retain the predominance of town centre uses in general and retail uses in particular.~~ ***2. Cheltenham and Tewkesbury Borough Retail Policies*** *Retail policies within the Boroughs of Cheltenham and Tewkesbury are set out in the saved policies of the existing Local Plans. These policies will be reviewed and taken forward through the immediate review of the JCS retail policy.* *Within the Boroughs of Cheltenham and Tewkesbury, new retail development will be encouraged in accordance with the policies in the saved local plans.* ***3. Gloucester City Shopping Frontages*** *The city centre boundary and primary shopping area boundaries, and primary frontages and secondary frontages for Gloucester city centre are set out at Appendix X of this Plan. Within the Primary Shopping Area of Gloucester City Centre, the following approach applies:*	Policy title changed to reflect that the policy contains more than just the hierarchy of centres. (1) "City and town centres" wording changed to reflect Gloucester City's status as a City and Bishop's Cleeve's status as a village. (2) Through the examination it was agreed that the retail policies of Cheltenham and Tewkesbury Boroughs would be reviewed through the review of retail policy in the JCS and this would include boundaries and frontages. (3) The is the approach for retail set out in the draft Gloucester City Plan. (4)These reflect the latest JCS retail update, provision for accommodating the floorspace will be in accordance with the principles in the policy and reviewed further through the retail review. (5)

JCS Table of Main Modifications

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td></td><td></td><td>

i. Primary frontages

Within the primary shopping frontage identified, new A1 retail development will be encouraged. The change of use of A1 (retail) premises at ground floor level will not be permitted, unless it can be demonstrated that the unit is not suitable for continued A1 use, the proposed use will maintain or enhance the vitality of the area and it would not have a significant adverse impact on the amenity of adjacent residents or businesses.

ii. Secondary frontages

Within the secondary shopping frontage identified, the change of use from A1 retail use to use classes A2 (financial institutions), A3 (restaurants and cafes), A4 (pubs), A5 (hot food takeaway), D1 (non-residential institutions) and D2 (assembly and leisure) will be permitted provided that it would not have a significant adverse impact on the amenity of adjacent residents or businesses, or result in a continuous frontage of two or more non-A1 retail units

4. Retail Floor Space Requirements

Over the plan period to 2031, provision will be made for *at least* the following new *retail* floorspace ~~requirements in~~ *for* the ~~existing designated centres~~ *following settlements:*

<table>
<tr><th></th><th>~~Convenience goods floorspace capacity (sq. m net)~~</th><th>~~Comparison goods floorspace capacity (sq. m net) approx.~~</th></tr>
<tr><td>~~Cheltenham~~</td><td>~~0~~</td><td>~~70,000~~</td></tr>
<tr><td>~~Gloucester~~</td><td>~~0~~</td><td>~~42,000~~</td></tr>
<tr><td>~~Tewkesbury~~</td><td>~~0~~</td><td>~~825~~</td></tr>
</table>

</td><td>Introduction of policy supporting regeneration strategies for centres (6) Commitment to immediate review of the JCS retail policy.</td></tr>
</table>

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason

~~Winchcombe~~	~~250~~	~~450~~
~~Bishop's Cleeve~~	~~1,200~~	~~625~~

Comparison goods

Location	***Comparison goods (net sales area, sq m)***		
	2021	***2026***	***2031***
Cheltenham	*7,466*	*25,605*	*45,494*
Gloucester	*6,819*	*23,381*	*41,542*
Tewkesbury	*516*	*1,773*	*3,150*
Winchcombe	*19*	*65*	*115*
Bishops Cleeve	*75*	*258*	*458*

Convenience goods

Location	***Convenience goods (net sales area, sq m)***		
	2021	***2026***	***2031***
Cheltenham	*577*	*1,252*	*1,805*
Gloucester	*2,120*	*2,967*	*3,664*

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>Tewkesbury</td><td>770</td><td>910</td><td>1,025</td></tr>
<tr><td>Winchcombe</td><td>188</td><td>196</td><td>203</td></tr>
<tr><td>Bishops Cleeve</td><td>1,924</td><td>2,031</td><td>1,117</td></tr>
</table>

The provision of the above retail floorspace will be ~~The allocation of appropriate sites for the above floorspace requirements will be set out in the district plans,~~ accommodated in accordance with the sequential test and impact test and having regard to the key principles set out ~~above~~ in this policy.

5. Key principles for development in centres

The following key principles will be drawn upon in the determination of relevant planning applications:
i. New residential, retail, leisure, culture, tourism, office development and community facilities that contribute to the vitality and viability of designated centres will be promoted and supported.
ii. Town centre development will be of a scale that is appropriate to its role and function as set out above and will not compromise the health of other centres or sustainable development principles.
iii. Proposals that help to deliver the regeneration strategies for Gloucester City Centre, Cheltenham Town Centre and Tewkesbury Town Centre will be supported.
iv. Proposals for retail and other main town centre uses that are not located in a designated centre, or are not in accordance with a policy in either the JCS or District plans, will be robustly assessed against the requirements of the sequential test and impact test, as set out in national Planning Practice Guidance, or locally defined impact assessment thresholds as appropriate.
</td><td></td></tr>
</table>

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		v. The provision of new local centres of an appropriate scale to provide for the everyday needs of new communities within the identified Strategic Allocations (see Part 6 of this document) will be permitted. *6. Retail Review* *Following adoption of the JCS, this policy will be subject to an immediate review. The single issue review will take approximately two years to complete.* **This policy contributes towards achieving Objective 2.**	

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
PMM040	4.3.6	4.3.6 The JCS Retail Study identified several underlying weaknesses in Gloucester that need to be addressed. This includes a lack of significant investment in new retail floorspace over the recent past as well as connections between the centre with the wider footfall generators such as Gloucester Docks/Quays, the Cathedral and the bus/rail interchange. ~~It is important therefore that key regeneration proposals, such as King's Quarter, are protected from inappropriate developments elsewhere and realised in the context of the clear strategy for the City centre in its City Plan.~~	Elaborated on in the following paragraph.
PMM041	Additional text after 4.3.6	*Gloucester City Council has an adopted 'Regeneration and Economic Development Strategy' (January 2016), which sets out a range of regeneration sites and priorities, many of which are already making good progress. This includes for example the King's Quarter area, which will provide a new, modern bus station as part of an integrated public transport interchange, as well as other main town centre uses including retail and leisure. It is important these regeneration proposals are prioritised and protected from inappropriate developments elsewhere.*	
PMM042	4.3.7 to 4.3.9	~~In addition to Gloucester and Cheltenham, There are other designated centres in the JCS area that provide an important but more localised function. These include the market town of Tewkesbury which provides for the catchment of the town and the surrounding rural hinterland. Tewkesbury forms the focus for food shopping in the north of the JCS area, but offers limited comparison goods shopping, the focus for this being at the other larger centres.~~ *Tewkesbury town is an important designated centre in the JCS and the primary service centre in the Borough. However, in accordance with its status as a market town, it provides a more localised function which includes the catchment of the town and the surrounding rural hinterland. Tewkesbury has a proactive regeneration partnership with brings together public, private and community organisations to deliver economic prosperity and environmental quality for the town. The partnership works to coordinate, support and facilitate the delivery of the Tewkesbury Town Centre Masterplan and projects that contribute to the future improvement of the town including the continued improvement of its retail offer.*	Elaborating on the role of Tewkesbury Town

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		Within Tewkesbury Borough, s~~S~~maller rural service centres, such as Winchcombe and Bishop's Cleeve, provide for their residents and the residents of surrounding rural areas. Winchcombe and Tewkesbury also function as important tourist destinations. The policy set out above has been prepared in the context of the NPPF *and Planning Practice Guidance. It is underpinned by evidence contained in* ~~and has been informed by~~ the JCS Retail Study (Phase 1*, 2011)* ~~and Phase 1 Update~~) *and the JCS Retail Study (2015)*~~, prepared by DPDS retail consultants for the JCS authorities~~. This ~~Retail Study~~ identifie~~d~~*s* floorspace requirements for ~~convenience (food) and~~ comparison goods (clothes, furniture etc) ~~shopping~~ *and convenience goods (food) for each of the main settlements identified in the hierarchy* ~~in the existing cen~~tres until *up to* 2031. ~~Where the table in the policy shows '0', this is due to existing planning commitments already providing the required floorspace.~~ The Retail Study *(Phase 1)* also provided an analysis of the health of the different designated centres in the JCS area, ~~with the exception of the smaller local centres, which have been assessed separately~~. This understanding of the health of the different town centres has helped to inform policy at JCS level and will also form a key part of the evidence in preparing the district plans. *Following the adoption of the JCS, this policy will be subject to an immediate review.*	Providing an update on the latest retail evidence Reinforcing the commitment to review the retail policy
PMM043	Delivery 4.3.10	These include~~, for example, the establishment of detailed town centre boundaries, Primary and Secondary Shopping Areas,~~ the allocation of *non-strategic* sites to provide for identified need, and the identification of locally defined thresholds for impact assessments (as necessary).	JCS now makes provision for town centre boundaries and frontages, which will be covered in

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
			the review and… To provide clarity on which element of the Local Plan strategic and non-strategic sites will be considered.
PMM044	SD4 4.4.3	The NPPF identifies a number of ways in which planning authorities can support the move to a low carbon future. These include planning for development which reduces greenhouse gas emissions~~,~~ *and* actively supporting energy efficiency improvements in existing buildings ~~and ensuring that planning policy is consistent with the Government's zero carbon buildings policy, and adopts nationally described standards~~. ~~The Government's zero carbon buildings policy requires all new domestic developments to be zero carbon by 2016, and all commercial developments by 2019. The Building Research Establishment Environmental Assessment Method (BREEAM) is the nationally-recognised standard for sustainable design and construction.~~	These paragraphs were deleted due to changes in national legislation, policy and guidance and relevant ministerial statements which remove the national Zero Carbon Buildings Policy
PMM045	SD4 - Policy	Policy SD4: Sustainable Design and Construction 1. Development proposals will demonstrate how they contribute to the aims of sustainability by increasing energy efficiency, minimising waste and avoiding the unnecessary pollution of air, harm to the water environment, and contamination of land or interference in other natural systems. In doing so, proposals (including changes to existing building) will be expected to achieve ~~and where viable, exceed applicable~~ national standards. All development will be expected to be adaptable to climate change in respect of the design, layout, siting, orientation and function of both buildings and associated external spaces. Proposals must demonstrate that development is designed to use water efficiently, will not adversely affect water quality, and will not hinder the ability of a water body to meet the	1) and (5) Changes in national legislation, policy and guidance and relevant ministerial statements have removed the provision of higher standards than those required at national level. (2) Reworded to increase

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		requirements of the Water Framework directive. ~~2.~~ *All development will be expected to incorporate the principles of waste minimisation and re-use. Planning applications for major development must be accompanied by a waste minimisation statement, which demonstrates how any waste arising during the demolition, construction and subsequent occupation of the development will be minimised and sustainably managed.* ~~Waste created through the process of construction should be carefully managed and reduced wherever possible. Major planning applications must be accompanied by a waste minimisation statement which demonstrates how the development will seek to minimise waste and sustainable re-use waste materials whenever possible during the lifespan of the development.~~ ~~Where viable, such developments should secure 10% or more of their energy demand from decentralised (on or near site) and renewable or low carbon energy sources (including the use of combined heat and power where appropriate).~~	clarity in response to the Gloucestershire County Council submissions.
PMM046	SD4 4.4.6	**Explanation** ~~Proposals to apply the relevant elements of sustainable construction frameworks such as the 'Code for Sustainable Homes' and BREEAM could be used to corroborate higher performance.~~	
PMM047	SD4 4.4.9 – 4.4.10	~~The Gloucestershire Waste Core Strategy was formally adopted in November 2012 and forms part of the statutory development plan. It is supported by as Supplementary Planning Document entitled 'Waste Minimisation in Development Projects'. The approach set out in that document is endorsed by the JCs authorities and will be used in decision taking.~~ ~~The British Geological Survey mineral resource map for Gloucestershire suggests that sand, gravel and~~	This text was deleted because the relevant policy text was also deleted. Changes in national legislation, policy and guidance and relevant

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		~~limestone resources are present; in the JCS area. To avoid the unnecessary sterilisation of these important mineral resources, the Gloucestershire Minerals Local Plan (prepared by the County council) is required to define Minerals Safeguarding Areas along with appropriate policies for managing development. Once designated, these will be shown on the JCS proposals map when it is next reviewed. Applicants for non-mineral development that might potentially sterilise such resources will be required to carry out a mineral assessment in consultation with the Mineral Planning Authority. In the interests of sustainable development, where it is environmentally and economically viable, practical and acceptable to do so, provision should be made for prior extraction of the mineral, ideally to be used within the new development.~~ *The Gloucestershire Waste Core Strategy was adopted in November 2012 and forms part of the statutory development plan. Policy WCS2 of the Waste Core Strategy specifically sets out how waste reduction should be considered, including through new development, over the JCS area as well as the rest of the county. This policy is supported by adopted Supplementary Planning Document (SPD) entitled 'Waste Minimisation in Development Projects'. The SPD has been endorsed by the JCS authorities and will be used in decision-taking.* *Mineral resources present within the JCS area include sand and gravel, clay and limestone. To avoid the unnecessary sterilisation of these important mineral resources, the Minerals Local Plan for Gloucestershire (prepared by the County Council as the Minerals Planning Authority – MPA) is required to define Minerals Safeguarding Areas (MSAs) and set out appropriate policies for managing development. Once designated, these will be shown on the Minerals Local Plan for Gloucestershire proposals map and incorporated into the JCS proposals map when it is next reviewed. Applicants for non-minerals development, which may sterilise mineral resources, will be required to carry out a mineral assessment in consultation with the MPA. In the interests of sustainable development, where it is environmentally and economically viable, practical and acceptable to do so, provision will need to be for the prior extraction of minerals, and wherever possible this should be used within the new development.*	ministerial statements have removed the provision of higher standards than those required at national level. This text replaces the former version and is slightly reworded to give further clarity on the role of the Minerals Safeguarding Areas and the relationship between the JCS and the Gloucestershire Minerals Local Plan.
PMM048	4.4.12	~~Gloucestershire Country Council commissioned a study into renewable energy capacity across the county (Entec 2010). It provided an assessment on the potential contribution of various development scenarios in generating on-site renewable energy. In most of the development scenarios assessed, it could be~~	Reference to the study is deleted as it is no longer referred to in the policy,

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		~~demonstrated that at least 10% reduction of CO2 emissions from energy demand could be achieved through on-site renewable energy sources without impacting on viability. Some sites were shown to have potential for even greater on-site renewable energy generation. Therefore, a baseline of 10% was judged to be appropriate to use for sites across the JCS area.~~	and the 10% target has been removed so as to be in accordance with changes in national legislation, policy and guidance.
PMM049	SD4 4.4.17 – 4.4.18	~~On occasions where it can be fully and clearly demonstrated that the 10% target is not feasible or viable due to technical or site constraints, we will consider a lower percentage contribution. In such cases, proposals will need to demonstrate the full range of renewable and low carbon technologies that they have considered, and the contribution that can be achieved from these towards energy demand.~~ Delivery of the elements of this policy will come through effective development management practices ~~and may be the subject of more detailed requirements in forthcoming District plans~~.	Reference to the 10% target is deleted as it has been removed from policy. This text is removed as there is currently no specific intention to develop policy on this area in district plans. Despite this, district plans could develop further policy on this if sound and reasonable to do so.
PMM050	SD6 Green Belt 4.6.2	~~The JCS authorities commissioned AMEC to carry out a Green Belt Assessment in 2011 which is available to view as part of the JCS evidence base. This work represents the most up-to-date evidence on this topic and provides an independent evaluation of the wider Green Belt within the JCS area. It is a comprehensive assessment which considers how strategic segments of the Green Belt perform against the purposes of including land within Green Belt.~~	This text was moved to later on in the chapter to improve readability.

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
PMM051	4.6.5	~~An alternative approach to interpreting and working with the 2011 JCS Green Belt Review, and the one which has been taken forward, is to consider the detail sitting behind the AMEC assessment of each individual segment of land assessed. The AMEC report provides a useful matrix of Green Belt assessment results which individually assesses the contribution each segment makes to:~~ ~~i. Checking the unrestricted sprawl of large built-up areas~~ ~~ii. Preventing nearby towns from merging into one another~~ ~~iii. Assisting in safeguarding the countryside from encroachment~~ ~~iv. Preserving the setting and special character of historic towns.~~ ~~Those parts of the Green Belt which make a significant contribution in all four categories have not been taken forward as having potential for strategic allocation. This provides a simplistic but consistent approach to the consideration of Green Belt in the assessment of potential Strategic Allocations and therefore necessary alterations to the Green Belt to allow for sustainable development. More information on how the independent Green Belt assessment was used to identify locations for Strategic Allocations is available to view as part of the JCS evidence base in the 2013 Strategic Allocations Report.~~ *The JCS authorities commissioned AMEC to carry out a Green Belt Assessment in 2011 which is available to view as part of the JCS evidence base. This work represents the most up-to-date evidence on this topic and provides an independent evaluation of the wider Green Belt within the JCS area. It is a comprehensive assessment which considers how strategic segments of the Green Belt perform against the purposes of including land within Green Belt* *The work of AMEC follows from and assesses the Cheltenham Green Belt Review (2007) undertaken by AERC. This earlier study assesses the Green Belt within Cheltenham Borough only.*	This text was deleted to make the introduction more concise and because the new text identifies where further information on the development of the JCS Green Belt policy can be found. This text has been added as an overview of the consideration of Green Belt as part of the JCS, including the work undertaken through examination

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		The process by which the Green Belt Assessment was used to inform the selection of broad locations and strategic allocations for development is detailed in the JCS 2013 Strategic Allocations Report (Examination Document EBLO102). *The Green Belt in the JCS area was a significant topic of discussion as part of the JCS examination. Further work was undertaken by the JCS authorities and is set out in the 'Green Belt topic paper' (examination document 142) and the 'Green Belt, Safeguarded Land and Spatial Strategy Update Paper' (examination document 196). The Main Modifications draft of the JCS reflects this further work, and the Inspectors interim report of May 2016.*	
PMM052	SD6 Policy	Policy SD6: Green Belt To ensure the Green Belt continues to serve its key functions, it will be protected from harmful development. Within its boundaries, development will be restricted to those limited types of development which are deemed appropriate by the NPPF, unless very special circumstances can be demonstrated. *That is: 'whether very special circumstances exist to outweigh the harm automatically caused to the Green Belt by virtue of the development being inappropriate and any other harm actually caused'* The boundaries of the reviewed Green Belt are identified on the proposed Changes to the green Belt Boundary Map (see Appendix 2). *Consideration will be given to a limited review of the Green Belt in other locations as necessary through the Borough Plans, where this is justified by exceptional circumstances* Gloucestershire Airport, Cheltenham Racecourse, *existing waste management facilities in the Green Belt operating in accordance with extant planning permission,* and the waste management sites allocated in	(1)Insertion of the full 'very special circumstances' test (3) This new policy provision makes clear that Borough Plans may further review the Green Belt where this is justified by exceptional circumstances (4) Additional wording to clarify that the policy provision applies to existing consented waste facilities in the Green Belt and include reference to the 'very special

