

TEWKESBURY BOROUGH COUNCIL

Report to:	Council (Extraordinary)
Date of Meeting:	31 January 2017
Subject:	Joint Core Strategy: Main Modifications
Report of:	Julie Wood, Head of Development Services
Corporate Lead:	Mike Dawson, Chief Executive
Lead Member:	Councillor D M M Davies
Number of Appendices:	Three

Executive Summary:

The Joint Core Strategy (JCS) is the strategic planning document being prepared jointly by Gloucester City, Cheltenham Borough and Tewkesbury Borough Councils to provide a framework for meeting the development needs of the area over the plan period from 2011 to 2031.

A Council report on the JCS proposed main modifications was considered by Tewkesbury Borough Council on 25 October 2016. At this meeting the Council passed a resolution that officers bring to the Council for approval proposed main modifications to the June 2014 Pre-Submission Gloucester, Cheltenham and Tewkesbury Joint Core Strategy which do not include Twigworth as part of the Innsworth/Twigworth strategic allocation.

Subsequent to the meeting a letter from Defence Infrastructure Organisation dated 28 October 2016 (now examination document EXAM 262) was received confirming that following a recent assessment there was a continued Defence requirement for a significant portion of the MoD Ashchurch site for at least the next 10 years.

This report presents amended proposed main modifications which remove the site at Twigworth as a strategic allocation. In addition, changes have been made to remove the strategic allocation at MoD Ashchurch and to include a commitment to undertake an early and immediate review respectively of the housing land supply for both Gloucester City and Tewkesbury Borough. Other alterations have also been made to the plan since 25 October 2016 meeting to add greater clarity and detail, including to policies SD13 Affordable Housing and INF3 Flood Risk. These main modifications are detailed within Appendix 1 of the report.

In considering the evidence available (including that presented to and obtained since the Council meeting on 25 October 2016), the housing shortfall at Gloucester City and guidance received from the Inspector it is considered that there is likely to be soundness issues if the land at Twigworth is not included as a strategic allocation. Members are therefore advised that the most robust approach to obtaining a sound plan would be to approve proposed main modifications which include a Twigworth Strategic Allocation. Consequently, alternative proposed main modifications, which include a strategic allocation at Twigworth, as detailed within Appendix 2, are those recommended to the Council.

This report seeks approval of proposed main modifications to the June 2014 Pre-Submission JCS for the purposes of undertaking formal public consultation into Post Submission Proposed Main Modifications to the JCS.

Proposed main modification reports are also being considered by Gloucester City Council on

Monday 6 February and by Cheltenham Borough Council on Friday 10 February.

Once approved, the main modifications will then be made available for public consultation and form part of the emerging plan policies for the purposes of development management. It will be for the Inspector to set out in her Final Report, whether she is satisfied that the plan can be made sound with main modifications.

Recommendation:

The Council is asked:

- (1) To approve for public consultation the proposed main modifications to the June 2014 Pre-Submission Gloucester, Cheltenham and Tewkesbury Joint Core Strategy as set out in Appendix 2 to this report (including proposed modifications to the Proposals Map and Key Diagram) as those it endorses and considers necessary to make the JCS sound.**
- (2) To delegate authority to the Chief Executive of Tewkesbury Borough Council, in consultation with the Leader of Tewkesbury Borough Council, to make minor changes to the proposed main modifications and proposed modifications to the Proposals Map and Key Diagram in terms of formatting, presentation and accuracy.**
- (3) To delegate authority to the Chief Executive of Tewkesbury Borough Council, in consultation with the Leader of Tewkesbury Borough Council, to progress and sign a joint planning statement with Wychavon District Council and thereafter any formal memorandum of agreement in respect of the delivery of development on land at Mitton making a contribution towards Tewkesbury Borough's housing requirements.**

Reasons for Recommendation:

See sections 1-6 below.

Resource Implications:

See section 10 below.