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		the Gloucestershire Waste Core Strategy, are designated as developed sites within the green Belt that are acknowledged as having wider benefits where the co-location of facilities can be determined as essential to their use. Notwithstanding this, further development in any of these locations will need to meet the requirements of green Belt policy in the NPPF *and/or National Planning Policy for Waste,* be in accordance with the development Plan, and not compromise the openness of the Green Belt or increase the risk of urban sprawl*, unless very special circumstances can be demonstrated.* <u>Gloucestershire Airport</u> i. Gloucestershire Airport is shown on Inset Map 1 (see Appendix 3) ii. In the Essential Operational Area of the airport, new structures, buildings or extensions to buildings will only be permitted if they are essential to the operation of the airport and require an airport location iii. Elsewhere within the airport, in the Non-Essential Operational area, business uses which support the airport will be permitted. <u>Cheltenham Racecourse</u> At Cheltenham Racecourse, as shown on Inset map 2 (Appendix 4), development, including extensions, will only be permitted where: i. The development is principally related to the business of the racecourse ii. The development does not extend beyond the confines of the *'Racecourse Policy Area'* (as show on Inset Map 2). <u>Waste Management Sites</u> The Gloucestershire Waste Core Strategy allocates sites for waste ~~management~~ *recovery* facilities,	circumstances' test for Green Belt development not otherwise in accordance. (7) Wording amended to clarify the nature of waste facilities in the Green Belt and specify their need to be in conformity with the Development Plan, NPPF and NPPW. (8) (i) In the submission plan the area around the Sewage Treatment Works at Hayden was known as a "Development Exclusion Zone". Odour modelling work through the statement of common ground has shown that the full area covered by the zone need not entirely exclude development, and proposals will need to do further work to demonstrate where development, with appropriate mitigation can take place. Therefore this provision has been retitled

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		including within the Green Belt. ~~When determining planning applications, any specific need for waste treatment in a particular location, for example the co-location of related waste facilities, along with proximity to the main sources of arising and the wider environmental benefits of a proposal should be assessed as material factors in decision-taking.~~ *Future waste development on allocated sites in the green Belt should be in accordance with development Plan, and be consistent with the NPPF and National Planning policy for Waste.* <u>Safeguarded Areas</u> i. An area of land west of Cheltenham, as shown on Inset Map 4 (Appendix 6), will be safeguarded for longer-term development needs. A large area of ~~this safeguarded~~ land *at West Cheltenham* is also designated as ~~a Development Exclusion~~ *an Odour Monitoring* zone, where development which is likely to be significantly affected by odours will not be permitted ii. An area of land at north west Cheltenham, as shown on strategic Allocation plan A5, will be safeguarded for longer-term development needs *iii. An area of land at Twigworth, as shown on strategic Allocations Plan A1, will be safeguarded for longer-term development needs* iv. Safeguarded areas are not allocated for development at the present time. Planning permission for the permanent development of safeguarded land (except for uses that would not be deemed inappropriate within the Green Belt) will only be granted if a future review of the JCS deems the release of this land necessary and appropriate and proposes the development. v. Should any land be released in the safeguarded area, development proposals will be assessed against the following criteria: - Development must be well-integrated and planned as part of any urban extension of	'Odour Monitoring Zone'. (iii) addition of safeguarded land at Twigworth following the inclusion on a strategic allocation at this location. (v) Wording amended to reflect the need for physical connectivity of

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		strategic scale, directly and substantially *physically* linked to the urban area of Cheltenham - Development must be well-related to public transport and other existing and planned infrastructure and where it makes a positive contribution to the setting of Cheltenham - Development must not lead to a piecemeal, isolated or inefficient use of land in this area.	any potential scheme
PMM053	4.6.12 – 4.6.14	Because of the Racecourse's location in the Green Belt, new development will need to be well related to the business of the Racecourse, ~~although this would necessarily preclude its use for other activities where these are appropriate Green Belt.~~ *For example, new hotel or conferencing buildings may be permitted within the Racecourse policy Area, so long as these do not detract from or limit the current use or future growth of the area for horse racing.* The Cheltenham Racecourse policy area has been ~~slightly~~ amended from that shown in the 2006 Cheltenham Plan to allow for further growth of facilities required for the business of the racecourse. *The Green Belt accommodates existing waste management facilities. It also contains allocated sites for facilitating the development of strategic residual waste recovery facilities as set out in the adopted Gloucestershire Waste Core Strategy. Waste allocations within the Green Belt are for the purpose of contributing towards ensuring there is sufficient provision to meet forecast local needs for waste management infrastructure in Gloucestershire up to 2027. Future development proposals on waste allocations within the Green Belt will normally be determined by the local Waste Planning Authority (WPA).* *All such proposals should be in accordance with the Development Plan and be consistent with the NPPF and National Planning Policy for Waste unless very special circumstances can be demonstrated. A lack of suitable and available non-Green Belt sites; the demonstration of particular locational needs such as proximity to main waste arising; and a beneficial operating relationship with existing waste management*	Text amended to clarify that new hotel or conferencing facilities could be appropriate in the Racecourse Policy Area so long as in accordance with the Development Plan as a whole. Deleted because the Racecourse Policy Area has been increased in size since the submission of the JCS to further sustainably accommodate the needs of the Racecourse, balancing the sensitivity of the Green Belt. Text modified to take into account the submissions

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		facilities are matters, along with the relative sensitivity of the green Belt to development in relation to its five purposes should be taken into account when determining whether very special circumstances could exist in relation to future waste management proposals. ~~Three waste management facilities identified in the Gloucestershire Waste Core Strategy (2012) are within the Green Belt. When determining planning applications, any specific locational need for waste treatment in a particular place as well as the wider environmental benefits of a proposal should be assessed as a material factor in decision-taking. Despite this, considerable weight should be attached to the value of the green Belt designation as set out in NPPF and in this plan.~~	from the County Council on waste sites in the Green Belt, including the role of already consented sites within the designation and an overview of some of the principles guiding future decision making.
PMM054	4.6.15 – 4.6.18	**Other amendments to the Green Belt boundary** ~~Shurdington~~ ~~Amendments have been made to the Green Belt boundary at Shurdington, shown on inset map 3 9appendix 5), to allow limited development and to provide a more appropriate boundary.~~ ~~The amendments to the boundary at Shurdington include the existing playing field to the north of the settlement, and also land and existing built development to the south of the settlement. These amendments seek to provide a more appropriate Green belt boundary and also to allow for limited development to take place, where appropriate, and in accordance with Policies INF4 and INF5.~~ *West Cheltenham* *A change has been made to the Green Belt boundary to the north of the strategic allocation at West cheltenham and to the south of the allocation at north West Cheltenham in the area of the Old Gloucester Road and Arle Nurseries. This is to provide a more appropriate Green Belt boundary after the removal of the strategic allocations from the Green Belt.* South West Cheltenham A small change has been made to the green Belt boundary at the south west of Cheltenham (known as the former M&G site) to provide a more appropriate boundary after an implemented permission.	Removed because these amendments to the Green Belt boundary are no longer being furthered through the JCS, although they may be examined again through the Tewkesbury Borough Plan.

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		A small change has been made to the green Belt boundary in the area of the Reddings to provide a more appropriate boundary after an implemented permission at Grovefield Way.	This text was included to remove from the green belt the consented and started scheme at Grovefield way as discussed through the examination.
PMM055	4.6.21 – 4.6.22 Safeguarded Land	A significant constraint on the safeguarded land at West Cheltenham is the operation of Hayden Sewage Treatment Works, which is a long-established site with an area of around 22 hectares. The Sewage Treatment works *has been upgraded in recent years, but still* emits odours which have the potential to seriously affect any development that occur nearby. *Currently an area in the Green Belt around Hayden Sewage Treatment Works is identified in the Cheltenham and Tewkesbury Local Plans as a Development Exclusion Zone. The JCS on adoption will replace this designation with a similar area identifying the need for Odour Monitoring. Odour modelling work through the statement of common ground between the JCS authorities and the West Cheltenham Consortium has shown that the full area covered by the zone need not entirely exclude development, and proposals will need to demonstrate where development, with appropriate mitigation, can take place.* ~~Recent works to upgrade the Sewage Treatment Works means that there is potential that the Development Exclusion Zone around the works which is currently identified in the 2006 Cheltenham Borough Local Plan could be reduced in size. However, this work is on-going and no results have yet been released.~~ *In parallel to reducing odour emissions, Severn Trent is committed to the future development opportunities associated with this site. This includes ongoing assessment of the viability of whole sale relocation of the existing treatment works. In time, this would enable the entire area of the Safeguarded Land to be released for development.* ~~On review of the JCS, some or all the land at this location may be capable of development when needed, particularly if the relocation of Hayden Sewage Treatment Works can be facilitated through~~	Updated to show that the works is the subject to ongoing updating and upgrades The authorities have a statement of common ground with the consortium at West Cheltenham (exam 198) which describes ongoing work regarding odour

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		~~redevelopment of the area.~~ *On review of the JCS as work advances on the West Cheltenham Site, the Odour Monitoring Zone could be reduced or removed in accordance with the evidence base and mitigating works undertaken as part of the development of the allocation.* *The designation of the Odour Monitoring Zone in the JCS at West Cheltenham does not prevent development at the West Cheltenham strategic allocation except where such development would be significantly affected by odours. Further work through the master planning of the development along with appropriate mitigation will facilitate the development of the site. Decision takers should weigh the evidence presented as to the impact of odour on a particular proposal in this area, taking into account policy SD15 Health and Environmental Quality of the JCS, and relevant advice from the Environment Agency or other expert body.* *An area of Safeguarded Land has been identified at Twigworth adjacent to land that has been included as a strategic allocation at this location. In making an allocation at Twigworth and removing it from the Green Belt it has been necessary to identify new Green Belt boundaries that are strong and defensible. At Twigworth the boundaries have been redrawn using the well-defined features of Frog Furlong Lane, Down Hatherley Lane and the Tewkesbury Road (A38). However, the resulting area to be removed from the Green Belt is larger than the development site that is available for allocation now through the JCS. As the remaining area is not available for development, but would be removed from the Green Belt, it was been identified as Safeguarded Land which could provide a potential development option in future through a review of the JCS.*	reduction for the site. As work advances on the West Cheltenham Site, the Odour Monitoring Zone could be reduced or removed in accordance with the evidence base and mitigating works undertaken by Severn Trent. Explanation of the Safeguarded Land at Twigworth that has resulted from the strategic allocation in this area.
PMM056	SD8 Policy	Policy SD8: The Cotswolds Area of Outstanding Natural Beauty (AONB) All development proposals in ~~adjacent to~~ *within the setting of* the Cotswolds AONB will be required to conserve and, where appropriate, enhance its landscape, scenic beauty, wildlife, cultural heritage and other special qualities. Proposals will be required to be consistent with the policies set out in the	SD8 wording amended to "within the setting of" agreed during the examination session on the policy and in

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		Cotswolds AONB Management Plan.	accordance with national policy and guidance
PMM057	SD9 Policy no. 5	Policy SD9: Historic Environment Development proposals at Strategic Allocations must have regard to the findings and recommendations of the JCS Historic Environment Assessment (or any subsequent revision) *demonstrating that the potential impacts on heritage assets and appropriate mitigation measures have been assessed.*	SD9 (5) Added to reflect the representations of Historic England on the importance of assessing impacts on heritage assets.
PMM058	SD10 Policy Number 2	Policy SD10: Biodiversity and Geodiversity This will be achieved by: - Ensuring that European protected Species and National protected Species are safeguarded in accordance with the law - Conserving and enhancing biodiversity and geodiversity on internationally, nationally and locally designated sites, and other assets of demonstrable value where these make a contribution to the wider network, *thus ensuring that new development both within and surrounding such sites has no unacceptable adverse impacts*	Change suggested by Natural England to capture development outside of a designated site.
PMM059	4.10.7	The JCS provides an opportunity to deliver some of the objectives and complement the work programme of the Local nature Partnership (LNP). The three local authorities are all partner organisations of the LNP, helping to deliver actions to address the needs of priority species and habitats as well as plans for other biodiversity and geodiversity assets of local importance or interest. The Gloucestershire Nature Map *at Appendix 8* sets out spatial priorities for ecological conservation and enhancement across the county.	New map
PMM060	4.10.12	The JCS requires developers to avoid harm to biodiversity or, where this is not possible, to incorporate	Reflecting representations

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		mitigation measures into the design of developments. *Developers should also ensure that development outside designated sites will not cause reasonably foreseeable harm to those sites, and if such an effect is likely, should mitigate against it.* For situations where measures cannot be provided on-site, the local authorities may in certain circumstances consider a system of 'biodiversity offsetting'. In addressing the impacts of potential developments on geodiversity, it is intended that the councils will follow a similar approach to that proposed for biodiversity, based on avoidance, on-site mitigation and off-site compensation (for example, by improving the exposure of the geological feature).	by Natural England
PMM061	SD11 Policy number 2, 3, 4	Policy SD11: Residential Development Housing development will be permitted *at sites allocated for housing through the development plan, including* Strategic Allocations and *allocations in* ~~on sites that are allocated for housing by~~ district and neighbourhood plans. On sites that are not allocated, housing development and conversions to dwellings will be permitted on previously-developed land in the existing built-up areas of Gloucester City, *the Principal Urban Area of* Cheltenham and Tewkesbury towns, rural service centres and service villages *except where otherwise restricted by policies within district plans.* Housing development on other sites will only be permitted where: - It is for affordable housing on a rural exception site in accordance with Policy SD13 or - It is infilling within the existing built-up areas of *the City of Gloucester* ~~cities,~~ *the Principal urban Area of Cheltenham, Tewkesbury Borough's* towns and villages *except where otherwise restricted by policies within district plans,* or	2) provide clarification that policy relates to sites that are allocated for housing development. (3) clarification that housing development must be balanced other policies within the district plans. (4ii) To better define the areas where infilling may be appropriate.
PMM062	4.11.4	In accordance with Policy SP2, new housing will be delivered within the two main urban centres of Cheltenham and Gloucester and through urban extensions to those centres to meet needs where they arise. Development is directed to Tewkesbury town in accordance with its role as a market town and to rural service centres and service villages. This will include sites allocated in district or neighbourhood plans and additional windfall sites. Windfall development on previously-developed land within cities, towns, rural service centres and service villages is supported in principle, subject to the other policies in	More detailed policies on this issue will be dealt with through district plans.

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		this strategy and the relevant district and neighbourhood plans. ~~In addition to this, proposals that will bring empty space back into use are encouraged.~~	
PMM063	4.11.5	Outside cities, towns, rural service centres and service villages, there are generally insufficient facilities to support development and so they are not considered sustainable locations for residential development. Hence, new residential development is not considered appropriate unless specific exceptions are made within JCS, district or neighbourhood plan policies. For the purpose of this policy (4 ii), infill development means the development of an under-developed plot well related to existing built development. Additional special circumstances where housing development may be acceptable are listed in NPPF Paragraph 55.	
PMM064	4.11.10	The JCS local authorities carry out an annual assessment of land availability, incorporating the ~~SHLAA~~ *SALA* , to identify sites that may be suitable for housing or other uses. This includes a record of brownfield and greenfield sites within the main settlement areas that may have potential for housing development. The assessment is therefore an important part of the evidence base for the planning of future housing delivery. ~~The JCS authorities are committed to developing a shared methodology with other local authorities in the Housing Market area and using this work to inform local site allocations and housing supply policies.~~	Shared approach to SALA already in place between JCS authorities. A working group has been established across Gloucestershire.
PMM065	SD12 4.12.3	**Explanation** It is important to ensure that housing provision is responsive to local market changes and the needs of the local area, providing accommodation for people with different needs and at different stages in their lives. Local authorities are required by the NPPF to plan for a mix of housing and to identify the size, type, tenure and range of housing that is required. This information is contained in the local housing evidence base, which includes the JCS Assessment of Housing Requirements, the Gloucestershire SHMA 2014 *and 2015 JCS update,* and other data held by local authorities and their partners. Developers should refer to this evidence base to ensure that their proposals will contribute to mixed and balanced communities and a balanced housing market across the county of Gloucestershire.	Provides the most up to date evidence on the SHMA.

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
PMM066	4.12.6	New housing should be designed in a way that enables households, including older people *and those with disabilities* to live comfortably. This will include having adequate space to allow home working or study, space for visitors in housing for older people, and space to allow ease of movement in specialist accommodation. Within the JCS area this will be achieved by meeting *or* ~~and~~ exceeding minimum space standards (see Delivery section below). New housing should also be built to high standards of sustainable design and construction in accordance with Policy SD4.	To encourage homes suitable for people throughout their lives. Clarification that standards could be met or exceeded.
PMM067	After 4.12.8	*This policy also considers the needs of Gypsy, Travellers and Travelling Showpeople as part of the wider housing mix and needs in the area. Policy SD14 specifically deals with the needs of these communities who are covered by the Government's definition set out within the Planning policy for traveller Sites. However, there is still a housing requirement for those members of the community who do not meet the definition and provision for this type of accommodation should be considered as part of the general housing mix. These needs will be explored further through future work on the SHMA and district plans.*	Additional explanatory text to include that the needs of the Gypsy, Traveller and Travelling Showpeople communities should be considered as part of the housing mix in the area. This is particularly relevant as Policy SD14 now only covers those people who meet the Governnment's new definition within the Planning Policy for Traveller Sites. Other housing needs for these communities is to be considered as part of the general mix through the

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
			SHMA.
PMM068	4.12.10 – 4.2.12 Delivery	The ~~Gloucestershire~~ *updated 2015* SHMA ~~2014~~ provides an indication of the number and proportion of housing of different sizes and tenures that are likely to be required in the county over the plan period. Equivalent data for each local authority area is provided within the document appendices. Developers should refer to this information (or any subsequent publication) and engage with the relevant local authority in drawing up their proposals. For development at Strategic Allocations, it will usually be necessary to consider the needs of more than one local authority area. *The Government's housing standards review was completed in 2015 which presents a single set of national space standards. These are optional standards that can only be applied where there is a local plan policy based on evidence local need and where viability is not compromised.* ~~Subject to the findings of the government's Housing standards review~~ *The* district plans may in future *include such a policy or potentially* adopt *locally*-specific space standards. *However,* until such standards are adopted, the JCS authorities will refer to the minimum space standards employed by the Homes and Communities Agency and apply these to all types of housing. As well as meeting minimum space standards, housing proposals will need to demonstrate how accessibility and adaptability have been considered as part of the design of the scheme. This may include providing a proportion of housing to a recognised standard, such as Lifetime Homes, where it is appropriate in the view of the local authority. For development at Strategic Allocations, the standards and proportions to be delivered should be agreed with the local authority. ~~Subject to~~ *Following* the findings of the Government's Housing Standards Review, district plans may in future *also* adopt specific standards for accessibility and adaptability.	Provides most up to date evidence on the SHMA. Provides an update on progress of the Government's Housing Standards Review.
PMM0069	SD13 Background 4.13.2	There are three main classifications of affordable housing *as set out in Annex 2 of the NPPF:* Housing that does not meet the above definition of affordable housing, such as 'low cost market housing', is not defined as affordable housing for the purpose of this policy.	Provides reference to currently definition of Affordable Housing contained within the NPPF.

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		• Social rented housing is owned by local authorities and private registered providers (as defined in Section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. • Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable). • Intermediate housing is housing for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the affordable housing definition above. These can include shared equity (shared ownership and equity loans), other low-cost housing for sale and intermediate rent, but not affordable rented housing. *The Government, through the Housing & Planning Act 2016, has also set out a duty for Local Authorities to promote the supply of Starter Homes. The Starter Homes initiative is aimed at increasing opportunities for home ownership and therefore this particular tenure of housing is to be offered for at least 20% below their market value for people who have not previously been a home buyer and want to own and occupy their own home. The Housing and Planning Act 2016 includes Starter Homes within the definition of affordable housing, however, the mechanism for introducing of the wider definition is to be subject to further legislation. Therefore, currently the definition provided within Annex 2 of the NPPF remains the most relevant.*	Provides an update on the latest position regarding Starter Homes.
PMM0070	SD13 Policy Number 1, 2, 6, 7, 9 & 10	~~The JCS local authorities will seek through negotiation to deliver new affordable housing as follows:~~ ~~1. On sites of 5-9 dwellings 9or covering 0.2 hectares or more of land), 20% affordable housing will be sought~~ ~~2. On sites of 10 or more dwellings 9or covering 0.4 hectares of more of land), 405 affordable housing will be sought~~ 1. The JCS authorities will seek, through negotiation*, for new development* to deliver new affordable	Policy altered to reflect latest JCS evidence on CIL/viability and changes to national policy and guidance on affordable housing contributions. (6) To reflect the potential that not all affordable housing tenures (such as

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		housing on a sliding scale approach as set out below: *i. Within the Strategic Allocation sites a minimum of 35% affordable housing will be sought.* *ii. Outside of the Strategic Allocation sites, on sites of 11 dwellings or more, or sites with a maximum combined gross floor space of greater than 1000sqm; a minimum of 20% affordable housing will be sought on developments within the Gloucester City administrative area and a minimum of 40% will be sought within the Cheltenham Borough and Tewkesbury Borough administrative areas.* *iii. On sites of 10 dwellings or less, no contribution towards affordable housing will be sought.* *iv. Notwithstanding the above, affordable housing policy for sites of 10 dwellings or less may be applied under policies set out within district plans.* 2. ~~For the purpose of this policy, residential units are dwelling houses~~ This policy applies to dwellings (as defined by use class C3) and also any self-contained units of accommodation within a residential institution (use class C2). Where a development site has been divided into parts, or is being delivered in phases, the site will be considered as a whole for the purpose of determining the appropriate affordable housing requirement. 6. Provision should be made*, where possible,* to ensure that housing will remain at an affordable price for future eligible households, or that subsidy will be recycled for alternative affordable housing provision. 7. In certain circumstances, where there is clear evidence of a local housing need that cannot be met elsewhere, affordable housing will be permitted on rural exception sites. A rural exception site must be within, or on the edge of, a rural settlement. It should be of a ~~small~~ scale ~~and~~ well related to the	Starter Homes) can meet this requirement. (7) to provide clarity on the definition of the scale of new development

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		settlement both functionally and in terms of design. *9.* If a development cannot deliver the full affordable housing requirement, a viability assessment, *conforming to an agreed methodology*, in accordance with Policy INF7 will be required. *Viability assessments will be published in full prior to determination for all non-policy compliant schemes. Where necessary the JCS authorities will arrange for them to be independently appraised at the expense of the applicant.* *10. The viability of a site may enable additional levels of affordable housing to be delivered above the requirements set out in this policy. The JCS authorities will negotiate with developers to find an appropriate balance to deliver affordable housing and infrastructure needs.* ~~For the purpose of~~ This policy, ~~residential units are dwelling~~ ~~houses~~ applies to dwellings (*as defined by* use class C3) and also any self-contained units of accommodation within a residential institution (use class C2). Where a development site has been divided into parts, or is being delivered in phases, the site will be considered **as a whole** for the purpose of determining the appropriate affordable housing requirement Provision should be made, *where possible*, to ensure that housing will remain at an affordable price for future eligible households, or that subsidy will be recycled for alternative affordable housing provision. **Rural exception sites** In certain circumstances, where there is clear evidence of a local housing need that cannot be met elsewhere, affordable housing will be permitted on rural exception sites. A rural exception site must be within, or on the edge of, a rural settlement. It should be of a ~~small~~ scale ~~and~~ well related to the settlement both functionally and in terms of design.	

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		If a development cannot deliver the full affordable housing requirement, a viability assessment, *conforming to an agreed methodology*, in accordance with Policy INF7 will be required. *Viability assessments will be published in full prior to determination for all non-policy compliant schemes Where necessary the JCS authorities will arrange for them to be independently appraised at the expense of the applicant.* *The viability of a site may enable additional levels of affordable housing to be delivered above the requirements set out in this policy. The JCS authorities will negotiate with developers to find an appropriate balance to deliver affordable housing and infrastructure needs.*	
PMM0071	4.13.4 onwards	The Gloucestershire SHMA 2014, *updated in September 2015*, provides evidence relating to affordable housing needs in the JCS area. It includes a Long-Term Balancing Housing Markets (LTBHM) model which informs this policy by providing an indication of the levels of affordable housing required from 2013-2031 to achieve a balanced housing market. Policy SD13 has also been informed by: • Planning commitments at the base date of the LTBHM model (2013) • The composition (by site size) of expected housing delivery over the plan period, based on Policy SP2. This includes assumptions about district capacity and windfall development that are informed by assessments of land availability and past trends in housing delivery. • An assessment of the viability of the JCS affordable housing policy and of the JCS as a whole, taking account of the cumulative requirements of all policies *and the potential for Section 106 and Community Infrastructure Levy contributions*. The policy reflects a strategic partnership approach to affordable housing delivery across the JCS area. This consistency of approach will help to ensure that full housing needs can be met in a way that supports urban regeneration and does not place onerous requirements on any individual local authority. *The latest evidence from the 2015 SHMA, which emerged through the JCS examination, determined that*	Provides updated evidence on the SHMA To reflect latest JCS

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		there is a need for 638 affordable houses per year across the JCS area. ~~Taking account of the factors listed above, the JCS authorities together will need to deliver 39% affordable housing on sites of five or more residential units. Although some sites will deliver 100% affordable housing (for example where the developer is a specialist provider), in recent years many sites have not delivered the full affordable housing requirement due to viability. For these reasons, in order to allow some flexibility in meeting the full affordable housing need, a requirement of 40% is set for development of 10 or more residential units, subject to the viability of development.~~	evidence on viability. Updated to include latest affordable need figure and abbreviated to aid readability. Further narrative is provided in the evidence base documents.
		Viability is key factor in a sites ability to contribute towards affordable housing needs and an important consideration in setting the appropriate level of contributions from new development. The latest viability evidence presented by the 'Plan Viability, Community Infrastructure Levy and Affordable Housing Study' (February 2016) demonstrates that viability across the JCS area and between different development types can differ significantly. Sites across the JCS area will be able to contribute to affordable housing a greater or lesser degree depending on the circumstances of each case. The viability and infrastructure challenges need to be taken into account when considering how we meet the overall need for affordable housing across the wider area.	Provides explanatory text on the issues of viability across housing developments in the JCS area.
		Policy SD13 reflects the need to ensure that smaller residential developments remain viable while still contributing towards essential infrastructure needs. For this reason, affordable housing is not required on sites of 0-10 residential units. This is in accordance with national policy and guidance. The policy also reflects the viability of differing value areas that exist across the JCS and as such requires that sites of 11 or more dwellings provide a 40% contribution within Cheltenham and Tewkesbury, but only a 20% contribution within Gloucester.	Provides justification of the approach to affordable housing across the JCS area.
		The Strategic Allocations in the JCS present altogether different viability considerations from the rest of the area. The latest viability work evidences that, for Strategic Allocations, a 35% affordable housing contribution could be viable. However, it is recognised that each of these allocations will have their own	

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		individual deliverability and viability challenges. Therefore there will need to be balance between infrastructure provision and affordable housing in the context of deliverability. Some development proposals on the Strategic Allocations may be able to achieve greater than 35% affordable housing, while others may require a greater focus on infrastructure provision to deliver the site leading to a lower affordable housing contribution. Each proposal will be submitted with a detailed viability evidence to determine the appropriate balance. ~~Policy SD13 reflects the need to ensure that smaller residential developments remain viable. For this reason, affordable housing is not required on sites of 0-4 residential units. On sites of 5-9 residential units there is a lower affordable housing requirement of 20%.~~ *The national Planning Practice Guidance states that affordable housing contributions should not be sought from developments of 10 units or less and this has been reflected in this policy. However, the guidance also sets out that, in designated rural areas (section 157(1) of the Housing Act 1985), local planning authorities may choose to apply a lower threshold of 5 units or less. Where a lower threshold is applied developments of between 6 and 10 units would be subject to affordable housing contributions but in the form of commuted cash payments only. There are areas within the JCS that would fall under this rural area designation, such as the Cotswold AONB, and therefore each authority may choose to apply a lower threshold where appropriate. Further detail and policies may be provided through the district-level plans.* In accordance with Policy SD12, a flexible approach is taken to the mix of housing tenures, types and sizes to be provided. This will allow local authorities and developers to refer to the most up-to-date evidence on housing need and to take account of the local context. For development at Strategic Allocations it will usually be necessary to consider the needs of more than one local authority area. *As part of the mix of affordable housing, developments should also consider the needs of specialist*	Provide justification of the approach to affordable housing at Strategic Allocations. Provides explanatory text on the issues of viability across housing developments in the JCS area.

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		accommodation and how a site could contribute towards delivering them. This may include provision for affordable Gypsy, Traveller and Travelling Showpeople pitches and/or plots in line with any needs identified through the latest Gypsy and Traveller Accommodation Assessment and the SHMA. This would include the needs of these communities who are identified either within or outside the Government's definition set out through the Planning Policy for Traveller Sites.	Additional explanatory text to include that the affordable needs of the Gypsy, Traveller and Travelling Showpeople communities should be considered as part of this policy. This is particularly relevant as Policy SD14 now only covers those people who meet the Government's new definition within the Planning Policy for Traveller Sites. Other housing needs for these communities is to be considered as part of the general mix through the SHMA.
PMM0072	**Policy SD14** 4.14.1, 2 & 3	'Planning Policy for Traveller Sites' *(PPTS)* was *first* published by the Government in March 2012 and ~~aligns~~ *aligned* planning policy for traveller communities more closely with other forms of housing. It introduced, for example, the requirement for councils to demonstrate a five-year supply of pitches/plots against locally-assessed targets based on robust local evidence. *A replacement to the original 2012 PPTS was first published on the 31 August 2015 by the Department of Communities and Local Government, which provides a new definition of Gypsies, Travellers and Travelling Showpeople for planning purposes. Under the new guidance only those people of nomadic habit of life, including those that have ceased to travel temporarily on grounds only of their own/ their family or dependants educational or health needs*	New background text to reflect the Government's latest Planning Policy for Traveller Sites.

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		or old age, are defined as Travellers in planning terms. All other accommodation needs for those members of the community that have ceased travelling permanently must now be considered in the context of the Strategic Housing Market Assessment (SHMA). Therefore, Policy SD12 ensures that the needs of those no longer meeting the definition in planning terms are planned for in appropriate accommodation in line with Government Guidance on the periodical review of housing needs: Caravans and Houseboats (July 2016). For the purposes of establishing the need for sites and yards in light of the change to the definition and to identify the resulting needs of both travelling households and non-travelling households, an up to date Gypsy and Traveller Accommodation Assessment (GTAA) was undertaken in early 2016, replacing the Gloucestershire Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTTSAA) 2013. The JCS area has long-established Gypsy, Traveller and Travelling Showpeople communities. There are many reasons for this, including excellent road connections, proximity of land close to the urban areas for access to services and employment opportunities, and strong family ties. ~~There are particular concentrations in~~ Tewkesbury Borough *is home to the majority of communities within the JCS area*~~, close to the urban areas of Gloucester and Cheltenham.~~ . ~~A Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTTSAA), published in 2013, identifies the need for additional pitches/plots for different traveller communities for Gloucestershire between 2013 and 2031. A summary of these needs for the JCS authorities is provided at paragraph 4.130 and Table C4 of that report, which can be downloaded in full from the JCS website.~~ *The GTAA 2016 Update provides a robust and credible evidence base to be used to guide the implementation of development plan policies and the provision of new Gypsy and Traveller pitches and Travelling Showpeople plots for the period 2016-2031.*	Modified to enhance readability. Updated to reflect new assessment based on Governments latest Planning Policy for Traveller Sites.
PMM0073	SD14 Policy	**Policy SD14: Gypsies, Travellers and Travelling Showpeople** 1. *Existing permanent residential and transit Gypsy, Traveller and Travelling Showpeople sites,*	(1) To ensure the protection of existing GTTS sites. (2) clarification that

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		identified on the proposals map, will be protected from development to alternative uses. 2. ~~All~~ Proposals for new *permanent and temporary, residential and transit* Gypsy, Traveller and Travelling Showpeople sites will be assessed against the following criteria: ~~There is a proven need for the development and/or the capacity of the site can be justified to meet needs for further gypsy traveller and travelling showpeople sites, or extensions to existing sites.~~ i. Proposals on sites in areas of sensitive landscape will be considered in accordance with Policy SD7 (Landscape Policy) and Policy SD8 (The Cotswolds Area of Outstanding Natural Beauty). In all other locations the proposal ~~will~~ *must* not have an unacceptable impact on the character and appearance of the landscape and the amenity of neighbouring properties, and ~~is~~ *should be* sensitively designed to mitigate any impact on its surroundings.	it includes permanent, temporary, residential and transit sites (3) provide additional protection against the development of sites subject to hazards.
PMM0074	Explanation 4.14.4	The Gloucestershire *GTAA 2016* sets out the need for new pitches/plots resulting from existing traveller communities in Gloucestershire *between a new base date of 2016* ~~2013~~ and *the plan end date of* 2031. Within the JCS area, the assessment sets out the requirement for provision of ~~151 permanent~~ *8* pitches for Gypsies and Travellers (as shown in Table C4 below) *who meet the 2015 definition of Travellers for planning purposes.* ~~Of these, 147 pitches relate to communities that currently reside in Tewkesbury Borough~~ *All of this confirmed need is within Tewkesbury borough and has been identified as a need for privately owned sites. However regardless of planning status, under the Housing Act 1985 the local authority must assess and plan for the housing needs of all communities residing in their area. The assessment, therefore, also sets out the accommodation needs for those who have been confirmed to no longer meet the 2015 definition and an estimate of the type and level of accommodation required by those who are unknown as a result of either being unwilling or unavailable for interview. The assessment also sets out a requirement for the provision of 29 plots for Travelling Showpeople who meet the 2015 definition. Of these, 21 plots are identified for communities that currently reside in Tewkesbury borough,*	Provide explanation of the impact of the latest Government guidance on Planning Policy for Traveller Sites on the latest GTTA 2016.

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td></td><td></td><td>with 8 in Gloucester City.

The housing needs of the Gypsy, Traveller and Travelling Showpeople households who do not meet the new definition of a Traveller, or whose status is unknown, will now be assessed as part of the wider housing needs of each area through the SHMA. The affordable requirement of this community, identified as ‘public’ in the GTAA, along with other forms of affordable provision, will be addressed as part of the overall affordable housing requirement as set out in Policy SD13.</td><td>Clarification that the needs of those who do not meet the new PTTS definition will be dealt with through the SHMA. Any affordable need will be met through Policy SD13.</td></tr>
<tr><td>PMM0075</td><td>Table C4 and C5</td><td>Table C4 – Permanent Gypsy and Traveller Pitch Requirements in the JCS area
<table>
<tr><td>~~Local Authority~~</td><td colspan="2">~~2013-2017~~</td><td colspan="2">~~2018-2022~~</td><td colspan="2">~~2023-2027~~</td><td colspan="2">~~2028-2031~~</td><td>~~Total~~</td></tr>
<tr><td></td><td>~~Public~~</td><td>~~Private~~</td><td>~~Public~~</td><td>~~Private~~</td><td>~~Public~~</td><td>~~Private~~</td><td>~~Public~~</td><td>~~Private~~</td><td></td></tr>
<tr><td>~~Cheltenham~~</td><td>~~0~~</td><td>~~1~~</td><td>~~0~~</td><td>~~0~~</td><td>~~0~~</td><td>~~0~~</td><td>~~0~~</td><td>~~1~~</td><td>~~2~~</td></tr>
<tr><td>~~Gloucester~~</td><td>~~0~~</td><td>~~1~~</td><td>~~0~~</td><td>~~0~~</td><td>~~0~~</td><td>~~0~~</td><td>~~0~~</td><td>~~1~~</td><td>~~2~~</td></tr>
<tr><td>~~Tewkesbury~~</td><td>~~20~~</td><td>~~44~~</td><td>~~12~~</td><td>~~15~~</td><td>~~13~~</td><td>~~16~~</td><td>~~12~~</td><td>~~15~~</td><td>~~147~~</td></tr>
<tr><td>~~Total~~</td><td>~~20~~</td><td>~~46~~</td><td>~~12~~</td><td>~~15~~</td><td>~~13~~</td><td>~~16~~</td><td>~~12~~</td><td>~~17~~</td><td>~~151~~</td></tr>
</table></td><td></td></tr>
</table>

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason

Meet the PPTS 2015 Definition

Local Authority	*2016-2021*		*2021-2026*		*2026-2031*		*Total*
	Public	*Private*	*Public*	*Private*	*Public*	*Private*	
Cheltenham	*0*	*0*	*0*	*0*	*0*	*0*	*0*
Gloucester	*0*	*0*	*0*	*0*	*0*	*0*	*0*
Tewkesbury	*0*	*5*	*0*	*1*	*0*	*2*	*8*
Total	*0*	*5*	*0*	*1*	*0*	*2*	*8*

Table C5 – Permanent Travelling Showpeople Plot Requirements in the JCS area

Meet the PPTS 2015 Definition

Local Authority	*2016-2021*		*2021-2026*		*2026-2031*		*Total*
	Public	*Private*	*Public*	*Private*	*Public*	*Private*	
Cheltenham	*0*	*0*	*0*	*0*	*0*	*0*	*0*
Gloucester	*0*	*7*	*0*	*0*	*0*	*1*	*8*
Tewkesbury	*0*	*17*	*0*	*2*	*0*	*2*	*21*
Total	*0*	*24*	*0*	*2*	*0*	*3*	*29*

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
PMM0076	4.14.5	~~The report also sets out that if transit pitches are considered necessary, a transit site of at least 10 pitches should be provided within Gloucestershire, but in a location in proximity to main road networks such as the M5 and A40. However, it also recommends that 'tolerated temporary stopping places' are used by some authorities as an alternative way of providing for temporary accommodation needs.~~ *The GTTSAA 2013 stated that if transit pitches are considered necessary, a transit site of at least 10 pitches should be provided within Gloucestershire. Alternatively, the report recommended the use of a formal 'temporary toleration' policy, to meet the needs of Gypsies and Travellers moving through the County, without the need to establish a formal transit site, which can often be difficult to manage and maintain. Since the GTTSAA was published in 2013, two transit sites have been granted planning permission in Gloucestershire, one at Morton Valence in Stroud District for six pitches and one at Minsterworth for eight pitches; 14 transit pitches in total. The suggested need arising from the GTTSAA has therefore been exceeded.* ~~In addition, the JCS authorities are pursuing a policy of 'temporary toleration' as opposed to publicly owned transit sites.~~ The nature of existing provision in Gloucestershire means that a very significant proportion of the needs arise in Tewkesbury Borough. However, ~~the government policy document 'Planning Policy for Traveller Sites (2012)~~ *PPTS* sets out that where there are special or strict planning constraints across an area, local planning authorities should consider working together through the 'Duty to Co-operate' to provide for traveller needs, in order to provide more flexibility in the identification of sites, including the preparation of joint development plans. Further to this, the assessment confirms issues with the ability to bring forward sites for traveller communities in urban areas for reasons such as limited land availability and site viability. Depending on the availability of deliverable sites, it may also be necessary to work with other Gloucestershire authorities to address needs arising from their communities. ~~In terms of the JCs, significant development will be coming forward through the Strategic Allocation and urban extensions and the need for affordable accommodation for all members of the community will~~	Clarification on the position of transit sites within the JCS. The JCS no longer requires a specific commitment for GTTS pitches on strategic allocations, but instead