Legal Implications:

The purpose of the examination of the JCS is to assess whether the JCS has been prepared in accordance with the duty to co-operate, legal and procedural requirements and whether it is sound (as set out in paragraph 182 of the National Planning Policy Framework ("NPPF")) and a local planning authority should only submit a plan which it considers sound. The JCS was submitted for examination on 20 November 2014.

The Pre-Submission Version of the JCS (June 2014) ("June 2014 Pre-Submission JCS") was the publication version upon which representations were made and as the Inspector considered that there have been the subsequent changes (which have not yet undergone public consultation) as set out in the Submission Version of the JCS (November 2014) that go beyond what would fall within the category of minor amendments, the Inspector has been considering the June 2014 JCS during the examination rather than the Submission Version of the JCS (November 2014).

The Inspector has indicated that she is minded to find a number of the policies in the June 2014 JCS unsound; during the hearings and also initially within her Preliminary Findings dated 16 December 2015 and subsequently within her Interim Report dated 26 May 2016, which have

been followed by her Note of Recommendations made at the hearing session on 21 July 2016 (dated 25 July 2016).

The Inspector is therefore indicating that she would not be able to recommend that the June 2014 Pre-Submission JCS is adopted without modifications and that the JCS can only be found to be sound with main modifications. The Inspector has invited the JCS team to draft a set of main modifications, including those which have already been discussed during previous hearings, those which flow from the Interim Report recommendations, those discussed during the July 2016 hearings (which were held for the Inspector to discuss the implications of the Interim Report with the JCS authorities in terms of any queries or complications they may have had in advance of preparing modifications) and those within the Inspector's Note of Recommendations made at the hearing session on 21 July 2016.

Once proposed main modifications are approved for consultation, though still not representing the policies of an adopted plan, these will then form part of the emerging plan policies as the JCS Councils are seeking to be found sound and capable of adoption. It will be for the Inspector to set out in her Final Report, whether she is satisfied that the plan can be made sound with proposed main modifications and if so, the exact wording of main modifications to be made.

Under Section 23 of the Planning and Compulsory Purchase Act 2004, it is not possible to adopt a development plan document, that an Inspector has only found to be sound with main modifications, without all the main modifications as recommended in an Inspector's Final Report. Save for any minor amendments, which (taken together) do not materially affect the policies set out in the development plan document; the wording must be as the main modifications set out within the Final Report.

Risk Management Implications:

Delay to the progress of the Joint Core Strategy examination and adoption of the plan means that the Council will not have an up to date local plan for the area. The absence of the Joint Core Strategy could result in an uncoordinated approach to development, leading to inappropriate and incremental development being allowed on appeal that does not take account of cross boundary implications and requirements for supporting infrastructure, with the potential for adverse environmental impacts. There are applications already submitted relating to strategic sites identified through the JCS and other major applications pending that are being hindered by delays in progressing the plan. It is therefore critical that examination is advanced as quickly as possible. The recent government consultation response on New Homes Bonus indicates that there is still a significant risk of losing the bonus in relation to new development if the Borough were to halt plan making or if it were to fail to progress towards adoption in 2017. The Government have already announced within its Provisional 2017-2018 Local Government Finance Settlement that it intends to introduce a baseline for housing growth set at an initial baseline of 0.4% of the council tax base for 2017-18. Housing growth below this level in each authority will not receive bonus allocations. From 2018-19 it will consider withholding New Homes Bonus payments from local authorities that are not planning effectively, by making positive decisions on planning applications and delivering housing growth. In addition, a written statement by the Housing & Planning Minister on 21 July 2015 set out that in cases where no Local Plan has been produced by early 2017 the Government will intervene to arrange for the Plan to be written.

Performance Management Follow-up:

Subject to Council approval, the proposed main modifications will be subject to a formal consultation period that will take place during February 2017 to March/April 2017. Following this, further examination hearing sessions will be held to deal with representations made through the consultation. The Inspector will then produce a Final Report which will be reported back to the Councils to consider the formal adoption of the plan.