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		~~need to be addressed through these developments. It may be possible for sites for traveller communities to be provided as part of well-masterplanned Strategic Allocations, as required at Policy SA1, and the potential for such provision will be fully considered through the planning process. Further non-strategic site allocations will be considered by each of the JCS authorities in district plans, in the context of locally set targets.~~ ~~'Planning Policy for Traveller Sites' PTTS requires that local planning authorities provide a criteria against which potential site allocations will be assessed. It will also form the policy against which other speculative applications that may come forward should be assessed.~~	affordable requirements will be met through Policy SD13. Criteria based policy provided through Policy SD14. District plans may wish to development further detailed policy and guidance if required..
PMM0077	Delivery 4.14.8 & 9	The purpose of Policy SD14 is to set out the overall numbers of pitches and plots required within the JCS area for gypsies, travellers and travelling showpeople, and to set out a criteria-based policy for use in the assessment of potential sites. ~~Policy SA1 provides detail with regard to site provision through the JCS.~~ In order to bring forward adequate numbers of sites for Gypsies, Travellers and Travelling Showpeople communities, it ~~will~~ *may* also be necessary for provision to come forward through smaller non-strategic sites~~, particularly during the first five years of the plan.~~ This will be ~~established~~ *examined* through the lower-level district plans.	
PMM0078	**Policy SD15** Policy number 3	Proposals for development at Strategic Allocations, and other development proposals *as appropriate* ~~at the discretion of the local planning authority~~, must be accompanied by a health impact assessment.	SD15 (3) Edited to wording agreed during the examination session on this policy to increase its readability and effectiveness
PMM0079	Delivery After 4.15.8	*Applications which may require health impact assessments should first be screened to determine whether*	Text added to clarify the need for screening for

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td></td><td></td><td>it is necessary for a full assessment to take place</td><td>Health Impact Assessments where required.</td></tr>
<tr><td>PMM0080</td><td>Part 5 Policy INF1 and INF 2 5.2.2 - 5.2.5</td><td>INF1 ~~and INF2~~ –TRANSPORT NETWORK

Background
The NPPF states ~~in Paragraph~~ 29 that ‘The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel’. The ONS data on commuting patterns collected from the Annual Population Survey (2010 and 2011) indicates a high proportion of people both living and working within the JCS area. This self-containment highlights the potential for short-distance trips to transfer where appropriate to non-car modes, such as public transport, walking or cycling – something which the NPPF considers~~, at Paragraph 17,~~ to be a core planning principle ~~,reiterated at part 4 of the document~~. Enabling the transfer to non-car modes requires a co-ordinated approach across several policy and delivery areas, and the JCS seeks to achieve this through its policies on design and infrastructure ~~(see, for example, criterion vii of Policy SD5).~~. This policy contributes to the delivery of the strategy’s ambitions and strategic objectives including:

<table><tr><th>~~Ambition~~</th><th>~~Strategic Objective~~</th></tr><tr><td>~~A thriving economy~~</td><td>~~1)Building a strong and competitive urban economy~~
~~2)Ensuring vitality of town centres~~</td></tr><tr><td>~~A sustainable natural and built environment~~</td><td>~~4)Conserving and enhancing the environment~~
~~5)Delivery excellent design in new developments~~
~~6)Meeting the challenges of climate change~~</td></tr><tr><td>~~A healthy, safe and inclusive community~~</td><td>~~7)Promoting sustainable transport~~
~~9)promoting healthy communities~~</td></tr></table>
The preparation and implementation of transport strategy is primarily a matter for the Local Transport</td><td>Section title changed to better reflect policy provisions.

Removal of specific NPPF references in line with the rest of the JCS.

Table deleted to not duplicate reference to objectives in policy and to bring in line with the rest of the JCS.

Clarification on the role of development plans in</td></tr>
</table>

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		Plan ~~policy and proposals are not primarily matters for the development plan (in this case the JCS and emerging district plans)~~. The role of the development plan is to reflect, support and enable the implementation of transport objectives through its land-use policies and proposals. In the JCS area, the Local Highway Authority is Gloucestershire County Council. The County Council manages and maintains the local road network, supports non-commercial passenger transport services, and promotes safe and sustainable travel. The Local Transport Plan (LTP) is prepared by the County Council and sits alongside the JCS. In order to get a 'full picture' of transport policy and its implementation, the two documents need to be read together. *The LTP is the key strategy for the delivery of essential transport infrastructure to support the delivery of growth identified through the JCS.* The preparation of this and other relevant parts of the JCS are the result of co-operation between the planning authorities and the Local Highway Authority. ~~The~~ Highways England ~~Agency, an executive agency of the Department for Transport~~*, is a government company that is charged with operating, maintaining and improving* ~~manages and maintains~~ the strategic road network *in the area* including the M5, M50, A40, A46 and A417. ~~The Highways Agency also~~ *Highways England also* contributes to local transport policy formulation and implementation by engaging with the Local Highway Authority through the periodic LTP review process and other relevant consultations. Ongoing partnership working also happens through regular liaison and operation meetings.	developing the transport strategy. Clarification on the role of the LTP. Updated to provide information on the change from Highways Agency to Highways England.
PMM0081	Policy INF1 and INF 2	~~**Policy INF1: Access to the Transport Network**~~ ~~1. Developers should aim to provide safe and accessible connections to the transport network to enable travel choice for residents and commuters. All proposals must ensure that:~~ ~~a. The development provides safe vehicular access to the highway network~~ ~~b. Any increased level of car use derived from the development does not result in severe increases in congestion on the network. Severe increase in congestion in~~	

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		~~this context relates to highway junctions no longer operating within their design capacity~~ ~~c. Any severe increase in congestion likely to arise from development must be mitigated to ensure highway junctions operate within their design capacity, and~~ ~~d. Connection should be provided where appropriate to existing walking, cycling and passenger transport networks and should be designed to enable and encourage maximum potential use~~ ~~2. Where a significant amount of new trips is anticipated from a proposed development the local planning authority may require application to be accompanied by a Travel Plan that has full regard to the criteria set out in paragraph 35 of the National Planning policy Framework.~~ ~~**This policy contributes towards achieving Objectives 1, 2, 3, 6, 7 and 9.**~~ ~~**Policy INF2 – Safety and Efficiency of the Transport Network**~~ ~~1. Developers will be required to assess the impact of proposals on the transport network to ensure that they will not detrimentally affect its safety or efficiency. All proposals will demonstrate the impact of prospective development on:~~ ~~i. Congestion at network pinch-points~~ ~~ii. Travel safety within the vicinity of the development, and~~ ~~iii. Noise and/or atmospheric pollution within the vicinity of the development.~~ ~~2. Planning permission will be granted only where the impact of development is not considered to be severe, or where severe impact is considered likely, can be mitigated to the satisfaction of the local planning authority in consultation with the Local Highway Authority.~~ ~~**This policy contributes towards achieving Objectives 4, 5, 6, 7 and 9**~~	Policy INF1 and INF2 have

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		Policy INF1: Transport Network *1. Developers should provide safe and accessible connections to the transport network to enable travel choice for residents and commuters. All proposals should ensure that:* *a. Safe and efficient access to the highway network is provided for all transport modes* *b. Connections are provided, where appropriate, to existing walking, cycling and passenger transport networks and should be designed to encourage maximum potential use* *c. All opportunities are identified and taken, where appropriate, to extend and/or modify existing walking, cycling and public transport networks and links, to ensure that credible travel choices are provided by sustainable modes* *2. Planning permission will be granted only where the impact of development is not considered to be severe. Where severe impacts that are attributable to the development are considered likely, including as a consequence of cumulative impacts, they must be mitigated to the satisfaction of the Local Planning Authority in consultation with the Highway Authorities and in line with the Local Transport Plan.* *3. Developers will be required to assess the impact of proposals on the transport network through a Transport Assessment. The assessment will demonstrate the impact, including cumulative impacts, of the prospective development on:* *a. Congestion on the transport network* *b. Travel safety within the zone of influence of the development* *c. Noise and/or atmospheric pollution within the zone of influence of the development* *4. Where appropriate the local planning authority may require applications to be accompanied by a*	been amalgamated following discussions at examination that there was duplication between them. (1b) recommended addition following engagement with Gloucestershire County Council (1c) recommended addition following engagement with Stagecoach bus operator. (2)Amalgamation of previous policy INF1 1.ii and INF2 2. (3)Developed from Policy INF2 1. Specific reference to transport assessments and cumulative impacts of development. (3a) Widening the definition to include the transport network as a whole which could be

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		Travel Plan that has full regard to the criteria set out in the NPPF. ***This policy contributes towards achieving Objectives 1, 2, 3 4, 5, 6, 7 and 9.***	affected. (3b& 3c) Terminology changed from vicinity to zone of influence to clarify where reasonable impacts should be assessed. (4) Developed from Policy INF1 2. Reworded to allow travel plans to be requested in a broader range of circumstances.
PMM0082	Explanation 5.2.7 - 5.2.8	The desired outcome from all development remains a safe and efficient transport network where people feel safe and they have a reasonable variety of travel choices. The degree of choice must be realistic in relation to the proposed development in terms of use, affordability and ongoing maintenance. Policy SD5 ~~Criterion vii 'Movement and connectivity'~~ sets out the approach to sustainable travel modes and choice in new development *in regards to masterplanning, design and layout.* The need to mitigate the impact of car-based travel in respect of road congestion, health and atmospheric pollution is a key objective of the NPPF. It underpins the requirement in ~~Paragraph 32 of~~ the NPPF for development that generates significant amounts of movement to be supported by Transport Statements or Transport Assessments. Proposals should fully consider measures, where feasible, to encourage individuals to walk or cycle for appropriate short distance trips (less than three miles) or use passenger transport for longer distance journeys. The impact on passenger transport services needs to be considered to ensure site sufficient capacity exists on services and/or car-parking facilities at rail stations.	Clarify link between transport policy and SD5 Removal of specific policies in the NPPF to be consistent with the rest of the JCS. Further explanation of the role of travel plans to support policy.

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		The local planning authority may require a site-wide travel plan to be submitted with proposals to address sustainable transport strategy for a development. Travel plans are a useful tool when considering how best to mitigate the impact of car-based transport and to promote a shift towards more sustainable modes. Travel plans will be expected to conform to the guidance set out in the NPPF and the PPG. ~~A site-wide travel plan, as detailed in paragraphs 35 and 36 of the NPPF, is a useful tool when considering how this is best achieved and monitored, and the local planning authority may require one to be submitted with proposals.~~ *They should form long-term management strategies to put in place measures to actively manage the transport impacts of development and promote and encourage sustainable travel. This should take into account all journeys likely to result from a development. Travel plans will be expected to identify specific outcomes, targets and measures and set out clear future monitoring and management arrangements.*	Removal of specific policies in the NPPF to be consistent with the rest of the JCS.
PMM0083	Delivery 5.2.11	The County Council has provided a number of useful documents which provide advice for developers. These are all available through Gloucestershire County Council's website (www.gloucestershire.gov.uk) and are periodically updated and added to ensure they remain fit for purpose. • ~~**Local Developer Guide 2013** – provides a brief overview for developers on the type of infrastructure considerations that should be taken into account when making a planning application~~ • **Local Transport Plan** ~~**2012-2026**~~ ***2015-2031*** – provides an overview of the strategic context of the transport network within the county, *setting out strategy, policies and investment priorities. The LTP is a living document which will be updated and amended to reflect changing policy at the national and local level. This would enable the LTP to be responsive to any significant transport infrastructure needs that may arise through*	Text on Local Developer Guide moved below LTP point.

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		the JCS plan period, including future reviews. • ***Local Developer Guide 2013*** *– provides a brief overview for developers on the type of infrastructure considerations that should be taken into account when making a planning application*	Further explanation of role of the LTP.
PMM0084	**Policy INF3** 5.3.2	The majority of flood risk in Gloucester City arises from the smaller river catchments. While the Severn is capable of coming out of its bank and flooding a large area, flood risk is reduced by the presence of defences. Nevertheless, the Severn may contribute to flooding as the effects of high flows in the smaller streams may be worsened by the elevated levels in the Severn, making it difficult for them to discharge. *The Environment Agency is working with Gloucester City Council, the County Council and landowners to secure improved flood defences around lower Westgate in Gloucester. This will need a co-ordinated approach to development particularly at key regeneration sites in the area if wider flood benefits are to be realised.*	To clarify ongoing flood defence work in Gloucester city
PMM0084a	Policy INF3	*iii.* Requiring new development that could cause or exacerbate flooding to be subject to a flood risk assessment which conforms to national policy and incorporates the latest available *updates to* modelling and historic data and information and guidance contained in the authorities' Strategic Flood Risk Assessments and Supplementary Planning Documents, in order to demonstrate it will be safe, without increasing flood risk elsewhere	iii) Included to ensure that the flood risk information available to decision takers is as up to date as possible taking into account model updates. More detail is given in explanation text 5.3.
PMM0085	Explanation 5.3.5	The Environment Agency regularly updates the 'Flood Map for Planning' showing areas at high (1 in 100 year), medium (1 in 1,000 year) and low (less than 1 in 1,000 year) risk of flooding (these are Flood Zones 3, 2 and 1 respectively). To complement these maps, Gloucestershire County Council, the Lead Local Flood Authority *(LLFA),* prepared a SFRA Level 1 for the county (September 2008). This assessed all	

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		forms of flood risk: fluvial (rivers), tidal (sea), surface water, groundwater, sewers and impounded water bodies (reservoirs and canals), in the context of the situation at the time and taking into account the likely impacts of climate change in the future. Gloucestershire County Council also produces Surface Water Management Plans which seek to identify areas more vulnerable to surface water flooding and indicate measures to mitigate this, recognising that it is not economically viable to eliminate flooding altogether.	
PMM0085a	After 5.3.6	*To ensure that flood information is up to date when taking planning decisions about flood risk, planning allocations will be required to ensure that the modelling and flood flows used to justify the flood zones set out in any application take account of updates and changes to the models used. Particular regard should be had to changes and updates to models relating to rainfall predictions and climate change data.*	Included to ensure that the flood risk information available to decision takers is as up to date as possible taking into account model updates. Relevant Policy is set out in 2 (iii)
PMM0086	5.3.7 Bullet points 4 and 5	• Careful site design, including reconfiguring ground levels or site access points, culvert improvements, channel restoration, the use of planting, and existing woods and trees to manage flood risk and incorporating SuDS. Suitable SuDS solutions will vary according to location, for example under-ground water storage tanks may not necessarily be suitable or desirable. Developers will need to think creatively about the most sustainable SuDS solutions, taking into account principles of good design and the effect of the scheme on the development as a whole and its surroundings. *For more information see the LLFA guidance on SuDS* • *Where a Surface Water Management Plan shows the presence of pluvial flooding, the development will need to compensate for the pluvial flood volume lost by providing additional flow and storage capacity within the developments surface water drainage system and attenuation storage.* • *Ensuring that all flood management designs which form part of planning applications are fully implementable and free from legal or design impediments which are likely to affect their usefulness.* • Considering *and acting on* the cumulative impact of existing and new development*, for example:*	Additional information added as further explanation of policy 2 (iv). Explanation text added that flood risk management solutions should be demonstrated to be realistic and implementable during the planning process. Included to give an example of considering the impacts of new development infrastructure on upstream

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		Ensuring that works to raise the highway levels where the highway is subject to fluvial flooding will only be permitted if provision is made at the same time to provide additional flood flow capacity under the highway to ensure no adverse impacts upstream.	flood risk
PMM0087	Delivery After 5.3.15	*Developers should follow guidance from the LLFA when considering SuDS schemes. This can be found in its November 2015 publication 'Gloucestershire SuDS design and maintenance guide'*	Signposting to latest guidance on SuDS.
PMM0088	Policy INF4 Explanation 5.4.6 & 7	The JCS authorities have produced a Green Infrastructure Strategy based on an assessment of the area's environmental assets. The strategy identifies two key regional/sub-regional green infrastructure assets in the area: The Cotswolds AONB to the east and the River Severn and its washlands to the west. *The River Severn area has been promoted by the JCS authorities as a potential Regional Park. This would recognise the special habitat qualities of the area as well as its importance for the quiet enjoyment of the countryside.* Below this, at an intermediate level, the strategy seeks to link these two assets and the main urban areas through a number of green corridors, most of which are watercourses. At a local level, the strategy identifies watercourse corridors as key green infrastructure assets in the urban areas. Ideally, all green infrastructure should link with these areas and form a co-ordinated network. The Green Infrastructure Strategy therefore includes a vision that everyone living in the JCS area can, within 300 metres (five minutes' walk-time), access a green infrastructure corridor or asset. From there, people will be able to travel through interconnected and multi-functional green spaces to ultimately emerge into the strategic assets of The Cotswolds AONB or the Severn and its washlands. Enhancement of green infrastructure and ecological networks will require existing assets to be retained (where appropriate), improved and better managed, and new features to be created. *It is recognised that the growth to be delivered through the JCS may increase demands on green spaces through increased recreational use. This will require careful management, particularly for ecologically sensitive sites.* This could include requiring developer contributions for such provision (for example, a contribution towards the management of the Cotswolds Beechwoods Special Area of Conservation [SAC]). *The JCS authorities will work together with key stakeholders, such as Natural England and the Environmental*	Signposting the potential regional park Text added to reflect submissions by Natural

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		Agency, to develop management and mitigation packages for important green and ecological networks and to discuss how future development can contribute to this. Policy on developer contributions is set out in Policy INF7. New green infrastructure should combine with established green spaces to thread through and surround the built environment, connecting urban areas and villages with the natural and agricultural areas beyond. This will require delivery of both large- and small-scale interventions at local, intermediate and strategic/landscape level. Development at Strategic Allocations will need to deliver connectivity through the site, linking urban areas with the wider rural hinterland.	England.
PMM0089	Delivery After 5.4.12	*The indicative site layout for the strategic allocation at North West Cheltenham indicates where a green buffer should be retained near Swindon Village when master planning this area in accordance with Policy SA1. The Cheltenham Plan will allocate the specific boundaries of Local Green Space in this area, along with any other Local Green Space to be allocated in the Borough.*	Text added to reference the "Swindon Village Green Buffer/ Indicative Local Green Space area for allocation in the Cheltenham Plan" as referenced in Policy SA1 and on the indicative site layout for this allocation.
PMM0090	Policy INF5 Delivery 5.5.6	Delivery will primarily be through the development management process. Through preparation and implementation of the JCS IDP, the three JCS councils, Parish Councils and Neighbourhood Forums will continue to work collaboratively with infrastructure providers, developers and partnership groups to ensure that social and community infrastructure needs of existing and future communities are met. *Existing social sustainability initiatives including the partnership between Cheltenham Borough Homes, the Barnwood Trust, Bromford and Sovereign, as well as the Asset Based Community Development (ABCD) initiative at Gloucester city, will be taken forward by the JCS authorities, including through the district level plans.*	Providing an update on ongoing social sustainability initiatives in the JCS area
PMM0091	Policy INF6 Background	Commercial renewable energy installations tend to be large as they have to capture the available natural energy from the environment around them and, as such, they have tended to be controversial. ~~Wind~~	