Environmental Implications:

Delay to the progress of the Joint Core Strategy could further result in an uncoordinated approach to development. It is important that future growth is plan-led to ensure that combined impacts on the environment and the infrastructure needs of the wider area are taken into account. The comprehensive approach to environmental impacts cannot be fully assessed through incremental and piecemeal growth. The JCS is being assessed through a sustainability appraisal process and Habitats Regulation Assessment (HRA) which consider the environmental, social and economic outputs of the Plan and ensure that development meets the needs of both present and future generations. The Sustainability Appraisal supporting the JCS encompasses Strategic Environmental Assessment as required by EU Directive (2001/42/EC). In addition HRA has been undertaken as required under the European Directive 92/43/EEC on the "conservation of natural habitats and wild fauna and flora for plans" that may have an impact on European (Natura 2000) Sites.

1.0 INTRODUCTION/BACKGROUND

- 1.1 On 31 May 2016 the JCS Councils received the Inspector's Interim Report regarding her examination of the JCS up to that date. The Inspector's Interim Report was published as EXAM232 and is available to view at:

<http://www.gct-jcs.org/Documents/Examination-Document-Library-6/EXAM232---JCS-Inspectors-Interim-Findings---31052016.pdf>

The JCS Councils each met in June 2016 (Tewkesbury Borough Council meeting on 28 June 2016 and Cheltenham Borough Council and Gloucester City Council each meeting on 30 June 2016) to review those findings and resolved to:

- Note the Interim Report of the Inspector;
- Agree that the JCS officers attend the July 2016 hearings to discuss the Interim Report and the recommended way forward with the Inspector, identifying specific consequences and key points arising from the finding to the Inspector; and
- Agree that a summary of comments made by Members at the Council meetings held by the JCS Authorities be passed to the JCS Inspector for consideration.

Cheltenham Borough Council also resolved to undertake an urgent review on Local Green Space for those areas affected by the Inspector's Interim Report.

- 1.2 During July 2016 hearings (on 6-7 July 2016 and 19-21 July 2016) were held in light of the Interim Report, and the resolutions of Council above. These hearings covered issues such as which strategic allocations should be included in the JCS, safeguarded land, further evidence on retail, a further site visit to Leckhampton, the JCS housing trajectory and Local Green Space. The hearings agenda are available to view at: <http://www.gct-jcs.org/Documents/Examination-Document-Library-6/Agenda-for-JCS-hearings-on-6-and-7-July-2016.pdf> and <http://www.gct-jcs.org/Documents/Examination-Document-Library-7/Agenda-JCS-Hearings-19-21-July.pdf>
- 1.3 On the last day of the July hearings, 21 July 2016, the Inspector made a statement on progress of the examination and the next steps to be taken. The Inspector's Note of Recommendations made at the hearing session on 21 July 2016 was subsequently published as EXAM 259 and is available here: <http://www.gct-jcs.org/Documents/Examination-Document-Library-7/EXAM-259---Inspectors-Note-of-Recommendations-from-21-July-2016.pdf>
- 1.4 Consequently, at the meeting of Tewkesbury Borough Council on 25 October 2016, Members were presented with a suite of proposed main modifications to the June 2014 Pre-Submission JCS. These modifications were formulated on the following basis:
- Those suggested by the JCS Councils during the hearing process in evidence either in response to the Inspector's questions or in response to matters raised by those making representations on the plan (including through Statements of Common Ground).
 - Those identified through the Inspector's Interim Report and Note of Recommendations.
- 1.5 At this Council meeting the proposed main modifications presented were not agreed, instead Council resolved that Officers bring to the Council for approval, proposed main modifications to the June 2014 Pre-Submission Gloucester, Cheltenham and Tewkesbury Joint Core Strategy which do not include Twigworth as part of the Innsworth/Twigworth strategic allocation.
- 1.6 This report, therefore, again seeks approval for proposed main modifications to the June 2014 Pre-Submission JCS for the purposes of undertaking formal public consultation into Post Submission Proposed Main Modifications to the JCS.
- 1.7 In accordance with the Council resolution on 25 October 2016 a schedule of modifications without a Twigworth allocation has been provided at Appendix 1. Officers must advise the Council that there are likely to be soundness issues with this approach. Therefore, an alternative schedule of modifications including an allocation at Twigworth is also presented (Appendix 2).
- 1.8 In order to advance the JCS, proposed main modifications need to be approved will then be subject to formal public consultation. The Inspector needs to be satisfied that any recommendations made in the Inspector's Final Report, being ones that make the plan sound, have been sufficiently consulted upon. It is not lawful to adopt a Plan as originally submitted where an Inspector has required modifications to be made for the Plan to be sound. It will only be possible to adopt a plan which includes all the main modifications the Inspector recommends within the Final Report.