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
	5.6.3 – 5.6.5	~~farm development in particular has been perceived as visually intrusive, although generally wind generation is supported by the vast majority of the population 9NOP DTI commissioned survey 2006).~~ The drive for renewable/low carbon sources of energy is not just about reducing greenhouse gas emissions; it also concerns a more secure energy market, long- term cheaper energy costs, and importantly for the JCS, retaining money within the local economy. Installation of plant can also support local job creation. ~~This policy~~ *Policy INF6* applies to proposals concerning ~~all~~ renewable energy or low carbon energy-generating technologies, including ~~wind turbines,~~ biomass generators, anaerobic digestion plants and other energy from waste technologies, hydropower turbines, and ground-mounted solar photovoltaic arrays. *The one exception to this is with wind turbines. Locations for these, unless government guidance changes to the contrary, will be allocated through district level plans or neighbourhood plans where appropriate.*	Potential wind farm development will now be addressed through District –level plans in accordance with national guidance.
PMM0092 NOT USED			
PMM0093	INF6 Policy Number 1 point iii.	Policy INF6: Renewable Energy/Low Carbon Energy Development 1. Proposals for the generation of energy from renewable resources, or low carbon energy development *(with the exception of wind turbines),* will be supported, provided the wider environmental, social or economic benefits of the installation would not be outweighed by a significant adverse impact on the local environment, taking into account the following factors: iii. Any unacceptable adverse impacts on users and residents of the local area, including emissions, noise, odour and visual amenity~~, including shadow flicker~~.	Potential wind farm development will now be addressed through District –level plans in accordance with national guidance. Shadow flicker relates

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
			primarily to wind turbines.
PMM0094	Explanation 5.6.8	The NPPF suggests that local planning authorities consider identifying suitable areas for renewable energy. Gloucestershire County Council commissioned ENTEC to undertake a study into renewable energy capacity across the county in 2010. ~~It established that 10% on-site energy generation was feasible in most development scenarios, which has been set out in Policy SD4.~~ It ~~also~~ considered renewable/low carbon development at a commercial level and identified wind and biomass as potential resources for the JCS area. Furthermore, it identified that there were no significant grid constraints within the JCS area, and that electric and gas grid availability was generally good. The ENTEC study does not provide sufficiently strong evidence on its own to enable the JCS authorities to identify suitable areas for developing renewable energy; however, district plans may seek to identify these based on more detailed local evidence, or may seek to provide further guidance on the issue.	See changes to SD4 which removes this target in accordance with national guidance
PMM0095	**Policy INF7** Background 5.7.1	Government says that *'Infrastructure is the foundation upon which our economy is built. The government remains determined to deliver better infrastructure in the UK to grow the economy and improve opportunities for people across the country.' (National Infrastructure Delivery Plan 2016–2021 Executive Summary.)* ~~'The quality of a nation's infrastructure is one of the foundations of its rate of growth and the living standards of its people. That is why the government has put long-term investment in roads, railways, energy, telecommunications and flood defences at the heart of its growth plan' (National Infrastructure Plan 2013, page 3)~~ This standpoint is mirrored in the NPPF. There is little further to add in emphasising the importance of infrastructure in all its forms to the community as a whole.	Updated to the National Infrastructure Plan wording
PMM0096	Policy	**Policy INF7: Infrastructure Delivery** 1. Where ~~need is~~ *infrastructure requirements are* generated as a result of individual site proposals and/or ~~as a consequence of~~ *having regard to* cumulative impact, new development will be served and supported by adequate and appropriate on- and/or off-site infrastructure and services. In identifying infrastructure requirements, development proposals will also demonstrate that full regard has *been* given, where appropriate, to implementing the requirements of the Joint Core Strategy Infrastructure Delivery Plan.	(1) Wording change to assist readability and increase plan flexibility Changes to wording to reflect national guidance

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		2. Where need for additional infrastructure and services and/or impacts on existing infrastructure and services is expected to arise, the local planning authority will seek to secure appropriate ~~and proportionate~~ infrastructure ~~provision in respect of~~ *which is necessary, directly related, and fairly and reasonably related to the scale and kind of the development proposal, including*: i. ~~Affordable housing~~ *Broadband infrastructure* ii. Climate change mitigation/adaptation iii. Community *and cultural* facilities *and initiatives* iv. Early Years and Education v. Health and well-being facilities vi. The highway network, traffic management, sustainable transport and disabled people's access vii. Protection of cultural and heritage assets and the potential for their enhancement viii. Protection of environmental assets and the potential for their enhancement ix. Provision of Green Infrastructure including open space x. Public realm, and xi. Safety and security including emergency services xii. Flood risk management infrastructure This list *of potential infrastructure items* is neither exhaustive, *sequential* nor are its elements mutually exclusive.	(i) Affordable housing provision is dealt with in Policy SD13. Broadband Infrastructure links in with delivery of Strategic Objective 1 and reflects examination hearings on the vison and objectives. (iii) Community and Cultural facilities and initiatives were introduced to the policy to deliver Objective 8 and changes to Policy INF5 Social and Community Infrastructure allowing for the provision of Community Building Projects. The list of infrastructure items should not be considered to be sequential or in priority order.
PMM0097	Explanation 5.7.4	It follows, from the preceding paragraphs and from the background to this policy, that the provision of infrastructure is a matter of critical importance in the consideration and determination of applications for planning permission. Existing infrastructure may have sufficient capacity to absorb some if not all the envisaged impact of new development. However, in many instances this may not be the case. Furthermore, where additional provision is needed, the JCS authorities acknowledge that it may not be practical and/or economically viable to require a developer to make provision for all required infrastructure identified with their proposal at the outset. Consequently a phased approach to	

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		provision and maintenance, *that is* fully justified within the *planning* application, may be acceptable. Nevertheless, if sufficient provision cannot be adequately demonstrated both in terms of infrastructure items and necessary maintenance, planning permission is likely to be refused. For the avoidance of doubt, references to 'new development' in*clude development of all scales and types.* ~~Policy INF7 are not necessarily subject to considerations of scale.~~	Altered to improve clarity
PMM0098	Delivery 5.7.5	This policy will primarily be delivered through the development management process. Prospective developers should begin identification of infrastructure requirements at an early stage in the formulation of a proposal, seeking advice and guidance from infrastructure providers, local authorities and local communities where necessary. *This includes the Gloucestershire County Council 'Local Developer Guide: Infrastructure & Services with New Development' (adopted February 2013).* There are several policies elsewhere in the JCS that directly or indirectly relate to the provision of infrastructure. ~~including all those in park 5 Infrastructure Policies., Prospective~~ Developers should read the JCS as a whole.	Signposting readers to the Gloucestershire Document Altered to improve clarity
PMM0099	**Policy INF8** Policy	**Policy INF8: Developer Contributions** *1.* Arrangements for direct implementation or financial contributions towards the provision of infrastructure and services required as a consequence of development, including its wider cumulative impact, and provision where appropriate for its maintenance, will be negotiated with developers before the grant of planning permission. *Financial contributions will be sought through the S106 and CIL mechanisms as appropriate.* *2.* Where, having regard to the on- and/or off-site provision of infrastructure, there is concern relating to the viability of the development, an independent viability assessment, funded by the developer and in proportion with the scale, nature and/or context of the proposal, will be required to accompany planning ~~applications. The submitted assessment and its methodology may be~~	Policy INF 8 "Financial contributions…" to aid clarity and make clear S106 or CIL mechanisms could be used. Publication of viability

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		~~independently appraised.~~ *applications. Viability assessments will be undertaken in accordance with an agreed methodology and published in full prior to determination for all non-policy compliant schemes Where necessary the JCS authorities will arrange for them to be independently appraised at the expense of the applicant.*	assessments will be required for non-compliant schemes in line with best practice and for reasons of transparency. Publication of such assessments will allow communities to assess the robustness of the appraisal and empower decision makers.
PMM0100	After 5.8.5	*Publication of viability assessments will be required for non-compliant schemes in line with best practice and for reasons of transparency. Publication of such assessments will allow communities to assess the robustness of the appraisal and empower decision makers.*	As above, explanatory text related to the need to publish viability assessments for non policy compliant schemes.
PMM0101	**Policy SA1** Background 6.1.1.- 6.1.3	Strategic Policies SP1 and SP2 in Part 3 of this plan set out the scale and distribution of development to be delivered across the JCS area in the period to 2031. The identification and delivery of eight Strategic Allocations on the edges of existing urban areas is an important part of the delivery of the JCS as a whole. Policy SA1 formally designates these eight Strategic Allocations and focuses on the need to deliver comprehensive development in each of these areas. Comprehensive development is critical in ensuring that large-scale proposals use land efficiently, maximise the efficient and effective delivery of infrastructure over the life of the development, and ensure the protection and enhancement of natural resources. The Strategic Allocations Report details the process by which the approximate capacity of the sites in Table SA1 was calculated, *except for allocations at Twigworth, Winnycroft and West Cheltenham. The*	

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		capacity of these sites has been informed through the JCS evidence base as it progressed after submission . The approach took into account extensive work carried out over a number of years on the developable areas within these allocation boundaries. Once these areas were identified, the yield of housing predicted to arise from the site was reduced to take into account infrastructure and green space requirements. These reductions in yield are in addition to reductions made to allow for areas already identified solely for green infrastructure within the allocation boundaries. Where available, detailed work from prospective developers was assessed and considered along with other available technical reports to ensure that the numbers in Table SA1 are as accurate and achievable as possible.	Updated for new strategic allocations not previously covered by the Strategic Allocations report.
PMM0102	Policy	**Policy SA1: Strategic Allocations Policy** 1. New development will be provided within Strategic Allocations in order to deliver the scale and distribution of development set out in Policies SP1 and SP2. 2. The Strategic Allocations are listed in Table SA1 and delineated on Plans A1-A11~~9~~ below and are marked on the *proposals map* ~~proposed submission policies map~~. The red lines on Plans A1–A11~~9~~ (not including *A2, A6, A7 and A8 which have been removed from the JCS*) mark the boundaries of the allocations and are separately and collectively part of this policy. 3. *Each Strategic Allocation is supported by site specific policies A1-A11 (not including A2, A6, A7 and A8) which have been removed from the JCS) below to provide further detailed guidance on the development of these sites. These site policies also form part of this policy.* 4. *Development proposals should enable a comprehensive scheme to be delivered across the developable area within each Strategic Allocation. Developers must ensure that the sites provide an appropriate scale and mix of uses, in suitable locations, to create sustainable developments that support and complement the role of existing settlements and communities.* 5. Proposals must be accompanied by a comprehensive masterplan for the *entire* Strategic Allocation. This should demonstrate how new development will integrate with and complement its surroundings in an appropriate manner, in accordance with Policy SD5.	(2) Changes to reflect new and removed sites and numbering. (3) Addition to policy to link to new individual site policies which are parts of the whole SA1 policy. (4) Policy point altered to remove infrastructure which is dealt with in more detail under a specific policy point. (5) Clarification to make clear that policy points apply to the whole red line boundary of a Strategic Allocation. (former point 4)

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		~~4. Proposals will be required to demonstrate how the provision of new gypsy, traveller and travelling Showpeople sites will be incorporated into development proposals for Strategic Allocations.~~ 6. Strategic Allocations ~~which include residential development~~ should seek in all cases to retain and enhance areas of local green space within the boundary of the allocation, which meet the criteria in ~~the~~ NPPF *and relevant national guidance* ~~Paragraph 77~~ whilst delivering the scale and distribution of development required by this policy. This is in addition to the requirements of Policy INF4. *7.* ~~Development proposals should enable a comprehensive scheme to be delivered across the developable area within each Strategic Allocation.~~ *Infrastructure should be planned and provided comprehensively across the site taking into account of the needs of the whole Strategic Allocation. Developers must engage with the relevant infrastructure regulators and providers to ensure the implementation of the Infrastructure Delivery Plan and the provision of any other necessary infrastructure in accordance with Policies INF7 and INF8.* ~~Developers must engage with the relevant infrastructure regulators and providers to ensure implementation of the Infrastructure Delivery Plan or provision of other necessary infrastructure, as appropriate, and in accordance with Policies INF7 and INF8. Developers must ensure that Strategic Allocations provide an appropriate scale and mix of uses, in suitable locations, to create sustainable urban extensions that support and complement the role of existing settlements and communities.~~ *8. The transport strategy to support the delivery of Strategic Allocations should align with and where appropriate contribute to the wider transport strategy contained within the Local Transport Plan, including priority transport corridors and junctions. The development of Strategic Allocations must encourage the use of walking, cycling and the use of public transport and ensure that transport demands arising from the development can be effectively mitigated in accordance with Policy INF1.* **This policy contributes towards achieving Objectives 1, 2, 4, 6, 7, 8 and 9**	Requirement for gypsy and traveller provision removed and dealt with under Policy SD14. (6) Removed restriction of only applying to Strategic Allocations which include residential development and reworded for clarity. (7) Reinforcing the need for a comprehensive approach to infrastructure provision across Strategic Allocations. (8) To emphasise the need for Strategic Allocations to address transport impact and sustainable transport modes.
PMM0103	Table SA 1	**Table SA 1**	Table modified to reflect the removal and inclusion of Strategic Allocations and

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes						Reason
				Indicative Housing Site Total	Indicative Housing to be delivered up to 2031	Hectares of Employment Land to be delivered up to 2031		to update with latest capacity figures.
			A1 Innsworth	*1300* ~~1250~~	*1300* ~~1250~~	9.1		
			A1a Twigworth	*995*	*995*	N/A		
			~~A2 North Churchdown~~	~~532~~	~~532~~	~~N/A~~		
			A3 South Churchdown	*1100* ~~868~~	*1100* ~~868~~	17.4		
			A4 North Brockworth	1500	1500	*3* ~~N/A~~		
			A5 North West Cheltenham	*4285* ~~4785~~	*4285* ~~4785~~	23.4		
			~~A6 South Cheltenham Leckhampton~~	~~1124~~	~~1124~~	~~N/A~~		
			~~A8 MoD Site at Ashchurch~~	~~2726 (*2125 up to 2031)~~	~~2125~~	~~20 *~~ ~~*(this is replacement of existing use)~~		
			A9 Ashchurch	N/A	N/A	14.3		
			A10 Winneycroft	*620*	*620*	*N/A*		

JCS Table of Main Modifications

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>A11 West Cheltenham</td><td>1100</td><td>1100</td><td>45</td></tr>
<tr><td>Total</td><td><s>13,993</s> 10,900</td><td><s>12,284</s> 10,900</td><td><s>64.2</s> 112.2</td></tr>
</table>
</td><td></td></tr>
<tr><td>PMM0104</td><td>6.1.4</td><td>Proposals for development at Strategic Allocations must have regard to all relevant planning policies in the plan as well as Policy SA1, including site specific policies A1-A11. <s>The JCS identifies a number of specific requirements for Strategic Allocations and other major developments, which include the following :</s>
<table>
<tr><th><s>Policy</s></th><th><s>Requirement</s></th></tr>
<tr><td><s>SD3</s></td><td><s>The provision of new local centres of an appropriate scale to provide for the everyday needs of new communities.</s></td></tr>
<tr><td><s>SD4</s></td><td><s>Major planning applications must be accompanied by a waste minimisation statement and an Energy Statement.</s></td></tr>
<tr><td><s>SD5</s></td><td><s>Policy SD5 sets out design requirements including masterplanning. Masterplans are required for all Strategic Allocations by Policy SA1.</s></td></tr>
<tr><td><s>SD7</s></td><td><s>Planning applications will be supported by a Landscape and Visual Impact Assessment where, at the discretion of the local planning authority, one is required.</s></td></tr>
<tr><td><s>SD9</s></td><td><s>Development proposals at Strategic Allocations must have regard to the findings and recommendations of the JCS Historic Environment Assessment (or any subsequent revision).</s></td></tr>
<tr><td><s>SD14</s></td><td><s>Policy SD14 sets criteria for proposals for new Gypsy, Traveller and Travelling Showpeople sites. Policy SA1 requires proposals at Strategic Allocations to consider provision of these sites at these locations.</s></td></tr>
</table>
</td><td>Earlier versions of the JCS did not include site specific policies for each strategic allocation. This table was intended to re-inforce the most relevant parts of the plan for strategic allocation purposes, but has been superseded by these policies. The plan must be read and applied as a whole in each case.</td></tr>
</table>

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		~~SD15~~ ~~Proposals for development at Strategic Allocations must be accompanied by a health impact assessment.~~ ~~INF3~~ ~~The cumulative impact of the proposed development on flood risk in relation to existing settlements, communities or allocated sites must be assessed and effectively mitigated.~~ ~~INF4~~ ~~Development at Strategic Allocations will be required to deliver connectivity through the site linking urban areas with the wider rural hinterland.~~	
PMM0105	Strategic Allocations Information	**Strategic Allocations** ***Policies & Maps*** ~~**Information**~~ ~~Red line plans and descriptions~~ The red lines on each of the Strategic Allocations plans show the policy allocation area, and are drawn to follow identifiable boundaries such as roads and watercourses wherever available. Areas of land and buildings which may not be suitable or available for *development or* redevelopment are included within these boundaries. However, site allocations work has indicated that a development of the scale set out in Table SA1 will be achievable within these locations. *Proposals should also take into account the indicative site layouts presented for each allocation as part of this document, integrating key elements into site masterplanning where practical.* Full regard must be given to the requirements of the NPPF and the development plans of each of the three councils when assessing development options for these locations. ~~Proposals should take account of the indicative site layouts prepared as part of this document and ensure that key elements are wherever possible integrated into masterplanning.~~ *Furthermore, in order to ensure the sustainable development of the allocations, a site specific policy has been prepared which sets out the key principles and*	Reworded to improve clarity and emphasise the introduction of site specific policies.

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		infrastructure requirements.	
PMM0106	Plan A1 Innsworth	***POLICY A1 - Innsworth & Twigworth*** *The Strategic Allocation identified at Innsworth & Twigworth (as shown on Proposals Map Plan A1) will be expected to deliver:* *i. Approximately 2,295 new homes* *ii. Approximately 9 hectares of employment generating land* *iii. A local centre including the provision of an appropriate scale of retail, healthcare and community facilities to meet the needs of the new community* *iv. New primary and secondary education schools and facilities* *v. A green infrastructure network of approximately 100 hectares, corresponding with flood zones 2 and 3.* *vi. Protection to key biodiversity assets, including a new nature reserve with the green infrastructure area to support the restoration of the SSSI and improve the ecology of the area.* *vii. Adequate flood risk management across the site and ensure that all vulnerable development is located wholly within flood zone 1. This includes measures to reduce flood risk downstream through increasing storage capacity.* *viii. Flood risk management will be a critical part of master planning the site in linking the Innsworth and Twigworth areas, avoiding overland flow routes and addressing surface water flooding. Detailed flood risk assessments must utilise the latest flood risk modelling information for the whole site and any other areas impacted by the development in terms of flood risk.* *ix. A layout and form of development that respects the landscape character as well as the character and setting of heritage assets and the historic landscape.* *x. A layout and form that integrates, where appropriate, important hedgerows within the development.* *xi. A layout and form that reduces the impact of electricity pylons and high voltage lines; with the siting of residential development being a particular consideration.* *xii. Primary vehicle accesses from A38, Innsworth Lane and explore the potential for a new main*	Each Strategic Allocation has been given a site specific policy to covered detailed issues to be considered in bringing forward development. These delivery issues are based the JCS evidence base and is what is considered necessary to enable sustainable development.