2.0 TWIGWORTH STRATEGIC ALLOCATION

- 2.1 The Inspector recommended, within her Interim Report and Note of Recommendations made at the hearing session on 21 July 2016, that a site at Twigworth should be allocated for housing-led development of at least 750 dwellings (the Inspector having in error referred to the existing outline application as being for 750 dwelling, which actually relates to the application for 725 dwellings), with further capacity to be investigated by the JCS authorities.
- 2.2 In preparing the proposed main modifications for the Council meeting on 25 October 2016 and due to Member concerns about the site, a letter was written to the Inspector on 23 September 2016 from the JCS authorities. The letter stated that the present preference was not to include the strategic allocation at Twigworth at this stage as being the most appropriate way forward in meeting Gloucester's housing requirement. The letter proposed an alternative approach where any shortfall could be addressed through plan review to allow for consideration of all potential site options (including those outside the JCS area).
- 2.3 A response was received from the Inspector on 6 October 2016. In her letter the Inspector stated that reasons for omission of Twigworth should be sound and properly evidenced and that, furthermore, because Twigworth makes a lesser contribution to the Green Belt than some other strategic allocations around Gloucester and appears to be equally sustainable, there may be soundness issues if good land use reasons are not put forward for its omission.
- 2.4 The JCS authorities have undertaken evidence based work on the Twigworth site to assess its deliverability and sustainability. This has included sustainability appraisal, landscape and visual sensitivity assessment, historic environment assessment, transport modelling and a strategic flood risk assessment. The evidence reports can be viewed on the JCS website: <http://www.gct-jcs.org/New-Evidence-Base-and-Associated-Documents/New-Evidence-Base.aspx>
- The results of this work presented no evidence-based reason to suggest that an allocation at Twigworth is not deliverable.
- 2.5 Following the Council resolution on 25 October 2016, and to investigate specific concerns raised regarding flood risk on the site, the JCS authorities commissioned additional flood risk work, which has been undertaken by Thomas Consulting. This additional assessment concluded that there are no overriding flooding issues which would prevent the land being allocated for development. However, the report did make suggested changes to the developable area of the site based on information from modelling and flood flow data and the latest guidance from the Environment Agency regarding climate change. The report also recommends additions to JCS policy INF3 Flood Risk to strengthen the guidance. The full report can be viewed on the JCS website: <http://www.gct-jcs.org/Documents/New-Evidence-Base-and-Associated-Documents/4753-Report-Thomas-Consulting-final-report-and-appendices-1-to-5-reduced.pdf>

- 2.6 In light of the housing shortfall position at Gloucester City, the findings of the Inspector through the Interim Report, the Note of Recommendations made at the hearing session on 21 July 2016 and subsequent correspondence, as well as the evidence base on deliverability, it is considered that there is likely to be soundness issues if an allocation at Twigworth were not included as a proposed main modification. Members are therefore advised that the most robust approach to obtaining a sound plan would be to approve proposed main modifications which include a Twigworth Strategic Allocation. Therefore, alternative proposed main modifications, which include a strategic allocation at Twigworth (with an indicative capacity for 995 dwellings), have been provided and are detailed within Appendix 2 of the report and are recommended to the Council.

3.0 MoD ASHCHURCH STRATEGIC ALLOCATION

- 3.1 The MoD Ashchurch site was a strategic allocation in the June 2014 Pre-Submission JCS and was expected to deliver 2,225 dwellings and 20ha of employment land over the plan period to 2031 plus a further 500 dwellings post-2031. However in October 2016 confirmation was received from the DIO that there is a continued requirement for a significant portion of the land within the MoD site for at least the next 10 years. As such it is the current intention of the MoD to retain all but an eastern section of the site.
- 3.2 This eastern area comprises of approximately 15.8ha which could be released for development from 2023/24 for approximately 400 dwellings. In addition, there is land within the strategic allocation beyond that which is owned by the MoD that has the potential to deliver up to 1100 dwellings. The challenge for the remaining parcels of available land is around access, masterplanning, place making and infrastructure provision. These issues currently present uncertainty that the sites could be sustainably developed and questions their deliverability. Therefore, the proposed main modifications (in both Appendix 1 and Appendix 2) includes the removal of the MoD Ashchurch site as a strategic allocation at the present time.

4.0 LAND AT MITTON

- 4.1 The Inspector recommended that the JCS authorities engage in constructive discussions with Wychavon District Council a view to seeking agreement on the release of land at Mitton to contribute towards Tewkesbury Borough's housing requirement. As a result the Council has been liaising with Wychavon District Council on a joint planning statement which considers the early delivery of a Phase 1 development at Mitton for 500 dwellings that would contribute towards Tewkesbury Borough's requirements and the 500 dwellings has been included in the housing trajectories for Tewkesbury Borough. Any further phases for the wider site (approximately 1,100 capacity in total) would be considered through a future review of the South Worcestershire Development Plan or be subject to further agreements between the two authorities. This report therefore also seeks delegated authority for the Chief Executive, in consultation with the Leader of Tewkesbury Borough Council, to progress and sign a joint planning statement with Wychavon District Council that can be submitted to the Examination.

5.0 TEWKESBURY BOROUGH HOUSING SHORTFALL

- 5.1 Tewkesbury Borough has an identified shortfall against the total JCS housing requirement of 2,843 dwellings, largely due to the removal of the MoD Ashchurch site. However, 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 in a sound, strategic and plan-led way.

- 5.2 The proposed main modifications therefore propose additional changes to the Delivery, Monitoring and Review section of the JCS to provide a commitment to undertaking a partial immediate review of Tewkesbury's housing supply following the adoption of the plan. The review would allow time for a comprehensive assessment of development alternatives to meeting Tewkesbury's housing requirements. This would allow further exploration of potential early delivery of sites at MoD Ashchurch as well as any wider potential within the Tewkesbury town and Ashchurch area, including opportunities and constraints presented by improvements to the M5 Junction 9 and A46.

6.0 GLOUCESTER CITY HOUSING SHORTFALL

- 6.1 Gloucester City has an identified shortfall against the total JCS housing requirement of 1,313 dwellings (which would become 2,308 without the Twigworth Strategic Allocation). Despite this shortfall, Gloucester City can on adoption maintain at least a 5.8 years (or 5.7 years without Twigworth) 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 in a sound, strategic and plan-led way.
- 6.2 The proposed main modifications therefore propose additional changes to the Delivery, Monitoring and Review section of the JCS to provide a commitment to undertaking a partial early review of Gloucester's housing supply following the adoption of the plan. This review will allow consideration of any other development options that become available, both within and outside the JCS area that meet the JCS Spatial Strategy. This could include further development opportunities within the urban area that are not currently deliverable, as well as the potential for urban extensions in Tewkesbury Borough and Stroud District. As such, it is important that any review is undertaken in tandem with the review of the Stroud Local Plan so that all potential development alternatives to be comprehensively explored through the plan-making process.