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		junction onto the A40 to the south of the site. *xiii. The potential for a highway link through both the Innsworth and Twigworth sites linking the A38 and A40.* *xiv. Measures necessary to mitigate the traffic impact of the site, including the use of travel plans to encourage the use of more sustainable transport modes.* *xv. High quality public transport facilities and connections within and adjacent to the site* *xvi. Safe, easy and convenient pedestrian and cycle links within the site and to key centres, providing segregated links where practical.*	
PMM0107	Plan A1 Innsworth	**Plan A1 – Innsworth *& Twigworth*** This Strategic Allocation lies to the north of Gloucester and is bounded by Innsworth Lane and Innsworth Technology Park to the south, open countryside to the west, *Down Hatherley Lane* ~~the Hatherley Brook and its associated floodplain~~ to the north, and Frogfurlong Lane and Imjin Barracks to the east. The residential settlement of Innsworth lies to the south of the site *and Twigworth and Down Hatherley to the north*. *The Hatherley Brook and its associated floodplain run through the centre of the site which also includes* ~~A~~*a* Site of Special Scientific Interest. ~~is situated within the Strategic Allocation to the north west of the site.~~	Site description amended to include reference to the Twigworth site.
PMM0108	Plan A2 North Churchdown	~~**Plan A2 – North Churchdown**~~ ~~This Strategic Allocation lies to the north of Churchdown and is bounded by the A40 Golden Valley to the south, Parton Road and residential development to the south west, the B4063 to the west, and Normans Brook and the Gloucestershire Airport to the north east. The site is located to the north of the built-up area of Churchdown village.~~	Site removed as a strategic allocation.
PMM0109	Plan A3 South Churchdown	***POLICY A3 - South Churchdown*** *The Strategic Allocation identified at South Churchdown (as shown on Proposals Map Plan A3) will be expected to deliver:* *i. Approximately 1,100 new homes.* *ii. Approximately 17 hectares of employment generating land.*	Each Strategic Allocation has been given a site specific policy to covered detailed issues to be considered in bringing forward development. These delivery issues are

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		iii. Provision of an appropriate scale of retail, healthcare and community facilities to meet the needs of the new community. *iv. Contribution to primary and secondary education schools and facilities* *v. A green infrastructure network of approximately 50 hectares, including protection and enhancement of visual linkages from Tinker's Hill and Churchdown through to Innsworth Ditch, and the safeguarding of Pirton Brake ancient woodland and buffer strip along the railway line. Habitat creation and management should complement the reserve at Horsbere flood management scheme to the immediate south of the Railway line.* *vi. A landscape buffer along the route of the A40 and the railway line including the protection of views from Tinkers Hill/Churchdown Hill.* *vii. Protection to key biodiversity assets, including Innsworth Ditch and the safeguarding of the ponds and associated biodiversity at Pirton Court.* *viii. Adequate flood risk management across the site and ensure that all vulnerable development is located wholly within flood zone 1.* *ix. A layout and form of development that respects the landscape character and separation of the villages Churchdown, Innsworth, Longlevens and Elmbridge.* *x. A layout and form of development that respects the character and setting of Pirton Farmhouse and Barn.* *xi. A layout and form that reduces the impact of electricity pylons and high voltage lines; with the siting of residential development being a particular consideration.* *xii. Primary vehicle accesses from B4063 Cheltenham Road East and Pirton Lane and explore the potential for a new access junction to the site from the A40.* *xiii. Measures necessary to mitigate the traffic impact of the site, including the use of travel plans to encourage the use of more sustainable transport modes.* *xiv. High quality public transport facilities and connections within and adjacent to the site* *xv. Safe, easy and convenient pedestrian and cycle links within the site and to key centres, providing segregated links where practical. This should include enhancement of Sustrans Route 41 to extend the route through the site.* *xvi. Safeguard land for an extension to the planned park and ride facility at Elmbridge.*	based the JCS evidence base and is what is considered necessary to enable sustainable development.

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
PMM0110	Plan A4 – North Brockworth	***POLICY A4 - North Brockworth*** *The Strategic Allocation identified at North Brockworth (as shown on Proposals Map Plan A4) will be expected to deliver:* *i. Approximately 1,500 new homes.* *ii. Approximately 3 hectares of employment generating land.* *iii. Provision of an appropriate scale of retail, healthcare and community facilities to meet the needs of the new community.* *iv. New primary and secondary education schools and facilities* *v. A green infrastructure network of approximately 27 hectares including provision across the A46 and along Court Road towards Churchdown and along Horsbere Brook.* *vi. The retention of the small traditional orchard to the east of the allocation.* *vii. A layout and form of development that respects the character and setting of the heritage asset at Brockworth Court and integrates, where appropriate, historically important hedgerows within the development.* *viii. Adequate flood risk management across the site and ensure that all vulnerable development is located wholly within flood zone 1.* *ix. Protection to key biodiversity assets, including facilitating the active management of Horsbere Brook.* *x. Primary vehicle accesses from Delta Way, Valiant Way and Court Road.* *xi. Measures necessary to mitigate the traffic impact of the site, including the use of travel plans to encourage the use of more sustainable transport modes.* *xii. High quality public transport facilities and connections within and adjacent to the site* *xiii. Safe, easy and convenient pedestrian and cycle links within the site and to key centres, providing segregated links where practical. Particular consideration should be given to the upgrading of the pedestrian and cycle crossing on Valiant Way between residential and employment areas.*	Each Strategic Allocation has been given a site specific policy to covered detailed issues to be considered in bringing forward development. These delivery issues are based the JCS evidence base and is what is considered necessary to enable sustainable development.
PMM0111	Plan A5 North West Cheltenham	***POLICY A5 - NORTH WEST CHELTENHAM*** *The Strategic Allocation identified at North West Cheltenham (as shown on Proposals Map Plan A5) will*	Each Strategic Allocation has been given a site specific policy to covered

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		be expected to deliver: *i. Approximately 4,285 new homes* *ii. Approximately 23 hectares of employment generating land, including a 10 hectare B-class office park* *iii. Local centre(s) including the provision of an appropriate scale of retail, healthcare and community facilities to meet the needs of the new community,* *iv. New primary and secondary education schools and facilities* *v. A green infrastructure network of approximately 100 hectares which will conserve the River Swilgate and Hyde Brook corridors, protecting important trees and hedgerows where appropriate.* *vi. Protection to key biodiversity assets including through the development of a Biodiversity Management Plan.* *vii. Adequate flood risk management across the site and ensure that all vulnerable development is located wholly within flood zone 1.* *viii. A layout and form of development that respects the landscape character and separation of the villages of Brockhampton, Elmstone Hardwicke, Swindon and Uckington.* *ix. A layout and form that respects the character and setting of heritage assets that may be affected by development.* *x. A layout and form that respects area of high landscape character and visual sensitivity, including key views into the site from the surrounding key visual and landscape receptors* *xi. Primary vehicle accesses from the A4019 Tewkesbury Road, secondary access from Runnings Road/Manor Road, and public transport only access to Swindon village via Quat Goose Lane.* *xii. Measures necessary to mitigate the traffic impact of the site, including the use of travel plans to encourage the use of more sustainable transport modes.* *xiii. High quality public transport facilities and connections within and adjacent to the site, including a multi-use transport hub with circa 350 parking spaces.* *xiv. Safe, easy and convenient pedestrian and cycle links within the site and to key centres, providing segregated links where practical.* *xv. Take into account of the indicative Local Green Spaces identified on the Proposals Map with consideration of the special features of that area which make it suitable for this designation.*	detailed issues to be considered in bringing forward development. These delivery issues are based the JCS evidence base and is what is considered necessary to enable sustainable development.

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
PMM0112	Plan A6 South Cheltenham Leckhampton	~~**Plan A6 – South Cheltenham – Leckhampton**~~ ~~The Strategic Allocation area is located to the south of Cheltenham, south of Shurdington Road and north of Church Road, on the lower slopes of Leckhampton Hill, adjoining the Cotswolds AONB. The land is divided by Hatherley Brook and crossed diagonally from north-west to south-east by Kidnappers Lane. The area to the north of the Strategic Allocation contains a mixture of paddocks, allotments, small holdings, nurseries and some dwellings. It is divided by hedges with few specimen trees. This Strategic Allocation is of local historical importance to Leckhampton, which has long been an area of settlement. The Church, The Rectory, Field Cottage and Moat Cottage are all listed buildings, and the moated site is an ancient monument.~~	Site removed as a strategic allocation.
PMM0113	Plan A7 South Cheltenham Up Hatherley Way	~~**Plan A7 – South Cheltenham – Up Hatherley Way**~~ ~~Removed.~~	Site removed as a strategic allocation at Pre-Submission stage.
PMM0114	Plan A8 MoD Site at Ashchurch	~~**Plan A8 – MOD Site at Ashcurch**~~ ~~Land at this location covers a large area which extends from the A46 northwards to Aston Carrant Lane. The mainline railway provides the western boundary for this Strategic Allocation. Most of the site is previously developed land, which comprises an army camp. It also has a railway spur which extends into the site from the south west. The northern part of the allocation is greenfield land which is currently largely agricultural land. The residential area of Ashchurch is situated to the west of the site, and there is open countryside to the north, east and south of the site.~~	Site removed as a strategic allocation.
PMM0115	Plan A9 Ashchurch	***POLICY A9 - Ashchurch*** *The Strategic Allocation identified at Ashchurch (as shown on Proposals Map Plan A9) will be expected to deliver:* *i. Approximately 14 hectares of employment generating land.* *ii. A green infrastructure network of approximately 5 hectares including a green corridor along the route of the Tirle Brook and a woodland belt at the southern boundary of the site to minimise harm*	Each Strategic Allocation has been given a site specific policy to covered detailed issues to be considered in bringing forward development. These delivery issues are based the JCS evidence

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		to views from Oxenton Hill. *iii. Adequate flood risk management across the site and ensure that all vulnerable development is located wholly within flood zone 1.* *iv. Primary vehicle access from the A46 and a secondary access from Fiddington Lane.* *v. Measures necessary to mitigate the traffic impact of the site, including the use of travel plans to encourage the use of more sustainable transport modes. This shall include consideration of the operation of the Strategic Road Network.* *vi. Development that does not prejudice future highway improvements to the A46. This may include requirements to safeguarded sufficient land to allow for the delivery of future highway infrastructure improvements around the A46 and M5 Junction 9.* *vii. High quality public transport facilities and connections within and adjacent to the site. This may include measures that will help facilitate an enhanced rail passenger service from Ashchurch for Tewkesbury station and bus advantage measures long the A438/A46 corridor where practical.* *viii. Safe, easy and convenient pedestrian and cycle links within the site and to key centres and the railway station, providing segregated links where practical.*	base and is what is considered necessary to enable sustainable development
PMM0116	Strategic Allocations Information	***POLICY A10 - Winneycroft*** *The Strategic Allocation identified at Winneycroft (as shown on Proposals Map Plan A10) will be expected to deliver:* *i. Approximately 620 new homes* *ii. A comprehensive green infrastructure network will be provided on site, including the provision of on-site allotments, a new on-site community orchard, and the retention of protected trees.* *iii. Areas of informal and formal recreation space on-site including the provision of permanent changing facilities.* *iv. Adequate flood risk management across the site, including betterment works to the Sudbrook to provide downstream attenuation.* *v. A layout and form that integrates, where appropriate, important hedgerows within the development.* *vi. A layout and form that respects the landscape character of the edge of city setting and the*	Each Strategic Allocation has been given a site specific policy to covered detailed issues to be considered in bringing forward development. These delivery issues are based the JCS evidence base and is what is considered necessary to enable sustainable development

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		transition to suburban and rural character to south and east of the site. *vii. A layout and form that respects the setting of the heritage asset at Winneycroft Farm and the adjacent historic orchard area.* *viii. A layout and form that reduces the impact of electricity pylons and high voltage lines; with the siting of residential development being a particular consideration.* *ix. Primary vehicle accesses from Corncroft Lane and Winneycroft Lane.* *x. Measures necessary to mitigate the traffic impact of the site, including the use of travel plans to encourage the use of more sustainable transport modes.* *xi. High quality public transport facilities and connections within and adjacent to the site.* *xii. Safe, easy and convenient pedestrian and cycle links within the site and to key centres and the wider green infrastructure network, providing segregated links where practical.*	
PMM0117	Strategic Allocations Information	***PLAN A10 - Winnycroft*** *Winnycroft is an area located to the south east of Gloucester city where the existing urban fringe of Gloucester meets the semi-rural area. The area is bounded by Winnycroft Lane to the west, Corncroft Lane to the north and the M5 motorway to the east and south. The existing land use is agricultural land.*	Site description added for Winnycroft Strategic Allocation
PMM0118	Strategic Allocations Information	***POLICY A11 – West Cheltenham*** *The Strategic Allocation identified at West Cheltenham (as shown on Proposals Map Plan A11) will be expected to deliver:* *i. Approximately 1,100 new homes* *ii. Approximately 45 hectares of B-class led employment land to be focussed upon a cyber security hub and other high technology and high 'Gross Value Added' generating development and ancillary employment uses* *iii. All development should be employment led, delivery of housing must be in tandem with employment development* *iv. A comprehensive masterplan and development strategy for the strategic allocation, set within the context of the safeguarded land at West Cheltenham, which includes:* *a. a delivery strategy for employment focussed land release*	Each Strategic Allocation has been given a site specific policy to covered detailed issues to be considered in bringing forward development. These delivery issues are based the JCS evidence base and is what is considered necessary to enable sustainable development

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		b. a positive impact on the regeneration of neighbourhoods in west Cheltenham *c. Integrates built form and a comprehensive network of accessible green infrastructure, including local green space. The network will incorporate and protect notable natural features, including the Hatherley Brook, the Fiddlers Green Key Wildlife Site and important trees and hedgerows.* *v. Primary vehicle accesses from Fiddlers Green Lane and B4634 Old Gloucester Road.* *vi. Measures necessary to mitigate the traffic impact of the site, including the use of travel plans to encourage the use of sustainable transport modes.* *vii. High quality public transport facilities and connections within and adjacent to the site.* *viii. Safe, easy and convenient pedestrian and cycle links within the site, to key centres and with neighbouring existing development and the wider green infrastructure network* *ix. A distribution of development that takes account of the proximity of the Hayden sewage treatment works and incorporates appropriate spatial planning arrangements and mitigation measures designed to minimise material impacts on residential properties and commercial premises. Development which is likely to be significantly affected by odours will not be permitted within the Odour Monitoring Zone identified on the proposals* *x. A landscape buffer to the western boundary of the site which will provide screening between the development and the Hayden sewage treatment works.*	
PMM0119	Strategic Allocations Information	***PLAN A11 – West Cheltenham*** *Land to the west of Cheltenham is relatively flat land drained by the River Chelt. The West Cheltenham Strategic Allocation is adjacent to the urban edge of Cheltenham and has an urban fringe character. The area is bounded by Old Gloucester Road to the north, Hayden Lane to the east and Pheasant lane to the South. To the east of the allocation is land safeguarded for the further growth of Cheltenham well beyond the plan period, which includes the Hayden Sewage Treatment works. The land within the allocation is predominately in agricultural use.*	Site description added for West Cheltenham Strategic Allocation
PMM0120	Indicative site layouts	**Indicative site layouts** ~~The indicative site layouts have not yet been revised following draft JCS consultation. New, more indicative and diagrammatic place-shaping layouts will replace these graphics to indicate our work on options for identifying sustainable and achievable developments on the sites. These layouts have been~~	Deleted as the Indicative site layouts have now been revised to take into account the outputs of the examination sessions and

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		~~generated using only a specific set of constraints as set out in Strategic Allocations Report and therefore are subject to these limitations. These layouts will not be included in policy and are intended only as guidance.~~	from the Interim Report.
PMM0121	Part 7 Monitoring & Review 7.1 7.2 7.3 7.4	PART 7 – *Delivery,* Monitoring & Review *Delivery (including Housing Implementation Strategy)* *Whilst the JCS can allocate sites and local authorities can discuss with landowners and developers how best to bring their sites forward in the allocated locations, there is always a risk that sites may not come forward as planned during the anticipated timescale. Therefore the NPPF states the need for a Housing Implementation Strategy (HIS) which explains what the JCS authorities will do should there be any barriers to delivering development as proposed by Policies SP1 and SP2 (see Pages 25 and 29), and also how to respond to changing circumstances. The HIS (which takes forward the Housing Background Paper – EBLO 101) sets out the trajectory and delivery for both market and affordable housing.* *The JCS sets out key principles, but many proposals need to be developed through more detailed policy documents, such as the district plans and development briefs which will take time to prepare. Large sites will take time to masterplan and commence development, especially where significant infrastructure is required. There is likely to be a contingency supply of housing from unallocated sites, including capacity delivered through the urban areas and across rural service centres and service villages. This provides some buffer for slippage in the anticipated delivery of larger sites.* *Delivering the strategy will also require a wide range of private, public sector and voluntary bodies working together. In preparing the strategy, the JCS authorities have worked with infrastructure providers and landowners/developers to establish that the allocated strategic sites are deliverable. If circumstances change, the JCS authorities will implement the measures set out below to ensure that the required housing and employment needs will still be met during the plan period. Any requirement to bring forward additional sites or alternative strategies in local plans will need to be in line with the distribution strategy of this plan as set out in this document in Policies SP1 and SP2.*	Text has been taken from the Delivery part of the Introduction, but has been amended to include reference to the Housing Implementation Strategy

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
PMM0122	7.1 7.2 7.3 7.4	*Monitoring* ~~Background~~ Monitoring the performance of the Plan is essential to assess the effectiveness of the JCS and to record whether proposals and policies are being implemented and delivered. The outputs of appropriate monitoring will enable the councils to be fully informed of the progress of development in the area and whether a full or partial review of the plan is necessary. The NPPF sets out that plans should be flexible to adapt to changing circumstances. ~~As detailed in the introduction to this plan, t~~The councils are committed to reviewing the plan if delivery issues emerge through monitoring, and will implement measures to ensure that housing, employment and infrastructure needs are met during the plan period. In order to ensure effective monitoring, a *Monitoring* Framework has been prepared, setting out key indicators that will track the delivery of the plan. The tables below set out the indicators in relation to each JCS objective. They include any specifically-identified target, the source of the data, and the frequency of monitoring. The range of indicators reflects the JCS's relationship with other plans and programmes and therefore includes *relevant national* indicators ~~required by Government as part of the 'Single List', 'Contextual Indicators' (CI) which relate to local characteristics and issues of the locality~~ and other 'Local Indicators' such as those from the Local Transport Plan (LTP). *The monitoring outcomes will be reported through a single JCS Authority Monitoring Report (AMR) which will be regularly updated*. ~~The monitoring outcomes for each Development Plan Document will be reported in each Authority's Monitoring Report (AMR).~~ The AMR is required to outline the progress in preparing the documents and assess the extent to which the policies are being implemented and their effectiveness. Where a policy is not meeting its objective, the AMR will explain why and suggest what action should be taken. The monitoring framework itself will be reviewed as part of the AMR. *The NPPF requires plans to be flexible and responsive to change. If monitoring indicates that delivery*	Section moved from the Introduction and expanded These changes reflect the discussions at the hearings around the trigger mechanisms and the Gloucestershire devolution bid. Includes the inspector request for an immediate review of the retail topic. Provides for clarification as AMR's are no longer required annually.

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		problems are emerging or that circumstances are changing in other ways, the JCS authorities will consider implementing some or all the following measures to bring forward development: • *working with developers and infrastructure providers to remove obstacles to the delivery of sites* • *seeking alternative sources of funding if problems with infrastructure provision is delaying development of key strategic sites* • *the early release of safeguarded land* • *identifying alternative site(s) in general accordance with the distribution strategy of this plan as set out in Policies SP1 and SP2 which may be delivered through District Plans* • *working with other authorities under the Duty to Co-operate to address any unmet needs. This will include continued cross-boundary working with Stroud District Council and Wychavon District Council.*	
PMM0123	Part 7 Monitoring & Review 7.1 7.2 7.3 7.4	*Review* *Housing Supply Review Mechanism* *To reflect the government's emphasis on flexibility, the methodology for a JCS review will be reviewed in whole or in part is based upon a trigger mechanism.* *The trigger mechanism solely for monitoring purposes is a 10% buffer applied to the Housing Requirement of each JCS Authority on an annual basis. This mechanism will serve as an early warning to the JCS Authorities when a housing land supply shortfall could be imminent and corrective action is required. Thus the mechanism would be triggered where completions in any year fell below 110% of the Trajectory.* ***In the event of the strategic allocations cumulatively delivering less than 75% of their projected housing completions (considered annually), over three consecutive years (based on the trajectories set***	These changes reflect the discussions at the hearings around the trigger mechanisms and the Gloucestershire devolution bid. Includes the inspector request for an immediate review of the retail topic.