7.0 STEPPED TRAJECTORIES

- 7.1 The Inspector confirmed in her Note of Recommendations made at the hearing session on 21 July 2016 that stepped trajectories may soundly be used in the JCS implementation strategy subject to robust justification. Stepped trajectories were already included within the proposed main modifications presented to the Councils in October in respect of Cheltenham. The basis for this is that completions are lower early in the plan period because strategic allocations have not yet started delivering. Higher targets can be met in later years because, by that time, strategic allocations will be fully delivering. Similarly, stepped trajectories are now proposed in respect of Tewkesbury in respect of the middle years of the plan in order to allow sufficient time for the immediate review to be undertaken with the expectation that sites identified as part of the review will be able to deliver the stepped off requirements by the latter years of the plan period.

Should the Twigworth allocation be omitted, as set out in Appendix 1, the middle years of the plan at this stage for Gloucester's needs would not be met and as part of those proposed modifications stepped trajectories in respect of the same have been included.

8.0 ADDITIONAL MAIN MODIFICATIONS

- 8.1 Additional proposed main modifications to JCS have been proposed following the last report to Council on 25 October 2016. These modifications have been included to add further clarity, strength and detail to certain policies in order for them to guide sustainable development.

- 8.2 Policy INF3: Flood Risk now includes additional guidance following the recommendations from the Thomas Consulting report on flooding. Significantly this includes a requirement that planning applications take into account of the latest available flood modelling and flows to justify the flood zones used for a development. It also sets out that development will need to compensate for pluvial flood storage lost through any development.
- 8.3 Policy SD13: Affordable Housing has been amended to provide clarity that sites (outside of strategic allocations) with a maximum combined gross floor space of greater than 1000sqm will be required to provide a 40% affordable housing in Cheltenham and Tewkesbury, and 20% in Gloucester (irrespective of whether the development is for 10 units or less). The policy also clarifies that, for sites of 10 or less dwellings, further affordable housing guidance may be provided through district-level plans.
- 8.4 Policy SP2: Spatial Strategy has been amended to reflect the changing housing and employment delivery from proposed strategic allocations taking into account the changes brought about through the MoD Ashchurch and Twigworth strategic allocations.
- 8.5 Mapping changes have also been necessary to reflect changes in proposed strategic allocations and are provided at Appendix 2A in respect of the proposed main modifications at Appendix 2 (including Twigworth) or Appendix 1A in respect of the proposed main modifications at Appendix 1 (excluding Twigworth).
- 8.6 In summary, the following proposed main modifications have been amended following the last report to Council:
- PMM014: referencing clarification.
 - PMM017: referencing clarification.
 - PMM018: referencing clarification.
 - PMM020: Policy SP2 changes to strategic allocations and housing supply figures.
 - PMM021: Policy SP2 explanatory text change to strategic allocations and housing supply figures.
 - PMM023: Policy SP2 explanatory text change to Gloucester and Tewkesbury housing shortfall.
 - PMM024: referencing clarification.
 - PMM025: Policy SP2 explanatory text change to employment delivery from strategic allocations.
 - PMM026: Policy SP2 explanatory text change to remove reference to MoD Ashchurch strategic allocation.
 - PMM028: Policy SP2 housing supply tables (SP2a) change to delivery from strategic allocations.
 - PMM029: Policy SP2 strategic allocation supply table (SP2b) change.
 - PMM030: Policy SP2 settlement hierarchy table (SP2c) to update service village list regarding Twigworth (Appendix 1 change only).
 - PMM034: numbering clarification.
 - PMM035: Policy SD2 clarification on Gloucester urban regeneration.
 - PMM039: Policy SD3 wording change to policy 5.iii. to support regeneration strategies.