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		out in the Housing Implementation Strategy), this will trigger the need for the consideration of a partial or full JCS review. *In line with the Gloucestershire devolution bid to the Government, any full or partial review is intended to be aligned with the other Gloucestershire authorities. This is intended to begin within 5 years of adoption of the JCS in line with national guidance.* *"We will work together to achieve … core strategies and local plans … and coordination of plan reviews by 2020" (Gloucestershire Devolution Bid - September 2015)* *Retail Review* *Notwithstanding the above trigger mechanism, a single issue review of the JCS will be undertaken for the Retail and Town Centres policy (SD3) immediately after the adoption of the JCS. This single issue review will take approximately 2 years to complete.*	
PMM0123a	Part 7 Monitoring & Review	*Gloucester Housing Supply Review* *As presented in the housing trajectories below, Gloucester City has an identified shortfall against the total JCS housing requirement of 1,313 dwellings. Despite this shortfall, Gloucester City can maintain at least a 5.8 years supply of housing land and sufficient sites to delivering housing in the short to medium term. However, it is critical that the shortfall is addressed over the plan period and the JCS authorities are providing an approach to dealing within this in a strategic and plan-led way.* ***To deal with the shortfall the JCS authorities will undertake an early review of Gloucester's housing supply following the adoption of the JCS.*** *It has not been possible to identify sites within the JCS now to meet all of Gloucester's housing requirements for the entire plan period. However, the JCS authorities are committed to continue to working, through a review of the plan, to identify and allocate sites that will deliver housing growth. A review of the plan will explore the further potential for sites to meet Gloucester's needs in the latter part of the plan period.*	Modification included to set out the commitment to deal with Gloucester's housing shortfall through an early review.

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		This review will allow consideration of any other development options that become available, both within and outside the JCS area. This could include further development opportunities within the urban area that are not currently deliverable, as well as exploring the potential for urban extensions. The JCS authorities have a Statement of Cooperation in place with Stroud District regarding the need to explore meeting unmet needs arising from the JCS area within Stroud District where it is reasonable to do so and consistent with achieving sustainable development. As such, it is important than any review is undertaken in tandem with the review of the Stroud Local Plan so that all potential development alternatives are comprehensively explored using agreed site assessment criteria through the plan-making process.	
PMM0123b	Part 7 Monitoring & Review	*Tewkesbury Housing Supply Review* *As presented in the housing trajectories below, Tewkesbury Borough has an identified shortfall against the total JCS housing requirement of 2,843 dwellings. This shortfall has been significantly exacerbated by a recent decision by the Defence Infrastructure Organisation regarding the now delayed release of the MoD Ashchurch strategic allocation which was expected to deliver 2,125 dwellings to 2031. Despite this shortfall, Tewkesbury Borough can maintain at least a 5.3 years supply of housing land and sufficient sites to deliver housing in the short to medium term*. However, it is critical that the shortfall is addressed over the plan period and the JCS authorities are providing an approach to dealing with this in a strategic and plan-led way.* ***To deal with the shortfall the JCS authorities will undertake a review of Tewkesbury's housing supply immediately after the adoption of the JCS.*** *There remains development potential within the Tewkesbury town and Ashchurch area to meet the housing requirements of the Borough. However, there exists barriers and uncertainty over delivery/availability of sites at the current time which means any alternative strategic allocations are not possible within the JCS now. However, the JCS authorities are committed to continue to working, through a review of plan, to identify and allocate sites that will deliver housing and employment growth.*	Modification included to set out the commitment to deal with Tewkesbury's housing shortfall through an early review.

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		The MoD Ashchurch allocation area continues to be an option for sustainable development. The DIO have confirmed the intention to release part of the site for development and there is land that was within the allocation that is not in the DIO/MoD ownership. These land parcels have the potential for release within the plan period and could deliver up 1,600 dwellings. The challenge for these sites that remain available is around access, masterplanning and infrastructure provision which would need to be overcome before an allocation could be made. *A site at Fiddington has been presented as an omission site through the JCS examination and, as concluded in the Inspector's Interim Report (May 2016), it is the only other sustainable strategic site around Tewkesbury town within the JCS area. The site does therefore have potential to meet the development needs of the Borough, however, there are concerns about deliverability at the current time. This revolves around the highway infrastructure needs of the area and investigations into a new 'off-line' alternative to the A46 through Ashchurch. Until more is known about the delivery of this infrastructure then allocation of the site at Fiddington in the JCS now is not considered to be appropriate.* *In addition to this, there is potential within the wider Tewkesbury town and Ashchurch area that present options to meeting housing requirements. This includes sites not discussed through the JCS to date, including those presented through the Tewkesbury Strategic Assessment of Land Availability. However, more site investigation and evidence gathering would need to be undertaken to assess whether they are sustainable options and provide certainty over their deliverability.* *The Borough Council have submitted a bid for the HCA Capacity Fund in order to support the delivery of growth in this area and unlock housing sites both within and beyond the current plan period. This will include facilitating the earlier release of sites where possible, particularly exploring the potential to bring forward the remaining development parcels on the MoD strategic allocation where access and place making are challenges. However it will also involve support for developing a strategy for longer-term growth, looking beyond sites that have been identified through the JCS process and incorporating the impact and opportunities of an off-line A46 route. This will include support for a Development Delivery Plan, including strategic masterplanning, to provide a comprehensive approach which addresses issues such as place making, transport, community building, social infrastructure and green infrastructure. This*	

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		work will help to inform the review of the JCS and the issue of Tewkesbury's housing supply. *Outside of the JCS area a site Mitton, in Wychavon District, has been promoted to the JCS examination as an omission site which could help meet the requirements of Tewkesbury Borough. The JCS authorities are working with Wychavon on the delivery of this site and have an agreed planning statement in place to deal with a first phase of the site coming forward to meet Tewkesbury's needs. The JCS authorities will continue to work with Wychavon on the potential delivery of the site.* **The 5 year supply calculations and housing trajectories provided in the main modifications JCS do not yet include a full update of permissions granted in 2016/17. Tewkesbury Borough has resolved to permit sites that would deliver 269 dwellings that have not yet been taken into account.*	
PMM0124	Part 7 Monitoring & Review	*Trajectories* *Under each Council, the table gives the delivery by year split into other delivery and strategic allocations, followed by the total and cumulative calculations. This is then followed by the annual requirements, which for the case of Cheltenham has a stepped approach. The last two columns give the net difference between requirements and completions and annual requirement taking into account past/projected completions.* *Then again for each Council is a chart which graphically illustrate the requirement versus completions on a cumulative basis.* *For each Council, the 5 years supply calculation is provided.* ***Approach to Previous Delivery Shortfalls Against the Housing Requirement*** *The JCS examination included a discussion regarding whether any plan period shortfalls in delivery could be spread over the remainder of the plan period (Liverpool approach), allowing time for sites to begin delivery to address it. The Submission JCS was accompanied by 5 year supply calculations that included the entire shortfall within the first 5 years (Sedgefield approach). However, it is considered that there is*	Information is from the HIS. This would remain in the HIS on issuing.

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		real merit in using the Liverpool approach and spreading the shortfall across the plan period. *The use of the Liverpool approach has been found to be acceptable in a recent Inspector's report on the Basingstoke and Deane Local Plan 2011-2029 dated 6th April 2016. In his report, the Inspector states (at paragraph 94):* *"The Council's reasons for pursuing the Liverpool approach are linked to its partial reliance on several large sites, which require the provision of significant infrastructure prior to the completion of the first dwellings. These major allocations, which I deal with below in more detail, are sustainably located, near to the main urban areas, especially Basingstoke; they can achieve economies of scale and important community and environmental provision. In my view, these benefits outweigh the delay in their implementation. I therefore support the use of the Liverpool approach for Basingstoke and Deane."* *In this case it was noted that the larger allocations would be delivering a significant proportion of the area's housing need. However, the challenge in delivering these allocations was recognised and that it would take more time for maximum delivery of housing to occur on these sites, particularly due to infrastructure provision. In this Inspector's view the shortfall should be spread across the plan period to allow time for the larger allocations to deliver. The situation at Basingstoke and Dean is comparable and relevant to the JCS.* *The JCS strategic allocation sites are anticipated to start delivering at different years during the plan period and the delivery on each site is staggered to make an allowance for sites to build up to maximum annual delivery over a number of years. The use of the Liverpool approach, as per the Basingstoke and Dean example, would allow time for these sites to come forward to help meet the previous shortfall and deliver the ongoing annual requirements.* *The JCS authorities have therefore prepared trajectory scenarios that use both the Sedgefield and Liverpool approaches to demonstrate the impact that each would have on the 5 year supply calculations. The Inspector has accepted that the Liverpool approach is justified within the JCS area and supports the use of this approach in her Interim Report (Exam 232, Para 26).*	

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
PMM0125	Part 7 Monitoring & Review	*Gloucester* *The charts below for Gloucester, illustrates a historic undersupply, but an over-supply in the middle plan period which gives a comfortable 5-year supply using the Liverpool method. The latter 3 years of the plan period shows the shortfall. However, an early review of Gloucester's housing supply will enable sites to be identified to meet the full requirement.*	Delivery and supply calculations provided for each authority area.

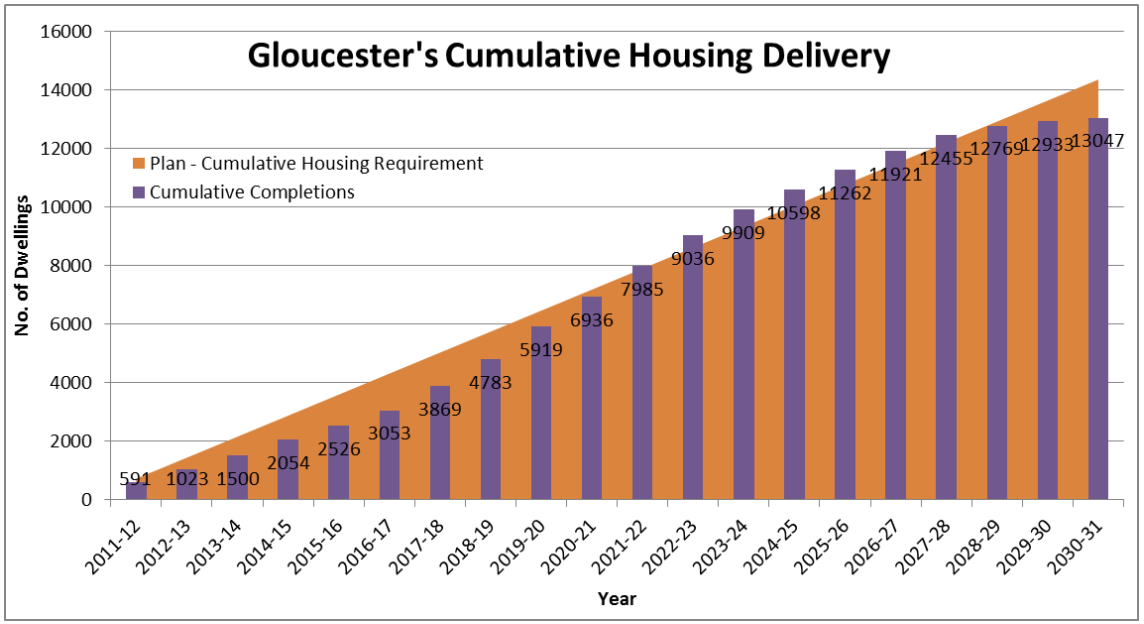
JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		(NEW TABLE)	

Gloucester — **Liverpool**

Year	Other Delivery	SA Delivery	Total Projected Completions	Cumulative Completions	**Plan** - Annual Housing Requirement	**Plan** - Cumulative Housing Requirement	**Monitor** - No. of dwellings above or below cumulative requirement	**Manage** - annual requirement taking account of past/projected completions
2011-12	591	0	591	591	718	718	127	718
2012-13	432	0	432	1023	718	1436	413	724
2013-14	477	0	477	1500	718	2154	654	740
2014-15	554	0	554	2054	718	2872	818	754
2015-16	472	0	472	2526	718	3590	1064	766
2016-17	527	0	527	3053	718	4308	1255	785
2017-18	741	75	816	3869	718	5026	1157	802
2018-19	689	225	914	4783	718	5744	961	801
2019-20	761	375	1136	5919	718	6462	543	792
2020-21	567	450	1017	6936	718	7180	244	763
2021-22	524	525	1049	7985	718	7898	-87	740
2022-23	451	600	1051	9036	718	8616	-420	709
2023-24	273	600	873	9909	718	9334	-575	671
2024-25	89	600	689	10598	718	10052	-546	646
2025-26	64	600	664	11262	718	10770	-492	640
2026-27	64	595	659	11921	718	11488	-433	636
2027-28	64	470	534	12455	718	12206	-249	631
2028-29	64	250	314	12769	718	12924	155	656
2029-30	64	100	164	12933	718	13642	709	770
2030-31	64	50	114	13047	718	14360	1313	1073

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		(NEW CHART) 	

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		(NEW TABLE)	

5 year supply calculation

Pre Adoption Delivery			
GCC Annual Housing Requirement	a	718	718
Number of years into the plan period to adoption	b	6	6
Requirement to plan adoption	c	4308	4308
Actual Delivery 2011-2016	d	2526	2526
Anticipated Delivery to Plan adoption (2016 to 2017)	e	505	505
Total anticipated Delivery to Plan adoption	f = d + e	3031	3031
Anticipated shortfall on adoption	g = c - f	1277	1277
5YHLS from Adoption		**Sedgefield**	**Liverpool**
5 Year Requirement	h = a x 5	3590	3590
Remainder of plan period 2022 to 2031	i	14	14
Plan Period Shortfall to be met within the five year period	j, Sedge = g, Liv = (g/i) x 5	1277	456
NPPF Buffer	k = 5% of (h + j)	243	202
Total no. of dwellings required	m = h + j + k	5110	4248
Total anticipated supply	n	4945	4945
Percentage of total requirement met	p = n/m	**96.8%**	**116.4%**
Supply in Years	p = n/m*5	**4.8**	**5.8**

JCS Table of Main Modifications

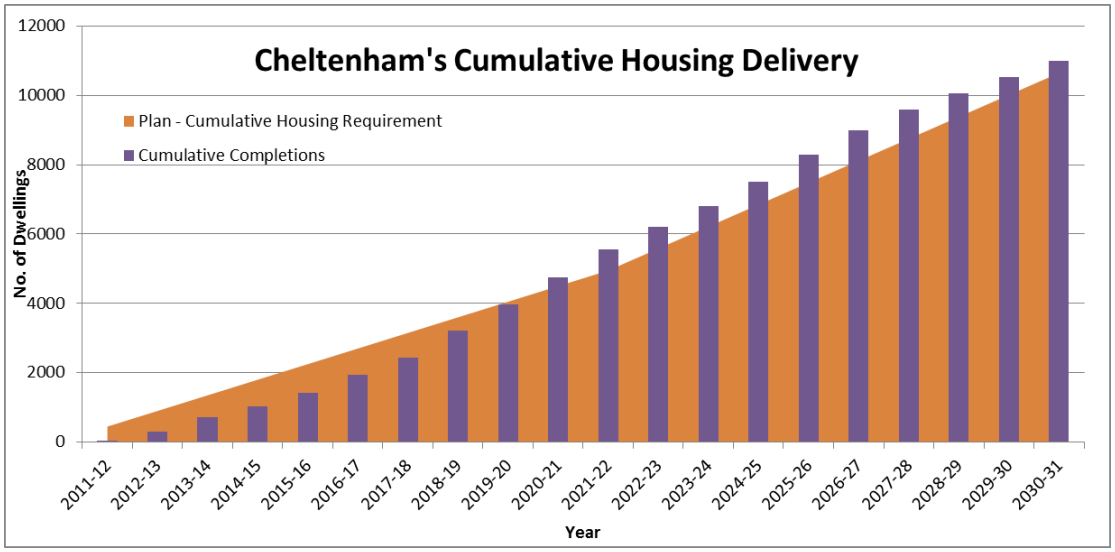
Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
PMM0126	Part 7 Monitoring & Review	*Cheltenham* *The charts below for Cheltenham, illustrates a historic undersupply, but an over-supply in the middle and later plan period giving comfortable 5-year supply.* *A step trajectory has been employed up to 2021/2022, which improves the 5 year supply.*	Delivery and supply calculations provided for each authority area.

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		(NEW TABLE)	

Cheltenham								Liverpool
Year	Other Delivery	SA Delivery	Total Projected Completions	Cumulative Completions	**Plan** - Annual Housing Requirement	**Plan** - Cumulative Housing Requirement	**Monitor** - No. of dwellings above or below cumulative requirement	**Manage** - annual requirement taking account of past/projected completions
2011-12	33	0	33	33	450	450	417	450
2012-13	267	0	267	300	450	900	600	471
2013-14	413	0	413	713	450	1350	637	482
2014-15	316	0	316	1029	450	1800	771	485
2015-16	397	0	397	1426	450	2250	824	495
2016-17	526	0	526	1952	450	2700	748	502
2017-18	415	75	490	2442	450	3150	708	500
2018-19	440	340	780	3222	450	3600	378	501
2019-20	433	310	743	3965	450	4050	85	479
2020-21	487	310	797	4762	450	4500	-262	457
2021-22	471	335	806	5568	450	4950	-618	426
2022-23	282	360	642	6210	633	5583	-627	388
2023-24	238	360	598	6808	633	6216	-592	563
2024-25	218	485	703	7511	633	6849	-662	559
2025-26	188	580	768	8279	633	7482	-797	538
2026-27	140	580	720	8999	633	8115	-884	500
2027-28	83	510	593	9592	633	8748	-844	456
2028-29	93	380	473	10065	633	9381	-684	422
2029-30	79	380	459	10524	633	10014	-510	405
2030-31	92	380	472	10996	633	10647	-349	378

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		(NEW CHART)  	

JCS Table of Main Modifications

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td></td><td></td><td>

(NEW TABLE)

<table>
<tr><td colspan="4">5 year supply calculation</td></tr>
<tr><td colspan="4"></td></tr>
<tr><td>Pre Adoption Delivery</td><td></td><td></td><td></td></tr>
<tr><td>CBC Annual Housing Requirement</td><td>a</td><td>450</td><td>450</td></tr>
<tr><td>Number of years into the plan period to adoption</td><td>b</td><td>6</td><td>6</td></tr>
<tr><td>Requirement to plan adoption</td><td>c</td><td>2700</td><td>2700</td></tr>
<tr><td>Actual Delivery 2011-2016</td><td>d</td><td>1426</td><td>1426</td></tr>
<tr><td>Anticipated Delivery to Plan adoption (2016 to 2017</td><td>e</td><td>496</td><td>496</td></tr>
<tr><td>Total anticipated Delivery to Plan adoption</td><td>f = d + e</td><td>1922</td><td>1922</td></tr>
<tr><td></td><td></td><td></td><td></td></tr>
<tr><td>Anticipated shortfall on adoption</td><td>g = c - f</td><td>778</td><td>778</td></tr>
<tr><td></td><td></td><td></td><td></td></tr>
<tr><td>5YHLS from Adoption</td><td></td><td>Sedgefield</td><td>Liverpool</td></tr>
<tr><td>5 Year Requirement</td><td>h = a x 5</td><td>2250</td><td>2250</td></tr>
<tr><td>Remainder of plan period 2022 to 2031</td><td>i</td><td>14</td><td>14</td></tr>
<tr><td>Plan Period Shortfall to be met within the five year period</td><td>j, Sedge = g, Liv = (g/i) x 5</td><td>778</td><td>278</td></tr>
<tr><td>NPPF Buffer</td><td>k = 20% of (h + j)</td><td>606</td><td>506</td></tr>
<tr><td>Total no. of dwellings required</td><td>m = h + j + k</td><td>3634</td><td>3034</td></tr>
<tr><td>Total anticipated supply 2017 to 2022</td><td>n</td><td>3615</td><td>3615</td></tr>
<tr><td>Percentage of total requirement met</td><td>p = n/m</td><td>99.5%</td><td>119.2%</td></tr>
<tr><td>Supply in Years</td><td>p = n/m*5</td><td>5.0</td><td>6.0</td></tr>
</table>

</td><td></td></tr>
<tr><td>PMM0127</td><td>Part 7 Monitoring & Review</td><td>

Tewkesbury

The charts below for Tewkesbury, demonstrates sufficient housing land supply, including a 5 year supply, until the middle of the plan period where there is a shortfall. A step has been introduced from 2024/25 to

</td><td>Delivery and supply calculations provided for each authority area.</td></tr>
</table>

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		provide Tewkesbury with a sufficient supply until 2028/29. This will enable adequate time to undertake an immediate review of Tewkesbury's housing supply while maintaining a 5 year supply. It should be noted that the 5 year supply calculations and housing trajectories provided in the main modifications JCS do not yet include a full update of permissions granted in 2016/17. Tewkesbury Borough has resolved to permit sites that would deliver 269 dwellings that have not yet been taken into account. This will reduce the housing shortfall and increase the 5 year supply.	

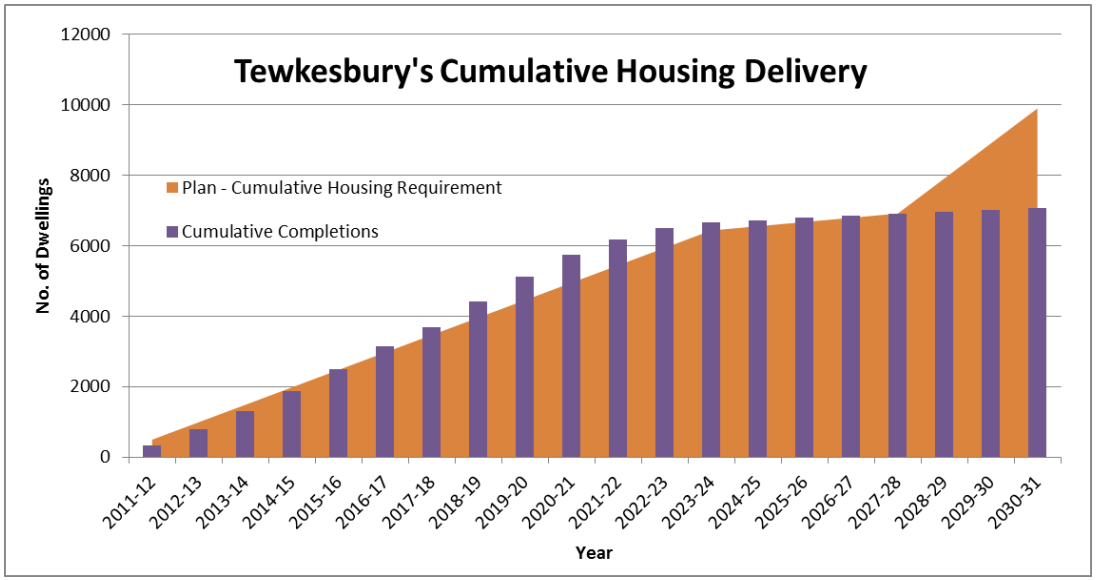
JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		(NEW TABLE)	

Tewkesbury

Year	Other Delivery	SA Delivery	Total Completions and Projected Completions	Cumulative Completions	**Plan** - Annual Housing Requirement	**Plan** - Cumulative Housing Requirement	**Monitor** - No. of dwellings above or below cumulative requirement	**Manage** - annual requirement taking account of past/projected completions
2011-12	318	0	318	318	495	495	177	495
2012-13	462	0	462	780	495	990	210	530
2013-14	513	0	513	1293	495	1485	192	537
2014-15	573	0	573	1866	495	1980	114	533
2015-16	630	0	630	2496	495	2475	-21	518
2016-17	635	0	635	3131	495	2970	-161	491
2017-18	565	0	565	3696	495	3465	-231	463
2018-19	688	25	713	4409	495	3960	-449	449
2019-20	598	125	723	5132	495	4455	-677	405
2020-21	496	125	621	5753	495	4950	-803	360
2021-22	294	125	419	6172	495	5445	-727	334
2022-23	222	100	322	6494	495	5940	-554	350
2023-24	156	0	156	6650	495	6435	-215	384
2024-25	76	0	76	6726	120	6555	-171	452
2025-26	76	0	76	6802	120	6675	-127	86
2026-27	61	0	61	6863	120	6795	-68	95
2027-28	56	0	56	6919	120	6915	-4	106
2028-29	46	0	46	6965	995	7910	945	119
2029-30	46	0	46	7011	995	8905	1894	1184
2030-31	46	0	46	7057	995	9900	2843	1374

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		(NEW CHART)  	

JCS Table of Main Modifications

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td></td><td></td><td>(NEW TABLE)
<table>
<tr><td>5 Year Supply Calculation</td><td></td><td></td></tr>
<tr><td></td><td></td><td></td></tr>
<tr><td>Pre Adoption Delivery</td><td></td><td></td></tr>
<tr><td>TBC Annual Housing Requirement</td><td>a</td><td>495</td></tr>
<tr><td>Number of years into plan adoption</td><td>b</td><td>6</td></tr>
<tr><td>Requirement to plan adoption</td><td>c</td><td>2970</td></tr>
<tr><td>Actual Delivery 2011-2016</td><td>d</td><td>2496</td></tr>
<tr><td>Anticipated Delivery to Plan adoption (2016 to 2017)</td><td>e</td><td>560</td></tr>
<tr><td>Total anticipated Delivery to Plan adoption (2011 to 2017)</td><td>f = d + e</td><td>3056</td></tr>
<tr><td></td><td></td><td></td></tr>
<tr><td>Anticipated over supply on adoption</td><td>g = f- c</td><td>-86</td></tr>
<tr><td></td><td></td><td></td></tr>
<tr><td>5YHLS from Adoption</td><td></td><td></td></tr>
<tr><td>5 Year Requirement</td><td>h = a x 5</td><td>2475</td></tr>
<tr><td>Remainder of plan period 2022 to 2031</td><td>i</td><td>14</td></tr>
<tr><td>Plan Period over supply to offset over the five year period</td><td>j = g</td><td>-86</td></tr>
<tr><td>NPPF Buffer</td><td>k = 20% of h</td><td>478</td></tr>
<tr><td>Total no. of dwellings required</td><td>m = h + j + k</td><td>2867</td></tr>
<tr><td>Total anticipated supply 2017 to 2022</td><td>n</td><td>3041</td></tr>
<tr><td>Percentage of total requirement met</td><td>p = n/m</td><td>106.1%</td></tr>
<tr><td>Supply in Years</td><td>p = n/m*5</td><td>5.3</td></tr>
</table></td><td></td></tr>
<tr><td>PMM0128</td><td>Part 7 Monitoring & Review</td><td>Strategic Allocations Trajectory (including Mitton in Wychavon)</td><td>Updated strategic allocations trajectory provided.</td></tr>
</table>

JCS Table of Main Modifications

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td></td><td></td><td>

(NEW TABLE)

<table>
<tr><th>Site Name</th><th>JCS Period Delivery</th><th>2017-18</th><th>2018-19</th><th>2019-20</th><th>2020-21</th><th>2021-22</th><th>2022-23</th><th>2023-24</th><th>2024-25</th><th>2025-26</th><th>2026-27</th><th>2027-28</th><th>2028-29</th><th>2029-30</th><th>2030-31</th></tr>
<tr><td>Land at West Cheltenham</td><td>1100</td><td></td><td>25</td><td>50</td><td>50</td><td>75</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td></tr>
<tr><td>North West Cheltenham - CBC</td><td>2225</td><td></td><td>60</td><td>60</td><td>60</td><td>60</td><td>60</td><td>60</td><td>185</td><td>280</td><td>280</td><td>280</td><td>280</td><td>280</td><td>280</td></tr>
<tr><td>A5 North West Cheltenham - TBC</td><td>2060</td><td>75</td><td>255</td><td>200</td><td>200</td><td>200</td><td>200</td><td>200</td><td>200</td><td>200</td><td>200</td><td>130</td><td>0</td><td>0</td><td>0</td></tr>
<tr><td>Innsworth</td><td>1300</td><td></td><td>25</td><td>50</td><td>50</td><td>125</td><td>150</td><td>150</td><td>150</td><td>150</td><td>150</td><td>150</td><td>150</td><td></td><td></td></tr>
<tr><td>Twigworth</td><td>995</td><td></td><td></td><td>25</td><td>50</td><td>50</td><td>125</td><td>150</td><td>150</td><td>150</td><td>150</td><td>145</td><td></td><td></td><td></td></tr>
<tr><td>South Churchdown</td><td>1100</td><td></td><td></td><td>50</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>50</td></tr>
<tr><td>North Brockworth</td><td>1500</td><td>75</td><td>150</td><td>150</td><td>150</td><td>150</td><td>150</td><td>150</td><td>150</td><td>150</td><td>150</td><td>75</td><td></td><td></td><td></td></tr>
<tr><td>Winnycroft</td><td>620</td><td></td><td>50</td><td>100</td><td>100</td><td>100</td><td>75</td><td>50</td><td>50</td><td>50</td><td>45</td><td></td><td></td><td></td><td></td></tr>
<tr><td>Mitton (Phase One)</td><td>500</td><td></td><td>25</td><td>125</td><td>125</td><td>125</td><td>100</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td>Total Delivery</td><td>11400</td><td>150</td><td>590</td><td>810</td><td>885</td><td>985</td><td>1060</td><td>960</td><td>1085</td><td>1180</td><td>1175</td><td>980</td><td>630</td><td>480</td><td>430</td></tr>
</table>

</td><td></td></tr>
<tr><td>PMM0129</td><td>Monitoring Framework</td><td>

Monitoring Framework

Below is a list of monitoring indicators that will be collected by the JCS Authorities and other external organisations that may be included within the AMR, where data is available in any given year.

<table>
<tr><th colspan="4">Building a strong and competitive urban economy</th></tr>
<tr><th>Indicator</th><th>Target</th><th>Source</th><th>Period</th></tr>
<tr><td>Net additional jFobs created by sector (employment generating uses)</td><td>A minimum of ~~28,000~~ *39,500* jobs created over the plan period</td><td>GCC Inform</td><td>Annually</td></tr>
<tr><td>Economically inactive persons aged 16-64</td><td>Maintain levels close to the south west and national average</td><td>ONS</td><td>Annually</td></tr>
</table>

</td><td>Section updated to reflect the JCS Modifications and the removal of those indicators that are considered more appropriate for monitoring district level plans</td></tr>
</table>

JCS Table of Main Modifications

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>Net amount of employment floorspace created by use class (employment-generating uses)</td><td>~~34-60ha~~ 192ha of employment land ~~floorspace created~~ delivered over the plan period.</td><td>Annual Employment Monitoring</td><td>Annually</td></tr>
<tr><td>Amount of employment land lost to other non-employment-generating uses</td><td>No target but annually assessed</td><td>Annual Employment Monitoring</td><td>Annually</td></tr>
<tr><td>Gross weekly earnings of full- time workers.</td><td>Maintain levels close to the south west and national average</td><td>ONS/NOMIS</td><td>Annually</td></tr>
<tr><td>Percentage of residents with NVQ Level 4 qualification and above</td><td>Maintain levels close to the south west and national average</td><td>ONS</td><td>Annually</td></tr>
<tr><td>Net new business start-ups</td><td>To increase business start-ups in the JCS area, improving on the rate of start-ups per 10,000 working age people against other English districts</td><td>GCC Inform</td><td>Annually</td></tr>
</table>
</td><td></td></tr>
<tr><td>PMM0130</td><td>Monitoring Framework</td><td>
<table>
<tr><th colspan="4">Meeting the challenges of climate change</th></tr>
<tr><th>Indicator</th><th>Target</th><th>Source</th><th>Period</th></tr>
</table>
</td><td>Section updated to reflect the JCS Modifications and the removal of those indicators that are considered more</td></tr>
</table>

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes					Reason
		Per capita reduction in CO_2 emissions by local authority area	60% reduction in CO_2 emissions across Gloucestershire by 2020/21 from the 2005 baseline year	Greenhouse Gas Report~~/LTP3 Annual Progress Report~~	Annually		appropriate for monitoring district level plans
		New developments incorporating Sustainable Drainage Systems (SuDS) development	No target but monitoring progress	Internal monitoring (SA indicator)	Annually		
		Installed Renewable Capacity for Gloucestershire	No target but monitoring progress	RegenSW Renewable Energy Progress Report – Annual Survey (SA indicator)	Annually		
		~~10% of energy demand from major sites delivered from decentralised, renewable or low carbon sources~~	~~All developments over 10 residential units or non-residential development over 1000m2~~	~~Internal monitoring~~	~~Annually~~		
		Number of planning permissions granted contrary to Environment Agency advice on flooding or water quality grounds.	No permissions granted contrary to EA advice	Internal monitoring	Annually		

JCS Table of Main Modifications

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td></td><td></td><td></td><td></td></tr>
</table>
</td><td></td></tr>
<tr><td>PMM0131</td><td>Monitoring Framework</td><td>
<table>
<tr><th colspan="4">~~Meeting the challenges of climate change~~ Promoting Sustainable Transport</th></tr>
<tr><th>Indicator</th><th>Target</th><th>Source</th><th>Period</th></tr>
<tr><td>~~Local bus passenger journeys~~ Increase use of bus</td><td>~~Maintain and increase journeys from a base year of 2011/12 (21,361)~~ Increase number of bus passenger journeys</td><td>LTP~~3~~ Annual Progress Report.</td><td>Annually</td></tr>
<tr><td>~~Annualised index of cycling trips~~ Increase use of cycling</td><td>~~No target but monitoring progress~~ Increase the number of cycle users at sites across the county</td><td>LTP~~3~~ Annual Progress Report.</td><td>Annually</td></tr>
<tr><td>Increase use of rail</td><td>Increase the number of rail ticket sales from railway stations</td><td>LTP~~3~~ Annual Progress Report.</td><td>Annually</td></tr>
<tr><td>~~Average journey time per mile during morning peak~~ Journey time reliability on primary strategic routes</td><td>~~Maintain and improve journey time~~ Maintain average journey times at 2015/16 levels</td><td>LTP~~3~~ Annual Progress Report.</td><td>Annually</td></tr>
</table>
</td><td>Section updated to reflect the JCS Modifications and the removal of those indicators that are considered more appropriate for monitoring district level plans</td></tr>
</table>

JCS Table of Main Modifications

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>~~Morning peak period traffic – number of vehicles travelling towards urban centres~~ Number of peak hour vehicle journeys</td><td>~~Traffic to remain at current levels compared with 2077-2010 average AM peak period traffic: Gloucester 5539 vehicles Cheltenham 12936 vehicles~~ Restrict growth in the number of peak hour vehicle journeys on local access routes</td><td>*LTP~~3~~ Annual Progress Report.*</td><td>Annually</td></tr>
<tr><td>~~Levels of self containment~~</td><td>~~Continue to improve on 2011 levels: Gloucester 66% Cheltenham 77% Tewkesbury 39%~~</td><td>~~Census returns~~</td><td>~~10 year census~~</td></tr>
</table>
</td><td></td></tr>
<tr><td>PMM0132</td><td>Monitoring Framework</td><td>
<table>
<tr><th colspan="4">Delivering a wide choice of quality homes</th></tr>
<tr><th>Indicator</th><th>Target</th><th>Source</th><th>Period</th></tr>
<tr><td>Net dwelling completions, based on the set housing requirements and 5-year housing supply</td><td>To deliver against the established objectively assessed need over the plan period.</td><td>Annual Housing Monitoring</td><td>Annually</td></tr>
<tr><td>Net completions of Gypsy, Traveller and Travelling Showpeople accommodation</td><td>To deliver against the established objectively assessed need over the plan</td><td>Annual Housing Monitoring</td><td>Annually</td></tr>
</table>
</td><td></td><td>Section updated to reflect the JCS Modifications and the removal of those indicators that are considered more appropriate for monitoring district level plans</td></tr>
</table>

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>against requirements, based on the set target</td><td>period.</td><td></td><td></td></tr>
<tr><td>Net affordable housing completions against annual requirements</td><td>To deliver against the established objectively assessed need over the plan period.</td><td>Internal monitoring</td><td>Annually</td></tr>
<tr><td>Cumulative housing completions on JCS Strategic Allocations.</td><td>Minimum 75% of the annual cumulative requirement of the three districts.</td><td>Internal monitoring</td><td>Annually</td></tr>
</table>
</td><td></td></tr>
<tr><td>PMM0133</td><td>Monitoring Framework</td><td>
<table>
<tr><th colspan="4">Promoting healthy communities</th></tr>
<tr><th>Indicator</th><th>Target</th><th>Source</th><th>Period</th></tr>
<tr><td>Number of Air Quality Management Areas</td><td>Reduce the number of Air Quality Management Areas.</td><td>LTP~~3~~ Annual Progress Report</td><td>Annually</td></tr>
<tr><td>~~Access to services and facilities by public transport, walking and cycling~~
Maintain bus passenger access to facilities</td><td>~~90% of Gloucestershire residents to be able to access services and facilities within a 30-45 minute journey time by public transport, walking and cycling~~
Maintain level of access to GP services and facilities by public transport within 45 minutes</td><td>LTP~~3~~ Annual Progress Report</td><td>Annually</td></tr>
<tr><td>~~Amount of public open space provided~~</td><td>~~All schemes to meet policy standards for the~~</td><td>~~Internal monitoring~~</td><td>~~Annually~~</td></tr>
</table>
</td><td></td><td>Section updated to reflect the JCS Modifications and the removal of those indicators that are considered more appropriate for monitoring district level plans</td></tr>
</table>

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes					Reason
		~~in new developments~~	~~provision of public open space~~				
		~~Number of Lower Super Output Areas in the 20% most deprived in England and Gloucestershire~~	~~To reduce the number of Lower Super Output Areas amongst the 20% most deprived in Gloucestershire and England~~	~~South West Observatory, Indices of Deprivation~~	~~Annually~~		
		Number of essential community facilities lost or gained through the development process	No loss of community facilities	Internal monitoring	Annually		
		~~Provision of sporting facilities~~	~~Increase sports facilities in the JCS area as a percentage of regional provision: JCS area - 6% in January 2013~~	~~Sport England Local Sport Profiles~~	~~Annually~~		
		~~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*~~	~~Maintain and improve the % of dwellings with sufficient access to green space~~	~~Internal monitoring~~	~~Annually~~		

JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		~~- 100ha green space site within 5km~~ ~~- 500ha green space site within 10km~~	
PMM0134	Appendices (Maps) 2, 3, 4, 5, 6, 7	*SEE APPENDIX 2A* *Update to JCS Appendices Maps 2, 3, 4 and 5* *Removal of JCS Appendices Maps 6 & 7* *Addition of Gloucestershire Nature Map Strategic Nature Areas and City of Gloucester Proposed Primary Shopping Area, Primary Frontage and Secondary Frontage Map*	Updated
PMM0135	Superseded Policies	*SEE APPENDIX 3*	To comply with regulation 8(5) of the Town and Country Planning (Local Planning)(England) Regulations 2012