- PMM052: Policy SD6 change to policy and explanatory text regarding safeguarded areas at Twigworth (Appendix 1 change only).
- PMM070: Policy SD13 change to clarify guidance on site area affordable housing thresholds and approach to small sites.
- PMM0084a: Policy SD15 additional policy wording to require latest available updates to flood modelling to be taken into account.
- PMM0085a: Policy SD15 explanatory text new addition to support need for requirement for latest available flood modelling.
- PMM0086: Policy SD15 explanatory text additional flood guidance to cover surface water storage and flood management.
- PMM0103: Policy SA1 strategic allocations table (SA1) change to reflect strategic allocations.
- PMM0106: Policy A1 changed to remove guidance relating to Twigworth (Appendix 1 change only).
- PMM0114: Policy A8 removed to reflect removal of MoD Ashchurch strategic allocation.
- PMM0123: Delivery, Monitoring and Review section addition of titles to text.
- PMM0123a: Delivery, Monitoring and Review section additional text regarding early review of Gloucester's housing supply.
- PMM0123b: Delivery, Monitoring and Review section additional text regarding immediate review of Tewkesbury's housing supply.
- PMM0125: Delivery, Monitoring and Review section updated with latest housing trajectory charts and calculations for Gloucester.
- PMM0127: Delivery, Monitoring and Review section updated with latest housing trajectory charts and calculations for Tewkesbury.
- PMM0128: Delivery, Monitoring and Review section updated with strategic allocation trajectory.
- PMM0134: Maps (at Appendix 1A and 2A) updated to reflect changes to strategic allocations.
- PMM0135: List of existing policies that would be superseded by JCS proposed policies (at Appendix 3).

9.0 CONSULTATION

- 9.1 Public consultation on the JCS has been extensive throughout its development, with the key consultation stages including:
- Key Issues & Questions – November 2009/February 2010.
 - Developing the Preferred Option – December 2011/February 2012.
 - Draft JCS – October/December 2013.
- 9.2 The Pre-Submission (June 2014) version of the plan was consulted upon during summer 2014 and the Submission JCS (November 2014), which included amendments with the Inspector subsequently considered to go beyond minor amendments was submitted to the Secretary of State for its examination in public. The representations to the Pre-Submission (June 2014) JCS were referred to the Inspector for consideration as part of the examination process and it is the Pre-Submission (June 2014) version which the Inspector has been examining.

- 9.3 The examination has been held in public with extended examination around key parts of the plan such as the objectively assessed need, economic strategy, strategic sites and local green space. Those who responded to the Pre-Submission consultation have, been able to submit evidence to the examination and appear at hearing sessions.
- 9.4 Council approval is sought on the proposed main modifications for the purposes of undertaking a formal public consultation period expected to take place during February 2017 to March/April 2017.
- 9.5 The consultation responses received on the modifications will then be submitted to the Inspector for her further consideration. The Inspector has also indicated that further public hearing sessions will be held so that respondents to the consultation may be able to address her directly.

10.0 RELEVANT COUNCIL POLICIES/STRATEGIES

- 10.1 Tewkesbury Borough Council Plan 2016-2020.

11.0 RELEVANT GOVERNMENT POLICIES

- 11.1 Planning and Compulsory Purchase Act 2004.
Localism Act 2011.
Town and Country Planning (Local Planning) (England) Regulations 2012.
Housing and Planning Act 2016.
National Planning Policy Framework.
National Planning Practice Guidance.

12.0 RESOURCE IMPLICATIONS (Human/Property)

- 12.1 The consultation and examination process will involve a significant amount of officer time and therefore has human resource implications for the Council. This includes preparing for and running the consultation, processes and analysing the responses, attending and giving evidence at hearing sessions and any additional work on the plan and its evidence base as the examination progresses.

13.0 SUSTAINABILITY IMPLICATIONS (Social/Community Safety/Cultural/ Economic/ Environment)

- 13.1 The purpose of the planning system is to contribute to the achievement of sustainable development. Planning decisions are required to be made in accordance with an adopted Development Plan. The Plan-led approach to development will help ensure that new development is supported by the necessary facilities and infrastructure to make it sustainable in the long term.

14.0 IMPACT UPON (Value For Money/Equalities/E-Government/Human Rights/Health And Safety)

- 14.1 None.

15.0 RELATED DECISIONS AND ANY OTHER RELEVANT FACTS

15.1 None.

Background Papers: None.

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Appendices:

- 1: Table of Proposed Main Modifications (excluding Twigworth).
- 1A: Modification Maps.
- 2: Table of Proposed Main Modifications (including Twigworth).
- 2A: Modification Maps.
- 3: Superseded Policies.